

Reg 19 All Comments

Introduction

Local Plan Consultation Point	Introduction
Rep ID	SDLP11
Rep Status	Processed
Consultee ID	1264821
Consultee Full Name	Mr Martin Brandon
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Introduction Paragraph 1.35 Monitoring and Review
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The plan includes land allocations for various purposes. Each site has a set of checks or conditions that have to be satisfied for development to proceed to planning consent and implementation.</p> <p>Past experience (from a development underway at Station Road Walmer) suggests that these conditions are not rigorously carried through to the planning application stage or implementation on site. The council itself has allowed the developer to disregard them.</p> <p>I am looking for the council to be much more robust in ensuring developments meet all the requirements of the Local Plan at both planning application and implementation stage , and that checks on this are included in Appendix C monitoring indicators.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	As above a more robust commitment from the council and modification of the monitoring indicators.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	To me this issue is quite fundamental. I would like the opportunity, briefly, to demonstrate how key requirements of the previous Local Plan were allowed to be disregarded by the council. This is relevant to the examination of the current Local Plan because if the requirements of the plan are to be disregarded by the council itself then the validity of the plan itself is undermined. And those of us who have contributed to it via consultation responses will feel their input is not valued.
Include files	
Local Plan Consultation Point	Introduction
Rep ID	SDLP126
Rep Status	Processed
Consultee ID	1330717
Consultee Full Name	Mrs Mandy Gass
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	The development within the Aylesham village
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Population within Aylesham has almost trebled over the last 6 years with no additional employment opportunities, education facilities, roads or public transport or medical facilities so to,include Aylesham in the plan with no improvements to the already insufficient resources is not sound. Development within Aylesham has already satisfied the government's requirements. Aylesham has not been given what has been promised in the last lot of development. with regard to its to duty to cooperate - the plan has only been advertised via the internet which is insufficient plus it has put the onus on the community to advertise. The open events should have been better publicised and support should have been given to the community who wish to comment. The system is not user friendly and it is complicated. more time should be given for the public to respond, specifically as this has come out at the same time as the Canterbury plan and it is over the Christmas period.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Remove the proposed new developments from Aylesham until sufficient infrastructure is already in place. Do the consultation in a tick box (poll) type form. Advertise it locally in person as well as the internet.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I feel it's important to have representation from those that live in Aylesham.
Include files	
Local Plan Consultation Point	Introduction
Rep ID	SDLP517
Rep Status	Processed
Consultee ID	1266351
Consultee Full Name	Dr Sharon Danby
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Introduction
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>The plan is unsound as it does not comply with the legally binding commitment made by DDC when they declared a climate emergency in 2020 and prepared their climate change strategy. The plan will not do enough to meet the target of the district being net zero by 2050.</p> <p>The regulation 19 stage of the consultation is not fit for purpose as it is overly complicated and difficult to use. The process has left many members of the public including myself feeling overwhelmed and confused as to how to make a representation. For those who are working full time this has been a task for which they do not have enough time. As a result those who may have wanted to make a submission have not been able to. The format of the submission form is also difficult to navigate. Without prior experience of planning law it is difficult to say whether a part of the plan is legal or not. As to the duty to cooperate it is impossible to know.</p> <p>The unsound plan needs updating after the government announcement on 5/12/22 that mandatory housing targets are not to be imposed. The figure of nearly 11,000 is unsustainable and should now be reviewed, particularly with respect to allocated land around Station Rd Walmer and proposed developments around villages. The character and landscape value of the district is being rapidly eroded under the current plan and this must not continue as it is contrary to NPPF 21. It is not sustainable to build on agricultural land which is in short supply as we are only 50% self sufficient in producing food in the UK. The CPRE has found that almost 14,500 hectares of farmland has been permanently lost to development since 2010. The contribution from the districts agricultural land is of vital importance. Much of the agricultural land is also vital for flood protection, and field margins are important for wildlife and biodiversity, forming corridors between habitats for vertebrates and nesting and roosting sites for birds. Dover District also has a wealth of character landscapes, AONB, heritage coast, nature reserves, internationally rare chalk grassland and rewilded areas such as Betteshanger Park. Overdevelopment under the last weak plan has meant that these areas are under pressure and being denuded as their boundaries are eroded and wild lifecorridors between sites are cut off. The new plan does not do enough to protect these areas, wildlife and biodiversity. Developments should not be allowed to remove ancient woodlands and trees and biodiverse rich habitats even if it is deemed for the greater good. This is not sustainable as all nature is interconnected and if it fails then we all fail. The UK is one of the worst countries in the world for biodiversity loss, we have lost half of our biodiversity since the 1970's.</p> <p>Development has been at such a pace that infrastructure cannot keep up. Buses have been cut recently, cycle and pedestrian routes have not been upgraded sufficiently to connect new large developments like Whitfield to main bus and train routes without car dependence. Aylesham has not had a secondary school which would mean children could walk to school. Many rural communities are entirely car dependent due to lack of buses and the roads not being safe to use their bikes.</p> <p>Not enough emphasis is put on renovating existing housing stock to provide greener, insulated, fuel efficient homes. Each new build generates around 56 tonnes of embedded carbon.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Better mapping of the Dover District taking into account internationally rare areas of chalk grassland.</p> <p>Large buffers around the AONB to protect its character from the built environment.</p> <p>Tighter protections on our remaining biodiversity, hire several biodiversity officers to monitor closely and prevent loss of ancient woodland, chalk grassland, veteran trees, protected wildlife and rich habitats.</p> <p>Stop the use of agricultural land for development.</p> <p>Renovate and insulate rather than build new, brownfield not greenfield.</p> <p>Turn attention away from destroying village communities with unsustainable housing estates outside their village boundaries.</p> <p>Do not give developers the get out clause of financial mitigation for destruction of wildlife and habitat. No development should further deplete our critically low levels of biodiversity.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	

Local Plan Consultation Point	Introduction
Rep ID	SDLP667
Rep Status	Processed
Consultee ID	1331756
Consultee Full Name	Mrs Rhona Kyle
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 34 Site name HELLA
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The online proposal and complaint forms are impenetrable and difficult to find. They are far too complex. The You Tube video is of poor quality and not easy to comprehend. I suggest that your proposal is not easily read, is too dense and too convoluted to respond to and it is difficult knowing where to respond to. It is not accessible and therefore how can it be a sound proposal if it prevents people from responding to it. You deny participation from people. It is Kafkaesque.</p> <p>The proposal does not take into consideration the impact the proposed new buildings will have on the existing community - the roads are already inadequate and dangerously insufficient for the existing community and the proposed exit from the new estate onto Ringwould Road is dangerous and thoughtless. Ringwould road is at times made a single track by passing vans and SUV's. The route from Upper Street through to Chalk Hill Road onto Ringwould Road has no passing places and again is dangerous already to existing road users. Ringwould Road leading to A253 is hazardous and A253 needs to be widened completely if it were to cope with additional traffic.</p> <p>The infrastructure proposals are clearly not thought through. The proposed building of new housing in Walmer, Ringwould and Kingsdown is creeping sprawl - it holds no respect for the lay of the land and the areas of outstanding natural beauty.</p> <p>There is no reference to the landscaping of these new builds. Already a poor precedent has been created by recent builds where no landscaping has been considered (although promised). If a new build is to be put on that hill then a forest should be planted around it.</p> <p>No real consideration is given to the impact on the existing community. This proposal will have a devastating effect on our existing inadequate roads. It is an area of outstanding beauty. Also no real support is offered to the existing or proposed community - pharmacies, shops, creative outside spaces, thoughtful well considered landscaping. You are offering the building of what exactly? Define the type of properties. It seems to me you are proposing creeping sprawl. You are offering up a triangular pincer movement of sprawl from Deal, Walmer and Kingsdown.</p> <p>Recently, executive homes in Walmer and Deal have been built that are rammed together, small gardens, lack of privacy, no landscaping (not even trees). Yet these green community ideas were all in the original proposals - so what happened? If recent builds were proven to be a success in providing real support for cohesive, happy communities this might set a positive precedent but that is not the case. Already a negative precedent has been created by recent past mistakes. There is not enough mention of social housing. However, by the time houses do get built the percentage of social housing magically seems to diminish. Faith is built on trust and belief for the good of all - not just erecting</p>

	<p>too many houses on an area of outstanding beauty and making a profoundly negative impact of the existing community and the extraordinary landscape.</p> <p>On a final note, your online forms are far too complex and impenetrable for people to tackle and therefore without real true consultation this whole proposal is non valid and unsound. The YouTube Video is of poor quality and difficult to understand - this is profoundly unfair.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Make your plan more accessible so that it is easy to reply to. These online forms are impossible, dense and not created for the general public. The You tube video is of poor quality - redo it please.</p> <p>The infrastructure proposals are weak and lacking real comprehension of the impact on the existing community as the existing roads leading to Kingsdown are dangerous and deadly. Tweaking them with a few passing places will not work. If you cannot tackle the infrastructure you must scrap the plan completely. The A253 is not fit to support the traffic leading from Deal to Dover and it is a perilous twisting road that cannot hold additional traffic.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	No
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
Include files	
Local Plan Consultation Point	Introduction
Rep ID	SDLP662
Rep Status	Processed
Consultee ID	1331808
Consultee Full Name	Mr Robert Hogben
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	1 Introduction
<p>2 - Do you consider this part of the Plan sound?</p>	No
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared</p> <p>Justified</p> <p>Effective</p> <p>Consistent with National Policy</p>

<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>No</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Yes</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>The plan is unsound as it does not comply with the legally binding commitment made by DDC when they declared a climate emergency in 2020 and prepared their climate change strategy. The plan will not do enough to meet the target of the district being net zero by 2050. DDC should be much more ambitious about the green credentials of new housing. If new homes generated their own power, were insulated to the highest standards, and collected rain water, it would greatly help stretched local services and go a long way towards making the housing stock fit for the coming decades.</p> <p>The regulation 19 stage of the consultation is not fit for purpose as it is overly complicated and very difficult to use. The process has left many members of the public including me and my wife feeling overwhelmed and confused as to how to make a representation. For those who are working full time this has been a task for which they do not have enough time. As a result those who may have wanted to make a submission have not been able to. The format of the submission form is also difficult to navigate. Without prior experience of planning law it is difficult to say whether a part of the plan is legal or not. As to the duty to cooperate it is impossible to know. The unsound plan needs updating after the government announcement on 5/12/22 that mandatory housing targets are not to be imposed. The figure of nearly 11,000 is unsustainable and should now be reviewed, particularly with respect to allocated land around Station Rd Walmer and proposed developments around villages.</p> <p>The character and landscape value of the district is being rapidly eroded under the current plan and this must not continue as it is contrary to NPPF 21. It is not sustainable to build on agricultural land which is in short supply as we are only 50% self sufficient in producing food in the UK. The CPRE has found that almost 14,500 hectares of farmland has been permanently lost to development since 2010. The contribution from the districts agricultural land is of vital importance. Much of the agricultural land is also vital for flood protection, and field margins are important for wildlife and biodiversity, forming corridors between habitats for vertebrates and nesting and roosting sites for birds. Dover District also has a wealth of character landscapes, AONB, heritage coast, nature reserves, internationally rare chalk grassland and rewilded areas such as Betteshanger Park. Overdevelopment under the last weak plan has meant that these areas are under pressure and being denuded as their boundaries are eroded and wildlife corridors between sites are cut off. The new plan does not do enough to protect these areas, wildlife and biodiversity. Developments should not be allowed to remove ancient woodlands and trees and biodiverse rich habitats even if it is argued that this is for the greater good. This is not sustainable as all nature is interconnected and if it fails then we all fail. The UK is one of the worst countries in the world for biodiversity loss, we have lost half of our biodiversity since the 1970's.</p> <p>Development has been at such a pace that infrastructure cannot keep up. Buses have been cut recently, cycle and pedestrian routes have not been upgraded sufficiently to connect some developments to main bus and train routes without car dependence. Aylesham has not had a secondary school which would mean children could walk to school. Many rural communities are entirely car dependent due to lack of buses and the roads not being safe to use their bikes. Not enough emphasis is put on renovating existing housing stock to provide greener, insulated, fuel efficient homes. Each new build generates around 56 tonnes of embedded carbon. The NPPF states that we should prioritise brownfield sites over greenfield but although there are many opportunities to develop brownfield sites in Dover, this has not been prioritised. Many developments have been for larger houses in villages and there is not enough provision for affordable housing.</p> <p>The wording of the local plan is not definitive, it leaves too many loop holes and vague preferences which enable large developers to argue and get what they want, to maximise profits, not what the people of the Dover area need.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Better mapping and understanding of the Dover District, taking into account internationally rare areas of chalk grassland, woodland and trees wherever they occur.</p> <p>Large buffers around the AONB to protect its character from the built environment. Stronger protection for the AONB and the Ripple LCA F3.</p> <p>Tighter protections on our remaining biodiversity.</p> <p>Tighter definitions in the local plan so that developers have no room to argue what has been specified in the local plan.</p> <p>Hire several biodiversity officers to monitor closely and prevent loss of ancient woodland, chalk grassland, veteran trees, protected wildlife and rich habitats and to actively go out into the community, looking for ways to improve biodiversity by such things as accessing grants for hedge planting and the creation of ponds where ever possible in our district.</p> <p>Employ experts to liaise with farmers in our area to encourage the most environmentally friendly farming and land management practices which will encourage maximum biodiversity in the countryside and maximum sequestration of carbon in soils and biomass.</p> <p>Stop the use of agricultural land for development.</p>

	<p>Renovate and insulate rather than build new houses, brownfield not greenfield.</p> <p>Turn attention away from destroying village communities with unsustainable housing estates outside their village boundaries.</p> <p>Do not give developers the get out clause of financial mitigation for destruction of wildlife and habitat. No development should further deplete our critically low levels of biodiversity.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Introduction
Rep ID	SDLP693
Rep Status	Processed
Consultee ID	1331821
Consultee Full Name	Laura Marney
Consultee Company / Organisation	Deal Town Council
Agent Full Name	Laura Marney
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Overarching Vision
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<ul style="list-style-type: none"> Deal Town Council Planning Committee <p>Deal Town Council wishes to comment specifically on the implementation of the legal requirements for drawing up the plan. regret that both the Deal Town Council Planning Committee and the Full Council were not parts of the process of consulting about and writing the plan.</p> <p>The arrangement to have one KALC member to liaise with local town and parish councils was not at all satisfactory; we received no feedback from our "delegate", and were never explicitly consulted on matters germane to this Council.</p>

	<p>While taking into account the need for confidentiality, the chaos around proposed changes to national planning policy, and the impact of Covid-19 on the process, we nevertheless still reach the conclusion that there was inadequate consultation.</p> <p>However well councillors and officials in Whitfield think they know local needs and likely reactions, it is nevertheless parish and town councillors who connect closely with their electorates. There should have been greater efforts to devise robust systems and accountability so as to make the process genuinely participatory and the outcome more sensitive to local voices.</p> <p>On that basis we would therefore question the legitimacy of the Regulation 18 and 19 drafts of the Dover Local Plan.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>We would appreciate the reasoning behind your lack of consultation with all the elected members of Deal Town Council.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>Introduction</p>
<p>Rep ID</p>	<p>SDLP541</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331762</p>
<p>Consultee Full Name</p>	<p>Ms Waite-Gleave Sarah Waite-Gleave</p>
<p>Consultee Company / Organisation</p>	<p>Dover and Deal Green Party</p>
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>Your DDC system should treat separately my submission from my organisation and my submission as an individual resident separately.</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I registered 2 separate email addresses; 1 as private residents, a different 1 on be half of my organisation, your portal appears to have combined the 2. I have uploaded word documents supporting my / our view on why DLP is not legally compliant / unsound with precision.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Introduction
Rep ID	SDLP908
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All - General comments

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Kent County Council (KCC) is committed to working with the District Council and other key stakeholders to ensure that sustainable growth is supported by necessary infrastructure – that is planned for, funded and delivered in a timely manner, ahead of housing / commercial growth where required – ensuring an 'Infrastructure First' approach to development. An “Infrastructure First” approach is embedded in the Kent and Medway Infrastructure Proposition, a proposal that seeks to enable accelerated housing delivery, which is focussed on building the right homes in the right places and providing the public services, transport infrastructure, jobs and homes that residents will need now and in the future. To deliver sustainable development, close working and a collaborative approach with all key stakeholders will be crucial – taking in to account all necessary infrastructure and services required to deliver robust and resilient communities during the plan period and beyond within the District – whilst also considering any cross boundary, strategic implications of growth. The County Council would therefore welcome continued engagement.</p> <p>As the Local Plan progresses, the County Council would value timely engagement in the shaping and inputting, as appropriate, into the draft Statement of Common Ground to ensure that all cross-boundary and strategic matters are properly and clearly addressed.</p> <p>Please see a summary of the strategic issues raised:</p> <ul style="list-style-type: none"> • KCC is encouraged by the fact that Heritage features so prominently in the Vision. • It welcomes the amendments to reflect the Rights of Way Network. • It supports the vision that necessary infrastructure is required to support the housing growth. • KCC have recommended amendments to wording and have also suggested additions to some of the policies put forward. We hope these changes either help to make policies clear and in some cases provide more flexibility. • They have suggested that reference to a number of the following Council’s documents should be included: <ul style="list-style-type: none"> • the County Council’s Right of Way Improvement Plan • Kent and Medway Low Emissions Strategy • County Council’s Environment Strategy • Kent’s Plan Bee • KCC would also encourage further car free development. • They would hope that the Dover Fastrack project is reflected in policy. • They also raise some concerns in regard to safeguarding and waste linked to Policy SA3 and Policy DM8. • They would like further dialogue in regard to how further highway related evidence is produced. • They consider that an historic landscape characterisation assessment is carried out in order to fully appreciate the landscape character and incorporate it into green Infrastructure effectively. • KCC would suggest a Transport Strategy for the District. • They would also ask that further discussions took place with Kent Highways before the IDP is published. <p>As a general statement, the County Council is keen to ensure that their interests are represented within the local policy frameworks of the Districts and Boroughs in Kent. KCC is committed to working in partnership with Local District Councils to achieve the aims contained within the 'Rights of Way Improvement Plan 2018 – 2028 (ROWIP)'. As the Local Highway Authority, KCC promotes the protection and enhancement of the PRoW network and, experience shows that local planning policy support for the work it does is mutually beneficial in both protecting the network and negotiating enhancements to it, through new development.</p> <p>In respect of PRoW, the County Council supports the draft Regulation 19 Local Plan and it welcomes the amendments made to reflect the PRoW network following the County Council’s response to the Regulation 18 Consultation on 17 March 2021. However, there is still no reference to the County Council’s Rights of Way Improvement Plan (ROWIP) and KCC would emphasise again that reference to the ROWIP is included to enable the successful partnership working to continue to deliver improvements to the District’s PRoW network.</p>

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Introduction
Rep ID	SDLP810
Rep Status	Processed
Consultee ID	1331898
Consultee Full Name	Lorna Biggs
Consultee Company / Organisation	
Agent Full Name	Lorna Biggs
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP40 St Margarets at Cliffe small housing sites. Site STM010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No

6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I would like to see evidence that procedures were correctly followed by DDC at Regulation 18 stage of the Local Plan Process as it is my understanding that a public consultation did not take place
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Remove STM010 from Regulation 19 version of the Local Plan.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Introduction
Rep ID	SDLP809
Rep Status	Processed
Consultee ID	1331882
Consultee Full Name	Dr. Nagy Rafla
Consultee Company / Organisation	
Agent Full Name	Nigel Crawford
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Strategic Policy 4 - Residential Windfall Development
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy

4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Representation Appeal</p> <p>The "desktop sift assessment" was inaccurate, given that the ground for the rejection was due to an "Unsuitable site: - Site is not well located in relation to the existing village". The postcode presented by the council against site reference WOR005, is that of another property further away (Upton house) on Deal Road.</p> <p>The desktop sift assessment, failed to identify the correct postcode, existing access, ownership boundaries, road widening proposal, footpath proposal, access to the immediate bus stops, and proximity to Worth village.</p> <p>The decision to drop this site from the local plan was unsound and was not legal, it was not given due diligence and consideration, in-spite of many attempts by the applicant, to communicate with the Council, regarding the draft Local Plan, via, telephone calls, emails, and previous representations, without a response, except that it was valid. The post code presented by the Council against the Land, is that of another property further away (Upton house) on Deal Road.</p> <p>The site presented is in an excellent position for the village and the offering of a footpath and widening the road, it will be a great help for the village. The site has access to three bus stops, two at the entrance to Deal Road and one just opposite at The Street, Worth and with a footpath it will be easy access to the villagers to use public transportation rather than using a car.</p> <p>The site has access to electricity, water, telephone lines, and internet as well as the main drain running just across its edge with Mill Lane. The site is vacant since the applicant's ownership in 1996. The site is kept tidy by cutting the grass once a year and has no constraints. The site is not in a flood-risk area. The site is flat and not in an area of outstanding natural beauty. The site is privately owned and is available immediately if successful. There have been few interested in developing this site, including a large property company as well as few local builders, and hence could employ few locals if the council agrees.</p> <p>The Dover Local Plan is not compliant, is unsound, and fails to comply with the Duty to Cooperate.</p> <p>This includes public participation in the preparation of the Local Plan.</p> <p>The process for public engagement for the Local Plan should be in general accordance with the Statement of Community Involvement (SCI)</p> <p>The Local Plan should have regard to national planning policy. The National Planning Policy Framework (NPPF)</p> <p>Soundness</p> <p>To ensure the local plan is sound, it should meet the following criteria</p> <p>Positively prepared</p> <p>Provides a strategy which, as a minimum, seeks to meet Dover District's objectively assessed needs and is informed by agreements with other authorities so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development</p> <p>Justified</p> <p>An appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence</p> <p>Effective</p> <p>Deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and</p> <p>Consistent with national policy</p> <p>Enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.</p> <p>Compliance with the Duty to Co-operate</p> <p>The Local Plan should comply with the Duty to Cooperate.</p> <p>Section 33A of the Planning & Compulsory Purchase Act requires the Council to engage constructively, actively, and on an ongoing basis with neighbouring authorities and certain</p>

	<p>other bodies over strategic matters during the preparation of the Plan. The Council is expected to provide evidence of how they have complied with the Duty. Non-compliance with the Duty to Cooperate cannot be rectified after the submission of the Plan. Therefore, the Inspector has no power to recommend modifications in this regard. Where the Duty has not been complied with, the Inspector cannot recommend adoption of the Plan.</p> <p>Strategic Policy 4 - Residential Windfall Development Site_Origin HELAA, HELAA Reference WOR005, Origin_Ref HELAA213, Page 21.</p> <p>The “desktop sift assessment” was inaccurate and failed to identify the correct postcode, existing access, ownership boundaries, road widening proposal, footpath proposal, access to the immediate bus stops, and proximity to Worth village.</p> <p>The decision to drop this site from the local plan was unsound and was not legal, it was not given due diligence and consideration, in spite of many attempts by the applicant, to communicate with the Council.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	The Consultee would like the opportunity to participate.
<p>Include files</p>	<p>Local Plan Representation - CT14 0BD.pdf Representation for Site Reference WOR005.pdf</p>
<p>Local Plan Consultation Point</p>	Introduction
<p>Rep ID</p>	SDLP1451
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1252080
<p>Consultee Full Name</p>	Ellen Gilbert
<p>Consultee Company / Organisation</p>	Tunbridge Wells Borough Council
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Introduction - Whole Plan
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Thank you for enabling Tunbridge Wells Borough Council (TWBC) to comment on the Regulation 19 Submission Local Plan. Set out below are the comments that TWBC wishes to make in response to the consultation, which are made having regard to matters of legal compliance, tests of soundness and the Duty to Cooperate.</p> <p>TWBC is generally supportive of the Plan, which seeks to meet growth needs over the plan-period to 2040, on matters relating to housing, the economy, community facilities and infrastructure. The Plan seeks to conserve and enhance the natural and historic environment, mitigate and adapt to climate change as well as to achieve well-designed places. The Local Plan sets out a strategy that meets the District's housing needs as well as its aspirations for economic growth.</p> <p>Accordingly, TWBC supports the vision and strategic policies of the Local Plan.</p> <p>The Strategy:</p> <p>The Plan comprises policies and site allocations to ensure a greater choice, and high-quality housing, and focusses new development at accessible and sustainable locations, utilising existing infrastructure, facilities and services and making the best use of brownfield land.</p> <p>The proposed growth strategy focusses growth at the least sensitive areas of the district, which TWBC supports in principle. This means Dover Town with an urban expansion at Whitfield, with some further dispersed growth at local centres/smaller villages.</p> <p>Transport Infrastructure:</p> <p>TWBC welcomes the plan to enhance modes of transport, delivering targeted improvements to the local and strategic road network, including the M20 at Maidstone.</p> <p>Development Management policies:</p> <p>TWBC notes the proposed Development Management policies that cover matters relating to climate change, place-making, new homes, employment and the local economy, retail and town centres, transport and infrastructure as well as the natural and historic environment.</p> <p>Conclusion – Tests of Soundness:</p> <p>Given the above, TWBC considers that the Dover District Council Submission Local Plan has been positively prepared. TWBC considers the growth strategy to be appropriate and justified, as well as effective and consistent with national policy.</p> <p>Duty to Cooperate:</p> <p>TWBC does not wish to comment on this aspect, which will be considered in detail at the forthcoming Local Plan Examination.</p> <p>Legal compliance:</p> <p>TWBC has considered the published Local Development Scheme, Statement of Community Involvement and Sustainability Appraisal and Habitats Regulations Assessment, and considers the Plan meets with the tests of legal compliance.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will	

make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Introduction
Rep ID	SDLP1535
Rep Status	Processed
Consultee ID	1271535
Consultee Full Name	Jean Swan
Consultee Company / Organisation	Adisham Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Whole Plan
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Regulation 19 consultation. Although this plan applies to our neighbouring district the plans for Aylesham significantly impact Adisham. Adisham Parish Council congratulates the council on a well thought out and mainly sympathetic revised local plan.</p> <p>Under Policy 14 we welcome the proposed Priority Habitat Inventory on the fringes of this parish and would be happy to assist if required. Adisham Parish is fortunate to have within its boundary several SSSI status woodlands. Geographically they should be considered within the context of the DDC Draft Local Plan.</p> <p>Adisham Parish council welcome the removal of 500 homes from DDC Draft Local Plan, however we have concerns over the proposal to build 640 houses linking Aylesham to Snowdown.</p> <p>Particular concerns: Traffic- There is already a considerable strain on local roads particularly on the B2046 Adisham to Aylesham and further on as it joins the A257 at Wingham. Further development in the area would see a significant increase to traffic. This applies to the minor roads and lanes that connect Adisham and Aylesham. It is very likely that Adisham will be used to bypass the major routes into cant A2. The B2046 has had an increase in traffic incidents some fatal.</p>

	<p>Public transport - Bus and train services are limited. There are no firm proposals to improve these services. Currently one school bus, 89b, operates. The bus travels from Aylesham to Adisham, by the time it gets to Adisham there is standing room only. Children from Adisham and Bekesbourne are not provided with a safe form transport at present, with more development assurances of safe transport must be in place.</p> <p>Adisham village has limited facilities/amenities and relies on Aylesham's local facilities. Recent building has increased the demand for these amenities. Medical services, leisure facilities and early years amenities need to be increased and improved to support further development.</p> <p>Within the requirements of the NPPF we welcome the district councils target of providing affordable housing @20% above the national proposal of 10% outside of urban areas</p> <p><i>(DDC note - this is the full representation from Adisham Parish Council. Some extracts have been made and placed against specific policies / consultation points, where relevant)</i></p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Not Applicable
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
Include files	
Local Plan Consultation Point	Introduction
Rep ID	SDLP1307
Rep Status	Processed
Consultee ID	1252081
Consultee Full Name	Planning Department
Consultee Company / Organisation	Canterbury City Council
Agent Full Name	
Agent Company / Organisation	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	Whole Plan
<p>2 - Do you consider this part of the Plan sound?</p>	Yes
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	

4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>Canterbury City Council representation to Dover District Council Regulation 19 Local Plan Consultation.</p> <p>Canterbury City Council (CCC) welcomes the opportunity to comment on the Regulation 19 Dover District Local Plan and supporting Sustainability Appraisal of the Dover District Local Plan, Habitats Regulation Assessment on the Dover District Local Plan and Infrastructure Delivery Plan Draft for Consultation 2022.</p> <p>CCC has a signed Statement of Common Ground (SoCG) with Dover District Council (DDC) dated April 2021 (Appendix A) which sets out how CCC and DDC as local planning authorities have worked effectively under the Duty to Cooperate (DtC) and with other prescribed bodies, on strategic matters that cross the administrative boundaries between the two districts.</p> <p><i>(DDC note - Specific comments made on Local Plan sections/policies have been separated out into correct consultation points. Appendices referred to in this representation are published as part of Local Plan evidence and therefore no re-attached to this representation)</i></p> <p>Stodmarsh</p> <p>Natural England has raised water quality concerns in relation to the Stodmarsh European Site, situated in Canterbury District. We understand that Dover District Council has demonstrated that any additional nutrients reaching Stodmarsh SAC/SPA/Ramsar as a result of new connections to Dambridge waste water treatment works would not have a significant effect on Stodmarsh site and that Natural England have confirmed that Dover District is no longer impacted by its water quality and nutrient neutrality advice in relation to Stodmarsh.</p> <p>Canterbury City Council looks forward to continued cooperation with Dover District Council beyond the closure of the Regulation 19 consultation. Yours sincerely, Andrew Thompson, Corporate Policy and Strategy Manager</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Not Applicable
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	Introduction
<p>Rep ID</p>	SDLP1167
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1331713

Consultee Full Name	Woodchurch Property (BK) Ltd
Consultee Company / Organisation	Woodchurch Property (BK) Ltd
Agent Full Name	Rosie Dennis
Agent Company / Organisation	DHA Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House, Shepherdswell (SHE004 & TC4S082)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Edit: DDC amendment:</p> <p>See attached representation: which summarises DDC process, tests of soundness, legal compliance and Duty to co-operate. Detailed comments on Duty to Co-operate as follows:</p> <p>"3.3 Summary</p> <p><i>3.3.1 On account of the above and the documents published within the Council's Local Plan Evidence Base, we are satisfied that the Council as the strategic policy making authority has demonstrated effective and on-going joint working with neighbouring authorities, the county council, prescribed bodies and other relevant bodies. Further, we agree that the Council has prepared and maintained statements of common ground documenting the cross-boundary matters being addressed in accordance with the Framework and the Duty to Co-operate may be discharged by the Planning Inspector under Section 20(5) (c) of the Planning and Compulsory Purchase Act 2004.</i></p> <p><i>3.3.2 Without prejudice to the above, should ongoing work by the Council result in significant changes in circumstances such that the signed SoCGs may be amended or withdrawn, our client reserves the right to alter their consultation response accordingly and be present at the examination of the Plan to discuss further."</i></p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	To be able to respond to any matters raised in relation to amendments to Draft Policy SAP36. Any changes to the allocation directly impact the ability for the site at Land Adjacent to Mill Lane to be able to be delivered by our client, thus impacting the Council's housing delivery targets.

Include files	Land Adjacent to Mill Lane_Regulation 19 Written Rep_December 2022.pdf
Local Plan Consultation Point	Introduction
Rep ID	SDLP1169
Rep Status	Processed
Consultee ID	1271293
Consultee Full Name	Mr Alan Byrne
Consultee Company / Organisation	Historic England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Whole Plan
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>. Thank you for your email of 21 October 2022 inviting comments on the above consultation document.</p> <p>General Comments</p> <p>As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages of the planning process. This includes formulation of local development policy and plans, supplementary planning documents, area and site proposals, and the on-going review of policies and plans.</p> <p>There are many issues and matters in the consultation document that are beyond the remit and concern of Historic England and our comments are, as required, limited to matters relating to the historic environment and heritage assets. In our previous comments (by letter dated 16 March 2021), Historic England focused on the objective of the National Planning Policy Framework to set out a positive strategy for the conservation, enjoyment and enhancement of the historic environment (now Paragraph 190, NPPF); and contain policies to deliver the conservation and enhancement of the historic environment (revised Paragraph 190 a, NPPF).</p> <p>Our comments on the Regulation 18 stage draft Local Plan largely have been addressed in the current Publication version or are, in our view, not now likely to affect the soundness of the Local Plan. However, we have a number of general comments and points of detail relating to some aspects of the draft Submission Local Plan that, if incorporated, may help to strengthen or better elucidate the policies relating to the historic environment and heritage assets, or relate to site specific policies with a high degree of heritage significance.</p> <p><i>(DDC Note: Specific comments have been extracted and assigned against relevant policy areas - full representation is attached for information)</i></p> <p>Summary</p> <p>We welcome the inclusion of policies for the historic environment in the local plan that meet the obligation for preparing the positive strategy required by the paragraph 190, NPPF. The key test of the soundness of the plan and the achievement of sustainable development as defined in the NPPF in respect of the elements that relate to the historic environment, in our view, have been met with the exception of the inclusion of a policy addressing heritage at risk.</p>

	We should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals which may subsequently arise where we consider that these would have an adverse effect upon the historic environment. We hope that these comments are useful.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Inclusion of a policy addressing heritage at risk.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	SDLP1169 Historic England Att1.pdf
Local Plan Consultation Point	Introduction
Rep ID	SDLP1152
Rep Status	Processed
Consultee ID	1271448
Consultee Full Name	Kevin Bown
Consultee Company / Organisation	National Highways
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Whole Plan
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

Thank you for your notification dated 21 October 2022 inviting National Highways to comment on the Dover District Council (DDC) Regulation 19 consultation, seeking a response no later than 5pm on 9 December 2022.

Strategic Overview

As you may be aware, we are responsible for the operation and maintenance of the strategic road network (SRN) in England. We are committed to supporting Government objectives on economic growth and sustainable transport and recognise the need for closer integration of transport and land use planning as set out in the Department for Transport (DfT) Circular 02/2013 'The Strategic Road Network and the Delivery of Sustainable Development'.

Paragraph 33 of the Circular states that "development proposals are likely to be acceptable if they can be accommodated with the existing capacity of a section (link or junction) of the strategic road network, or they do not increase demand for use of a section that is already operating at over-capacity levels" taking account of any travel plan, traffic management and/or capacity enhancement measures that may be agreed.

Paragraph 34 of the Circular states that "where the Circular tests are not satisfied, additional assessment will be required to enable all parties to understand the scope and scale of the impact that the proposals are likely to have on the SRN. This assessment should:

- Demonstrate how the proposals will reduce the need to travel, especially by car
- Demonstrate how the proposals will improve accessibility by all modes of travel and influence travel behaviours
- Assess the likely impact of residual trips (i.e. after measures above have been considered)
- Identify appropriate and proportionate mitigation measures, and ensure that what is proposed promotes sustainable transport outcomes and avoids unnecessary works to the SRN"

Our general approach to reviewing Local Plans

As a statutory consultee, a Duty to Co-operate consultee and in order to safeguard the SRN, we will fully engage with all parties (the Council, development promoters, the public etc) in the production, adoption, and implementation of the Local Plan. Our approach to engagement in the Local Plan process is set out in detail in "The strategic road network: Planning for the Future".

Our involvement in the Local Plan process provides us and you with the confidence that the development within the Plan is acceptable and sustainable in terms of management of the SRN, and that a long-term strategy for development location, scale and associated necessary infrastructure is developed and agreed with us. This will ensure that the development management process is grounded in agreed principles and is as smooth and efficient as possible.

We welcome the opportunity to help identify the most suitable locations for development in order to encourage sustainable travel behaviour and make the best use of public transport capacity. This will minimise the need for costly, disruptive and carbon intensive highway infrastructure to mitigate developments, and will better meet the UK's net zero commitments and the need to improve air quality for local communities.

In our assessment of development proposals within Local Plans, we welcome engagement on the preparation and assessment of the evidence base that will demonstrate the impact of individual sites and the cumulative impact of the Plan, utilising our knowledge of the SRN and sharing any existing evidence we might hold. This will allow us to work together to develop an Infrastructure Delivery Plan for the Local Plan, in order to accommodate the development safely, effectively, and sustainably.

We are also keen to review and engage in the preparation of planning policies, ensuring that they are sustainable and meeting the needs of the SRN, its users, and the communities it serves and passes through.

Background to Regulation 19 Consultation

With regards to this DDC Regulation 19 consultation, we are concerned with plans or proposals that have the potential to impact the safe and operation of the SRN, in this case, the M20/A20 and the A2, and in particular the area around the A2 Whitfield roundabout, the A2 Whitfield Interchange and the A2 Duke of York Roundabout.

We, Dover District Council (DDC) and Kent County Council (KCC) have been working together on a continuous basis since the start of, and prior to DDC commencing work on the Local Plan in 2017. We acknowledge that the Regulation 19 Submission document is intended to be submitted to the Planning Inspectorate for Examination. It is the version that the Council will seek to adopt, subject to the outcome of the Examination and it will replace the Core Strategy 2010 and the Land Allocations Plan 2015.

While not specifically stated in the Consultation email dated 21 October 2022, we understand that DDC is also consulting on the Regulation 19 Transport Modelling Forecasting Main Report.

We have reviewed the information submitted in association with the Regulation 19 consultation and offer the following comments.

(DDC Note - The detailed comments made within the representation letter have been assigned to the relevant consultation point in relation to policy/part of the Local Plan and/or background documents - See letter attachment for full representation)

Conclusion

Subject to the detail set out above we have no major objections to the Dover District R19 Local Plan. However, as also set out we recommend that various amendments or additions are made to ensure the Local Plan is clear and complete with regards any further work to discern impacts or deliver required mitigations in connection with the SRN.

We are committed to continuing to work with DDC, KCC and all other parties as appropriate to ensure that the traffic impacts of the Local Plan on the SRN are accurately identified and assessed, with the development of appropriate mitigation measures as required.

Our normal requirement is for all technical assessment and appropriate mitigation for the SRN to be agreed prior to the formal submission of the plan, or prior to the Examination in Public where the former is not achievable. Towards this aim, once you have had opportunity to assess the various representations received, please feel free to contact me to discuss and progress matters.

I hope that our responses assist, but if you have any queries, please contact me via *(email address)*.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

[SDLP1152 National Highways Att1.pdf](#)

Local Plan Consultation Point

Introduction

Rep ID

SDLP1233

Rep Status

Processed

Consultee ID

1331099

Consultee Full Name

Rosie
Cavalier

Consultee Company / Organisation

Esquire Developments

Agent Full Name

Agent Company / Organisation

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.

SP3, SP4

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Introductory text on this rep, points split between SP3 (SDLP1204) and SP4 (SDLP796)</p> <p>1.0 INTRODUCTION</p> <p>1 i) About the Kent SME Developers Network</p> <p>These representations have been prepared by the Kent SME Developer Network (the Network) a consortium of Small and Medium (SME) Developers who are located in or operate within Kent and Medway. The Group is currently chaired by Paul Henry, Managing Director of Esquire Developments, an SME Housebuilder based in Longfield near Dartford, Kent.</p> <p>The Network was formed in November 2019 and presently comprises approximately 30 participants including SME Housebuilders and Developers (of varying size and scale) and Registered Providers. In addition, the Network includes representatives of Local Planning Authorities including Medway Council, Swale Borough Council, Tonbridge and Malling Borough Council, Tunbridge Wells Borough Council and Maidstone Borough Council. It is the intention that the Network grows over time to cover all of Kent including additional SME Developers and Local Planning Authorities. The Network has recently engaged with Dover District Council.</p> <p>The Network was set up to provide a platform for SMEs to discuss relevant planning and delivery issues associated with bringing forward smaller developments and to positively and proactively engage with Local Planning Authorities at the plan making and decision taking stages.</p> <p>The Government has recognised the need to support existing SMEs and encourage more into the market in order to diversify the housing market from the volume housebuilders and generate choice and improve quality of homes being built. The Government has described SMEs as being of 'National Importance'. Appendix 1 sets out the narrative behind the support and role for SME Housebuilders.</p> <p>The Network meets on a quarterly basis to discuss and explore relevant SME related issues, including working through planning related matters. Notable attendees at past meetings including Steve Quartermain (prior to his retirement as Chief Planner at the then MHCLG) and Homes England.</p> <p>In addition to the meetings acting as a discussion platform, the SME Network is also designed to act as a support and mentoring network, where land opportunities can be shared, or knowledge/experiences drawn from in-house teams in order to help each other and strengthen the SMEs. The Network can also act as a collective voice in the preparation of Local Plans or other consultations - such as this.</p> <p>The Network comprises the following:</p> <p><u>SME Housebuilders and Developers</u></p> <p>Esquire Developments Fernham Homes Wealden Homes Fernfield Homes Meridian Construction Aile Homes King and Johnstone Clarkmores</p>

Clarendon Homes
Gillcrest Group
A&E Property Ltd
Country House Homes
Classicus Estates
Woodcroft Developments
Provectus Developments
Penenden Heath Developments
Grandera Homes
Windmill Construction
Jarvis Homes
Aspire Designer Homes
Kentish Projects
Woolbro Homes
Cooper and Cole
Hillstone Homes
RJC New Homes
Wedgewood Homes
TG Designer Homes
Endeavour Construction Limited
Unique Land
Registered Providers
Hyde Housing
MHS
Local Planning Authorities
Medway Council
Maidstone Borough Council
Swale Borough Council
Tunbridge Wells Borough Council
Tonbridge and Malling Borough Council
Dover District Council
Folkestone District Council
Canterbury City Council
Agents
Tetlow King Planning
David Hicken Associates
Barton Willmore now Stantec

The Network welcomes ongoing engagement with Dover District Council and any other interested party.

For clarity, the representation contained in this response relate to the Members of the Network that are SME Housebuilders and Developers and not the Registered Providers, LPAs or Agents.

1 ii) Content of Representations

These representations have been prepared by the Network which seek to address strategic matters. Any site-specific matters will be addressed by individual SMEs within their own representations.

The representations are structured to respond to each relevant question posed within the document.

In summary the headline points are as follows:

We support the council identifying the need to meet the small sites requirements and support SME developers.

However, we are not convinced that the requirements of Paragraph 69 have been met in respect of 10% of allocations being on 1ha or less:

We support the principle of a Policy such as SP4, however we consider that amendments to the policy wording and the defined policies map are required in order to ensure it is 'effective' and therefore 'sound'.

We encourage the Council to continue to work with the Network, including the consideration of a small sites policy to help support SME developers within the plan period.

RESPONSE

Requirement of Paragraph 69

Paragraph 69 of the NPPF requires Local Planning Authorities to identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare. This is a clear requirement and therefore 1,099 dwellings need to be allocated on sites of this nature.

Central Government recognises the problem of bringing SMEs into the market and has sought to 'level the playing field' in the context of supporting small and medium sized sites at the plan making stage. Crucially, the NPPF 2019 confirms in paragraph 68 that:

Small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:

- 1 a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;
- 2 b) use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward;
- 3 c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and
- 4 d) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.

The NPPF provides for a clear direction to LPAs, that it must identify land to accommodate at least 10% of their housing requirement that are 1ha or less.

Paragraph 3.52 of the Reg 19 plan sets out that 11.4% of the housing requirement are on small sites. These sites are listed out in Appendix 3 of the Housing Topic Paper September 2022 and the table shows that the total of 1,249 dwellings are considered to be identified for delivery on small sites.

The Local Plan states (para. 3.52) that these small sites have been identified through the Local Plan and the brownfield register. Of the 1,249 dwellings, a total of 516 dwellings are allocated under 'small sites' within the Regulation 19 plan.

The remaining dwellings (733 dwellings) are to be found in the Brownfield Register. The Register is available on the Dover District Council website and was last updated in February 2021- nearly 2 years ago. Shown at Appendix 02 of this statement is the list of sites that make up the 11.4% as suggested by the council which fulfils this requirement, alongside comments taken from the Brownfield Register. A number of the sites listed in the Brownfield Register are noted to be 'complete' or 'built out'. This equates to a total of 313 units.

We consider a site that has been noted as complete or built out can no longer be counted as a site that will contribute towards meeting the housing need. Accordingly, this element should be removed from the total supply which would reduce the figure to 936 dwellings or 8.8% of the total requirement of 10,998 dwellings.

Further to this figure, there are a number of sites that are listed as 'under construction' (209 in total). It is not clear when these comments have been added to the Brownfield Register, but for a number of the sites listed, it is clear from sold house price data that a number of these dwellings have now been completed.

We consider it important, therefore for Dover District Council acknowledge that there could be as many as 522 dwellings on the Brownfield Register that are no longer available and that the Brownfield Register should be re-assessed.

We expect that following this review, the number would fall from 1,249 dwellings to 727 dwellings or 6.6% of the required total.

The SHLAA is a critical piece of work in this regard and it is crucial that sites of this scale are identified and that they are being promoted by SME developers (or capable of being delivered by an SME developer). It is not simply a numbers game but a qualitative exercise to ensure that a sufficient number of these small sites are identified to support the intent of paragraph 69 – which is to support SME developers.

Small sites have a significant advantage as they can deliver quickly. Accordingly, in allocating smaller sites (of 1ha), or indeed supporting SME developers in bringing forward larger 'small sites' (there are a number of SME Developers capable of delivering sites in excess of 1ha and up to 100 dwellings or more per site), it will help deliver housing in the short term and firstly seek to rectify the existing housing land supply issue and deliver in early years of the plan period whilst the larger, longer term sites move through the planning and delivery process.

It is critical to have a good blend of sites and small site and SME developers are key to the success of delivery. SMEs also seek to deliver good design and set a good standard in the Borough.

Support for SME's/Small Sites

We support the principle of Policy SP4- Residential Windfall Development which seeks to deliver small scale windfall development in certain locations. This allows SME's to come forward with development in sustainable locations.

However, we consider the wording of the policy is too restrictive and will not result in an effective policy. This is in part because the wording is too restrictive when referencing land that is within our immortally adjacent to settlement boundaries and that the settlement boundaries themselves are tightly drawn around these areas. The Regulation 19 Policy Map settlement boundaries do not include all existing built form and the proposed new allocations are also excluded from within the boundaries.

In order for this policy to be effective and to meet the windfall requirement (1,050 dwellings) we consider amendments are required to the wording of the policy and that the settlement boundaries as shown on the Policies Map should be modified to include the existing built form and the built form proposed in the Local Plan.

The wording of Policy SP4 should be amended as follows:

SP4 - Residential Windfall Development

1 Residential development or infilling of a scale that is commensurate with that of the existing settlement will be permitted within, or immediately adjoining or close to the existing built up confines of the settlement boundaries, as shown on the Policies Map, of the following settlements:

Ash, Alkham, Aylesham, Capel-le-Ferne, Deal, Dover, East Langdon, Eastry, Elvington, Eythorne, Guston, Goodnestone, Kingsdown, Lydden, Northbourne, Preston, Ripple, Sandwich, Shepherdswell, St Margarets at Cliffe, Wingham, and Worth.

1 Minor residential development or infilling or adjoining or close to the existing built up confines of the settlement boundaries of a scale that is commensurate with that of the existing settlement will be permitted within the settlement boundaries, as shown on the Policies Map, of the following settlements:

Ashley, Barnsole, Betteshanger, Chillenden, Coldred, Denton, East Studdal, Finglesham, Great Mongeham, Martin, Martin Mill, Nonington, Ringwould, Staple, East Stourmouth, Sutton, Tilmanstone, West Hougham, Wingham Green, Woodnesborough and Wootton.

Subject to all of the following criteria being met:

1 a) It is of a scale that is appropriate to the size of the settlement and the range of services and community facilities that serve it, taking account of the cumulative impact of any allocated sites and committed development;

1 b) It is compatible with the layout, density, fabric and appearance of the existing settlement and individually or cumulatively, would not result in the coalescence or merging of two (or more) separate settlements, or the significant erosion of a gap between settlements, so as to result in the loss of individual settlement identity or character;

1 c) In the case of settlements in, adjoining or surrounded by, the Kent Downs AONB or Heritage Coasts, that the proposal complies in the first instance with the primary requirement of conserving and enhancing landscape and scenic beauty, and, where this is demonstrated, that the scale and extent of development is limited, sensitively located and designed to avoid or minimise adverse impacts on these designated landscapes;

1 d) It would conserve and enhance landscape character and biodiversity and not result in an unacceptable intrusion into the open countryside or the loss of, important green spaces within the confines that contribute positively to the existing character of that settlement;

1 e) It would preserve or enhance any heritage assets within its setting;

2 f) It would not result in the significant loss of best and most versatile agricultural land currently used for agriculture;

1 g) Where the site adjoins open countryside, an appropriately designed landscape buffer is included;

2 h) It would not have an adverse impact on the living conditions of existing adjoining residents;

3 i) Where development would result in the loss of active employment, open space, sport or community facilities within the settlement that such development is consistent with the requirements of policies EN2, PM5 and PM6 of this Plan;

1 j) Traffic movements generated from the development do not result in severe impacts to the highway network that cannot be mitigated. This should be considered through transport assessments carried out in accordance with Policy TI2 which must take account of the cumulative impact of sites allocated for development. Proposals must not prejudice the ability of sites allocated for development to come forward due to limited highway capacity; and

1 k) It would be in accordance with all other relevant policies in the Plan.

2 New dwellings (both isolated and non-isolated) elsewhere in the countryside outside of settlement boundaries will only be permitted in exceptional circumstances under one or more of the criteria 1 to v), and subject to meeting criteria a) to k) above:

2 i) there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside;

1 ii) the development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets;

iii) the development would re-use redundant or disused buildings and enhance its immediate setting;

1 iv) the development would involve the subdivision of an existing residential building; or

2 v) the design is of exceptional quality, in that it: - is truly outstanding, reflecting the highest standards in architecture, and would help to raise standards of design more generally in rural areas; and – would significantly enhance its immediate setting, and be sensitive to the defining characteristics of the local area

In order to help meet housing needs as well as support SMEs and Self and Custom Builders, we consider the Council could still include a small sites policy or a policy which recognises the role of rural communities and supports windfall developments.

The Network is championing a small sites policy, which is presently being endorsed by a number of LPAs including Swale and Medway Council.

Any future plan should provide for a policy framework to allow SMEs to deliver throughout the lifetime of the plan, particularly in rural areas.

As part of the Network's objective, it has sought to introduce a policy into emerging Local Plans that seeks to support small and medium sized developments that builds on the 1ha site requirement but expands this into a policy framework that can allow SMEs to successfully operate within the policy framework of a Local Plan where there are limited opportunities through the allocations in which the Council has made (i.e. on larger sites).

In this respect, there is often a large windfall figure required to be met, or LPAs find themselves in a position where the presumption in favour of sustainable development is applicable. The SME policy set out below is a policy in which the Network considers would provide the opportunity for SME sites to come forward, whilst offering the LPA an enhanced development coming forward that is typically delivered by an SME – i.e. in respect of design quality or for instance carbon efficiencies.

Whilst the ideal scenario would be for the same policy to be adopted by each Council (and therefore apply a level of consistency in understanding and application of the policy), we also recognise that each LPA has a specific set of circumstances that may require the policy wording to be tweaked. This maybe the case in DDC and the Network would welcome further discussions as to how such a policy could be introduced into the Plan.

The suggested wording of the policy is as follows, but can be tailored to suite each LPA.

Policy [insert Policy Number] Small Sites

In order to recognise the value of SMEs and small scale sites, the Council will support development of unallocated or windfall small scale housing (C3) and approve applications providing the harm does not demonstrably outweigh the benefits; and where:

- 1 The site does not exceed 60 dwellings (net) and is of an appropriate scale to its location;
- 1 The site is being brought forward by a recognised SME Developer and is not part of a larger site;

III. The proposed development delivers;

- 1 A bespoke design approach;
- 2 A high quality design that is locally distinctive;
- 3 Is sympathetic to the character of its location;
- 4 All dwellings meet National Design Standards and endeavor to deliver a range of Carbon reduction build techniques;

1 The proposed development preserves residential amenity, designated heritage assets and core environmental assets and increase net biodiversity.

1 A flexible approach will be encouraged to the delivery of Affordable Housing assessed on a site by site basis. Where on site provision is demonstrated through evidence to be unviable or unattractive (less than 70% Open Market Value) to recognised Registered Providers, the Council will permit alternative levels of Affordable Housing or alternative forms of tenure, including First Homes, payment in-lieu of on site provision or another form of recognised Affordable Product as defined in the NPPF.

It is recognised that SMEs can deliver quickly and applicants are encouraged to explore if a reduced implementation period is appropriate.

A Small Sites policy will allow for SMEs to operate within the Plan Led system and will allow both Small and Medium sites to come forward (i.e. sites above 1ha and up to 60 dwellings). Such a policy will allow an SME to come forward with a planning application that meets locally defined specific criteria, such as high-quality design, low carbon footprint, reduced time limits for implementation etc and a flexible approach to the delivery of Affordable Housing. On the other side of the coin, the Council will receive higher quality developments being submitted that are in character with more rural fringe locations (remembering the SME site typology), but that those Rural Fringe locations can be supported with an appropriate amount of growth that will assist in preventing, slowing or reversing their cycle of decline.

Such a policy would provide for additional weight to be afforded to an SME application, and thus allow greater weight to be applied to the application in the overall planning balance. This would reduce risk to an SME and increase certainty at the planning stages, as the SME can tailor their scheme to meet the specific criteria. The LPA also recognises that it would result in a development that meets Building Better Building Beautiful objectives and potentially addressing Climate Change issues.

Crucially, the policy is designed to deliver up to 60 dwellings (and thus meet the M of SME as much as the S) but is worded in a way that seeks to ensure the development coming forward in any given location is consistent and respectful to the area that it is in i.e. a scheme of 60 dwellings may not be appropriate for a small village, but 20 maybe, and therefore a policy that refers up to a figure of 60 dwellings is deemed acceptable ? i.e. the policy is fully flexible.

In addition, the 60 dwelling threshold is very much seen as the scale of developments where larger SME's start to compete with Volume housebuilders on sites. A volume housebuilder will tend not to drop below 60 dwellings and thus the Policy is designed to really assist SME delivery and support the delivery of bespoke high-quality development, but also directly respond to certain SME challenges, such as how to deliver small numbers of Affordable Housing on any given site.

The Network recognises that other Kent LPAs are seeking to introduce a Small Sites Policy and a key aim for the policy is that there is a level of consistency in the wording across a number of LPAs, in order that the interpretation and understanding of the policy is also consistent on a cross boundary level – again seeking to reduce the risk at the planning stages to an SME.

In addition to the Policy itself, we also consider that an SME protocol should be prepared which provides guidance and clarity for SMEs at the pre-application and post-submission stages. The protocol would recognise the need to engage with SMEs and understand that a flexible approach is needed to certain issues (such as site typology/affordable housing provision).

The protocol could include a standard PPA timeframe and fixed cost to ensure that sufficient officer time is allocated to an SME application. Whilst SME applications tend to be on the smaller scale (when compared to larger volume housebuilder submissions), those applications are critical to the SME themselves, and accordingly the Network often discusses the frustration at the lack of engagement from LPAs on their applications – often perceived by SMEs in the Network as being at the bottom of the pile.

This position is especially so at the pre-application stage, where often paid pre-application advice is sought, but either never received or delayed, in some cases up to 9 months. Whilst this is a matter that may extend beyond Dover District Council, this is a 'real life' significant issue as a pre-application response is so important to an SME to determine the extent of risk that a site may carry.

The importance of a planning consent is vital to the success of an SME, no matter how small (or large) that scheme is, and greater engagement is always encouraged. This works both ways and greater engagement can improve the submission material of an SME and thus also reducing risk.

A further burden on SME's, and a point that the above policy is seeking to assist with is delivery of Affordable Housing. This is a wider matter than DDC, but it is well recognised that Registered Providers are rarely interested in sites unless the number of affordable homes being offered equates to at least 20 affordable dwellings. For DDC, this means that any site that falls under a 67-dwelling threshold will likely struggle to gain interest in a registered provider (at 30% AH requirement). The policy seeks a flexible approach to how Affordable Housing can be delivered by an SME in instances where it is the RP that is not interested, not that the SME does not wish to provide affordable homes.

Please see attached representations with appendices in full

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness

See above and attached representations in full

matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	Kent SME Reps to Dover Reg 19 Nov 22 final with appendices.pdf
Local Plan Consultation Point	Introduction
Rep ID	SDLP1203
Rep Status	Processed
Consultee ID	1331777
Consultee Full Name	Mr James Blomfield
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Sustainability Appraisal Reg 19 Chapter 6 - Draft Local Plan SA p74-165 / Chapter 3 Sustainability Context p15-29 / Whole Plan Viability Study Chapter 8 Local Plan Policy Requirements / Housing + Economic Land Availability Assessment HELAA - Main Report TC45 - Assessment of Sites p11
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<u>Dover Local Plan – Section 19 Consultation</u> SAP 44 SOUNDNESS The revised Local Plan is not sound for the following reasons:

It has not been justified and is not effective. It has not been positively prepared to meet 'objectively assessed' needs and for this reason is not consistent with National Policy.

Why have the reasonable, sustainable alternatives for additional housing previously suggested in larger development centres such as North Aylesham, Elvington and Ethorne and Farthingloe and included within the original plan have now been removed? At the same time the proposed allowance for housing has been increased in Capel-le-Ferne and will not be deliverable.

The original draft Local Plan has been changed so that 900 fewer houses are proposed overall and yet the number of houses proposed in Capel-le-Ferne has increased to 95.

This is on top of recent planning permission for 34 houses off Capel Street, 15 dwellings at Longships on Cauldham Lane and 40 new dwellings in a recently completed development at Grasslands.

Why is Dover District Council spreading development across numerous small sites which is uneconomic and unsustainable rather than concentrating in larger developments where existing services, facilities and infrastructure are already available?

Why Dover District Council persist with this policy in relation to Capel-le-Ferne when it clearly is not in keeping with the council's stated objectives?

SP2 - Planning for Healthy and Inclusive Communities and

SP3 – Housing growth

SP2 - Planning for Healthy and Inclusive Communities and

SP3 – Housing growth

SP2 states that *'The Council will support the creation of healthy, inclusive and safe communities in the District by ensuring that new development is well served by services and facilities (for example education, health care, community, cultural facilities, play, youth, recreation, sports, faith and emergency facilities) and that a mix of uses are provided in new development that support daily life.'*

SP3 states that what they are trying to achieve is *'To focus new development at accessible and sustainable locations which can utilise existing infrastructure, facilities and services, and to ensure development contributes to the sustainability of local communities and services, supporting regeneration and wherever possible make the best use of brownfield land'.*

But the proposals for Capel-le-Ferne do not meet any of the objectives in the above Strategic Policies as follows:

- 1 The location of the proposed development in SAP 44 will connect to existing overloaded roads using Capel Street as its primary access point.
- 2 The proposed development is on arable land, currently in use and not brownfield land.
- 3 The development of the village is clearly not sustainable – Capel-le-Ferne has little or no facilities and services – only one small shop, no post office, no health care facilities, no doctor, no dentist, no pubs within the village confines and only a primary school. Therefore, in order to access services, residents need to drive to either Folkestone or Dover which is clearly at odds with SP1 – Planning for Climate Change.
- 4 The addition of 40 dwellings recently completed at Grasslands has not led to any benefit to the community in terms of new services or facilities.
- 5 Trying to 'grow the villages' by increasing the number of houses, but not having any plans to help develop services and facilities is unsustainable, uneconomic and unethical. It will only lead to more unnecessary travel.
- 6 There is only a single bus service and no train service at all.
- 7 The strategic policy SP6 – Economic Growth identifies areas distant from Capel-le-Ferne for economic development. Capel-le-Ferne has little opportunity for employment generation so cannot be seen to contribute to SP6.
- 8 The agreed number of number of houses for the site was originally set at 100, then reduced to 50 to allow a single point of access to the site. It has now been increased to 70 and is deemed achievable. This is not realistic and undeliverable. It would appear that the increase in the number of houses is being driven by economic needs to cover developer contributions which are likely to be substantial rather than by any need by Dover District Council to provide more housing. The development at Longships under SAP45, which has been granted planning permission, exceeds the allocated housing number by 5 dwellings on the basis that sticking to the SAP45 allocation of 10 houses would be uneconomic. The development of SAP44 is likely to encounter similar cost problems and is unlikely to be achievable in the proposed timetable (2021-2026)

Consultation With Statutory Consultees (Reg 22)

Dover Council has not fully consulted with statutory consultees to ensure that the existing facilities where present are sufficient or that plans are in place for future development of infrastructure.

SP11 – Infrastructure and Developer Contributions states: *Supporting infrastructure should be provided in advance of, or alongside, the development, unless there is sufficient existing capacity. The appropriate phasing for the provision of infrastructure will be determined on a case-by-case basis with reference to the most up to date Infrastructure Delivery Plan (IDP) and the priority classification along with other relevant evidence, and in consultation with the relevant providers.*

It is noted that the site at Aylesham North (AYL004) has been removed for transport reasons – essentially Kent County Council objected on transport grounds. However, given 500 homes in a sustainable location (two rail stations, large settlement), that would seem to be the obvious logical focus for development and the Council has failed its Duty to Cooperate with Kent County Council by failing to ensure the relevant transport assessments are undertaken and potential mitigation identified and agreed; rather than simply removing the large site from the plan and increasing allocations on the edge of villages (such as Capel-le-Ferne) that they hope are small enough to slip under the radar at Examination. This is not ethical.

The existing infrastructure in Capel-Le-Ferne is already struggling to cope with the existing level of housing. Water supply is weak throughout the village, power outages are common, and drainage has insufficient capacity and frequently blocks.

The addition of 90 houses along with the 49 already given planning permission will make this worse. Access to the site is proposed via Capel Street, an already congested road (little off street parking, busy cut through, primary school).

Note also the checkered history of road traffic accidents and injuries caused at the congested at the junction of Capel Street/Cauldham Lane from New Dover Road.

Looking through the supporting Infrastructure Delivery Plan (IDP), no mention is made of any suggested improvements to facilities/services or for any proposed improvements to be carried out by Kent Highways, Southern Water (drainage) or Affinity Water (water supply) in Capel-le-Ferne.

Incremental development such as extensions to villages are more difficult to plan for with respect to infrastructure as they are too fragmented and should therefore be avoided.

Transport modelling has been carried out for developments in other areas, but nothing has been done for Capel-le-Ferne where there will be over 100 new houses accessing Capel Street, a narrow congested road. This was highlighted as a significant problem during the long drawn out process of granting planning permission for 34 dwellings off Capel Street. The revised Local Plan is proposing to add a further 70 houses along with 20 dwellings on Cauldham Lane. All the traffic from these developments will exit onto the New Dover Road at the junction of Capel Street/Cauldham Lane – a poorly designed junction which has been identified in numerous surveys as a real problem for development in the area. **The Local Plan does not include any transport modelling for this area.**

Kent County Council have reservations about access to the site SAP44 indicating that it is not ideal. Given the current frequent traffic congestion in the area, this is not surprising. Particular concern was raised regarding emergency vehicle access, hence the requirement for a secondary access to SAP44 and further consultation with the emergency services. However, it should be noted that this secondary access is via a single track lane. Clearly insufficient consultation has been carried out at this stage.

Although Dover District Council have consulted with Capel-le-Ferne Parish Council as required, they have not engaged fully with the parish council as the objections raised by the council to overdevelopment of the village have been ignored both in this local plan and in planning permissions granted in the past. If the purpose of consultation is to incorporate the views of the local population, Dover District Council have clearly failed in this regard.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful

Changes I would make:

Take SAP 44 out of the plan completely as it is not following the policies that the council say they are trying to Achieve and not following their own policies.

Choose one of the alternative sites for additional housing in larger development centres such as North Aylesham, Elvington and Ethorne and Farthingloe and included within the original plan. In particular, Aylesham North (AYL004) is far more appropriate, given 500 homes in a sustainable location (two rail stations, large settlement), that would seem to be the obvious logical focus for development

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I would like to participate as I represented the Village Council in recent Planning Committee meetings.
Include files	SDLP1203 Blomfield - Att 3.jpg.jpeg (3) Crashmap.png Cauldham Lane CT18 7HG.jpeg
Local Plan Consultation Point	Introduction
Rep ID	SDLP1306
Rep Status	Processed
Consultee ID	1331333
Consultee Full Name	Ms Marie Canny
Consultee Company / Organisation	Marine Management Organisation
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	1.14, 1.15, 3.267.
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Thank you for the opportunity to comment on the Dover District Local Plan, we were pleased to see inclusion of the South East Marine Plan in this consulted document. Although in this response we have selected 'Yes' to question 5 we have some key development points for the plan in relation to Duty to Cooperate.</p> <p>The inspector may seek to see that the plan lay out the statutory duty of the Local Authority to take account of Marine Plans and Marine Planning documents when developing local plans in accordance with the Marine and Coastal Access Act 2009. The current reference to Marine Plans in section 3.267 correctly refers to the marine plans but does not explicitly demonstrate this requirement being met. A simple fix, we would hope to see reference to this in this section.</p> <p>In addition, the Marine Management Organisation would hope to be included as a consulted body in the duty to cooperate section under sections 1.14 and 1.15 due to the jurisdictional overlap between the terrestrial and marine planning systems. The MMO is keen to maintain strategic cooperation with colleagues in Dover District Council to support an integrated planning system.</p>

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Introduction
Rep ID	SDLP1328
Rep Status	Processed
Consultee ID	1331624
Consultee Full Name	Mrs Patricia Smith
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP28 - Land between Eythorne and Elvington (EYT003/EYT009/EYT012
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	Development proposals in villages such as those proposed for Eythorne, Elvington and Shepherdsweil should be considered very carefully therefore I OBJECT to this application for the following reasons:

<p>possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<ol style="list-style-type: none"> 1 Infilling the areas of green fields around Eythorne, Elvington and Shepherdsweil will ruin the character of the villageS. 2 The proposed building of this huge number of additional new homes in these developments along with its inhabitants would overwhelm the villages and the limited amenities they have to offer. The village amenities, providing basic needs are already oversubscribed. The adequacy of these amenities to accommodate future demand should have been determined- I do not believe they are in any way adequate. 3 The protection of villages' visual, historic, archaeological and environmental qualities are at serious risk should these developments go ahead. 4 The developments, both during construction and once completed will result in a significant increase in traffic and the noise and pollution associated with this increase. Road widening to reduce the inevitable congestion is not an option in the roads leading in and out of the villages. 5 The proposed siting of the developments are particularly ill-considered: being on a greenfield sites, and building here would both diminish the striking views from the villages and have an irreversible impact on flora and fauna and the local biodiversity. I think it's fair to say that many villagers are proud, if not very protective of the many and varied wildlife that choose to make these villages their home. 6 The importance of protecting our rural communities and the benefits that they provides in terms of both our physical and mental well-being should not be underestimated. 7 We need to make it our priority to protect the natural environment and habitats so that they remain undisturbed and thriving for future generations to enjoy. 8 The development in Eythorne with some 350+ new homes on top of the proposed 39+ at St Andrews Gardens will have a significant impact on the roads in Shepherdsweil especially the main routes in and out of the village. I have personally abandoned my journey exiting the village via Coxhill due to congestion on numerous occasions. Our village roads simply cannot accommodate this significant increase in traffic. Traffic, particularly at peak times already causes major problems; a) sufficient pedestrian/vehicle segregation due to a lack of suitable foot paths and, b) speed and volume of traffic. 9 Being able to comment on the Local Plan has been quite difficult. This process should have been made far more straightforward than this Similar to how objections can be made on the planning portal.
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Look at using former brownfield sites before carving up and concreting over virgin agricultural land. Far too many new houses are being built in Kent at this time. Our roads, water/waste infrastructure is already overstretched. There are insufficient amenities available to accommodate the additional inhabitants of these small villages.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Not Applicable</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>Introduction</p>
<p>Rep ID</p>	<p>SDLP1458</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1333275</p>
<p>Consultee Full Name</p>	<p>Adam</p>

	Harwood
Consultee Company / Organisation	Environment Agency
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Whole Plan
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Thank you for consulting us on this stage of the proposed Dover Local Plan.</p> <p>We broadly support the adoption of the regulation 19 document, provided it is updated to include the following comments and recommendations in regards to environmental constraints within the areas detailed.</p> <p>Fisheries, Biodiversity and Geomorphology</p> <p>The importance of ecological networks of linked habitat corridors (both within the District and linking to adjacent District) to allow the movement of species between suitable habitats, and to promote the expansion of biodiversity is defined in the NPPF and the Local Nature Recovery Strategy commitment of the government's 25-year Environment Plan and enacted by the Environment Act 2021.</p> <p>The connectivity of Local Wildlife Sites and other designated sites should not be disrupted through the allocation of sites for development and should aim to promote further connectivity of the ecological blue and green network through habitat creation and improvement. A numerical commitment to biodiversity net gain is required in order to be in line with the Environment Act 2021 and should be realised equally in both terrestrial and aquatic habitats using the Natural England Biodiversity and Rivers Metrics.</p> <p>Allocated sites should not encroach on any watercourse, and we urge a minimum 10m buffer zone to development proposals that contain or are adjacent to watercourses.</p> <p>Where there is opportunity for river restoration, such as habitat enhancement/creation, remeandering, improved fish/Eel passage and the restoration of culverted watercourses to open channels, we would like to see a commitment to actively pursue these aims.</p> <p>Special focus could be aimed at culverted sections of any watercourse. If/where the watercourse is toe-boarded site allocations should consider opportunities for removal.</p> <p>With reference to Paragraph 185 of the NPPF (2021) which states that planning policies and decisions should "limit the impact of light pollution from artificial light on ... dark landscapes and nature conservation." We would urge appropriate lighting design in line with best practice guidance set out by the Bat Conservation Trust as riparian corridors are essential for many migrating and nocturnal species.</p> <p>As an informative point, allocations should take into consideration the use of sustainable urban drainage systems (SuDS) and Natural Flood Management (NFM) measures for flow attenuation, filtration, and water conservation.</p> <p>We welcome engagement at the earliest opportunity to identify opportunities through development proposals for securing measurable gains for biodiversity.</p> <p>Groundwater and Contamination Land</p> <p>The wording on the water efficiency policy confirms the optional higher water efficiency standard for all new dwellings of 110 litres per person per day and is one that we support, it is also encouraging that the Local Planning Authority "strongly support" proposals seeking more stringent water efficiency measures. We have the following recommended corrections an alterations that should be made before the Regulation 19 documents are implemented.</p>

Instance 1 Page 232 CC4 - Water Efficiency

“All new dwellings must be built to the higher water efficiency standard under Regulation 36(3) of the Building Regulations, to achieve a maximum use of 110 litres per person per day. The Council will strongly support proposals that seek to reduce daily water consumption even further, through the use of additional measures such as rainwater harvesting. For non-residential development, development must achieve BREEAM ‘Very Good’ standard overall, including Very Good for addressing maximum water efficiencies under the mandatory water credits, unless it can be demonstrated that it is not technically feasible and viable”

S 4.38 Where sites are identified as being on contaminated land, then a land contamination assessment will be required. Where sites are in close proximity to noise generating sources like busy road, railways or commercial uses then a noise survey and appropriate mitigation will be required. Where sites are in areas of poor air quality or close to an Air Quality Management Area then an air quality assessment will be required in accordance with Policy NE4 - Air Quality and suitable mitigation should be provided.

The wording contaminated land has a legal definition under Part IIa S 78A. There are no current determined Contaminated Land sites in Dover as far as I know, the wording here needs to be changed to land affected by contamination .

Instance 2

4.110 The site is located within Ground source Protection Zone 3; contaminated land is registered at the site and part of the site falls within the AONB. These issues need to be addressed within any proposal.

This section is incorrect. Land contamination may have been logged at the site and it may be on the planning brownfield register perhaps, but we have not been notified by Dover that it has been determined formally as **Contaminated Land**.

The following sections need minor corrections

Instance 3

11.48 In the areas of the district which are not on mains drainage, water treatment package plants can be installed, subject to the approval of the Environment Agency in the first instance.

11.48 In the areas of the district which are not on mains drainage, water treatment package plants may potentially be installed if they can meet non mains drainage design criteria. If they cannot they should be consulted on with the Environment Agency in the first instance, as they may require a formal Environment Permit for any discharges.

Instance 4

11.51 For residential and commercial developments where there is no mains connection within a reasonable distance, applicants will be required to provide details of a water treatment package plant or equivalent that is compliant and has been approved by Environment Agency guidance, as part of a planning application. Applications for residential extensions will not be required to provide such details.

For residential and commercial developments where there is no mains connection within a reasonable distance, applicants will be required to provide details of a water treatment package plant or equivalent that is compliant with Non-mains drainage regulations as part of a planning application. Discharges to ground that do not meet relevant exemption criteria will also require an environment permit from the Environment Agency. Further guidance is on .go.uk. Applications for residential extensions may not be required to provide such details under planning, but will still have to ensure that drainage systems comply with Non-mains drainage regulations and meet Building regulations.

Instance 5

11.51 For residential and commercial developments where there is no mains connection within reasonable distance, applicants will be required to provide details of a water treatment package plant or equivalent that is compliant with, and has been approved by Environment Agency guidance, as part of a planning application. Applications for residential extensions will not be required to provide such details.

11.51 For residential and commercial developments where there is no mains connection within reasonable distance, applicants will be required to provide details of a water treatment package plant or equivalent that is compliant with Non Mains Drainage regulations and aligns with Environment Agency risk assessment guidance, as part of a planning application. In some instances a separate Environmental Permit may be required from the EA. Applications for residential extensions will be required to provide details to show any risks are not exacerbated and current systems comply with NMD Regulations.

Aside from the aforementioned alterations, we approve of the importance placed on Groundwater protection in a number of policies, and explanatory text. The plan covers everything reasonably well from our view point. While there is no explicit policy on land affected by contamination, brownfield sites and other potentially pollution development is mentioned in various policies under water infrastructure and the like are mentioned adequately.

Flood Risk

Policy CC5

We would recommend a slight amendment to the wording in this policy in order to comply with the NPPF's guidance's definition of a "design flood" Paragraph:002 Reference ID: 7- 002-20220825 Flood risk and coastal change - GOV.UK (www.gov.uk)

Where development does go ahead, all floor levels for living and sleeping accommodation should be set at a minimum of 300mm and 600mm above the design flood level for Flood Zones 2 and 3 respectively, including an allowance for climate change.

We have reviewed the **new sites** for housing allocation included in the Reg 19 Submission Summary of Site Allocations and would draw your attention to 3 of these sites that lie within FZ3: Northwall Road & Ethelbert Road, Deal Stonar Close, Sandwich

These site lie within Flood Zone 3a; this is an area considered to be at 'high risk' from flooding in the absence of tidal defences. Whilst we appreciate that both Sandwich and Deal are well defended from tidal flooding, there is always a 'residual' risk from inundation in such areas. Accordingly, we would request that your Authority initially considers whether these sites suitably address the requirements of the flood risk Sequential Test before allocating them in the local plan.

The updated PPG to the NPPF places more emphasis on residual risk; therefore when considering these allocations it should be understood that in order for development to be made safe, it is likely that the ground floor would not be suitable for any form of living accommodation. Detailed design would be subject to a site-specific FRA but given the potential depths of flooding in the event of failure or breach of defences, development is unlikely to meet the requirements of Policy CC5 or the Exception Test, unless all living and sleeping accommodation is set at first floor or above. If this is would be unacceptable to the LPA, then these sites should not be allocated.

Environment Management

Local Plan to 2040

The government's 25 year plan to improve the environment should possibly be referenced in the Local Plan (25-year-environment-plan.pdf (publishing.service.gov.uk). Although many items mentioned in the 25 year plan are covered in the Local Plan, it makes sense to align government plans with local plans.

Policy NE6: Encouraging to see a policy dedicated to aspects of water quality.

Water Cycle Study: Although the water cycle study has been updated, not all information contained in this report is the most recent available. There is a reference to the SE River Basin Management Plan (2016). This is currently being updated with more recent information now available at the following links:

Updated RBMP 2022 <https://www.gov.uk/guidance/south-east-river-basin-district-river-basin-management-planupdated-2022>

River basin management plans, updated 2022: challenges for the water environment

<https://www.gov.uk/government/publications/river-basin-management-plans-updated-2022-challenges-for-the-water-environment>

The link on challenges for the water environment includes important information on the climate emergency and the biodiversity crisis. It would be useful to consider this latest information in the Local Plan and Water Cycle Study and include links in the documents. Even though many of the items have been covered in the Local Plan and associated documents, it would add value to the plan by including links to the latest information.

Water Cycle Study, Point 6.5 Nutrient Neutrality - *As a result of the mitigation measures for demonstrating this being difficult to deliver it has effectively resulted in an embargo on the granting of permissions for new housing in the areas affected, since the advice was issued nearly two years ago.*

This statement possibly gives the wrong message about nutrient neutrality and may not show the importance to protecting European sites such as Stodmarsh. Although it might be difficult in some cases to achieve nutrient neutrality for developments, the concept of nutrient neutrality is to protect the environment so that future generation will be able to enjoy the benefits. The intention of nutrient neutrality is not to stop development, but rather to allow for sustainable development.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me via the email below

(DDC note - this is the full representation from Environment Agency on the Local Plan. Extracts have been made from this to create additional representations against relevant consultation points/policies)

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s)

you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination? Not Applicable

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Local Plan Consultation Point

Introduction

Rep ID

SDLP1619

Rep Status

Processed

Consultee ID

1333375

Consultee Full Name

Ms
D C
King

Consultee Company / Organisation

Agent Full Name

Gurdev
Moore

Agent Company / Organisation

Rubix Estates

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.

Full Plan

2 - Do you consider this part of the Plan sound?

Yes

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)

4 - Do you consider the Local Plan is Legally Compliant?*

Yes

5 - Do you consider the Local Plan complies with the Duty to Co-operate?

Yes

6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

(DDC Note - covering letter stated the below in response to question 1 - Full cover note attached to this representation as well as SDLP1680 as an omission site to Alkham)
1 - Which part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.
Vision, Objectives, Policies SP3, SP4, SP5, SAP16, PM1, PM2, H1, TI3

	<p>Please refer to supporting cover letter. We support the growth in Alkham and encourage further sustainable and attractive development. This land is 2.16 hectares acres and is available for market and affordable housing.</p> <p>(DDC Note - Summary section extracted from covering note:)</p> <p>SUMMARY</p> <p>Overall, our representations conclude that the Plan is legally compliant, and provides a sound evidencebased approach to planning in the District over the plan period. It finds further that Dover District Council has sufficiently met the Duty to Cooperate.</p> <p>We look forward to onwards participation in the Examination of the Plan in 2023, and towards the progression of our promotion of this land for sustainable residential development.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	Moore Rubix Estates 1626 (Alkham) Att1_Redacted.pdf
Local Plan Consultation Point	Introduction
Rep ID	SDLP1639
Rep Status	Processed
Consultee ID	1333394
Consultee Full Name	Shelley Miller (Clerk)
Consultee Company / Organisation	Tilmanstone Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Whole Plan
2 - Do you consider this part of the Plan sound?	Yes

<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Not Applicable</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Not Applicable</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>It must be remembered that much of the work on this was done under the difficult circumstances of COVID restrictions. The Parish meeting @DDC way back in February 2019 when the first draft of the site allocation document was being prepared.</p> <p>Since then the sites have been visited and assessed. Some rejected and some retained. Since then there has been a further 'call for sites' each new site requiring assessment.</p> <p>Alongside all of this the other elements of the Local Plan have been worked on . A considerable body of work in addition to the day to day work of the planning and enforcement departments.</p> <p>Tilmanstone Village is not mentioned by name anywhere in the documents probably because there are no identified sites within the village confines. The part of our Parish that adjoins Whitfield is still in the plan but as part of the Whitfield expansion.</p> <p>Tilmanstone Village is included ,but not by name, when 'other' settlements are referred to especially when it comes to the drainage element of the infrastructure document and it is a stated aim that settlements dependent on cesspool drainage should be especially considered for improvement. Small, infill development within the confines of 'other' settlements will still be considered under the current NPPF .</p> <p>Tilmanstone will be affected by the expansion of Elvington. Doubling the size of Elvington which already scores highly on the indices of deprivation will put a great strain on existing services and infrastructure. New housing without adequate local infrastructure puts significant strain on local amenities such as medical services, school and playgroup places as well as increasing traffic on our roads. The existing sewerage system is already overloaded and any future developments will only exacerbate this problem.</p> <p>It should be noted with some concern that the expansion of the employment opportunities at Pike Road Industrial Estate is not substantiated by figures - it's marked N/A in the document. Barville Road was identified for improvement even before the A256 was built - improvements to this very busy, nominated HGV route have never been done and the increase in domestic traffic accessing the A256 as a result of the Elvington expansion will need to be addressed.</p> <p>Traffic measurement flows were taken just post pandemic and clearly show a flow much lower than the parish's normal traffic volume.</p> <p>If development is to be permitted it should be linked to a S106 agreements to improve the facilities within the parish, parishioners have mentioned that they "have a bus pass, but have no buses to use it on" The Parish Council should be consulted on allocation of funding to provide Road improvements to Barville Road. Greater consideration to prevent ad hoc use of 'windfall sites' which do not meet specified road safety or other material standards.</p> <p>In view of DDC's declaration of a climate emergency and cost of living crisis we are disappointed to see that the Council does not intend to use its powers under the Planning and Energy Act 2008 to set energy efficiency standards which go beyond the minimum required by Building Regulations for new homes.</p> <p>The Parish council welcome the proposals to protect and enhance the character, fabric, features, setting or views into and from Historic Parks and Gardens, especially in relation to Waldershare Park, a significant portion of which falls within our parish.</p> <p>Proposed developments will put additional strain on the current drainage system and inevitably cause traffic congestion with resulting increase in pollution levels.</p> <p>Whilst we acknowledge that the parish must grow, future developments should not put additional strain on the current infrastructure</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful</p>	

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Introduction
Rep ID	SDLP1303
Rep Status	Processed
Consultee ID	1333091
Consultee Full Name	James Kenyon
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Whole Plan
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	We have no comments to make at this stage of the Local Plan process. Please continue to consult our planning team on appropriate planning policy consultations and planning applications. Our separate Developer Experience team should be contacted by developers ahead of applications being submitted in relation to asset protection or diversionary measures and for matters relating to new or upgraded connections via dx@affinitywater.co.uk.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	Kenyon Affinity Water 1134 Att1.pdf
Local Plan Consultation Point	Introduction
Rep ID	SDLP1192
Rep Status	Processed
Consultee ID	1332924
Consultee Full Name	Amy Aldridge
Consultee Company / Organisation	Gladman Developments Ltd
Agent Full Name	Amy Aldridge
Agent Company / Organisation	Gladman Developments Ltd
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Introduction / Conclusion
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Introduction</p> <p>Context</p> <p>Gladman welcome the opportunity to comment on the Dover District Local Plan consultation, and request to be updated on future consultations and the progress of the New Dover District Local Plan. Gladman specialise in the promotion of strategic land for residential development and associated community infrastructure and have considerable experience in contributing to the development plan preparation process having made representations on numerous planning documents throughout the UK, alongside participating in many Examinations in Public. The Council will need to carefully consider its policy choice and ensure that the proposed approach positively responds to the revised National Planning Policy Framework (2021). There will also be a need to take consideration of changing circumstances associated with national planning policy and guidance over the course of the plan preparation period, including the Government's emerging proposals for the planning system. Gladman Developments have land interests in Dover and support the inclusion of SAP 14 - Land off Cross Road (DEA008) and Policy SAP46 - Land adjacent Langdon Court Bungalow, The Street, East Langdon (LAN003) as allocations for residential development. This representation provides additional information regarding the suitability and deliverability of these sites to support their continued inclusion. However, Land at Cross Road</p>

(DEA020) has been removed from the plan, with the only explanation offered being that the site already has permission (Dover DC Application reference: 20/01125). Gladman disagree with this approach and consider that the site should be recognised in the Local Plan as either an allocation or committed development. The site is not currently included on the Policies Map as either committed or future development, nor through the redrawing of the settlement boundary. Gladman looks forward to engaging further with the Council as the plan making process progresses.

Plan Making

The National Planning Policy Framework sets out the four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that:

- Positively Prepared – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- Justified – the plan should be an appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with National Policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

Legal Compliance

Duty to Cooperate

The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. As demonstrated through the outcome of the 2020 Sevenoaks District Council Local Plan examination and subsequent Judicial Review, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan. Whilst Gladman recognise that the Duty to Cooperate is a process of ongoing engagement and collaboration, as set out in the Planning Practice Guidance (PPG) it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard, Dover must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross-boundary strategic issues, and the requirement to meet any unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation. The revised Framework has introduced a number of significant changes to how local planning authorities are expected to cooperate, including the preparation of Statement(s) of Common Ground (SoCG) which are required to demonstrate that a plan is based on effective cooperation and agreements made by neighbouring authorities where cross boundary strategic issues are likely to exist¹. The SoCG(s) should provide a written record of the progress made by the strategic planning authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross. boundary matters have been considered and what actions are required to ensure issues are proactively dealt with.

Sustainability Appraisal -

In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives. Gladman note that the Proposed Submission Local Plan is accompanied by a Sustainability Appraisal dated September 2022. The Council should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Local Plan's decision-making and scoring should be robust, justified, and transparent.

National Planning Guidance

National Planning Policy Framework The National Planning Policy Framework sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally prepared plans for housing and other development can be produced. The NPPF requires that plans set out a vision and a framework for future development and seek to address the strategic priorities for the area. Local Plans should be prepared in line with procedural and legal requirements and will be assessed on whether they are considered 'sound'. The NPPF reaffirms the Government's commitment to ensuring up-to-date plans are in place which provide a positive vision for the areas which

they are responsible for, to address housing, economic, social, and environmental priorities and to help shape the development of local communities for future generations. In particular, paragraph 16 of the NPPF states that Plans should:

“a) Be prepared with the objective of contributing to the achievement of sustainable development; b) Be prepared positively, in a way that is aspirational but deliverable; c) Be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees; d) Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals; e) Be accessible through the use of digital tools to assist public involvement and policy presentation; and f) Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).” To support the Government’s continued objective of significantly boosting the supply of homes, it is important that the Dover District Local Plan provides a sufficient and variety of land that can be brought forward, without delay, to meet housing needs. In determining the minimum number of homes needed, strategic plans should be based upon a local housing needs (LHN) assessment defined using the standard method. LHN sets the minimum number of homes required and this is the starting point for determining the number of homes required in any local planning authority area, unless there are circumstances to justify an alternative approach. Once the minimum number of homes that are required is identified, the strategic planning authority should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. In this regard, paragraph 68 sets out specific guidance that local planning authorities should consider when identifying and meeting their housing needs, with Annex 2 of the NPPF providing definitions for the terms “deliverable” and “developable”. Once a local planning authority has identified its LHN, these needs should be met as a minimum, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so, or the application of certain policies in the Framework would provide a strong reason for restricting the overall scale, type and distribution of development (paragraph 11b).). Where it is found that full delivery of housing needs cannot be achieved (owing to conflict with specific policies of the NPPF), local authorities are required to engage with their neighbours to ensure that identified housing needs can be met in full (see paragraph 35). Paragraph 22 of the NPPF expects that local plans should look ahead over a minimum 15-year period from adoption. The Local Plan will need to be adopted at the latest by 2025 for the requisite 15-year period to be met. Gladman recommend that the Council keep abreast of the Levelling Up and Regeneration Bill (LURB) which is currently making its way through Parliament. The LURB contains some significant changes in respect of local plan production including the introduction of a set of national development management policies, a new Infrastructure Levy and design codes to be prepared by each individual local planning authority.

Planning Practice Guidance

The Planning Practice Guidance (PPG) was first published by the Government to provide clarity on how specific elements of the NPPF should be interpreted. The PPG has been updated to reflect the changes introduced by the revised NPPF to national planning policy and provides further clarity on how specific elements of the Framework should be interpreted when preparing Local Plans.

(DDC Note: This comment is the Introduction and Conclusion extracted from the Document provided by Galdman Development Ltd - Attached - The rest of the document has been divided up across the relevant sections of the Local Plan document.)

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Not Applicable

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files	Aldridge Gladman 0948 Att2.pdf
Local Plan Consultation Point	Introduction
Rep ID	SDLP1653
Rep Status	Processed
Consultee ID	1331868
Consultee Full Name	Ruth Marczin-Bundy (Parish Cllr)
Consultee Company / Organisation	Alkham Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Introduction
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Please accept Alkham Parish comments and suggestions for DDC Local Plan. This submission is a representative view of much of the community in Alkham. It is submitted as a word document by email, as there have been problems with the system accepting entries online. Furthermore, the document stands alone and gives a good picture for the vision of the rural Alkham Valley working towards being an active partner in nature regeneration of the UK. This will be brought about by increasing wildlife biodiversity and conservation, through actioning habitat creation with wildflower regeneration and tree planting and rewilding, for climate change resilience in this AONB within the District of Dover. We thank you for your kind consideration and look forward to further discussions and plans moving forward.</p> <p><i>(DDC note - the text above is taken from covering email sent with the representation)</i></p> <p>1 Introduction</p> <p>1.1 This report examines the Dover District Local Plan to 2040 and tries to highlight the impact and effects of the proposals on the village of Alkham from a resident's perspective. The report therefore considers each theme of the Dover District plan from an Alkham viewpoint .</p> <p><i>'Neighbourhood planning is a right for communities introduced through the Localism Act 2011. Communities can shape the development in their areas through the production of Neighbourhood Development Plans, Neighbourhood Development Orders and Community Right to Build Orders'. (Royal Town Planning Institute)</i></p> <p>1.2 Whilst neighbourhood plans cannot block developments which form part of the Local Plan i.e. the Dover District Plan, they can shape where development will go and what it will look like. Neighbourhood plans can also be used to shape the future focus of an area. Whilst Ash and Worth produced Neighbourhood Plans which have been incorporated into the DDC Plan, Alkham Parish Council took a decision prior to Covid not to develop a Neighbourhood Plan but through the community considerable work has been undertaken to identify key issues within the Parish boundary and I have tried to incorporate these views in the comments I have made.</p> <p>1.3 For purposes of the DDC Local Plan Alkham Parish sits within the Neighbourhood Area of West Dover, but for purposes of this report the comments only relate to the impact upon the Parish of Alkham and not to other parishes within the same identified neighbourhood area.</p> <p>1.4 Alkham is a village and civil parish in the Dover district of Kent, situated about four miles west of Dover. As well as the village itself, the parish contains the settlements of Chalksole and Ewell Minis.</p>

1.5 Alkham did not appear in the Domesday Book but in 1093 appeared as a subordinate church to Folkestone. It has therefore existed as a settlement for nearly 1000 years. The 2021 Census lists a population of 708 between 2011 and 2021. It covers an area of 13.00km² with a population density of 5454.44/km², a growth of 2.9%. The 2021 Census reflects that the population consists of 347 males and 361 females of which 682 were born in UK, 8 in EU, 2 in other parts of Europe, 9 in Middle East and Asia 4 in Africa and 2 in other countries. The population as it stands is predominately of retirement age.

Comment 1

I consider it essential that for the parish to grow and attract more young families through a balance between conservation, recreation and planned development to ensure the heritage, the SSSI green space of the valley, and a rural community can thrive in any plans being taken forward by the District Council. As can be seen later in the report I would ask that the Parish be considered for Conservation Area Status to ensure the natural resources offered by the Green Space can be maximised for the District as a whole.

2 Basic Conditions and Development Plan Status –

2.1 In order to meet the basic conditions set out in law in the 2011 Localism Act the District Plan must:

- • Have regard to national policies and advice contained in guidance issued by the Secretary of State.
- Contribute to the achievement of sustainable development in general conformity with the strategic policies of the development plan for the area.
- Be compatible with all current legislation and Human Rights Obligations.

Comment 2

I take no issue with the way in which the plan has been developed and its adherence to national planning guidance, land allocations and other strategies relevant to plan development at the current time. However, I note that the District Plan mentions 7 Neighbourhood areas and has formed 5 Neighbourhood Fora and makes a statement that communities have been part of the development process. I would ask for information on how Alkham is represented through the Neighbourhood Forum Framework and the consultation process both to develop the Plan thus far and to take it from inception to delivery be provided, as no one locally including the Parish Council Clerk seems to be aware of how Alkham is represented in the consultation process.

3 SECTION 1.46 of the DDC Plan - Key Issues and Objectives

3.1 In section 1.46 a number of key issues have been included for the District namely climate change, the move to carbon neutrality, flood management, sustainable development, the Whitfield Urban Expansion, combating the impact of Covid, economic growth, strategic transport growth, sustainable transport initiatives, appropriate infrastructure development, conservation, net gain biodiversity, achieving a balance between conservation and restoration. Wide ranging objectives have been set for each of these targets.

12 Conclusion

Whilst accepting the broad principles of the plan for the District as a whole the impact of the urban development planned is significant for the village of Alkham lying as it does between the planned growth areas of Hawkinge and Whitfield

Transport links are problematic, the fact that the road is unclassified does little to ensure adequate maintenance, the rising number of cars is untenable long term but there is a strong local community who wish to make the Parish a sustainable place for the future. Continued public transport is seen as a vital part of the solution.

I have tried to show the potential of the area of Alkham and the way it could be used to give a balance between recreation and conservation ensuring a major natural amenity in the area is protected yet becomes a green asset within the planning parameters and government targets and look forward to assisting DDC achieve these objectives.

Written by an Alkham resident which is supported by the Alkham Community

(DDC note - The full representation from Alkham PC is attached to this representation for information. However, specific comments from that main representation document have been extracted into separate consultation points/policy areas, relevant to the comments made. The comments extracted to this section are relevant to the Introduction / whole plan process)

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness

matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	Marczin-Bundy Alkham PC Em Att1.pdf
Local Plan Consultation Point	Introduction
Rep ID	SDLP2009
Rep Status	Processed
Consultee ID	1268546
Consultee Full Name	Ms Denise Bottle
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Eastry
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I've been on the Local plan to have my say and how they expect people to negotiate the minefield and leave your objections or comments heaven oly knows. I feel fir older folk. How do I submit my comments please?

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Introduction
Rep ID	SDLP1439
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Introduction
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>DDC Note The text below is an extract from the original representation which is attached to SDLP1438.</p> <p>Throughout the Reg 19 Local Plan there are references to the secretive 'pre-application process' which excludes the public, We submit that this process can exacerbate problems referred to in the 2020 report on England's planning processes from Transparency Intl UK; 'Permission Accomplished : Assessing corruption risks in local government planning'; problems TIUK recommend resolving with 'increased transparency, tighter rules, and strengthened oversight'.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	Introduction
<p>Rep ID</p>	SDLP2016
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1262466
<p>Consultee Full Name</p>	Mr Paul Dawkins
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	Introduction
<p>2 - Do you consider this part of the Plan sound?</p>	No
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	Positively prepared Justified Effective

	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Please plan an anti roadside litter campaign with other local councils port operators and crossing operators. Issue litter sacks with funding from Shepway Canterbury Port Authorities Ferry operators Tunnel operators
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Introduction
Rep ID	SDLP1428
Rep Status	Processed
Consultee ID	1333264
Consultee Full Name	National Grid (Avison Young)
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Whole Plan
2 - Do you consider this part of the Plan sound?	Yes

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>National Grid has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p>About National Grid</p> <p>National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses. National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use. National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.</p> <p><i>(DDC Note - Comment here extracted to Policy PM1)</i></p> <p>Further Advice</p> <p>National Grid is happy to provide advice and guidance to the Council concerning their networks. Please see attached information outlining further guidance on development close to National Grid assets. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect National Grid's assets.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Introduction
Rep ID	SDLP1612
Rep Status	Processed

Consultee ID	1333374
Consultee Full Name	Linda Hedley (Clerk)
Consultee Company / Organisation	Ringwould with Kingsdown Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Whole Plan
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I would also add the following as discussed at the PC last meeting. The website and the online portal have been very difficult to follow, after an hour going through all the 'click here' bits I gave up. I am rather disappointed that a response form could not have been placed in an easy to reach position on the DDC website. Given that some of the first consultations were carried out during the Covid-19 pandemic I am rather surprised about the number of comments you received. However there is more concern with the amount of people that did not have any access to the internet at all, or who were not used to it, and therefore could not make any comments, that the council has received a large enough cross section of the public comments to be fair and transparent
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

Local Plan Consultation Point	Introduction
Rep ID	SDLP2040
Rep Status	Processed
Consultee ID	1274683
Consultee Full Name	David Reid
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Introduction
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	One minor criticism on first skim through.....grey print in black is difficult for we elderly(!) as is grey on green but.....
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Introduction
Rep ID	SDLP2038
Rep Status	Processed
Consultee ID	1274769
Consultee Full Name	Karen Phillips
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Introduction
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	You make it so difficult for some people to access documents, 1 for one are one of them.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Introduction
Rep ID	SDLP1724
Rep Status	Processed
Consultee ID	1333477
Consultee Full Name	Cllr T Byfield
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Introduction
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note: The text below is an extract from the original representation which is attached to SDLP1438.</p> <p>Dover District plan report on Development management</p> <p><i>I have been tasked with reviewing the Dover local plan in respect of design and development. This is a very large document, so I have tried to break it down into manageable portions.</i></p> <p><i>The Dover plan does acknowledge that there are constant improvements in design and the plan will need to evolve and to consider new technology, improvements in materials and methods of construction.</i></p> <p><i>I have therefore taken the policies which are attached at the end of this document and extracted sections which I think will be of interest the town council and where I believe comment is due.</i></p> <p><i>I believe that the planning committee needs to be aware of these points extracted. My comments in italics</i></p> <p>To conclude, the local plan is a very large document and I think it needs to be broken down into a more easily readable document</p>

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Introduction
Rep ID	SDLP1728
Rep Status	Processed
Consultee ID	1333477
Consultee Full Name	Cllr T Byfield
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Introduction
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>DDC Note: The text below is an extract from the original representation which is attached to SDLP1438.</p> <p>Dover District plan report on Development management</p> <p><i>I have been tasked with reviewing the Dover local plan in respect of design and development. This is a very large document, so I have tried to break it down into manageable portions.</i></p> <p><i>The Dover plan does acknowledge that there are constant improvements in design and the plan will need to evolve and to consider new technology, improvements in materials and methods of construction.</i></p> <p><i>I have therefore taken the policies which are attached at the end of this document and extracted sections which I think will be of interest the town council and where I believe comment is due.</i></p> <p><i>I believe that the planning committee needs to be aware of these points extracted. My comments in italics</i></p> <p><i>The enforcement of planning is not mentioned as far as I can see, we all know this requires improvement, if this is not done the Dover district plan is just paper which will not be followed.</i></p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	Introduction
<p>Rep ID</p>	SDLP1762
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1273345
<p>Consultee Full Name</p>	Dennis Hill
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Introduction
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>1. The format of the consultation and requirement for on line comment is overly complex for the ordinary citizen to comment. Hence this representation being made via PSF rather than on line. Many people would already have given up there comment!</p> <p>2.Representation has already been made with regard to this site by many local residents in the first round of consultation. Despite very considerable opposition from local residents I cannot see any material change in the policy for this site. What is the point of local consultation if residents comments are totally ignored?</p> <p>3.The main objections to use of this site for residential use are numerous:-</p> <p>* The land is Grade 3 agricultural land- this is defined as good/moderate quality agricultural land with moderate limitations. Food security in the UK has been highlighted articularly since the war in Ukraine and has recently been highlighted by none other than th eHead of MI5 as a matter of national security. There is no present justification for th e loss of prime agricultural land.</p> <p>*Although on the OS map the site forms a completion of a development block between Dover Road and Liverpool Road, the topograhly of the siteis such that it forms an important part of the Glen Road valley, on steep ground with areas to the bottom liable to flooding.</p> <p>*The site is devoid of any local services, the nearest being in Woolmer village which is a walk up the steep Grams Road which doe not even have a continuous pavement. The nearest Primary school at Kingsdown is over subscribed. Most of the Local GP surgeries are over subscribed and not taking on new patients. Downs Cof E School may well be within 1200m as the crow flies but more than 1.5miles by road. Note that Castle Community College is now Walmer Beacon.</p> <p>*We would question whether the site is within 1000m of Walmer Station- even as the Crow flies. The site is served by a single track road – Liverpool Rd /Glen Rd which themselves are served off a network of very narrow roads with no or limited footpaths. A walk to the main bus stop at Walmer Village is up the steep Grams Road with only partial footpathing.</p> <ul style="list-style-type: none"> • Almost without doubt all movements to and from this site will be by car – hardly Climate Change Mitigation even with electric cars whose embodied carbon is higher than conventional combustion engines. • Little mention is made of the adjacent Hawkshill Down site which is and important public open space which will be undoubtedly adversely affected by a development at Rays Bottom.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I would be happy to partake in the oral part of the examination to help put across the above reasoning and the feelings of the local community.
Include files	
Local Plan Consultation Point	Introduction
Rep ID	SDLP1770
Rep Status	Processed
Consultee ID	1331526
Consultee Full Name	Mrs Mairi Jones
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Introduction
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	There has been inadequate consultation with the Alkham Valley, in particular the impact of housing growth in transport and green infrastructure, the AINB and SSSI DDC Note: Please see attached for detailed representation which has been divided against numerous consultation points.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Please see appended report

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I can speak to any of the points raised in the attached document
Include files	SDLP1770 Jones - Att 1_Redacted.pdf
Local Plan Consultation Point	Introduction
Rep ID	SDLP1774
Rep Status	Processed
Consultee ID	1331526
Consultee Full Name	Mrs Mairi Jones
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Introduction
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note: Please see detailed representation (attached at 1770) which has been divided against numerous consultation points. The representation has images within the text. The text below is an extract from the detailed representation.</p> <p>I take no issue with the way in which the plan has been developed and its adherence to national planning guidance, land allocations and other strategies relevant to plan development at the current time. However I note that the District Plan mentions 7 Neighbourhood areas and has formed 5 Neighbourhood Fora and makes a statement that communities have been part of the development process. I would ask for information on how Alkham is represented through the Neighbourhood Forum Framework and the consultation process both to develop the Plan thus far and to take it from inception to delivery be provided, as no one locally including the Parish Council Clerk seems to be aware of how Alkham is represented in the consultation process</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	Please see appended report

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I can speak to any of the points raised in the attached document
Include files	
Local Plan Consultation Point	Introduction
Rep ID	SDLP1787
Rep Status	Processed
Consultee ID	1333651
Consultee Full Name	Rosemary Rechter
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Introduction
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I have read the Dover and Deal Green Party contribution, and although I am not a member of the Green Party, I would like to endorse what they have to say.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant	

<p>and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	No
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	

Monitoring and Review

Local Plan Consultation Point	Monitoring and Review
Rep ID	SDLP16
Rep Status	Processed
Consultee ID	1259309
Consultee Full Name	Mr Peter Jull
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Monitoring & Review
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The plan was compliant until the day before the Regulation 19 consultation was authorised Canterbury City Council published their Regulation 18 consultation including significant development adjacent to the authority boundary at Aylesham.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	If this proceeds it makes some of the conditions proposed for SAP24 irrelevant and the reasons for not including proposed development north of Aylesham outdated. There needs to be significant consultation with Canterbury City Council on the future of Aylesham to ensure the provision of employment land, retail etc. in line with a masterplan that provides effective local planning.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	By the time Public Examination takes place, Canterbury's local plan will have progressed to the point that comments need to be updated/

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Monitoring and Review
Rep ID	SDLP371
Rep Status	Processed
Consultee ID	1331537
Consultee Full Name	Mr William Ratchford
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 40. St. Margaret's-at-Cliffe. STM010. Land located between Salisbury Road and The Droveaway, St Margarets-at-Cliffe. Page 171
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Site STM010 Policy SAP40 Reg 19 Local Plan (2022)</p> <p>This is additional to the group submission made by residents in The Droveaway, St Margaret's Bay to which I am a signatory.</p> <p>This is the first practical opportunity for me to comment on the draft local plan for this site due to STM010 being removed from allocation in SAP40 Reg 18 by Dover DC before being re-allocated in Reg 19. I live within 30 meters of the site.</p> <p>The DDC 2012 assessment form, which informed the adopted Land Allocation Local Plan 2015, said no to the inclusion of land site SAD28 (the same site as SMT010 in Policy SAP40 of the draft Local Plan to 2040). I largely concur with its findings and quote some of them below along with my comments.</p> <p>(The quotations are from the above mentioned assessment form, obtained by a Freedom Of Information Request, and released for public viewing by DDC Freedom Of Information Office)</p>

From the section entitled "Landscape Impact":

"The site lies within the AONB and close to the Heritage Coast. It abuts National Trust land to the NE. The site is on a crest of a hill and, despite the screening, would be visible from a long distance (Redevelopment of a house adjacent to this, but lower, on The Drove way had to undergo numerous changes before it was considered acceptable) Any development on the site would, therefore, have a highly detrimental impact on the designated landscape."

Comment: Actually the site lies not only in an AONB, but also within the Heritage Coast and a BOA, and several hundred yards from an SSSI and an SAC. The development of 78 and 80 The Drove way, immediately adjoining STM010, included the removal of vast amounts of chalk to allow the two chalet bungalows to sit low enough so that their rooflines did not impinge on the AONB landscape (I was a daily eyewitness to that). It must also be noted that DDC's Regulation 18 draft, as well as documents related to the Local Plan 2015, referred to STM010 as being adjacent to rather than in the AONB—a significant error on DDC's part and one which could be construed as influencing its decisions regarding STM010's eligibility for housing.

From the section entitled: "Biodiversity":

"The site is identified as chalk grassland to the NE(STM09), which is a priority habitat under the Natural Environment and Rural Communities Act 2006 and is a material consideration under PPS 9. That section of the site is not amenable to development. Apart from a small area of scrub to the SW, the rest of the site is arable with some hedging along boundaries. The arable is chalk-based and maybe amenable to reversion to chalk grassland with appropriate management.

The site could provide foraging and flight lines for bats. EIA Screen: Essential due to sensitive location Appropriate Assessment: The site is within 300m of the Dover to Kingsdown Cliff SAC and screening would be necessary. There would also be a requirement to contribute to the Thanet Coast Mitigation strategy."

Comment: I concur with the conclusions of the above quotation.

From the section entitled: "Green Infrastructure":

"The site is bounded by footpath ER26 along the SW, the vehicular cul-de-sacs of the Drove way to the NW, Salisbury Road to the SE and by National Trust land to the NE, providing a wide range of recreational walking, together with the biodiversity associated with chalk grassland and its associated hedges and scrub. The ambience of the area is demonstrated by the numbers of visitors to the coastal areas and the levels of usage of paths, both public and permissive. The site is within the 'restore and conserve' area of the GI network, reflecting the real opportunities for GI. Development would harm the existing GI and the opportunities for enhancement."

Comment: I concur with the conclusions of the above quotation.

From the section entitled "Proximity to Road Network"

"The two roads that lead to the site appear to be unadopted and not well maintained. There is no access onto the site. The site is located in the area between Salisbury Road and The Drove way. Salisbury Road is a single track unadopted road and there are no footways along its length. The Drove way is also a single track road but is adopted. However, the road already serves a large number of dwellings and there are no footways beyond the junction with Salisbury Road. Pedestrian access to services including the local bus stop is therefore poor and reliance on the car is likely to be high as a consequence."

Comment: The Droveaway is adopted. Cars are parked all along the Droveaway allowing single lane access and nothing more. I concur with the above quotation otherwise.

From the section entitled "Analysis":

"The site is located in the AONB in a highly visible location at the top of a hill on a plateau. Any development would have a detrimental impact on this designation. Access to the site is unsuitable on unadopted roads.

Comment: The Droveaway is adopted but very unsuitable. Otherwise I concur with the above quotation.

From the section entitled: "Consider for inclusion in the Submission Document?"

(Answer) "No"

Comment: I have lived at the end of The Droveaway for thirteen years. The land in question is a thirty seconds walk from my house. The above mentioned council document faithfully reflects the present situation except that now there are even more parked cars on The Droveaway and its size and condition have not changed. That DDC's present Planning Office have allocated STM010 as a building plot, thus radically negating their own past assessment, is understandably shocking.

I can only think that they have failed to consult their own archives —e.g. how could they otherwise have mistakenly identified the land as 'adjoining' the AONB? I also fear that they failed to visit and visibly assess the land, its setting and its accessibility. If they have failed to, it is crucial that they do visit in order to understand the error of their recent judgment. The DDC Planning Office must be made to understand that the construction of at least ten 'executive' houses on the highest point of our local AONB, no matter what attempts are made to screen, disguise, or 'landscape', can in no way be construed as a beauty enhancement or a road improvement. It would be unmistakably an insult to the designation AONB and the Heritage Coast, a dangerous precedent for future assaults on our protected environments, and a further deterioration of existing road difficulties.

I find the inclusion of Site SMT010 in policy SAP40 of the DDC Local Plan to be, as a decision, unsound, not justified, inconsistent with National Policy, and not legally compliant, and therefore I object strongly to its inclusion in the proposed Local Plan.

Thank you for the opportunity to submit my opinion.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The removal of STM010 as an allocation from policy SAP40 of the DDC Local Plan for the reasons given above

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Monitoring and Review
Rep ID	SDLP702
Rep Status	Processed
Consultee ID	1261008
Consultee Full Name	Dr John Garcia-Rodriguez
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Monitoring and Review
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The latest Authority Monitoring Report dated 2020/21 states that Dover District Council is in the process of agreeing a Statement of Common Ground with Canterbury City Council and Thanet District Council. It is not clear that these have been agreed. In the recent consultations for this new plan, I was informed by Dover District Council officers that they had not known of the 2 very large developments on the borders of Aylesham ie in Womenswold and Adisham by Canterbury City Council. Together with DDC's land allocation plans his would create a continuous large housing area - effectively a new town eventually three or four bigger than Sandwich but without anything like the facilities. There has evidently been a lack of discussion, consultation and collaboration between DDC and CCC. This forms a major part of DDCs plan and so it is obvious that overall the plan cannot be sound. The late removal of a few hundred houses from DDC's plan shows a late attempt to adapt to CCC's plans but that is not sufficient. There needs to be joint planning and joint consultation rather than fragmentation between 2 local authorities.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Monitoring and Review
Rep ID	SDLP710
Rep Status	Processed
Consultee ID	1261008
Consultee Full Name	Dr John Garcia-Rodriguez
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Monitoring and Review - Duty to Cooperate
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The latest Authority Monitoring Report dated 2020/21 states that Dover District Council is in the process of agreeing a Statement of Common Ground with Canterbury City Council and Thanet District Council. It is not clear that these have been agreed. In the recent consultations for this new plan, I was informed by Dover District Council officers that they had not known of the 2 very large developments on the borders of Aylesham ie in Womenswold and Adisham by Canterbury City Council. Together with DDC's land allocation plans his would create a continuous large housing area - effectively a new town eventually three or four bigger than Sandwich but without anything like the facilities. There has evidently been a lack of discussion, consultation and collaboration between DDC and CCC. This forms a major part of DDCs plan and so it is obvious that overall the plan cannot be sound. The late removal of a few hundred houses from DDC's plan shows a late attempt to adapt to CCC's plans but that is not sufficient. There needs to be joint planning and joint consultation rather than fragmentation between 2 local authorities.

<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Not Applicable
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	

Key Characteristics of Dover District

Local Plan Consultation Point	Key Characteristics of Dover District
Rep ID	SDLP5
Rep Status	Processed
Consultee ID	1254085
Consultee Full Name	Mrs Sue Ward
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Section 1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The NPPF Section 2 requires development to be sustainable and to use natural resources prudently. Section 20 requires conservation of the natural and historic environment. Section 73 requires that sites should be well located and supported by the necessary infrastructure. This plan fails in many respects. One of the attractions of Dover District has always been its rural and historic nature. This will be destroyed with the large scale of expansion at Whitfield. The town centre of Dover is already unattractive and semi derelict as a direct result of the existing expansion at Whitfield. It has a very fragmented shopping area, which results in most people preferring to shop in the superstores of Whitfield or the attractive small stores in Canterbury. If no one wishes to visit the town, they miss out on the historic elements, which are currently under promoted. The district is a net exporter of labour, so the need to travel to jobs outside the district is unsustainable in terms of carbon footprint. Unlike Dover town, Whitfield has no rail connection.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Development should be centred on the town of Dover to make it a vibrant and welcoming place. Brownfield sites should be prioritised, rather than taking the easy option of building on high grade arable land, Derelict buildings should be converted into high quality housing in order to turn around the decline of Dover town. In view of the Climate Emergency, housing should only be built with good access to the rail network in order to reduce the carbon footprint.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I have already made these points at the Regulation 18 stage, but they have been ignored
Include files	

Key Issues for the Local Plan

Local Plan Consultation Point	Key Issues for the Local Plan
Rep ID	SDLP94
Rep Status	Processed
Consultee ID	1330827
Consultee Full Name	Christopher Shilling
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	My comments relate to 1.46, 2.2, 3.17 and SP2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I am confining my comments to the area in which I live, and make my representation as a concerned citizen who believes the plan is unsound and possibly not legally compliant.</p> <p>- I fail to see how the sustainability report can be adequate. The buildings proposed at the back of St Andrews will interfere with the habitat of significant numbers of bats. This has not been taken into account.</p> <p>-The plan does not meet the stated goal of mitigating climate change (1.46). Building in and around Shepherdswell (and other villages) will result in a large number of additional journeys by car. There are virtually no employment opportunities in Shepherdswell or these areas, and the large majority of journeys will be by car.</p> <p>- The plans fails to address its stated aim of ensuring safe air quality (SP2). The extra buildings in shephedswell will inevitably increase pollution. More particularly, exhaust fumes will increase given that the roads in the village are mostly single track with passing places. There is already much congestion at rush hour times. Extra journeys will make this worse.</p> <p>- Extra houses in Shepherdswell, and the additional traffic that will follow, contradicts the Council's aim to 'Promote sustainable transport initiatives' (1.46 and 2.2). Traffic levels are already such as to make cycling and walking difficult (the roads in and around Shepherdswell are often without pavements. Many school children use Church Hill to walk to and from school / bus stops taking them to school. They compete with cars for space, often having to duck in between parked cars. The road is not safe as things stand. More building resulting in more car journeys would make this worse)</p> <p>- The plan contradicts the council's aim to ensure the health and well being of communities. My reaosning here is as above i.e. Traffic levels are already such as to make cycling and walking difficult (the roads in and around Shepherdswell are often without pavements. Many school children use Church Hill to walk to and from school / bus stops taking them to school. They compete with cars for space, often having to duck</p>

	<p>in between parked cars. The road is not safe as things stand. There are no pavements on this road, and no room for a pavement to be built. More building resulting in more car journeys would make this worse)</p> <p>- I fail to see that the plan meets its objective of 'conserving and enhancing' the district's 'natural environment.' Building behind St. Andrews in Shepherdswell will destroy an outstanding view which stretches presently to the sea.</p> <p>- It does not seem to take into account covenants on the plots of land earmarked for building. For example, I understand the plot of land in Mill Lane, Shepherdswell, on which 10 houses are planned has attached to it a covenant stating that the maximum houses built should be two.</p> <p>- In addition to these objections I am concerned that the District has not provided adequate means for those affected by the plan to express their views. This website has proven unreliable (I had to phone for guidance approx 3.45pm 14 November) and the features on the site enabling comment were not functioning. The site would not register me (I followed the steps and was only registered after phoning for help). I feel these problems will have made it unreasonably difficult for people to contribute their comments.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Key Issues for the Local Plan
Rep ID	SDLP944
Rep Status	Processed
Consultee ID	1267388
Consultee Full Name	Judith Hawarden
Consultee Company / Organisation	Hawarden farming
Agent Full Name	Judith hawarden
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	South Aylesham SAP24 - Land to the South of Aylesham (AYL003)
2 - Do you consider this part of the Plan sound?	No

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Comments on the Regulation 19 Submission Local Plan</p> <p>A considered approach to the Natural environment has been adequately presented in DM Policy 39 but there is a lack of research and presentation of the current role of the farmland, looking at rural employment food production, and current carbon capture. Farmland forms the greater part of the district's green areas although a photo of arable fields is used to introduce the section there has been no analysis of the impact on the local farming industry if farmland is continued to be developed.</p> <p>Although the district has below-average rainfall and water resources the rainwater is badly managed around Aylesham.</p> <p>The B2046 is a dangerous road with a high number of accidents, Dover district has above-average accident rates. https://www.crashmap.co.uk/Search shows a high number of accidents on the B2046, particularly at the Spinney Lane junction with numerous fatalities and serious injuries recorded along the length of the road. The B2046 is in poor condition with vehicles frequently leaving the road and ending up in our hedgerows and fields. The road surface is folding into ruts increasing its camber to the Canterbury side under the current impact, particularly on the stretch between Aylesham and Adisham junctions.</p> <p>Dover district has below-average job opportunities, we have seen London boroughs buying up batches of the new builds in Aylesham. London currently has over 87,000 empty houses. There are shortages of appointments for doctors dentists, vets and secondary school places. There is a lack of adequate buses and the local shops run low on some food daily. In Aylesham to date, 785 units have been delivered with 575 remaining.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Show a convincing argument for housing needs and employment opportunities in the District , in-depth study of B2046 ,study of flood water from Aylesham Northside development onto road and farmland
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	As local farmers of the land opposite the current new development, we have an understanding of the impact of new developments and how they could be improved to have less of an impact on the rural environment.
Include files	Screenshot 2022-11-29 9.07.00 AM.png
Local Plan Consultation Point	Key Issues for the Local Plan

Rep ID	SDLP1050
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Speaking to local residents, time and again, they point to details later in the plan where the effectiveness of policies and the degree to which they are justified (SP or DM) and residents' experience of DDC previous actions are incompatible with the Key Issues listed on page 18, and as such they need to be made more sound.</p> <p>Overarching Vision and Strategic objectives are designed to be, and are, emotionally inspiring. But we note numerous areas where the policies are not compatible with the aspirations described in Vision and Objectives. It is striking how very often the first comment from the public when planning is mentioned, is that the big developers run the LPA, and other LPAs in Kent, because of the strength of the developer lobby and its donations to the party in power and there is little local political backbone to prevent high profit ribbon suburban development overrunning the beautiful district that residents love, causing dangerous gridlock in our compact coastal towns. Prime Minister Sunak's announcement on 5 Dec 2022 about dropping compulsory housebuilding targets, means this Plan's SP3 and DM-H1 are unsound and not compliant with emerging govt policy. We note a prevalent belief among the public that well-meaning young planners are subject to a culture that puts satisfying 'developer partners' above the pleas of the electorate. Before Reg 18 DDC expelled community groups such as the Deal Society and The Dover Society and representatives of level 1 councils from the Local Plan Working Group (raising a question about the compliance with the Localism Act of 2011, and whether the Plan was positively prepared). This is tragic in terms of expectations of local democratic accountability and a dangerous form of disaffection. The public expect any local plan to be implemented by a planning committee, from which any local councillor/ businessman who has any contractual links with developers (or insider, friendly shared-knowledge of plans) must be excluded, there should not be even a sniff of conflict of interest issues.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	Key Issues for the Local Plan
Rep ID	SDLP1441
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Key issues for the local plan
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC Note <i>The text below is an extract from the original representation which is attached to SDLP1438.</i> Key Issues for Local Plan. P18 Speaking to local residents, time and again, they point to details later in the plan where the effectiveness of policies and the degree to which they are justified (SP or DM) and residents' experience of DDC previous actions are incompatible with the Key Issues listed on page 18, and as such they need to be made more sound.

Overarching Vision and Strategic objectives are designed to be, and are, emotionally inspiring. But we note numerous areas where the policies are not compatible with the aspirations described in Vision and Objectives. It is striking how very often the first comment from the public when planning is mentioned, is that the big developers run the LPA, and other LPAs in Kent, because of the strength of the developer lobby and its donations to the party in power and there is little local political backbone to prevent high profit ribbon suburban development overrunning the beautiful district that residents love, causing dangerous gridlock in our compact coastal towns. Prime Minister Sunak's announcement on 5 Dec 2022 about dropping compulsory housebuilding targets, means this Plan's SP3 and DM-H1 may now be unsound and not compliant with emerging govt policy. We note a prevalent belief among the public that well meaning young planners are subject to a culture that puts satisfying 'developer partners' above the pleas of the electorate. Before Reg 18 DDC expelled community groups such as the Deal Society and The Dover Society and representatives of level 1 councils from the Local Plan Working Group (raising a question about the compliance with the Localism Act of 2011, and whether the Plan was positively prepared). This is tragic in terms of expectations of local democratic accountability and a dangerous form of disaffection.

The public are aware of the Nolan principles which should underpin any local plan to be implemented by a planning committee. This requires any local councillor/ businessman who has any contractual links with developers (or insider, friendly shared-knowledge of plans) to be excluded, as there should not be even a sniff of conflict of interest issues.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Local Plan Consultation Point

Key Issues for the Local Plan

Rep ID

SDLP1775

Rep Status

Processed

Consultee ID

1331526

Consultee Full Name

Mrs
Mairi
Jones

Consultee Company / Organisation

Agent Full Name

Agent Company / Organisation

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Key issues for the Local Plan
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note: Please see detailed representation (attached at 1770) which has been divided against numerous consultation points. The representation has images within the test. The text below is an extract from the detailed representation.</p> <p>3 SECTION 1.46 of the DDC Plan - Key Issues and Objectives</p> <p>3.1 In section 1.46 a number of key issues have been included for the District namely climate change, the move to carbon neutrality, flood management, sustainable development, the Whitfield Urban Expansion, combating the impact of Covid, economic growth, strategic transport growth, sustainable transport initiatives, appropriate infrastructure development, conservation, net gain biodiversity, achieving a balance between conservation and restoration. Wide ranging objectives have been set for each of these targets.</p> <p>I believe that a key issue which has been omitted is the development of a WIRED District to support the business and housing growth required . At the current time broadband within Alkham Parish is insufficient to meet the demands upon it. Any successful growth economy whether urban or rural requires adequate digital infrastructure.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Please see appended report
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I can speak to any of the points raised in the attached document
Include files	

Overarching Vision

Local Plan Consultation Point	Overarching Vision
Rep ID	SDLP37
Rep Status	Processed
Consultee ID	1254085
Consultee Full Name	Mrs Sue Ward
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Section 1 Overarching Vision
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>One of the attractions of Dover District has always been its rural and historic nature. This will be destroyed with the large scale of expansion at Whitfield. The town centre of Dover is already unattractive and semi derelict as a direct result of the existing expansion at Whitfield. It has a very fragmented shopping area, which results in most people preferring to shop in the superstores of Whitfield or the attractive small stores in Canterbury. If no one wishes to visit the town, they miss out on the historic elements, which are currently under promoted. It needs to be explained how Dover Town can be made vibrant when priority is given to Whitfield Urban Expansion.</p> <p>The district is a net exporter of labour, so the need to travel to jobs outside the district is unsustainable in terms of carbon footprint.</p> <p>It is not protective of the natural environment to build thousands of houses on arable land, especially when there are already 1448 vacant properties in the district. Local food production can only decrease if this is allowed to happen and more and more food has to be brought in from other parts of this country and abroad. We will thereby lose biodiversity and increase pollution and global warming. Given that Dover District is a net exporter of labour the houses should be built where the jobs are.</p> <p>The public right of way network will be affected by development in many areas, so it is incorrect to say that this will be enhanced. A footpath or bridleway is effectively destroyed by being encased in housing developments, since they are no longer attractive to use. These rights of way are free to use and very important in the fight against obesity. I am also concerned that equestrian users are not mentioned in the vision, horse riding being a very important activity, supportive of local businesses and tourism. It is also a healthy activity available to middle aged women and disabled people, who are particularly underrepresented in sports facilities in the district.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant	<p>To recognise that overdevelopment at Whitfield will further destroy the town centre.</p> <p>To recognise that it is not sustainable to build houses where there are insufficient employment opportunities.</p>

and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	To recognise that productive arable land needs to be protected at all costs. To recognise that to encase a public right of way in a housing development effectively destroys it. To include equestrian use when talking about public rights of way.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	The plan talks about the problem, but its proposals exacerbate it. Opposing voices must be heard.
Include files	
Local Plan Consultation Point	Overarching Vision
Rep ID	SDLP450
Rep Status	Processed
Consultee ID	1266351
Consultee Full Name	Dr Sharon Danby
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Overarching Vision
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	The overarching vision is a pipedream. As central government has failed to make any positive contribution at COP27 we are not on track to avoid the worst of climate change and any "mitigation" will be pointless as most of Deal and the lower lying areas will be under water.

<p>possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>“The climate change emergency will have resulted in increased local food production, extensive tree planting, and the adoption of sustainable design and construction methods.” Unsound in the extreme as DDC are allocating land which is needed NOW to grow crops to development. The term sustainable is therefore not understood in this context.</p> <p>Central government have just announced 5/12/22 that the house targets are unrealistic due to a large number of concerned conservatives rebelling. This is because their constituents are fed up with unreasonable house building targets being pushed on them and their communities. It is unacceptable to all, the unsustainable damage that this is doing to our countryside and future ability to grow food and Dover District Council must now use this u-turn to halt these unsound plans.</p> <p>Everyone is annoyed and dismayed at the congestion, pollution, haphazard development and loss of countryside. In the future the very economy that towns like Deal and Sandwich, villages like St Margarets and Kingsdown relies on - tourism, may be destroyed. This is not legally compliant as it is contrary to NPPF 2021 item 11. (b)ii ‘SPs should provide for objectively assessed needs for housing & other uses, . . . unless(ii) any adverse impacts of doing so would significantly & demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole’.</p> <p>Thriving communities: There will be no housing opportunities for young local people as developers have no interest in building affordable homes when they could be making 30% profit.</p> <p>Future homes standard need to be implemented now. There will be a massive retrofit required for Dover District to achieve its climate change aspirations. Most jobs are in Dover due to the port and the town needs to supply the needs of these workers to avoid car journeys from elsewhere and conform with SP1.</p> <p>Rural communities must now be protected and plans to foist a large development on each of them dropped as no proper planning has been put in place in terms of infrastructure. The beauty, charm and community spirit of these settlements must not be destroyed for profit. As the overarching vision states <i>Kent Downs AONB, international, national and locally protected heritage assets, landscapes, wildlife sites, habitats and species will have been protected and enhanced.</i> The LDP seems to be at odds with this vision and is not justified - building on the boundary of the AONB is contrary to NPPF 21.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>In line with the government announcement on 5/12/22 DDC should now re-evaluate the unrealistic target imposed by central government and take time to have a proper plan based on green initiatives, retrofitting existing housing stock with insulation and renewables, renovating existing stock, focussing on Dover which is in dire need of an uplift. The damage that has already been done to communities like Walmer (Station Road) needs to be assessed and mitigated for. Detrimental plans to foist a large development on each of the larger villages need to be dropped as the infrastructure is groaning under the overdevelopment already inflicted on the area.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>Overarching Vision</p>
<p>Rep ID</p>	<p>SDLP367</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1266669</p>

Consultee Full Name	Mrs Susan Sullivan
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Overarching vision. Spectacular and Sustainable Environment
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The Vision states: From the iconic White Cliffs to the nationally valued chalk downlands of the Kent Downs AONB, international, national and locally protected heritage assets, landscapes, wildlife sites, habitats and species will have been protected and enhanced.</p> <p>I find it very difficult to believe that this will be delivered as it relates to priority habitats and protected and priority species. This view is based on my experience of planning applications to Dover District Council within the past 3 years. It has shown that the avoidance part of the mitigation hierarchy is not used as intended and 'mitigation' is largely seen as the answer to the problem of biodiversity getting in the way of development. Thus with application 20/00419 we are witnessing the removal of habitat for Turtle Doves the UK's fastest declining bird species. Subsequent planning applications 22/01152 and 22/00158 now threaten the mitigation areas that were set set up to compensate for this loss. The same applications will, if passed, see the digging up of 800 of the rare and protected Lizard Orchid. There is nothing in this Local Plan that convinces me that we shall see any meaningful changes to the way the Council approaches development and priority habitats and species.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>Avoid allocating sites of high biodiversity value for development.</p> <p>Insist on the mitigation hierarchy being used as intended.</p> <p>Protect priority habitats and protected and priority species from the effects of development.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I wish to participate as I believe that the current planning system is failing wildlife and habitats and that unless changes are forthcoming there will be no chance of the Government halting the decline in species abundance by 2030.
Include files	
Local Plan Consultation Point	Overarching Vision

Rep ID	SDLP216
Rep Status	Processed
Consultee ID	1273055
Consultee Full Name	Mrs Tina Matcham
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	4.266
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	See attachment
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	See attachment
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	SDLP0040 Matcham Att1 .pdf

SDLP0216 Matcham - Att 1.pdf	
Local Plan Consultation Point	Overarching Vision
Rep ID	SDLP227
Rep Status	Processed
Consultee ID	1331112
Consultee Full Name	Miss Emma Waller
Consultee Company / Organisation	Kent Wildlife Trust
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Overarching Vision
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	We are supportive of the inclusion of conserving biodiversity and net gain within the last paragraph of the vision: <i>Spectacular and Sustainable Environment</i> . However, examples of how the District will reach net zero carbon, and by when, should be included within the Overarching Vision. To reflect national policies relating to the natural environment, the Vision should seek to enhance the natural environment throughout urban areas, as well as rural areas. Creation, enhancement and retrofitting of high quality green infrastructure will play a key role in establishing urban areas as desirable places to live and work, whilst contributing to the government's commitment to achieve a nature recovery network.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	In addition to the protection and enhancement of habitats (mentioned within the Overarching Vision), we urge the council to include the creation of a coherent ecological network within the vision, to promote increased extent and connectivity of habitats within the District, in line with the Governments 25 Year Environment Plan and the upcoming Environment Bill. Strategic planning of Local Nature Recovery Strategies will be fundamental to informing development and biodiversity net gain delivery and thus should underpin the vision.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Overarching Vision
Rep ID	SDLP554
Rep Status	Processed
Consultee ID	1267584
Consultee Full Name	Jason Ransley
Consultee Company / Organisation	Dover Harbour Board
Agent Full Name	John Bowles
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Overarching Vision
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Dover Harbour Board welcomes the Overarching Vision and the Strategic Objectives expressed in the Draft Local Plan, particularly those relating to a Spectacular and Sustainable Environment, a Prosperous Economy and Thriving Places.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	N/A

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	N/A
Include files	
Local Plan Consultation Point	Overarching Vision
Rep ID	SDLP912
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Vision
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The County Council welcomes Dover's heritage feature so prominently in the Vision. Dover does indeed have a wealth of historic sites that can be used to drive regeneration, tourism and wellbeing in the District in the various ways highlighted in the Dover Heritage Strategy
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Overarching Vision
Rep ID	SDLP914
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	2.2 Strategic Objectives
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The County Council welcomes the commitment of the District Council to conserving the heritage of Dover, recognising that heritage assets are a finite resource and the contribution that they make to life and well-being in the district.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Overarching Vision
Rep ID	SDLP1170
Rep Status	Processed
Consultee ID	1271293
Consultee Full Name	Mr Alan Byrne
Consultee Company / Organisation	Historic England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Vision and Objectives
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Overall the Council's vision acknowledges the full breadth of Dover's rich historic environment and the important role heritage can play in the area's future. We are pleased to see the Council's vision highlights how the heritage of Dover, Deal and Sandwich can contribute towards creating thriving places and vibrant communities. <i>(DDC Note - This is an extract of the full Historic England representation which can be located at SDLP1169)</i>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Overarching Vision
Rep ID	SDLP1335
Rep Status	Processed
Consultee ID	1331659
Consultee Full Name	Ben Young
Consultee Company / Organisation	The Land Trust
Agent Full Name	Ben Young
Agent Company / Organisation	Bloomfields Chartered Town Planners
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP5 - Fort Burgoyne, Dover
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC EDIT: Detailed representation attached to SDLP0447 with figures and maps. Representation reproduced in box 7 below (as originally done by the agent).
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	1. Introduction 1.1. Following the publication of the Dover District Council Local Plan (Regulation 18 Draft) and the Targeted Call for Sites on the 20th of January 2021, the Land Trust submitted representations in relation to the development of their own appropriate strategy for the possible future use and regeneration of Fort Burgoyne, Fort Burgoyne Road, Guston, Dover, CT15 5LP . These representations are included as Appendix A of this Statement, however, can be summarised as follows:

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

- The site at Fort Burgoyne extends across an area of approximately 42 hectares and includes a recreation ground, a substantial area of chalk grassland and the main buildings and immediate surrounding grounds (including the Parade Ground). Fort Burgoyne is also a designated Schedule Monument, confirming that the site is of national importance.

- Fort Burgoyne was built in the 1860s to protect Dover Castle and was used to defend the South Coast of England as one of the “Palmerston Forts” built to defend against invasion. The polygonal system on which the building is built was used to defend and watch from the highest strategic point in Dover. After the First World War, Fort Burgoyne was used a military depot/store for Connaught Barracks before it ceased to be used for military purposes in 2006. In 2014 the Land Trust, a national charity, acquired the site from Homes England and since then has been considering a variety of options for the future development of Fort Burgoyne. This includes the submission of two pre-application enquiries relating to the future use of the site to DDC in July 2019 (DDC Ref: PE/19/00127) and July 2020 (DDC Ref: PE/20/00234), which serve to demonstrate that the Land Trust has a clear commitment to bringing Fort Burgoyne back into use for public benefit at the earliest opportunity.

- DDC’s adopted Core Strategy 2010, recognised the importance of Fort Burgoyne within the criterion vii of “Strategic Allocation” policy CP10 (Former Connaught Barracks Complex), which stated that alongside the allocation for around 500 dwellinghouses, *“the condition of Fort Burgoyne is stabilised, if possible new uses are accommodated, a public access strategy is agreed and a management arrangement is incorporated that secures a sustainable future for the Fort”*. The Dover District Local Plan Regulation 18 Draft appeared to “down-grade” of the Former Connaught Barracks site from a “Strategic Allocation” to a “Non-Strategic Housing Allocation”. The Regulation 18 draft no longer made any specific reference to Fort Burgoyne with no strategic policy objective to deliver the future of the Fort, a Scheduled Monument of national historic interest that is included on the Historic England at risk register.

- The representation therefore sought to raise that the Draft Local Plan needed to provide clarification as to how the regeneration of the two separate elements (being the residential development of Connaught Barracks and the regeneration of Fort Burgoyne) will be delivered to allow for proposals for Fort Burgoyne to be brought forward under a set of key objectives, independent of the Connaught Barracks housing development. It was subsequently suggested within the representation that the Fort’s future is secured through other means within the new Local Plan, either through its own strategic policy in other sections of the plan (such as the Employment and the Local Economy section), or through the re-wording of Site GUS002 or through other Development Management policies.

- Finally, given that, in a “Strategic Futures” Report (included as part of **Appendix A**) prepared by WYG and commissioned by the Land Trust, it was identified that there is circa 3,000 square metres of floorspace within existing buildings at Fort Burgoyne that would be potentially suitable for a wide variety of uses. It was also suggested that in order to secure a long-term future use for Fort Burgoyne and secure its regeneration, it would be wholly appropriate for it to be allocated within Strategic Policy 9 for business and employment purposes, in order for more flexibility to be given to the types of uses that might be permissible at the site.

1.2. Dover District Council (DDC) has subsequently published the Regulation 19 Submission of the Dover District Council Local Plan which sets out the vision, strategic objectives and overarching development strategy for future growth in the district over the period to 2040. The Land Trust have therefore instructed Bloomfields Chartered Town Planners to prepare further representations in relation to the Regulation 19 submission and the regeneration and future use of the Scheduled Monument, Fort Burgoyne.

2. Regulation 19 Submission of the Dover District Council Local Plan

2.1. It is welcomed that the aforementioned representations have been taken into account within the Regulation 19 Submission of the Dover District Council Local Plan.

SAP5 - Fort Burgoyne, Dover

2.2. In particular, the Trust is pleased to see the inclusion of Fort Burgoyne for Mixed Employment Use in table 4.1 and a positive site-specific policy to support site regeneration at Fort Burgoyne within Chapter 4: Housing and Employment Site Allocations at Strategic Allocation Policy SAP5 which states the following:

Figure 1: SAP 5- Fort Burgoyne, Dover as of Regulation 19 Submission, DDC Local Plan

2.3. The Land Trust also notes the pre-amble to Policy SAP5 which, at 4.109, recognises that Fort Burgoyne has the potential to accommodate new uses, provided that they are compatible with its status as a scheduled monument. The Trust continues to explore suitable uses for the reuse of the Fort, as evidenced by the grant of planning permission 21/01000 on the 7th July 2022 for the change of use of 4no. casemates to Use Class E with associated ancillary works.

2.4. The Land Trust remains committed to attracting uses for the Fort that will fit in with the long-term sustainable vision for investment in its re-use, as required by the preamble to Policy SAP5. The uses being explored, as evidenced in the previous Regulation 18 representations,

are all being considered with the aim of supporting local business growth and ensuring at the same time that any mixture of uses at the site are compatible in respect of access, servicing, general amenity and crucially with the aims of conserving the Scheduled Monument.

2.5. While the inclusion of this policy is largely supported, The Trust has a number of comments in respect of the criteria:

2.6. Criterion h sets out that a Surface Water Management strategy should be produced for the site. The Trust recognises the importance of surface water management; however, it is highlighted that the Fort already benefits from an existing surface water drainage system which was built in the 1860s as part of the construction of the site. This system has always discharged directly to the ditch of the Fort where it soaks into the ground.

2.7. Given the Scheduled Ancient Monument status of the site, establishing an alternative strategy for managing surface water may not be practical and could result in harm. As such it is suggested that this criterion should be removed.

2.8. Notwithstanding this, where relevant, any future planning applications for uses or development at the Fort can demonstrate if required how it would be compatible with the existing surface water drainage system and not require any alternative arrangements for its disposal.

2.9. In respect of criterion j which suggests that *“development within the boundary of Fort Burgoyne which would have a detrimental impact on the heritage significance, setting, views, biodiversity, character of coherence of the components and elements of the complex will not be permitted”*.

2.10. While the Trust acknowledges the need to avoid development which will have a detrimental impact on the range of criteria identified in this policy, any development within Fort Burgoyne would be restricted by the requirement for Scheduled Monument Consent approved by Historic England which is considered to negate the need for this criterion. Draft Local Plan policies in respect of landscape (NE2), ecological (SP13) and historic environment (HE1, SP15) further negate the need for this criterion.

2.11. It is therefore respectfully suggested that criteria h and j are removed from policy SAP 5.

Chapter 2 - Vision and Objectives

2.12. Chapter 2 sets out the overarching vision for Dover District, including that *“through careful stewardship of its world class landscapes, thriving natural environments and wealth of historic sites, Dover District will be a destination of choice for people of all ages to make their home, for businesses to invest in and for visitors to explore and experience.”*

2.13. It is appreciated that the vision highlights the *“Sensitive restoration of elements of its rich built heritage, will enhance the attractiveness of the town, while improved connections to its seafront will have been delivered by high quality design and investment in place making.”* Together with the strategic objective (echoed in Strategic Policy 15) to conserve and enhance heritage assets in the district *“in a manner appropriate to their significance, recognising their intrinsic value as a finite resource as well as their contribution to the character of the District and the positive role they can play in the regeneration of the District.”*

2.14. The Trust also welcomes the identification of Fort Burgoyne on the Local Plan key diagram (Figure 2 below) alongside other Regeneration Sites covered by policy SP6 as set out further over the page.

Figure 2: Figure 2.1, Local Plan Key Diagram

Chapter 3 - Strategic Policies

2.15. Chapter 3 sets out the districts strategic policies to achieve the aforementioned strategic objectives.

SP6 Economic Growth

2.16. Strategic Policy 6 seeks to grow and diversify the Dover District economy by providing additional employment floorspace through the regeneration of brownfield sites in key locations in the district, such as Fort Burgoyne, to deliver flexible employment uses, achieve a higher level of job growth, and help provide additional flexibility and choice to the market over the Plan period.

Figure 3: SP6- Economic Growth, Dover as of Regulation 19 Submission, DDC Local Plan

2.17. The Trust welcomes the inclusion of Fort Burgoyne at criterion 2 of policy SP6 as site where regeneration for a mix of uses to secure their future will be supported by Dover District Council.

2.18. It is noted that paragraph 3.117 sets out that no floorspace allowance has been included for Fort Burgoyne (and other sites allocated under criterion 2) as they are *“brownfield sites allocated for regeneration, and the mix of development and floorspace requirements will need to be determined through the planning application process in accordance with the policies in the Local Plan.”*

2.19. Given the complexities of the site we support this position but anticipate that employment floorspace will amount to circa 3,000 sqm.

Chapter 11 - The Natural Environment

Policy NE1 Biodiversity Net Gain

2.20. The Trust agrees with the requirements of Natural Environment Policy 1 for development proposals to provide a minimum of 10% biodiversity net gain above the ecological baseline within the development boundary. And notes criterion (a) which states that where it can be demonstrated that ecologically meaningful biodiversity net gain cannot be achieved within the site boundary, the Council will consider off-site alternatives in line with the mitigation hierarchy approach.

2.21. Given that a large portion of the 42 hectares at Fort Burgoyne has the potential to provide for significant biodiversity offering, in responding to this consultation The Trust wishes to record interest in working with the Council in developing its Dover District Biodiversity Net Gain Strategy with a view to Coombe Hole providing opportunity for off-site net gain whilst maximising the value of this Local Wildlife Site.

Figure 4: NE1- Biodiversity Net Gain, Dover as of Regulation 19 Submission, DDC Local Plan

2.22. In a similar vein to the BNG potential at Fort Burgoyne, the Land Trust has extensive experience of working with developers to create and provide in perpetuity management of Suitable Alternative Natural Greenspace (SANG), areas of greenspace that are of a quality and type that are suitable to divert recreational activities associated with new residential development away from protected sites (such as Special Protection Areas or Special Areas of Conservation).

2.23. In noting the requirement of Draft Policy SAP1(I) (Whitfield Urban Expansion) which requires a need for SANG to mitigate potential impacts upon the Lydden and Temple Ewell SAC, the Trust wishes to express interest in discussions with the Council and/or the developers of this site with a potential view to assisting them with meeting the policy requirements.

3. Summary

3.1. The overall objective of the Trust remains to seek to deliver a strong, sustainable future for the Fort, that secures its long-term status as a nationally and locally important historic site that will make a vital contribution to the district. The Land Trust supports the Regulation 19 Submission Version of the Dover District Local Plan and welcomes the inclusion of Fort Burgoyne as a strategic allocation site for regeneration subject to the comments set out in this representation.

4. Appendices

Appendix A- Representations on the Regulation 18 Draft Dover District Local Plan 2021 and Targeted Call for Sites

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Overarching Vision
Rep ID	SDLP1414
Rep Status	Processed
Consultee ID	1333243
Consultee Full Name	Mr and Mrs Tobin
Consultee Company / Organisation	
Agent Full Name	Mr Reece Lemon
Agent Company / Organisation	Lee Evans Partnership
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Vision and Objectives
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Representation submitted by Lee Evans On behalf of Mr and Mrs Tobin. Full Representation attached to SDLP1411. This document has been split across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1411.)</p> <p>The Landowner generally supports the Overarching Vision for the District in providing "outstanding opportunities for sustainable living", as outlined in the Regulation 19 draft. The Plan aspires to position Dover District as a destination of choice for people to make their home, achieved "...through careful stewardship of its world class landscapes, thriving natural environments and wealth of historic sites". These high level and aspirational principles which inform the direction of the Plan are supported, notwithstanding detailed comments on the policies contained within.</p> <p>3.9 The Vision goes on to outline aspirations for 'Vibrant Communities', which emphasises how "new developments will blend seamlessly with existing townscapes to embody the best of local distinctiveness and will have created places that are well-designed and well-built. Built to local design codes, they will respect the spectacular natural environments and rich heritage of the District achieves significant progress to becoming net zero carbon." In a similar manner, this level of ambition for the Plan is supported as an overall vision and related set of objectives, subject to the following detailed comments below. It is considered that the objectives are appropriate in supporting the implementation of the Vision over the plan period up to 2040.</p>

	3.11 The objectives themselves are reflected across the strategic policies as proposed, albeit with some amendment proposed to ensure the sound and effective implementation of such namely relating to the more confident delivery of housing across identified available, suitable, and achievable sites. This is most salient to the Landowner's interests with reference to the SAP55 – Woodnesborough Small Housing Sites which is – at present – not considered to have been positively prepared, and is considered unsound in its current iteration. Amendment is proposed herein to render the policy sound, specifically identified in Section 4 of this response.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Overarching Vision
Rep ID	SDLP1438
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Overarching vision
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective

	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC note: Att1 is the detailed representation which has been split against a large number of consultation points. We have grave doubts that the SPs, SAPs, and DM policies will meet the aspirations, vision and objectives announced, and that they will deliver a bright future of equitably distributed prosperity for the district.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	SDLP1438 Walmer TC - Att 1.pdf
Local Plan Consultation Point	Overarching Vision
Rep ID	SDLP1442
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Overarching Vision
2 - Do you consider this part of the Plan sound?	No

<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified Effective Consistent with National Policy</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>No</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>No</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p><i>DDC Note The text below is an extract from the original representation which is attached to SDLP1438.</i></p> <p>Overarching Vision and Strategic objectives are designed to be, and are, emotionally inspiring. But we note numerous areas where the policies are not compatible with the aspirations described in Vision and Objectives. It is striking how very often the first comment from the public when planning is mentioned, is that the big developers run the LPA, and other LPAs in Kent, because of the strength of the developer lobby and its donations to the party in power and there is little local political backbone to prevent high profit ribbon suburban development overrunning the beautiful district that residents love, causing dangerous gridlock in our compact coastal towns. Prime Minister Sunak's announcement on 5 Dec 2022 about dropping compulsory housebuilding targets, means this Plan's SP3 and DM-H1 may now be unsound and not compliant with emerging govt policy. We note a prevalent belief among the public that well meaning young planners are subject to a culture that puts satisfying 'developer partners' above the pleas of the electorate. Before Reg 18 DDC expelled community groups such as the Deal Society and The Dover Society and representatives of level 1 councils from the Local Plan Working Group (raising a question about the compliance with the Localism Act of 2011, and whether the Plan was positively prepared). This is tragic in terms of expectations of local democratic accountability and a dangerous form of disaffection.</p> <p>The public are aware of the Nolan principles which should underpin any local plan to be implemented by a planning committee. This requires any local councillor/ businessman who has any contractual links with developers (or insider, friendly shared-knowledge of plans) to be excluded, as there should not be even a sniff of conflict of interest issues.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>Overarching Vision</p>
<p>Rep ID</p>	<p>SDLP1255</p>
<p>Rep Status</p>	<p>Processed</p>

Consultee ID	1332985
Consultee Full Name	Dean Lewis Estates Ltd
Consultee Company / Organisation	Dean Lewis Estates Ltd
Agent Full Name	Nicole Burnett
Agent Company / Organisation	Burnett Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Vision and Objectives
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Text Extracted from Document sent from Nicole Burnett on Behalf of Dean Lewis Estates. Representation has been split across relevant areas of the Local Plan. Attachments can be found under reference SDLP1254.) Vision and Objectives 2.1.1 The new Local Plan once adopted will replace the Core Strategy 2010 and the Land Allocations Plan 2015, and will set out the vision strategic objectives and overarching development strategy for growth in the district over the period up to 2040. 2.1.2 DLE believe it is fundamental that the new Local Plan is aspirational, and growth orientated whilst also capable of being delivered over the plan period. The Overarching Vision notes that "Dover District will be a destination of choice for people of all ages to make their home, for businesses to invest and for visitors to explore and experience." Whilst DLE agree and support this vision, it is critical that the policies contained within the Local Plan enable sufficient growth in the right locations to be able to achieve this. 2.1.3 The Local Plan sets out a series of Strategic Objectives to support the overall vision for Dover District up to 2040. DLE are supportive of the strategic objectives particularly those under the sub heading 'Vibrant Communities', which seek to provide a greater choice of high quality housing to meet the needs of the district and address affordability issues. DLE agree that the focus of new development should be accessible and sustainable locations which can utilise existing infrastructure, facilities and services.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Overarching Vision
Rep ID	SDLP2000
Rep Status	Processed
Consultee ID	1273295
Consultee Full Name	Mr Martin Garside
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Overarching Vision
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	<p>DDC Note - Representation added by applicant directly to objective as well as via email - email includes Vision and Objectives and is attached. Rep also connected to rep SDLP874)</p> <p>Vision and objectives (overarching vision) The central aims set out in Chapter 2 - 'Vision and objectives (Overarching vision)' misses both the main housing challenges this part of south east England faces and misses the huge opportunity to revitalise the town of Dover itself. Taken overall, the plans for new housing in the whole plan show a depressing and unsustainable reliance on building on greenfield and agricultural land. And the housing mix proposed indicates a large part of this new housing will be three / four or more bedroom large houses.</p> <p>Section 7.3 indicates that the district plan seeks an overall housing mix of "12.2% from one bedroom, 20.4% from two bedrooms, 35.2% from three bedrooms, and 32.2% four or more bedroom dwellings".</p> <p>This mix feels very unsound - and simply does not meet the current or future housing challenges we face, especially in southern England. The proposed mix will</p>

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

inhibit the sustainable and effective growth of housing needed in the future. However - south east England faces a massive housing crisis. This manifests itself in a dire shortage of decent and affordable rental property. And a related shortage of affordable 'starter' flats and homes for young people. Yet staring Dover District Council in the face is the opportunity to revitalise the town of Dover itself. Dover is potentially a very fine town with a remarkable history. Sadly - for a number of reasons - much of the town is neglected and in urgent need of investment and growth. The image and reputation of the town has suffered as a result of this neglect. Indeed, the future prosperity of the wider district is held back by the decline of the town. The local district plan is a huge opportunity to grab hold of this long term failure and rebuild and renovate this key historic town. Key steps should include: building affordable flats and homes for purchase and rent on both brown field sites and on derelict sites much of the older housing may be suitable for 'retrofitting' with modern insulation standards and other improvements looking to increase the number of flats above retail premises where a retail premises is simply now unviable - appropriate and sensitive redevelopment should be enabled to turn the former retail unit into good quality housing existing car park provision should be reviewed to see if any could be used to build new housing Such steps would meet the actual housing needs of local people as well as improving both the visual appearance and the image of the town. Other benefits would include bringing life back into the economic life of existing high street which otherwise faces continuing decline. The superb asset of the highspeed rail link into Dover Priory remains a massive - but largely unrealised - opportunity to rejuvenate Dover Dover District Council should focus like a laser beam on the rejuvenation and improvement of the town of Dover. Plans to build considerable new housing on green field agricultural land on the edge of rural villages are largely not sustainable and fail to meet both current urgent needs and challenges of the future. I highlight two proposed sites in my village.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files	Garside Email_Redacted.pdf
Local Plan Consultation Point	Overarching Vision
Rep ID	SDLP1388
Rep Status	Processed
Consultee ID	1333152
Consultee Full Name	Mr P & Mrs S Laffin & Rubix Estates Ltd
Consultee Company / Organisation	
Agent Full Name	Mr Reece Lemon
Agent Company / Organisation	Lee Evans Partnership
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Overarching Vision and Objectives
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Representation submitted by Lee Evans On behalf of Mr and Mrs Laffin and Rubix Estates. Full Representation attached to SDLP1387. This document has been split across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment.)</p> <p>The Overarching Vision for the District in providing “outstanding opportunities for sustainable living” is supported as a high level principle underpinning the aspirations of the Plan.</p> <p>3.9 The ambition of the Plan to position the District as a destination of choice for people to make their home, achieved “...through careful stewardship of its world class landscapes, thriving natural environments and wealth of historic sites” is also supported as a matter of principle as a reasonable basis for the Plan.</p> <p>3.10 The Vision goes on to outline aspirations for ‘Vibrant Communities’, which emphasises how “new developments will blend seamlessly with existing townscapes to embody the best of local distinctiveness and will have created places that are well-designed and well-built. Built to local design codes, they will respect the spectacular natural environments and rich heritage of the District achieves significant progress to becoming net zero carbon”.</p> <p>It further underscores how the Plan should seek to provide greater choice of high-quality housing to meet the needs of Dover District’s growing population and changing demographic, and address affordability issues, as well as highlighting the focus of new development at accessible and sustainable locations which can utilise existing infrastructure, facilities and services, and to ensure development contributes to the sustainability of local communities and services. This objective is consistent with the thrust of the National Planning Policy Framework in its pursuit of sustainable development. Again, this is supported overall at the District-wide level as an appropriate and realistic vision for Dover over the plan period.</p> <p>3.12 Whilst commentary is not provided for each of these objectives, due regard has been had to their content.</p> <p>3.13 It is considered that the objectives are generally appropriate in supporting the implementation of the Vision, and that the objectives themselves are adequately reflected across the strategic policies as proposed, albeit subject to any refinement that may follow during the Examination process and later ‘Main Modifications’.</p>

	3.14 In this regard the Promoter supports to the overarching Vision, notwithstanding the detailed comments below, namely those relating to SAP16.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Overarching Vision
Rep ID	SDLP1628
Rep Status	Processed
Consultee ID	1333382
Consultee Full Name	Mr Colin and Linda Tearle
Consultee Company / Organisation	
Agent Full Name	Gurdev Moore
Agent Company / Organisation	Rubix Estates
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Overarching Vision and Objectives
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes

6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

(DDC Note - Representation submitted by Rubix Estates. Full Representation attached to SDLP1624. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1624.)

OVERARCHING VISION & OBJECTIVES

3.5 The Overarching Vision for the District in providing “outstanding opportunities for sustainable living” is supported as a high level principle underpinning the aspirations of the Plan.

3.6 The ambition of the Plan to position the District as a destination of choice for people to make their home, achieved “...through careful stewardship of its world class landscapes, thriving natural environments and wealth of historic sites” is also supported as a matter of principle as a reasonable basis for the Plan.

3.7 The Vision goes on to outline aspirations for ‘Vibrant Communities’, which emphasises how “new developments will blend seamlessly with existing townscapes to embody the best of local distinctiveness and will have created places that are well-designed and well-built. Built to local design codes, they will respect the spectacular natural environments and rich heritage of the District achieves significant progress to becoming net zero carbon”.

3.8 It further underscores how the Plan should seek to provide greater choice of high-quality housing to meet the needs of Dover District’s growing population and changing demographic, and address affordability issues, as well as highlighting the focus of new development at accessible and sustainable locations which can utilise existing infrastructure, facilities and services, and to ensure development contributes to the sustainability of local communities and services. This objective is consistent with the thrust of the National Planning Policy Framework in its pursuit of sustainable development. Again, this is supported overall at the District-wide level as an appropriate and realistic vision for Dover over the Plan period.

3.10 Whilst commentary is not provided for each of these objectives, due regard has been had to their content.

3.11 It is considered that the objectives are generally appropriate in supporting the implementation of the Vision, and that the objectives themselves are adequately reflected across the strategic policies as proposed, albeit subject to any refinement that may follow during the Examination process and later ‘Main Modifications’.

3.12 In this regard the Promoter supports to the overarching Vision for Elvington & Eythorne.

3.13 In accordance with the relevant Local Plan policies and development of the site and wider area would provide:

- A wide mix of housing typologies including affordable housing, housing for the older demographic and plots of land to contribute to meeting the demand for self and custom build housing.

- Design Codes will be developed to guide and ensure the delivery of beautiful, eco friendly homes that are affordable for local people;

- Formal and informal open spaces for leisure and recreation, including play areas, sports fields, allotments and community orchards, or enhancements to nearby facilities, to meet the needs of the development

Open spaces will be multi-functional contributing to the wider public networks with sustainable drainage. All new and existing residents will have access to upgraded routes for walkers and cyclists. This sustainable development will improve connections between and enhancements to existing habitats; provide safe routes for wildlife, protecting and enhancing wildlife assets

- Sustainable access arrangements will be in place from Adelaide Road with associated improvements and traffic calming measures to Adelaide Road and where necessary improvements to the Public Right of Way network to increase connectivity in the area.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s)

you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Strategic Objectives

Local Plan Consultation Point	Strategic Objectives
Rep ID	SDLP61
Rep Status	Processed
Consultee ID	1254085
Consultee Full Name	Mrs Sue Ward
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	2.5
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Equestrians should be included with walking and cycling routes
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Add equestrians to this section and include bridleways throughout when referring to Public Rights of Way
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Objectives
Rep ID	SDLP137
Rep Status	Processed
Consultee ID	1330827
Consultee Full Name	Christopher Shilling
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	My comments relate to 1.46, 2.2, 3.17 and SP2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I am confining my comments to the area in which I live, and make my representation as a concerned citizen who believes the plan is unsound and possibly not legally compliant.</p> <ul style="list-style-type: none"> - I fail to see how the sustainability report can be adequate. The buildings proposed at the back of St Andrews will interfere with the habitat of significant numbers of bats. This has not been taken into account. - The plan does not meet the stated goal of mitigating climate change (1.46). Building in and around Shepherdswell (and other villages) will result in a large number of additional journeys by car. There are virtually no employment opportunities in Shepherdswell or these areas, and the large majority of journeys will be by car. - The plans fails to address its stated aim of ensuring safe air quality (SP2). The extra buildings in shephedswell will inevitably increase pollution. More particularly, exhaust fumes will increase given that the roads in the village are mostly single track with passing places. There is already much congestion at rush hour times. Extra journeys will make this worse. - Extra houses in Shepherdswell, and the additional traffic that will follow, contradicts the Council's aim to 'Promote sustainable transport initiatives' (1.46 and 2.2). Traffic levels are already such as to make cycling and walking difficult (the roads in and around Shepherdswell are often without pavements. Many school children use Church Hill to walk to and from school / bus stops taking them to school. They compete with cars for space, often having to duck in between parked cars. The road is not safe as things stand. More building resulting in more car journeys would make this worse)

- The plan contradicts the council's aim to ensure the health and well being of communities. My reasoning here is as above i.e. Traffic levels are already such as to make cycling and walking difficult (the roads in and around Shepherdswell are often without pavements. Many school children use Church Hill to walk to and from school / bus stops taking them to school. They compete with cars for space, often having to duck in between parked cars. The road is not safe as things stand. There are no pavements on this road, and no room for a pavement to be built. More building resulting in more car journeys would make this worse)

- I fail to see that the plan meets its objective of 'conserving and enhancing' the district's 'natural environment.' Building behind St. Andrews in Shepherdswell will destroy an outstanding view which stretches presently to the sea.

- It does not seem to take into account covenants on the plots of land earmarked for building. For example, I understand the plot of land in Mill Lane, Shepherdswell, on which 10 houses are planned has attached to it a covenant stating that the maximum houses built should be two.

- In addition to these objections I am concerned that the District has not provided adequate means for those affected by the plan to express their views. This website has proven unreliable (I had to phone for guidance approx 3.45pm 14 November) and the features on the site enabling comment were not functioning. The site would not register me (I followed the steps and was only registered after phoning for help). I feel these problems will have made it unreasonably difficult for people to contribute their comments.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files	
Local Plan Consultation Point	Strategic Objectives
Rep ID	SDLP451
Rep Status	Processed
Consultee ID	1266351
Consultee Full Name	Dr Sharon Danby
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Strategic Objectives 2.2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The building of nearly 11,000 new homes in the Dover District is unsound. The embedded carbon in each new home is around 56 tonnes. Rather than build new, existing stock should be retrofitted with renewables and properly insulated. I would suggest that building new rather than renovating existing is contrary to NPPF Section 2 8c <i>adapting to climate change including moving to a low carbon economy</i> . This would go a long way towards achieving the climate commitments of DDC (SP1) and get residents out of fuel poverty. New development should insist on the highest Future Homes Standards now to avoid expensive retrofitting of homes. Flooding is a real concern in an area which is coastal and has already seen pressure to build on its flood plains and low lying land, particularly around Deal.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Retrofit where possible. Future Homes Standard now. Protect all flood risk areas.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Objectives
Rep ID	SDLP327
Rep Status	Processed
Consultee ID	1331112
Consultee Full Name	Miss

	Emma Waller
Consultee Company / Organisation	Kent Wildlife Trust
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Strategic Objectives
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p><i>Spectacular and Sustainable Envriomet</i> - We support the Council's commitment to reduce carbon emissions and the mention of the climate emergency. The climate crisis should be a priority, and tackling it should include more than making sure "new development is designed to adapt to, and mitigate, the effects of climate change". We encourage the council to use nature based solutions to help tackle the climate emergency, such as restoring coastal wetlands, allowing degraded habitats to recover and switching to restorative agricultural practices. This can help reduce climate change by capturing carbon dioxide from the air and sequestering it in plants, soils, and sediments.</p> <p>Nature based solutions should also be a priority for flood management, such as wilding river catchments and restoring wetlands to provide multiple benefits in terms of reduced flood risk and benefits for biodiversity.</p> <p>We support the inclusion of increasing habitat connectivity in this objective. We encourage the council to include the protection and enhancement of locally important habitats, such as Local Wildlife Sites, and rare and threatened species too (not just protected species).</p> <p>Prosperous Economy - We encourage the inclusion of sustainable tourism, to protect the environment, natural resources, and wildlife and by creating inclusive and accessible tourist opportunities.</p> <p><i>Vibrant Communities</i> - Daily contact with nature is linked to better health, reduced levels of chronic stress, reductions in obesity and improved concentration. The provision of high quality green infrastructure and access to nature should be at the heart of creating vibrant communities.</p> <p><i>Thriving Places</i> - We support the inclusion of improving the health and wellbeing of residents, however this should be linked with nature and how there are a multitude of health and wellbeing benefits with daily contact with nature.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>Prioritising nature based solutions to help halt the climate crisis aligns with the Government's Net Zero Strategy. For example, low carbon farming practices such as switching to restorative agricultural practices, which includes incorporating field buffers, no-till to reduce soil disturbance, diversified crop rotations, green manures and restrict the use of pesticide, is encouraged in the 'Key Commitments' of the Net Zero Strategy. It will also help achieve reaching net zero and the goals of the 25 Year Environment Plan.</p> <p>Policy SP1 – Planning for Climate Change solely focuses on how new developments will tackle climate change. In order to effectively deliver on its commitments to tackle the nature and climate crisis it is essential that the Plan addresses both the need to reduce Dover's use of fossil fuels, as well as in/offsetting residual carbon emissions. A policy requirement and target for in/offsetting residual carbon should be included for Policy SP1 in order to ensure that this Plan contributes and aligns with its own target of "becoming a net zero carbon emitter by 2030 at the latest" as mentioned in paragraph 3.7 of the Local Plan Regulation 19 Submission. Appropriate locations for the inseting and offsetting of residual carbon should be informed by a detailed Local Nature Recovery Strategy, ensuring that such schemes benefit biodiversity.</p>

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Objectives
Rep ID	SDLP328
Rep Status	Processed
Consultee ID	1331112
Consultee Full Name	Miss Emma Waller
Consultee Company / Organisation	Kent Wildlife Trust
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Strategic Objectives
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p><i>Spectacular and Sustainable Envriionmet</i> - We support the Council's commitment to reduce carbon emissions and the mention of the climate emergency. The climate crisis should be a priority, and tackling it should include more than making sure "new development is designed to adapt to, and mitigate, the effects of climate change". We encourage the council to use nature based solutions to help tackle the climate emergency, such as restoring coastal wetlands, allowing degraded habitats to recover and switching to restorative agricultural practices. This can help reduce climate change by capturing carbon dioxide from the air and sequestering it in plants, soils, and sediments.</p> <p>Nature based solutions should also be a priority for flood management, such as wilding river catchments and restoring wetlands to provide multiple benefits in terms of reduced flood risk and benefits for biodiversity.</p> <p>We support the inclusion of increasing habitat connectivity in this objective. We encourage the council to include the protection and enhancement of locally important habitats, such as Local Wildlife Sites, and rare and threatened species too (not just protected species).</p> <p><i>Prosperous Economy</i> - We encourage the inclusion of sustainable tourism, to protect the environment, natural resources, and wildlife and by creating inclusive and accessible tourist opportunities.</p> <p><i>Vibrant Communities</i> - Daily contact with nature is linked to better health, reduced levels of chronic stress, reductions in obesity and improved concentration. The provision of high quality green infrastructure and access to nature should be at the heart of creating vibrant communities.</p>

	<i>Thriving Places</i> - We support the inclusion of improving the health and wellbeing of residents, however this should be linked with nature and how there are a multitude of health and wellbeing benefits with daily contact with nature.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>Prioritising nature based solutions to help halt the climate crisis aligns with the Government's Net Zero Strategy. For example, low carbon farming practices such as switching to restorative agricultural practices, which includes incorporating field buffers, no-till to reduce soil disturbance, diversified crop rotations, green manures and restrict the use of pesticide, is encouraged in the 'Key Commitments' of the Net Zero Strategy. It will also help achieve reaching net zero and the goals of the 25 Year Environment Plan.</p> <p>Policy SP1 – Planning for Climate Change solely focuses on how new developments will tackle climate change. In order to effectively deliver on its commitments to tackle the nature and climate crisis it is essential that the Plan addresses both the need to reduce Dover's use of fossil fuels, as well as in/offsetting residual carbon emissions. A policy requirement and target for in/offsetting residual carbon should be included for Policy SP1 in order to ensure that this Plan contributes and aligns with its own target of <i>"becoming a net zero carbon emitter by 2030 at the latest"</i> as mentioned in paragraph 3.7 of the Local Plan Regulation 19 Submission. Appropriate locations for the insetting and offsetting of residual carbon should be informed by a detailed Local Nature Recovery Strategy, ensuring that such schemes benefit biodiversity.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Objectives
Rep ID	SDLP234
Rep Status	Processed
Consultee ID	1331112
Consultee Full Name	Miss Emma Waller
Consultee Company / Organisation	Kent Wildlife Trust
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Strategic Objectives
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p><i>Spectacular and Sustainable Envriomet</i> - We support the Council's commitment to reduce carbon emissions and the mention of the climate emergency. The climate crisis should be a priority, and tackling it should include more than making sure "new development is designed to adapt to, and mitigate, the effects of climate change". We encourage the council to use nature based solutions to help tackle the climate emergency, such as restoring coastal wetlands, allowing degraded habitats to recover and switching to restorative agricultural practices. This can help reduce climate change by capturing carbon dioxide from the air and sequestering it in plants, soils, and sediments.</p> <p>Nature based solutions should also be a priority for flood management, such as wilding river catchments and restoring wetlands to provide multiple benefits in terms of reduced flood risk and benefits for biodiversity.</p> <p>We support the inclusion of increasing habitat connectivity in this objective. We encourage the council to include the protection and enhancement of locally important habitats, such as Local Wildlife Sites, and rare and threatened species too (not just protected species).</p> <p><i>Prosperous Economy</i> - We encourage the inclusion of sustainable tourism, to protect the environment, natural resources, and wildlife and by creating inclusive and accessible tourist opportunities.</p> <p><i>Vibrant Communities</i> - Daily contact with nature is linked to better health, reduced levels of chronic stress, reductions in obesity and improved concentration. The provision of high quality green infrastructure and access to nature should be at the heart of creating vibrant communities.</p> <p><i>Thriving Places</i> - We support the inclusion of improving the health and wellbeing of residents, however this should be linked with nature and how there are a multitude of health and wellbeing benefits with daily contact with nature.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>Prioritising nature based solutions to help halt the climate crisis aligns with the Government's Net Zero Strategy. For example, low carbon farming practices such as switching to restorative agricultural practices, which includes incorporating field buffers, no-till to reduce soil disturbance, diversified crop rotations, green manures and restrict the use of pesticide, is encouraged in the 'Key Commitments' of the Net Zero Strategy. It will also help achieve reaching net zero and the goals of the 25 Year Environment Plan.</p> <p>Policy SP1 – Planning for Climate Change solely focuses on how new developments will tackle climate change. In order to effectively deliver on its commitments to tackle the nature and climate crisis it is essential that the Plan addresses both the need to reduce Dover's use of fossil fuels, as well as in/offsetting residual carbon emissions. A policy requirement and target for in/offsetting residual carbon should be included for Policy SP1 in order to ensure that this Plan contributes and aligns with its own target of "becoming a net zero carbon emitter by 2030 at the latest" as mentioned in paragraph 3.7 of the Local Plan Regulation 19 Submission. Appropriate locations for the insetting and offsetting of residual carbon should be informed by a detailed Local Nature Recovery Strategy, ensuring that such schemes benefit biodiversity.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Objectives
Rep ID	SDLP329
Rep Status	Processed
Consultee ID	1331112

Consultee Full Name	Miss Emma Waller
Consultee Company / Organisation	Kent Wildlife Trust
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Strategic Objectives
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p><i>Spectacular and Sustainable Environment</i> - We support the Council's commitment to reduce carbon emissions and the mention of the climate emergency. The climate crisis should be a priority, and tackling it should include more than making sure "new development is designed to adapt to, and mitigate, the effects of climate change". We encourage the council to use nature based solutions to help tackle the climate emergency, such as restoring coastal wetlands, allowing degraded habitats to recover and switching to restorative agricultural practices. This can help reduce climate change by capturing carbon dioxide from the air and sequestering it in plants, soils, and sediments.</p> <p>Nature based solutions should also be a priority for flood management, such as wilding river catchments and restoring wetlands to provide multiple benefits in terms of reduced flood risk and benefits for biodiversity.</p> <p>We support the inclusion of increasing habitat connectivity in this objective. We encourage the council to include the protection and enhancement of locally important habitats, such as Local Wildlife Sites, and rare and threatened species too (not just protected species).</p> <p><i>Prosperous Economy</i> - We encourage the inclusion of sustainable tourism, to protect the environment, natural resources, and wildlife and by creating inclusive and accessible tourist opportunities.</p> <p><i>Vibrant Communities</i> - Daily contact with nature is linked to better health, reduced levels of chronic stress, reductions in obesity and improved concentration. The provision of high quality green infrastructure and access to nature should be at the heart of creating vibrant communities.</p> <p><i>Thriving Places</i> - We support the inclusion of improving the health and wellbeing of residents, however this should be linked with nature and how there are a multitude of health and wellbeing benefits with daily contact with nature.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>Prioritising nature based solutions to help halt the climate crisis aligns with the Government's Net Zero Strategy. For example, low carbon farming practices such as switching to restorative agricultural practices, which includes incorporating field buffers, no-till to reduce soil disturbance, diversified crop rotations, green manures and restrict the use of pesticide, is encouraged in the 'Key Commitments' of the Net Zero Strategy. It will also help achieve reaching net zero and the goals of the 25 Year Environment Plan.</p> <p>Policy SP1 – Planning for Climate Change solely focuses on how new developments will tackle climate change. In order to effectively deliver on its commitments to tackle the nature and climate crisis it is essential that the Plan addresses both the need to reduce Dover's use of fossil fuels, as well as in/offsetting residual carbon emissions. A policy requirement and target for in/offsetting residual carbon should be included for Policy SP1 in order to ensure that this Plan contributes and aligns with its own target of "becoming a net zero carbon emitter by 2030 at the latest" as mentioned in paragraph 3.7 of the Local Plan Regulation 19 Submission. Appropriate locations for the insetting and offsetting of residual carbon should be informed by a detailed Local Nature Recovery Strategy, ensuring that such schemes benefit biodiversity.</p>

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Objectives
Rep ID	SDLP544
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We have compiled a 25 page submission on all SPs, most DMs and some SAPs. And updated it on 6 Dec 2022 in the light of the Mr Sunak's dropping of compulsory housebuilding targets and empowerment of LPAs. We are uploading it and sending our whole Word document to DDC localplan@dover.gov.uk to go to the Planning Inspectorate. to make sure it is included.</p> <p>We have grave doubts that the SPs, SAPs, and DM policies will meet the aspirations, vision and objectives announced, and that they will deliver a bright future of <u>equitably distributed</u> prosperity for the district. Throughout the Reg 19 Local Plan there are references to the secretive 'pre-application process' which excludes the public, We submit that this process can exacerbate problems referred to in the 2020 report on England's planning processes from Transparency Intl UK; 'Permission Accomplished : Assessing corruption risks in local government planning'; problems TIUK recommend resolving with 'increased transparency, tighter rules, and strengthened oversight'.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant	We have made precise suggestions in our word document.

and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	Strategic Objectives
Rep ID	SDLP898
Rep Status	Processed
Consultee ID	1331941
Consultee Full Name	Caroline Raffan
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC4 Water Efficiency
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	New build houses are generally seen as having a life span of 100 years. I am concerned that many houses being built in the area are planned to go on flood plains, and are not designed so as to have a longer life on view of projections of sea level rises. Builders are also permitted by DDC to put up too many houses and this is making a negative impact on air quality (too much traffic). Building to existing specifications and not having renewable accessories installed as part of the design is a lost opportunity and will not give buyers a "level playing field" when it comes to energy bills. Thus poorer people will not be benefitting as will richer buyers. The area needs new well designed social housing, which we are simply not seeing at all.

<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>New build houses are generally seen as having a life span of 100 years. I am concerned that many houses being built in the area are planned to go on flood plains, and are not designed so as to have a longer life on view of projections of sea level rises. Builders are also permitted by DDC to put up too many houses and this is making a negative impact on air quality (too much traffic). Building to existing specifications and not having renewable accessories installed as part of the design is a lost opportunity and will not give buyers a "level playing field" when it comes to energy bills. Thus poorer people will not be benefitting as will richer buyers. The area needs new well designed social housing, which we are simply not seeing at all.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>Strategic Objectives</p>
<p>Rep ID</p>	<p>SDLP1336</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331659</p>
<p>Consultee Full Name</p>	<p>Ben Young</p>
<p>Consultee Company / Organisation</p>	<p>The Land Trust</p>
<p>Agent Full Name</p>	<p>Ben Young</p>
<p>Agent Company / Organisation</p>	<p>Bloomfields Chartered Town Planners</p>
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP5 - Fort Burgoyne, Dover</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>Yes</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Yes</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Yes</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as</p>	<p>DDC EDIT: Detailed representation attached to SDLP0447 with figures and maps. Representation reproduced in box 7 below (as originally done by the agent).</p>

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

1. Introduction

1.1. Following the publication of the Dover District Council Local Plan (Regulation 18 Draft) and the Targeted Call for Sites on the 20th of January 2021, the Land Trust submitted representations in relation to the development of their own appropriate strategy for the possible future use and regeneration of **Fort Burgoyne, Fort Burgoyne Road, Guston, Dover, CT15 5LP**. These representations are included as **Appendix A** of this Statement, however, can be summarised as follows:

- The site at Fort Burgoyne extends across an area of approximately 42 hectares and includes a recreation ground, a substantial area of chalk grassland and the main buildings and immediate surrounding grounds (including the Parade Ground). Fort Burgoyne is also a designated Schedule Monument, confirming that the site is of national importance.

- Fort Burgoyne was built in the 1860s to protect Dover Castle and was used to defend the South Coast of England as one of the “Palmerston Forts” built to defend against invasion. The polygonal system on which the building is built was used to defend and watch from the highest strategic point in Dover. After the First World War, Fort Burgoyne was used a military depot/store for Connaught Barracks before it ceased to be used for military purposes in 2006. In 2014 the Land Trust, a national charity, acquired the site from Homes England and since then has been considering a variety of options for the future development of Fort Burgoyne. This includes the submission of two pre-application enquiries relating to the future use of the site to DDC in July 2019 (DDC Ref: PE/19/00127) and July 2020 (DDC Ref: PE/20/00234), which serve to demonstrate that the Land Trust has a clear commitment to bringing Fort Burgoyne back into use for public benefit at the earliest opportunity.

- DDC’s adopted Core Strategy 2010, recognised the importance of Fort Burgoyne within the criterion vii of “Strategic Allocation” policy CP10 (Former Connaught Barracks Complex), which stated that alongside the allocation for around 500 dwellinghouses, *“the condition of Fort Burgoyne is stabilised, if possible new uses are accommodated, a public access strategy is agreed and a management arrangement is incorporated that secures a sustainable future for the Fort”*. The Dover District Local Plan Regulation 18 Draft appeared to “down-grade” of the Former Connaught Barracks site from a “Strategic Allocation” to a “Non-Strategic Housing Allocation”. The Regulation 18 draft no longer made any specific reference to Fort Burgoyne with no strategic policy objective to deliver the future of the Fort, a Scheduled Monument of national historic interest that is included on the Historic England at risk register.

- The representation therefore sought to raise that the Draft Local Plan needed to provide clarification as to how the regeneration of the two separate elements (being the residential development of Connaught Barracks and the regeneration of Fort Burgoyne) will be delivered to allow for proposals for Fort Burgoyne to be brought forward under a set of key objectives, independent of the Connaught Barracks housing development. It was subsequently suggested within the representation that the Fort’s future is secured through other means within the new Local Plan, either through its own strategic policy in other sections of the plan (such as the Employment and the Local Economy section), or through the re-wording of Site GUS002 or through other Development Management policies.

- Finally, given that, in a “Strategic Futures” Report (included as part of **Appendix A**) prepared by WYG and commissioned by the Land Trust, it was identified that there is circa 3,000 square metres of floorspace within existing buildings at Fort Burgoyne that would be potentially suitable for a wide variety of uses. It was also suggested that in order to secure a long-term future use for Fort Burgoyne and secure its regeneration, it would be wholly appropriate for it to be allocated within Strategic Policy 9 for business and employment purposes, in order for more flexibility to be given to the types of uses that might be permissible at the site.

1.2. Dover District Council (DDC) has subsequently published the Regulation 19 Submission of the Dover District Council Local Plan which sets out the vision, strategic objectives and overarching development strategy for future growth in the district over the period to 2040. The Land Trust have therefore instructed Bloomfields Chartered Town Planners to prepare further representations in relation to the Regulation 19 submission and the regeneration and future use of the Scheduled Monument, Fort Burgoyne.

2. Regulation 19 Submission of the Dover District Council Local Plan

2.1. It is welcomed that the aforementioned representations have been taken into account within the Regulation 19 Submission of the Dover District Council Local Plan.

SAP5 - Fort Burgoyne, Dover

2.2. In particular, the Trust is pleased to see the inclusion of Fort Burgoyne for Mixed Employment Use in table 4.1 and a positive site-specific policy to support site regeneration at Fort Burgoyne within Chapter 4: Housing and Employment Site Allocations at Strategic Allocation Policy SAP5 which states the following:

Figure 1: SAP 5- Fort Burgoyne, Dover as of Regulation 19 Submission, DDC Local Plan

2.3. The Land Trust also notes the pre-amble to Policy SAP5 which, at 4.109, recognises that Fort Burgoyne has the potential to accommodate new uses, provided that they are compatible with its status as a scheduled monument. The Trust continues to explore suitable uses for the reuse of the Fort, as evidenced by the grant of planning permission 21/01000 on the 7th July 2022 for the change of use of 4no. casemates to Use Class E with associated ancillary works.

2.4. The Land Trust remains committed to attracting uses for the Fort that will fit in with the long-term sustainable vision for investment in its re-use, as required by the preamble to Policy SAP5. The uses being explored, as evidenced in the previous Regulation 18 representations, are all being considered with the aim of supporting local business growth and ensuring at the same time that any mixture of uses at the site are compatible in respect of access, servicing, general amenity and crucially with the aims of conserving the Scheduled Monument.

2.5. While the inclusion of this policy is largely supported, The Trust has a number of comments in respect of the criteria:

2.6. Criterion h sets out that a Surface Water Management strategy should be produced for the site. The Trust recognises the importance of surface water management; however, it is highlighted that the Fort already benefits from an existing surface water drainage system which was built in the 1860s as part of the construction of the site. This system has always discharged directly to the ditch of the Fort where it soaks into the ground.

2.7. Given the Scheduled Ancient Monument status of the site, establishing an alternative strategy for managing surface water may not be practical and could result in harm. As such it is suggested that this criterion should be removed.

2.8. Notwithstanding this, where relevant, any future planning applications for uses or development at the Fort can demonstrate if required how it would be compatible with the existing surface water drainage system and not require any alternative arrangements for its disposal.

2.9. In respect of criterion j which suggests that *“development within the boundary of Fort Burgoyne which would have a detrimental impact on the heritage significance, setting, views, biodiversity, character of coherence of the components and elements of the complex will not be permitted”*.

2.10. While the Trust acknowledges the need to avoid development which will have a detrimental impact on the range of criteria identified in this policy, any development within Fort Burgoyne would be restricted by the requirement for Scheduled Monument Consent approved by Historic England which is considered to negate the need for this criterion. Draft Local Plan policies in respect of landscape (NE2), ecological (SP13) and historic environment (HE1, SP15) further negate the need for this criterion.

2.11. It is therefore respectfully suggested that criteria h and j are removed from policy SAP 5.

Chapter 2 - Vision and Objectives

2.12. Chapter 2 sets out the overarching vision for Dover District, including that *“through careful stewardship of its world class landscapes, thriving natural environments and wealth of historic sites, Dover District will be a destination of choice for people of all ages to make their home, for businesses to invest in and for visitors to explore and experience.”*

2.13. It is appreciated that the vision highlights the *“Sensitive restoration of elements of its rich built heritage, will enhance the attractiveness of the town, while improved connections to its seafront will have been delivered by high quality design and investment in place making.”* Together with the strategic objective (echoed in Strategic Policy 15) to conserve and enhance heritage assets in the district *“in a manner appropriate to their significance, recognising their intrinsic value as a finite resource as well as their contribution to the character of the District and the positive role they can play in the regeneration of the District.”*

2.14. The Trust also welcomes the identification of Fort Burgoyne on the Local Plan key diagram (Figure 2 below) alongside other Regeneration Sites covered by policy SP6 as set out further over the page.

Figure 2: Figure 2.1, Local Plan Key Diagram

Chapter 3 - Strategic Policies

2.15. Chapter 3 sets out the districts strategic policies to achieve the aforementioned strategic objectives.

SP6 Economic Growth

2.16. Strategic Policy 6 seeks to grow and diversify the Dover District economy by providing additional employment floorspace through the regeneration of brownfield sites in key locations in the district, such as Fort Burgoyne, to deliver flexible employment uses, achieve a higher level of job growth, and help provide additional flexibility and choice to the market over the Plan period.

Figure 3: SP6- Economic Growth, Dover as of Regulation 19 Submission, DDC Local Plan

2.17. The Trust welcomes the inclusion of Fort Burgoyne at criterion 2 of policy SP6 as site where regeneration for a mix of uses to secure their future will be supported by Dover District Council.

2.18. It is noted that paragraph 3.117 sets out that no floorspace allowance has been included for Fort Burgoyne (and other sites allocated under criterion 2) as they are *"brownfield sites allocated for regeneration, and the mix of development and floorspace requirements will need to be determined through the planning application process in accordance with the policies in the Local Plan."*

2.19. Given the complexities of the site we support this position but anticipate that employment floorspace will amount to circa 3,000 sqm.

Chapter 11 - The Natural Environment

Policy NE1 Biodiversity Net Gain

2.20. The Trust agrees with the requirements of Natural Environment Policy 1 for development proposals to provide a minimum of 10% biodiversity net gain above the ecological baseline within the development boundary. And notes criterion (a) which states that where it can be demonstrated that ecologically meaningful biodiversity net gain cannot be achieved within the site boundary, the Council will consider off-site alternatives in line with the mitigation hierarchy approach.

2.21. Given that a large portion of the 42 hectares at Fort Burgoyne has the potential to provide for significant biodiversity offering, in responding to this consultation The Trust wishes to record interest in working with the Council in developing its Dover District Biodiversity Net Gain Strategy with a view to Coombe Hole providing opportunity for off-site net gain whilst maximising the value of this Local Wildlife Site.

Figure 4: NE1- Biodiversity Net Gain, Dover as of Regulation 19 Submission, DDC Local Plan

2.22. In a similar vein to the BNG potential at Fort Burgoyne, the Land Trust has extensive experience of working with developers to create and provide in perpetuity management of Suitable Alternative Natural Greenspace (SANG), areas of greenspace that are of a quality and type that are suitable to divert recreational activities associated with new residential development away from protected sites (such as Special Protection Areas or Special Areas of Conservation).

2.23. In noting the requirement of Draft Policy SAP1(l) (Whitfield Urban Expansion) which requires a need for SANG to mitigate potential impacts upon the Lydden and Temple Ewell SAC, the Trust wishes to express interest in discussions with the Council and/or the developers of this site with a potential view to assisting them with meeting the policy requirements.

3. Summary

3.1. The overall objective of the Trust remains to seek to deliver a strong, sustainable future for the Fort, that secures its long-term status as a nationally and locally important historic site that will make a vital contribution to the district. The Land Trust supports the Regulation 19 Submission Version of the Dover District Local Plan and welcomes the inclusion of Fort Burgoyne as a strategic allocation site for regeneration subject to the comments set out in this representation.

	4. Appendices Appendix A- Representations on the Regulation 18 Draft Dover District Local Plan 2021 and Targeted Call for Sites
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Objectives
Rep ID	SDLP1205
Rep Status	Processed
Consultee ID	1332924
Consultee Full Name	Amy Aldridge
Consultee Company / Organisation	Gladman Developments Ltd
Agent Full Name	Amy Aldridge
Agent Company / Organisation	Gladman Developments Ltd
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Vision and Objectives
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Gladman support the Council's objectives to create a sustainable environment, prosperous economy, vibrant communities and thriving communities. These strategic objectives can all be achieved through supporting housing delivery on sustainable sites and in suitable settlements underpinned by a robust spatial strategy and housing requirement. (DDC Note - Text Extracted from Document sent from Gladman Developments Ltd. Full attachment can be found under the introduction comment reference (SDLP1192)
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness	

matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Objectives
Rep ID	SDLP1443
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Strategic objectives
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<i>DDC Note The text below is an extract from the original representation which is attached to SDLP1438.</i> Overarching Vision and Strategic objectives are designed to be, and are, emotionally inspiring. But we note numerous areas where the policies are not compatible with the aspirations described in Vision and Objectives. It is striking how very often the first comment from the public when planning is mentioned, is that the big developers run the LPA, and other LPAs in Kent, because of the strength of the developer lobby and its donations to the party in power and there is little local political backbone to prevent high profit ribbon suburban development overrunning the

	<p>beautiful district that residents love, causing dangerous gridlock in our compact coastal towns. Prime Minister Sunak's announcement on 5 Dec 2022 about dropping compulsory housebuilding targets, means this Plan's SP3 and DM-H1 may now be unsound and not compliant with emerging govt policy. We note a prevalent belief among the public that well meaning young planners are subject to a culture that puts satisfying 'developer partners' above the pleas of the electorate. Before Reg 18 DDC expelled community groups such as the Deal Society and The Dover Society and representatives of level 1 councils from the Local Plan Working Group (raising a question about the compliance with the Localism Act of 2011, and whether the Plan was positively prepared). This is tragic in terms of expectations of local democratic accountability and a dangerous form of disaffection.</p> <p>The public are aware of the Nolan principles which should underpin any local plan to be implemented by a planning committee. This requires any local councillor/ businessman who has any contractual links with developers (or insider, friendly shared-knowledge of plans) to be excluded, as there should not be even a sniff of conflict of interest issues.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	

Key Diagram

Local Plan Consultation Point	Key Diagram
Rep ID	SDLP1049
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Key Diagram
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	See below
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	(The rail line from Dover Priory through Kearsney (close to Whitfield Urban development) to Canterbury East and Faversham, the Victoria Line, should be added to graphic page 17, it underpins siting of some large developments.)
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	Dover and Deal Green Party submission to Reg19 consultation.pdf
Local Plan Consultation Point	Key Diagram
Rep ID	SDLP1337
Rep Status	Processed
Consultee ID	1331659
Consultee Full Name	Ben Young
Consultee Company / Organisation	The Land Trust
Agent Full Name	Ben Young
Agent Company / Organisation	Bloomfields Chartered Town Planners
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP5 - Fort Burgoyne, Dover
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC EDIT: Detailed representation attached to SDLP0447 with figures and maps. Representation reproduced in box 7 below (as originally done by the agent).
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>1. Introduction</p> <p>1.1. Following the publication of the Dover District Council Local Plan (Regulation 18 Draft) and the Targeted Call for Sites on the 20th of January 2021, the Land Trust submitted representations in relation to the development of their own appropriate strategy for the possible future use and regeneration of Fort Burgoyne, Fort Burgoyne Road, Guston, Dover, CT15 5LP. These representations are included as Appendix A of this Statement, however, can be summarised as follows:</p> <ul style="list-style-type: none"> • The site at Fort Burgoyne extends across an area of approximately 42 hectares and includes a recreation ground, a substantial area of chalk grassland and the main buildings and immediate surrounding grounds (including the Parade Ground). Fort Burgoyne is also a designated Schedule Monument, confirming that the site is of national importance. • Fort Burgoyne was built in the 1860s to protect Dover Castle and was used to defend the South Coast of England as one of the "Palmerston Forts" built to defend against invasion. The polygonal system on which the building is built was used to defend and watch from the highest strategic point in Dover. After the First World War, Fort Burgoyne was used a military depot/store for Connaught Barracks before it ceased to be used for military purposes in 2006. In 2014 the Land Trust, a national charity, acquired the site from Homes England and since then has

been considering a variety of options for the future development of Fort Burgoyne. This includes the submission of two pre-application enquiries relating to the future use of the site to DDC in July 2019 (DDC Ref: PE/19/00127) and July 2020 (DDC Ref: PE/20/00234), which serve to demonstrate that the Land Trust has a clear commitment to bringing Fort Burgoyne back into use for public benefit at the earliest opportunity.

- DDC's adopted Core Strategy 2010, recognised the importance of Fort Burgoyne within the criterion vii of "Strategic Allocation" policy CP10 (Former Connaught Barracks Complex), which stated that alongside the allocation for around 500 dwellinghouses, *"the condition of Fort Burgoyne is stabilised, if possible new uses are accommodated, a public access strategy is agreed and a management arrangement is incorporated that secures a sustainable future for the Fort"*. The Dover District Local Plan Regulation 18 Draft appeared to "down-grade" of the Former Connaught Barracks site from a "Strategic Allocation" to a "Non-Strategic Housing Allocation". The Regulation 18 draft no longer made any specific reference to Fort Burgoyne with no strategic policy objective to deliver the future of the Fort, a Scheduled Monument of national historic interest that is included on the Historic England at risk register.

- The representation therefore sought to raise that the Draft Local Plan needed to provide clarification as to how the regeneration of the two separate elements (being the residential development of Connaught Barracks and the regeneration of Fort Burgoyne) will be delivered to allow for proposals for Fort Burgoyne to be brought forward under a set of key objectives, independent of the Connaught Barracks housing development. It was subsequently suggested within the representation that the Fort's future is secured through other means within the new Local Plan, either through its own strategic policy in other sections of the plan (such as the Employment and the Local Economy section), or through the re-wording of Site GUS002 or through other Development Management policies.

- Finally, given that, in a "Strategic Futures" Report (included as part of **Appendix A**) prepared by WYG and commissioned by the Land Trust, it was identified that there is circa 3,000 square metres of floorspace within existing buildings at Fort Burgoyne that would be potentially suitable for a wide variety of uses. It was also suggested that in order to secure a long-term future use for Fort Burgoyne and secure its regeneration, it would be wholly appropriate for it to be allocated within Strategic Policy 9 for business and employment purposes, in order for more flexibility to be given to the types of uses that might be permissible at the site.

1.2. Dover District Council (DDC) has subsequently published the Regulation 19 Submission of the Dover District Council Local Plan which sets out the vision, strategic objectives and overarching development strategy for future growth in the district over the period to 2040. The Land Trust have therefore instructed Bloomfields Chartered Town Planners to prepare further representations in relation to the Regulation 19 submission and the regeneration and future use of the Scheduled Monument, Fort Burgoyne.

2. Regulation 19 Submission of the Dover District Council Local Plan

2.1. It is welcomed that the aforementioned representations have been taken into account within the Regulation 19 Submission of the Dover District Council Local Plan.

SAP5 - Fort Burgoyne, Dover

2.2. In particular, the Trust is pleased to see the inclusion of Fort Burgoyne for Mixed Employment Use in table 4.1 and a positive site-specific policy to support site regeneration at Fort Burgoyne within Chapter 4: Housing and Employment Site Allocations at Strategic Allocation Policy SAP5 which states the following:

Figure 1: SAP 5- Fort Burgoyne, Dover as of Regulation 19 Submission, DDC Local Plan

2.3. The Land Trust also notes the pre-amble to Policy SAP5 which, at 4.109, recognises that Fort Burgoyne has the potential to accommodate new uses, provided that they are compatible with its status as a scheduled monument. The Trust continues to explore suitable uses for the reuse of the Fort, as evidenced by the grant of planning permission 21/01000 on the 7th July 2022 for the change of use of 4no. casemates to Use Class E with associated ancillary works.

2.4. The Land Trust remains committed to attracting uses for the Fort that will fit in with the long-term sustainable vision for investment in its re-use, as required by the preamble to Policy SAP5. The uses being explored, as evidenced in the previous Regulation 18 representations, are all being considered with the aim of supporting local business growth and ensuring at the same time that any mixture of uses at the site are compatible in respect of access, servicing, general amenity and crucially with the aims of conserving the Scheduled Monument.

2.5. While the inclusion of this policy is largely supported, The Trust has a number of comments in respect of the criteria:

2.6. Criterion h sets out that a Surface Water Management strategy should be produced for the site. The Trust recognises the importance of surface water management; however, it is highlighted that the Fort already benefits from an existing surface water drainage system which was built in the 1860s as part of the construction of the site. This system has always discharged directly to the ditch of the Fort where it soaks into the ground.

- 2.7. Given the Scheduled Ancient Monument status of the site, establishing an alternative strategy for managing surface water may not be practical and could result in harm. As such it is suggested that this criterion should be removed.
- 2.8. Notwithstanding this, where relevant, any future planning applications for uses or development at the Fort can demonstrate if required how it would be compatible with the existing surface water drainage system and not require any alternative arrangements for its disposal.
- 2.9. In respect of criterion j which suggests that *“development within the boundary of Fort Burgoyne which would have a detrimental impact on the heritage significance, setting, views, biodiversity, character of coherence of the components and elements of the complex will not be permitted”*.
- 2.10. While the Trust acknowledges the need to avoid development which will have a detrimental impact on the range of criteria identified in this policy, any development within Fort Burgoyne would be restricted by the requirement for Scheduled Monument Consent approved by Historic England which is considered to negate the need for this criterion. Draft Local Plan policies in respect of landscape (NE2), ecological (SP13) and historic environment (HE1, SP15) further negate the need for this criterion.
- 2.11. It is therefore respectfully suggested that criteria h and j are removed from policy SAP 5.

Chapter 2 - Vision and Objectives

- 2.12. Chapter 2 sets out the overarching vision for Dover District, including that *“through careful stewardship of its world class landscapes, thriving natural environments and wealth of historic sites, Dover District will be a destination of choice for people of all ages to make their home, for businesses to invest in and for visitors to explore and experience.”*
- 2.13. It is appreciated that the vision highlights the *“Sensitive restoration of elements of its rich built heritage, will enhance the attractiveness of the town, while improved connections to its seafront will have been delivered by high quality design and investment in place making.”* Together with the strategic objective (echoed in Strategic Policy 15) to conserve and enhance heritage assets in the district *“in a manner appropriate to their significance, recognising their intrinsic value as a finite resource as well as their contribution to the character of the District and the positive role they can play in the regeneration of the District.”*
- 2.14. The Trust also welcomes the identification of Fort Burgoyne on the Local Plan key diagram (Figure 2 below) alongside other Regeneration Sites covered by policy SP6 as set out further over the page.

Figure 2: Figure 2.1, Local Plan Key Diagram

Chapter 3 - Strategic Policies

- 2.15. Chapter 3 sets out the districts strategic policies to achieve the aforementioned strategic objectives.

SP6 Economic Growth

- 2.16. Strategic Policy 6 seeks to grow and diversify the Dover District economy by providing additional employment floorspace through the regeneration of brownfield sites in key locations in the district, such as Fort Burgoyne, to deliver flexible employment uses, achieve a higher level of job growth, and help provide additional flexibility and choice to the market over the Plan period.

Figure 3: SP6- Economic Growth, Dover as of Regulation 19 Submission, DDC Local Plan

- 2.17. The Trust welcomes the inclusion of Fort Burgoyne at criterion 2 of policy SP6 as site where regeneration for a mix of uses to secure their future will be supported by Dover District Council.
- 2.18. It is noted that paragraph 3.117 sets out that no floorspace allowance has been included for Fort Burgoyne (and other sites allocated under criterion 2) as they are *“brownfield sites allocated for regeneration, and the mix of development and floorspace requirements will need to be determined through the planning application process in accordance with the policies in the Local Plan.”*
- 2.19. Given the complexities of the site we support this position but anticipate that employment floorspace will amount to circa 3,000 sqm.

Chapter 11 - The Natural Environment

Policy NE1 Biodiversity Net Gain

- 2.20. The Trust agrees with the requirements of Natural Environment Policy 1 for development proposals to provide a minimum of 10% biodiversity net gain above the ecological baseline within the development boundary. And notes criterion (a) which states that where it can be demonstrated that ecologically meaningful biodiversity net gain cannot be achieved within the site boundary, the Council will consider off-site alternatives in line with the mitigation hierarchy approach.

2.21. Given that a large portion of the 42 hectares at Fort Burgoyne has the potential to provide for significant biodiversity offering, in responding to this consultation The Trust wishes to record interest in working with the Council in developing its Dover District Biodiversity Net Gain Strategy with a view to Coombe Hole providing opportunity for off-site net gain whilst maximising the value of this Local Wildlife Site.

Figure 4: NE1- Biodiversity Net Gain, Dover as of Regulation 19 Submission, DDC Local Plan

2.22. In a similar vein to the BNG potential at Fort Burgoyne, the Land Trust has extensive experience of working with developers to create and provide in perpetuity management of Suitable Alternative Natural Greenspace (SANG), areas of greenspace that are of a quality and type that are suitable to divert recreational activities associated with new residential development away from protected sites (such as Special Protection Areas or Special Areas of Conservation).

2.23. In noting the requirement of Draft Policy SAP1(l) (Whitfield Urban Expansion) which requires a need for SANG to mitigate potential impacts upon the Lydden and Temple Ewell SAC, the Trust wishes to express interest in discussions with the Council and/or the developers of this site with a potential view to assisting them with meeting the policy requirements.

3. Summary

3.1. The overall objective of the Trust remains to seek to deliver a strong, sustainable future for the Fort, that secures its long-term status as a nationally and locally important historic site that will make a vital contribution to the district. The Land Trust supports the Regulation 19 Submission Version of the Dover District Local Plan and welcomes the inclusion of Fort Burgoyne as a strategic allocation site for regeneration subject to the comments set out in this representation.

4. Appendices

Appendix A- Representations on the Regulation 18 Draft Dover District Local Plan 2021 and Targeted Call for Sites

<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	

Local Plan Consultation Point	Key Diagram
Rep ID	SDLP1440
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Key Diagram
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC Note The text below is an extract from the original representation which is attached to SDLP1438. (The rail line from Dover Priory through Kearsney (close to Whitfield Urban development) to Canterbury East and Faversham, the Victoria Line, should be added to graphic page 17, it underpins siting of some large developments.)
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Strategic Policies

Local Plan Consultation Point	Strategic Policies
Rep ID	SDLP365
Rep Status	Processed
Consultee ID	1263106
Consultee Full Name	Mr Mark Norcliffe
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Strategic Policies - specifically SP1, SP3, SP12
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I am commenting on the draft Local Plan in relation to soundness, since it is my belief that, at various points, this long and convoluted document fails to meet the specified criteria of being "positively prepared, justified, effective and consistent with national policy."</p> <p>I would contend that, in both its objectives and details, the Local Plan contains numerous omissions and contradictions, and that there is incorrect information contained in both the Plan itself and in its evidence base. These failings, of which examples are provided in my text, render the Plan unsound.</p> <p>In making my submission, I am making some observations about the general objectives and the Plan, and their possible implementation. However, in the examples that I cite, I have – inevitably – focused on my own community of Shepherdswell, and the neighbouring villages of Eythorne and Elvington. Others will be better placed than me to comment on shortcomings in relation to their specific neighbourhoods.</p> <p>The Overarching Vision sets out a number of lofty objectives, including :</p> <ul style="list-style-type: none"> • "Above all, the District will be defined by its enviable countryside and coastal environments" • "New developments will respect the spectacular natural environments" • The towns and villages of the District will enjoy improved infrastructure and services" • "New developments in accessible locations"

	<ul style="list-style-type: none"> • “Reducing the need to travel”– to meet climate change objectives • “Development that would result in disproportionate growth to any of the District’s settlements which cannot be supported by the necessary infrastructure and services.....will be resisted” <p>Unfortunately, the policies then put forward directly contradict these worthy aims. For example, Strategic Policy 3 (Housing Growth) foresees [para 3.51] that 76% of new housing stock will be built on greenfield sites, and only 23% on brownfield sites. This is clearly incompatible with, and in direct contradiction to, the vision of preserving the local countryside and reducing the need to travel.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	It is difficult to know where to begin. Perhaps a good starting point would be the inherent contradictions between the draft Plan's lofty strategic aims (of which I have highlighted a few above), and the planning policies that it then goes on to propose. Clearly the only way to meet many of the strategic objectives would be to focus on the redevelopment and regeneration of the town centre of Dover itself to create a proper urban centre that can generate prosperity for the whole district. This is where the plan should be focused, and not on cheap building developments in open countryside without the necessary infrastructure to support them.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	In the responses to the Regulation 18 consultation of the draft Local Plan, numerous inaccuracies and mistakes were reported to DDC. These were not matters of opinion, but matters of fact. It has become apparent that not all of these have been corrected in the document now under consultation. I am not, therefore, confident that the Council can be relied upon to present to the Inspector a document that is 100% accurate, and that members of the local community must have the opportunity to challenge such failings in a public forum.
Include files	
Local Plan Consultation Point	Strategic Policies
Rep ID	SDLP297
Rep Status	Processed
Consultee ID	1331112
Consultee Full Name	Miss Emma Waller
Consultee Company / Organisation	Kent Wildlife Trust
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Strategic Policies - Introduction
2 - Do you consider this part of the Plan sound?	No

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We are concerned that a Local Nature Recovery Strategy has not yet been provided, with paragraph 3.290 saying: <i>"As part of the of the Environment Act 2021 a national network of Local Nature Recovery Strategies is planned. Strategic Policy 14 provides support for the management, restoration and creation of habitats in accordance with the Kent Local Nature Recovery Strategy that will come forward"</i>. We strongly urge that a Nature Recovery Strategy is put forward as soon as possible and should include the recommendations set out in our comments.</p> <p>Kent Wildlife Trust support Dover District Council in their declaration of a climate emergency, and the goal of delivering a carbon neutral district by 2050. Further, we support the commitment for the Council to become a net zero carbon emitter by 2030 at the latest. The creation of a Climate Change Strategy and Action Plan will be essential in achieving these goals. In assessing the carbon emissions of the district, this plan must account for decisions taken by the council, including planning decisions, and on their impact to climate change. Clear policies and principles should seek to reduce emissions and increase absorption. At present we do not feel that the proposed policies will not be sufficient to meet the borough's commitments to achieve carbon neutrality.</p> <p>Regarding public health and wellbeing, Dover District Council should focus on connection with nature in the formation of all policies relating to health and communities.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policies
Rep ID	SDLP348
Rep Status	Processed
Consultee ID	1331112
Consultee Full Name	Miss Emma Waller
Consultee Company / Organisation	Kent Wildlife Trust

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Strategic Polices - Introduction
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We are concerned that a Local Nature Recovery Strategy has not yet been provided, with paragraph 3.290 saying: <i>"As part of the of the Environment Act 2021 a national network of Local Nature Recovery Strategies is planned. Strategic Policy 14 provides support for the management, restoration and creation of habitats in accordance with the Kent Local Nature Recovery Strategy that will come forward"</i>. We strongly urge that a Nature Recovery Strategy is put forward as soon as possible and should include the recommendations set out in our comments.</p> <p>Kent Wildlife Trust support Dover District Council in their declaration of a climate emergency, and the goal of delivering a carbon neutral district by 2050. Further, we support the commitment for the Council to become a net zero carbon emitter by 2030 at the latest. The creation of a Climate Change Strategy and Action Plan will be essential in achieving these goals. In assessing the carbon emissions of the district, this plan must account for decisions taken by the council, including planning decisions, and on their impact to climate change. Clear policies and principles should seek to reduce emissions and increase absorption. At present we do not feel that the proposed policies will not be sufficient to meet the borough's commitments to achieve carbon neutrality.</p> <p>Regarding public health and wellbeing, Dover District Council should focus on connection with nature in the formation of all policies relating to health and communities.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

Strategic Policy 1 - Planning for Climate Change

Local Plan Consultation Point	Strategic Policy 1 - Planning for Climate Change
Rep ID	SDLP153
Rep Status	Processed
Consultee ID	1329874
Consultee Full Name	Ms Nicola Purcell
Consultee Company / Organisation	Aylesham Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>In October 2021, Aylesham Parish Council supported the Climate and Ecological Emergency (CEE) Bill which address the full extent of the climate and nature crisis in the UK. As a result, any local plan should use up-to-date science to make sound recommendations.</p> <p>As the district is extremely water scarce, all possible measures should be implemented to help mitigate water scarcity. The use of Sustainable Urban Drainage systems (SUDs) is required to be prominent in all future developments. This will help to deal with surface water flooding. We welcome the Draft Local Plan's hierarchy of methods of discharge, with the use of combined sewers coming last.</p> <p>This relates to CC6 of SP1 – Surface Water Management.</p> <p>There are a number of options to ensure new homes produce the least possible carbon emissions. Aylesham Parish Council would like to see Dover District Council require the full 2025 Future Homes Standard to be delivered now (this will reduce emissions by between 75-80% compared to current standards), not at some point during the Local Plan's lifetime.</p> <p>This relates to CC1 of SP1 – Reducing Carbon Emissions.</p> <p>We welcome the commitment to planting trees within new developments that are native to Kent. This will help to keep the rural feel of Aylesham alive. Currently we often see newly planted trees dying within the first few years of their lives. There must be a comprehensive plan to ensure that these trees reach maturity (part d) and how this will be enforced by the local authority.</p> <p>This relates to CC8 of SP1 – Tree Planting and Protection.</p>

	<p>Aylesham Parish Council welcomes the commitment to planting larger numbers of trees but feels this must come with a long-term solution to maintaining the trees. Dover District Council must also commit to the full 2025 future homes standard now.</p> <p>Aylesham Parish Council welcomes the addition and enhancement of open spaces and play areas. However, there are two points to note in the IDP: why would S106 monies from Aylesham be spent upgrading play areas in Nonington?; and play areas and open spaces are last to be delivered in developments – this must not happen in the future.</p> <p>Aylesham Parish Council is identified as “Delivery Partners” on a number of projects due to be delivered: we have not been consulted on this prior to the Regulation 19 document being released.</p> <p>The HRA[1] suggests that AYL003 – Land South of Aylesham is “high” suitability for the European Golden Plover, and so all measures must be taken to ensure this SPA protected bird species is still able to migrate and flourish in the area. SAP 25 (mixed use employment) is considered “moderate”.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 1 - Planning for Climate Change
Rep ID	SDLP415
Rep Status	Processed
Consultee ID	1266351
Consultee Full Name	Dr Sharon Danby
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP1 planning for climate change

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The local plan is not compliant with legality (legally binding Net Zero Strategy, Climate Emergency Declaration 2019 and Climate Change Act 2008), in that it is too weak. eg section 3.14 "are expected to . . ." encourages tokenism from developers. Developers must adhere to future homes standard now. Retrofitting housing stock afterwards will be too costly and difficult and will be at the cost of the homeowner.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>To become effective and sound and compliant with the law to make Dover and UK zero carbon by 2050, the following should be added: (based on Plymouth and South Devon Joint Local Plan 27 adopted 2019 by 3 LPAs West Devon BC, South Hams DC, Plymouth CC)</p> <p>Delivering low carbon development</p> <p>The need to deliver a low carbon future for Dover district should be considered in the design and implementation of all developments, in support of a 2019 commitment to make Dover district net zero carbon emissions by 2050, it is necessary to halve 2005 levels of carbon emissions by 2034, and to increase the use and production of decentralised energy. The following provisions apply:</p> <p>Developments should identify opportunities to minimise the use of natural resources in the development over its lifetime, such as water, minerals and consumable products, by reuse or recycling of materials in construction, and by making best use of existing buildings and infrastructure. Major development should take account of projected changes in temperature, rainfall, wind and sea level in its design with the aim of mitigating and remaining resilient to the effects of changing climate.</p> <p>Development proposals will be considered in relation to the 'energy hierarchy' set out below:</p> <ul style="list-style-type: none"> Reducing the energy load of the development. Maximising the energy efficiency of fabric. Delivering on-site low carbon or renewable energy systems. Delivering carbon reductions through off-site measures. <p>Developments should reduce the energy load of the development by good layout, orientation and design to maximise natural heating, cooling and lighting, and reduce the heat loss area. For major developments, a solar master plan should show how access to natural light has been optimised in the development, aiming to achieve a minimum daylight standard of 27 per cent Vertical Sky Component and 10 per cent Winter Probable Sunlight Hours.</p> <p>All major development proposals should incorporate low carbon or renewable energy generation to achieve regulated carbon emissions levels of 20 per cent less than that required to comply with Building Regulations Part L.</p> <p>Developments will be required to connect to existing district energy networks in the locality or, where there is a future network planned, to be designed to be capable of connection to that network. Where appropriate, proportionate contributions will be sought to enable a network to be established or completed.</p> <p>(This is stronger than Mitigation a, b, c, d. and nothing less will put DDC on track to meet its legal commitment to be net zero by 2050, or be compliant with UK legal commitment to be net zero by 2050).</p> <p>There needs to be a stronger commitment to replace car use with walking and cycling and the network needs to be in place to support this. Particularly to connect to rail and bus services. Bus services need to be reinstated.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 1 - Planning for Climate Change
Rep ID	SDLP215
Rep Status	Processed
Consultee ID	1331245
Consultee Full Name	Mrs Marion Gourlay
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP 1 Planning for Climate Change
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>To plan for Climate Change the LP states it will be "Reducing the need to travel and maximising opportunities for smarter sustainable transport modes". This is rightly in line with National Transport and Land Use Policy, yet throughout your Local Plan much land for housing is earmarked for greenfield sites and edge of rural villages which will require fossil fuel car based developments where day to day trips for shopping, employment or medical facilities will only be made only by car.</p> <p>Climate friendly new housing necessitates accessibility by sustainable modes of transport - rail, bus or cycling. Yet there seems to be no joined up LU & Transport planning? For example:</p> <p>SAP32 Eastry 80 homes adjacent to land already granted permission for 100 homes (old Eastry hospital site) making approx. 200 additional new homes and 400 additional people into a village will a population of 2400. That's 25% of the current population. I do not see any sustainable transport plans to reduce the need to travel by car not any additional communities facilities.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will	<ol style="list-style-type: none"> 1 Be bold, be visionary. 2 Transport and LU polices must integrate. 3 Create th 15-min neighbourhood. Community facilities including shops, GPs and schools must be part of all additional housing plan. 4 Seek every opportunity to encourage sustainable & active travel.

make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I live between several beautiful villages in East Kent. Sady ruined by the volume, speed of additional traffic. More greenfiled development encourages additional car use. I find it extremely disappointing that the laudable words in the introduction to the LP do not translate to sustainable development in practice.
Include files	
Local Plan Consultation Point	Strategic Policy 1 - Planning for Climate Change
Rep ID	SDLP298
Rep Status	Processed
Consultee ID	1331112
Consultee Full Name	Miss Emma Waller
Consultee Company / Organisation	Kent Wildlife Trust
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP1 - Planning for Climate Change
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Policy SP1 – Planning for Climate Change solely focuses on how new developments will tackle climate change. In order to effectively deliver on its commitments to tackle the nature and climate crisis it is essential that the Plan addresses both the need to reduce Dover's use of fossil fuels, as well as in/offsetting residual carbon emissions.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance	A policy requirement and target for in/offsetting residual carbon should be included for Policy SP1 in order to ensure that this Plan contributes and aligns with its own target of <i>"becoming a net zero carbon emitter by 2030 at the latest"</i> as mentioned in paragraph 3.7 of the Local Plan Regulation 19 Submission. Appropriate locations for the inseting and offsetting of residual carbon should be informed by a detailed Local Nature Recovery Strategy, ensuring that such schemes benefit biodiversity.

with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Policy SP1 should also incorporate the use of nature based solutions into the policy, as they are vital to help reduce the impacts of climate change as well as to protect ecosystems and biodiversity. Nature based solutions can be incorporated into new developments, therefore for Policy SP1 we propose adding “ Incorporating sustainable nature based solutions, such as green roofs, rain gardens, or constructed wetlands to reduce flood risks and safeguard communities, habitats and species ”.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 1 - Planning for Climate Change
Rep ID	SDLP649
Rep Status	Processed
Consultee ID	1221958
Consultee Full Name	Ms Bridget Fox
Consultee Company / Organisation	The Woodland Trust
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Strategic Policy 1 - Planning for Climate Change
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	We welcome the priority given to the Council's commitment to being carbon neutral by 2050 and in particular the inclusion of policy seeking to maximise multi-functional green infrastructure for climate mitigation and adaptation. We would further encourage adding specific wording in support of new tree planting and woodland creation. A rapid increase in the rate of woodland creation has been proposed by the UK's Committee on Climate Change, to provide a key mechanism to lock up carbon in trees and soils, provide an alternative to fossil fuel energy and resource-hungry building material, and importantly to stem the declines in biodiversity. We welcome the approach set out later in the Plan (section 5.56) to increase tree canopy cover in the District and help sequester carbon from the atmosphere and feel this could usefully be referenced as part of SP1.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	We request that "and increasing tree canopy cover" be added after the bullet point "Maximising green infrastructure". While not required to achieve legal compliance, it would make the policy sounder by joining up with national policy on increasing tree cover in response to climate change.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	emergency-tree-plan.pdf
Local Plan Consultation Point	Strategic Policy 1 - Planning for Climate Change
Rep ID	SDLP708
Rep Status	Processed
Consultee ID	1261008
Consultee Full Name	Dr John Garcia-Rodriguez
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Strategic Policy 1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>The Dover Local Plan does not consider prevention as part of its climate change strategy, just mitigation and adaptation.</p> <p>It is well documented that cities and urban area are more environmentally-friendly than smaller rural dwelling patterns. This is primarily because of the impacts of transport of people and goods to and from these areas. Heating can also be provided more economically on a district basis. Dover should be concentrating on developing existing towns more such as Dover, Deal and Sandwich - not Aylesham.</p> <p>In terms of mitigation and adaptation similar considerations apply. Energy usage, likely to be more and more expensive, needs to be minimised. Again heating and transport are the two key uses of energy and promotion of urban dwelling opportunities needs to be the priority.</p> <p>Building houses uses a lot of energy in the production of materials such a concrete and tiles as well as in the construction process. The council should be planning on reusing and upgrading the rather poor housing stock there is in Dover in particular but also in north Deal. There is a lot of unoccupied housing in Dover.</p> <p>Just as all new houses should be ready to fit electric car chargers, new houses should all have solar panels on their roofs and designed to have roofs which are sufficiently south facing.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The modification would be to shift large scale development from Aylesham to Dover primarily but also to Deal and Sandwich. Development should not be primarily new houses but large scale refurbishment of run-down unoccupied houses. This would reduce the carbon impact of housing people and the impact of these people would be less in an urban area.</p> <p>I think this would be a big change to the plan but it is a "climate emergency".</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Not Applicable</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>Strategic Policy 1 - Planning for Climate Change</p>
<p>Rep ID</p>	<p>SDLP1051</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331762</p>
<p>Consultee Full Name</p>	<p>Ms Waite-Gleave Sarah Waite-Gleave</p>
<p>Consultee Company / Organisation</p>	<p>Dover and Deal Green Party</p>
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs</p>

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The local plan is not compliant with legality (legally binding Net Zero Strategy, Climate Emergency Declaration 2019 and Climate Change Act 2008), in that it is too weak. 'contributes to . . . ' encourages tokenism from developers. Developers would not starve if their return on investment were reduced from 29 or 30%.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>To become effective and sound and compliant with the law to make Dover and UK zero carbon by 2050, the following should be added: (based on Plymouth and South Devon Joint Local Plan 27 adopted 2019 by 3 LPAs West Devon BC, South Hams DC, Plymouth CC)</p> <p>Delivering low carbon development</p> <p>The need to deliver a low carbon future for Dover district should be considered in the design and implementation of all developments, in support of a 2019 commitment to make Dover district net zero carbon emissions by 2050, it is necessary to halve 2005 levels of carbon emissions by 2034, and to increase the use and production of decentralised energy. The following provisions apply:</p> <p>Developments should identify opportunities to minimise the use of natural resources in the development over its lifetime, such as water, minerals and consumable products, by reuse or recycling of materials in construction, and by making best use of existing buildings and infrastructure.</p> <p>Major development should take account of projected changes in temperature, rainfall, wind and sea level in its design with the aim of mitigating and remaining resilient to the effects of changing climate.</p> <p>Development proposals will be considered in relation to the 'energy hierarchy' set out below:</p> <p>Reducing the energy load of the development.</p> <p>Maximising the energy efficiency of fabric.</p> <p>Delivering on-site low carbon or renewable energy systems.</p> <p>Delivering carbon reductions through off-site measures.</p> <p>Developments should reduce the energy load of the development by good layout, orientation and design to maximise natural heating, cooling and lighting, and reduce the heat loss area. For major developments, a solar master plan should show how access to natural light has been optimised in the development, aiming to achieve a minimum daylight standard of 27 per cent Vertical Sky Component and 10 per cent Winter Probable Sunlight Hours.</p> <p>All major development proposals should incorporate low carbon or renewable energy generation to achieve regulated carbon emissions levels of 20 per cent less than that required to comply with Building Regulations Part L.</p> <p>Developments will be required to connect to existing district energy networks in the locality or, where there is a future network planned, to be designed to be capable of connection to that network. Where appropriate, proportionate contributions will be sought to enable a network to be established or completed.</p> <p><i>(This is stronger than Mitigation a, b, c, d. and nothing less will put DDC on track to meet its legal commitment to be net zero by 2050, or be compliant with UK legal commitment to be net zero by 2050) Cross referenced with DM policies CC1 and CC2 and CC3.</i></p> <p>'Mitigation f' must include following in order to become effective and sound. ' All new developments of over 40 dwellings must contribute to a Community Infrastructure Levy so that engineered kerbed cycle routes can enhance cycle paths 1, 2,15,16,17, and new engineered cycle tracks must be made safe in winter dark afternoons, new engineered cycle routes must link Whitfield Urban Development with Kearsney and Martin Mill stations and Elvington with Snowdown and Aylesham and Shepherdswell Stations, especially given the rural bus cuts implemented in these</p>

	villages in 2022. Also trains and buses on the key commuter routes must be equipped to carry (electric + cargo) bikes. Cross referenced with DM policy TI1. CIL is also needed to pay for other infrastructure essential for the local plan to be sound which is referred to below.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	Strategic Policy 1 - Planning for Climate Change
Rep ID	SDLP739
Rep Status	Processed
Consultee ID	1331585
Consultee Full Name	Terence Hopper
Consultee Company / Organisation	
Agent Full Name	Terence Hopper
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Srtategic Policy 1 Planning for climate Change
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC appears to have developed a plan that will increase the carbon footprint of the District rather than reduce it. It has developed the Green Village Concept. This appears to be based on fine intentions and hope rather than reasoned rational and common sense. In all likelihood, this will result in large housing estates in the middle of the country, from which residents will have to travel for their every need. In ignoring the settlement hierarchy, DDC has ensured that large sections of the district's residents will have to travel more miles to get what they need and will be less likely to use more environmentally friendly forms of transport. DDC has also developed a plan which would seem to require school children from Deal, Dover, and Thanet to travel to Sandwich for secondary education and the residents of Sandwich to travel to Deal or Dover for some of their leisure and recreational needs. Surely it is better for the children of Deal and Dover to be educated in or close to where they live and the residents of Sandwich to have their sports and leisure needs to be met in the town.

	<p>NB There appear to be no plans to expand secondary school places in Deal or Dover, where there has been and continues to be a considerable expansion of the housing provision.</p> <p>DDC has also embarked on a plan to centralize sources of employment, allowing smaller sites to be converted to housing use, often with the idea of tidying up an area. This reduces the ability of small businesses to locate in the community it serves. The larger managed, sites are not always a good fit for smaller businesses and those that want to work for themselves and so in some sense, the policy is also exclusionary to the smallest of businesses.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>DDC should seek to develop a plan that sticks more closely to its claimed climate credentials, in order for it to comply with national legislation. It should reconsider the Garden Village Concept.</p> <p>Make provision for educational needs to be met where the need arises,</p> <p>Be mindful that centralising the provision of sports and leisure facilities, dissuades many from taking regular exercise and excludes those in the community that have neither the means nor the ability to travel to centralised to the other end of the district.</p> <p>Be mindful of the needs of the smaller businesses that need to be embedded in the communities they serve and allow them the means to do so, by restricting the number of small employment spots that are converted to housing. DDC should move away from viewing employment space solely in terms of square meterage within the district.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	No
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
Include files	
Local Plan Consultation Point	Strategic Policy 1 - Planning for Climate Change
Rep ID	SDLP601
Rep Status	Processed
Consultee ID	1331790
Consultee Full Name	Julie Davies
Consultee Company / Organisation	CPRE Kent
Agent Full Name	
Agent Company / Organisation	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	SP1
<p>2 - Do you consider this part of the Plan sound?</p>	No
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared</p> <p>Justified</p> <p>Effective</p> <p>Consistent with National Policy</p>

4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We are CPRE, the countryside charity. Formed in 1926, CPRE is a registered charity and one of the longest established and most respected environmental groups in England, with over 40,000 members and supporters living in our cities, towns, villages and the countryside. CPRE Kent is the largest of the CPRE County branches</p> <p>Our vision is of a beautiful and thriving countryside that enriches all our lives, and our mission is to promote, enhance and protect that countryside. We believe that the planning system is a toolbox for achieving better – for people, for nature and for the economy – while supporting the delivery of more badly-needed homes to end the housing crisis.</p> <p>In general, CPRE Kent supports a development strategy which meets the following criteria:</p> <ol style="list-style-type: none"> 1 brownfield first, especially in urban areas and not in rural areas where it would result in unsustainable patterns of development 2 development should result in sustainable communities 3 housing provision in rural areas where there is an identified local need, and the scale of development is appropriate for the size of the settlement 4 plans should promote development in locations: <ol style="list-style-type: none"> 1 that are well supported by, or that will support, sustainable transport and active travel and 2 that are well served by regular public transport services and social and community facilities, that are in safe walking and cycling distance or would support, or result in, a sustainable settlement. <p>Overall, it is our position that local planning authorities should seek to ensure that the impact of development on the countryside, both directly and indirectly, is kept to a minimum and that development is sustainable in accordance with national planning policy.</p> <p>This response has been prepared jointly by the Kent Branch office of CPRE Kent and by the Dover District Committee of CPRE Kent, but for brevity our comments are expressed as being from ‘CPRE Kent’ throughout.</p> <p>We would welcome attending the examination to provide additional clarity on any of the points which we have raised.</p> <p>SP1 Planning for Climate Change</p> <p>CPRE Kent welcomes the fact that the first strategic policy relates to climate change, but queries whether climate change is actually at the heart of the Council's spatial strategy?</p> <p>SP1(f) refers to climate change mitigation, by “reducing the need to travel and maximising opportunities for ‘smarter’ sustainable travel” and at SP1(e) reference is made to climate mitigation by “maximising green infrastructure”.</p> <p>It is not clear how the Council's spatial strategy addresses the aim of reducing the need to travel – especially as a one of the proposed strategic allocations is at the rural villages of Eythorne and Elvington – which are car dependent communities, as evidenced by the huge issues they face in terms of rat running (in combination with pinch points in the local rural road network). In addition, funding has been withdrawn from the 92/92A bus service, and in terms of public transport these two villages are served only by a heritage railway line giving connectivity to nearby Shepherdswell, but not to places of local employment, such as Whitfield or Dover.</p> <p>We would query what the effectiveness of climate change mitigation (by maximising green infrastructure) will be, when the majority of the plan's allocations are on greenfield land – which already plays a huge role in carbon sequestration (SP14 Enhancing Green Infrastructure and Biodiversity). With a brownfield first strategy and a bold understanding of the benefits of increased densities, more greenfield sites could be retained for the contribution they already make towards carbon sequestration, food security and the health and wellbeing of the community.</p> <p>It is not clear from policy SP1 how the energy load of developments will be reduced to maximise natural heating, cooling and lighting – if this is the intention of SP1(a), then it should be more clearly stated.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s)	

you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	CPRE Kent would wish to participate at the examination hearings to explore these issues further.
Include files	
Local Plan Consultation Point	Strategic Policy 1 - Planning for Climate Change
Rep ID	SDLP1059
Rep Status	Processed
Consultee ID	1331808
Consultee Full Name	Mr Robert Hogben
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	1 Introduction
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	The plan is unsound as it does not comply with the legally binding commitment made by DDC when they declared a climate emergency in 2020 and prepared their climate change strategy. The plan will not do enough to meet the target of the district being net zero by 2050. DDC should be much more ambitious about the green credentials of new housing. If new homes generated their own power, were

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

insulated to the highest standards, and collected rain water, it would greatly help stretched local services and go a long way towards making the housing stock fit for the coming decades.

The regulation 19 stage of the consultation is not fit for purpose as it is overly complicated and very difficult to use. The process has left many members of the public including me and my wife feeling overwhelmed and confused as to how to make a representation. For those who are working full time this has been a task for which they do not have enough time. As a result those who may have wanted to make a submission have not been able to. The format of the submission form is also difficult to navigate. Without prior experience of planning law it is difficult to say whether a part of the plan is legal or not. As to the duty to cooperate it is impossible to know. The unsound plan needs updating after the government announcement on 5/12/22 that mandatory housing targets are not to be imposed. The figure of nearly 11,000 is unsustainable and should now be reviewed, particularly with respect to allocated land around Station Rd Walmer and proposed developments around villages.

The character and landscape value of the district is being rapidly eroded under the current plan and this must not continue as it is contrary to NPPF 21. It is not sustainable to build on agricultural land which is in short supply as we are only 50% self sufficient in producing food in the UK. The CPRE has found that almost 14,500 hectares of farmland has been permanently lost to development since 2010. The contribution from the districts agricultural land is of vital importance. Much of the agricultural land is also vital for flood protection, and field margins are important for wildlife and biodiversity, forming corridors between habitats for vertebrates and nesting and roosting sites for birds. Dover District also has a wealth of character landscapes, AONB, heritage coast, nature reserves, internationally rare chalk grassland and rewilded areas such as Betteshanger Park. Overdevelopment under the last weak plan has meant that these areas are under pressure and being denuded as their boundaries are eroded and wildlife corridors between sites are cut off. The new plan does not do enough to protect these areas, wildlife and biodiversity. Developments should not be allowed to remove ancient woodlands and trees and biodiverse rich habitats even if it is argued that this is for the greater good. This is not sustainable as all nature is interconnected and if it fails then we all fail. The UK is one of the worst countries in the world for biodiversity loss, we have lost half of our biodiversity since the 1970's.

Development has been at such a pace that infrastructure cannot keep up. Buses have been cut recently, cycle and pedestrian routes have not been upgraded sufficiently to connect some developments to main bus and train routes without car dependence. Aylesham has not had a secondary school which would mean children could walk to school. Many rural communities are entirely car dependent due to lack of buses and the roads not being safe to use their bikes. Not enough emphasis is put on renovating existing housing stock to provide greener, insulated, fuel efficient homes. Each new build generates around 56 tonnes of embedded carbon. The NPPF states that we should prioritise brownfield sites over greenfield but although there are many opportunities to develop brownfield sites in Dover, this has not been prioritised. Many developments have been for larger houses in villages and there is not enough provision for affordable housing.

The wording of the local plan is not definitive, it leaves too many loop holes and vague preferences which enable large developers to argue and get what they want, to maximise profits, not what the people of the Dover area need.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Better mapping and understanding of the Dover District, taking into account internationally rare areas of chalk grassland, woodland and trees wherever they occur.

Large buffers around the AONB to protect its character from the built environment. Stronger protection for the AONB and the Ripple LCA F3.

Tighter protections on our remaining biodiversity.

Tighter definitions in the local plan so that developers have no room to argue what has been specified in the local plan.

Hire several biodiversity officers to monitor closely and prevent loss of ancient woodland, chalk grassland, veteran trees, protected wildlife and rich habitats and to actively go out into the community, looking for ways to improve biodiversity by such things as accessing grants for hedge planting and the creation of ponds where ever possible in our district.

Employ experts to liaise with farmers in our area to encourage the most environmentally friendly farming and land management practices which will encourage maximum biodiversity in the countryside and maximum sequestration of carbon in soils and biomass.

Stop the use of agricultural land for development.

Renovate and insulate rather than build new houses, brownfield not greenfield.

Turn attention away from destroying village communities with unsustainable housing estates outside their village boundaries.

Do not give developers the get out clause of financial mitigation for destruction of wildlife and habitat. No development should further deplete our critically low levels of biodiversity.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 1 - Planning for Climate Change
Rep ID	SDLP684
Rep Status	Processed
Consultee ID	1331821
Consultee Full Name	Laura Marney
Consultee Company / Organisation	Deal Town Council
Agent Full Name	Laura Marney
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP1
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	In its current wording, DTC consider SP1 to be unsound (not consistent with national policy) on the basis that it does not make reference to the legally binding target for the UK to bring all greenhouse gas emissions to net zero by 2050 in the policy (we note and welcome the mention in the narrative text of the Climate Emergency declaration and the legally binding national target.)
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	<i>We recommend that explicit reference be made in Strategic Policy 1 to the Climate Emergency that DDC have declared, giving a firm commitment to delivering a Carbon Neutral district by 2050, in line with the legally binding targets of The Climate Change Act 2008 (as amended).</i>

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 1 - Planning for Climate Change
Rep ID	SDLP916
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP1
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Kent and Medway Energy and Low Emissions Strategy seeks to ensure that the decisions and plans embrace clean growth and allow the development of a clean, affordable and secure energy future – the County Council would recommend consideration of this strategy and the County Council's Environment Strategy during the development of the Local Plan for the Borough,</p> <p>The County Council supports the objective of promoting quality design in the built environment. The County Council supports the objective of promoting quality design in the built environment and actively encourages well designed places that consider and prioritise local context; distinctive identity; coherent built form; high-quality placemaking; intelligent movement and connectivity; sustainable homes and buildings; lifetime use; and preserves natural resources.</p> <p>The County Council requests that allocations which include education provision, designs in sustainable transport routes to and from the school site planned in order that sustainable travel can be supported, including walking and cycling routes for residents of the new development.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant	

and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 1 - Planning for Climate Change
Rep ID	SDLP1171
Rep Status	Processed
Consultee ID	1271293
Consultee Full Name	Mr Alan Byrne
Consultee Company / Organisation	Historic England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP1
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	We welcome the emphasis on climate change in respect of new buildings in this policy but note that climate change adaptations can impact heritage and will require careful thought to ensure an appropriate balance is struck between climate change measures and protection of heritage significance. (DDC Note - This is an extract of the full Historic England representation which can be located at SDLP1169)
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s)	

you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 1 - Planning for Climate Change
Rep ID	SDLP1592
Rep Status	Processed
Consultee ID	1252100
Consultee Full Name	Mrs Amandajayne Hollobon-Baxter
Consultee Company / Organisation	Sandwich Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	This policy should be amended to include the need for mitigation and adaptation to apply to existing buildings as well as new developments, particularly when they come into the planning process – for example, when applications are made for extensions, renovations, demolition and refurbishment. The policy should also be amended to state that great weight should be given to climate change mitigation and adaptation when

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	any new development is considered for approval and that developments which are not carbon-neutral should be resisted. Seek opportunities to plant more trees to offset climate change.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	This policy should be amended to include the need for mitigation and adaptation to apply to existing buildings as well as new developments, particularly when they come into the planning process – for example, when applications are made for extensions, renovations, demolition and refurbishment. The policy should also be amended to state that great weight should be given to climate change mitigation and adaptation when any new development is considered for approval and that developments which are not carbon-neutral should be resisted. Seek opportunities to plant more trees to offset climate change.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 1 - Planning for Climate Change
Rep ID	SDLP1274
Rep Status	Processed
Consultee ID	1271353
Consultee Full Name	Church Commissioners
Consultee Company / Organisation	
Agent Full Name	Mr Andrew Watson
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>(DDC Note - Text Extracted from Document sent from Savills on Behalf of the Church Commissioners. Representation has been split across relevant areas of the Local Plan. Full attachment and introduction to Policy comments can be found under reference SDLP1265 for Shepherdswell Site and SDLP1266 for Eastry Site.)</p> <p>Policy SP1 – Planning for Climate Change – COMMENTS</p> <p>Our client is supportive of the principle of a climate change policy in general but believe there needs to be greater quantifiability regarding 'applications for qualifying new built development'. With the policy and the supporting text, there is no explicit reference to what constitutes 'qualifying development' and as such, we consider that draft Policy SP1 is not measurable and is not effective. To ensure that Policy SP1 is effective and in accordance with Paragraph 35(c) of the NPPF, we submit the wording should be amended to read as follows:</p> <p>'Applications for qualifying new major, built development must be supported by a climate change statement'. Furthermore, greater clarity needs to be provided within the policy regarding what a 'climate change statement' encompasses. Given that what could constitute 'qualifying development' is broad, this could impact the scope of what is required within a climate change statement. Providing greater detail as to the Council's expectations of a climate change statement will ensure the policy is effective and in accordance with the NPPF. Additionally, further flexibility should be provided to the policy to allow for statements to be reflective of the scale and type of development by amending the wording as follows:</p> <p>"Applications for qualifying new built development must should be supported by a climate change statement which is proportionate to the scale and type of the development proposed." Policy SP1 recognises the need to mitigate and adapt to climate change. However, it is considered that Policy SP1 is lacking reference to the role of the reuse of buildings in tackling climate change and as such, the policy is not consistent with national policy. It is our view that an additional criteria should be included under climate change mitigation which explicitly references the reuse of existing buildings, including the conversion of existing buildings, and in accordance with paragraph 152 of the NPPF.</p> <p>Recommendation: DDC should clarify the meaning of what constitutes as 'qualifying development' and what a 'climate change statement' constitutes. It is recommended that the proposed wording changes suggested in Section 4 are adopted.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	Strategic Policy 1 - Planning for Climate Change
<p>Rep ID</p>	SDLP1182
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1331629
<p>Consultee Full Name</p>	Mr Andy Beeching

Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP50 - Land adjacent to Short Street, Chillenden (GOO006)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The evidence detailed in the Dover Local Plan regarding the potential to develop site SAP50 - Land adjacent to Short Street, Chillenden (GOO006) is flawed and inaccurate. It is further inconsistent with the Climate Emergency declaration of November 4th 2019 as it makes no consideration for the impact of this development on surrounding properties.</p> <p>An independent assessment of the site conducted by QVA Consulting (attached) provides an evidence based analysis of the site and identifies the following key conclusions</p> <ul style="list-style-type: none"> - current EA/SFRA surface water mapping does not reflect specific topography at the site - 98% of the site is at a high risk of surface water flooding - Conventional or SuDS drainage of the development is precluded by topography (no outfall), hydrogeology (no infiltration) and statutory flood risk obligations (increased flood risk offsite) - Measures required to pass the Exception Test would increase flood risk offsite. <p>As regards the Climate Emergency declaration and duty of care, I refer you to Section 19 (1A) of the Planning and Compulsory Purchase Act 2004, which states</p> <p>“Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority’s area contribute to the mitigation of, and adaptation to, climate change.”</p> <p>Clearly a development that has the potential in increase the impacts of climate change on the local area including neighbouring properties is contra to the clear direction of said Act and the Climate Emergency declaration by DDC.</p> <p>Also attached is the final report of the National Infrastructure Committee on Reducing the Risks of Surface Water Flooding. It states Climate change and urbanisation are set to put more properties at risk. The number of properties in areas at high risk is set to increase by 2055, including:</p> <ul style="list-style-type: none"> • an increase of around 20,000-135,000 properties in areas at high risk due to the impacts of climate change, which will increase the intensity and frequency of heavy rainfall • an increase of around 35,000-95,000 properties due to new development putting more pressure on drainage systems. <p>A further 50,000-65,000 properties may be put in areas at high risk due to unplanned increases in impermeable surfaces (e.g. front gardens being paved over), which, alongside new development, is part of ‘urbanisation’– the conversion of natural (often permeable) environments to urban ones where rainwater cannot enter natural drainage systems.</p>

	<p>The greenfield site off Short Street is a natural run off for surface water and as such a natural mitigator of flood risks for existing properties along Short Street as well the noted heritage site of The Grange.</p> <p>Recently reported changes to the Levelling Up an Regeneration Bill state that the former targets for Local Authorities will no longer be relevant or compulsory. This means an abandoning of damaging centralised mandatory housing targets that have led to needless, unaffordable and poorly designed greenfield developments in favour of an advisory system that takes local character and need into account.</p> <p>Despite further registered concerns at the Reg 18 stage regards heritage (proximity to a listed building of significant historical importance) , environment (removal of hedgerows, destruction of wildlife habitat and hunting grounds for owls and bats), access and egress (site is approached on a single track road and has 3 other access points for local inhabitants), it is disappointing that the comments of the local community and Parish Council have been ignored and disregarded without consultation or direct contact. This leads to the conclusion that the process is fundamentally a tick box exercise and does not have communities' best interests as the central pillar.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Removal of SAP50 - Land adjacent to Short Street, Chillenden (GOO006) from the local plan. It is not required economically, it is not relevant to sustainability of the local community, it is contra to climate change requirements and is likely to cause immeasurable future harm to adjoining properties. It is based on flawed assumptions and should be disregarded as a potential development site.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>Given the flawed evidence for the site's inclusion it is preferable to explain in person the potential impact on adjoining properties as a result of increased flood potential.</p>
<p>Include files</p>	<p>NIC-Reducing-the-Risk-of-Surface-Water-Flooding-Final-28-Nov-2022.pdf 1025 Short Street, Chillenden - QVA Tech. Note - SW Assessment & Flood Study (2022 12 06).pdf (1)</p>
<p>Local Plan Consultation Point</p>	<p>Strategic Policy 1 - Planning for Climate Change</p>
<p>Rep ID</p>	<p>SDLP1346</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1333128</p>
<p>Consultee Full Name</p>	<p>David Powell</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	<p>Klaire Lander</p>
<p>Agent Company / Organisation</p>	<p>Lander Planning</p>
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SP1</p>

2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Original Rep with Attachment. Lander Planning sent the attached document which has been split across the relevant sections of the Plan.) Planning for climate change is consistent with national policy and this policy is 'effective' and 'justified'. This policy is supported.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	Lander Planning 1132 Att1_Redacted.pdf
Local Plan Consultation Point	Strategic Policy 1 - Planning for Climate Change
Rep ID	SDLP1189
Rep Status	Processed
Consultee ID	1331701
Consultee Full Name	Mrs Rosalind Beeching
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Chillenden 4.291
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The evidence detailed in the Dover Local Plan regarding the potential to develop site SAP50 - Land adjacent to Short Street, Chillenden (GOO006) is flawed and inaccurate. It is further inconsistent with the Climate Emergency declaration of November 4th 2019 as it makes no consideration for the impact of this development on surrounding properties.</p> <p>An independent assessment of the site conducted by QVA Consulting (attached) provides an evidence based analysis of the site and identifies the following key conclusions</p> <ul style="list-style-type: none"> - current EA/SFRA surface water mapping does not reflect specific topography at the site - 98% of the site is at a high risk of surface water flooding - Conventional or SuDS drainage of the development is precluded by topography (no outfall), hydrogeology (no infiltration) and statutory flood risk obligations (increased flood risk offsite) - Measures required to pass the Exception Test would increase flood risk offsite. <p>As regards the Climate Emergency declaration and duty of care, I refer you to Section 19 (1A) of the Planning and Compulsory Purchase Act 2004, which states</p> <p>“Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority’s area contribute to the mitigation of, and adaptation to, climate change.”</p> <p>Clearly a development that has the potential in increase the impacts of climate change on the local area including neighbouring properties is contra to the clear direction of said Act and the Climate Emergency declaration by DDC.</p> <p>Also attached is the final report of the National Infrastructure Committee on Reducing the Risks of Surface Water Flooding. It states Climate change and urbanisation are set to put more properties at risk. The number of properties in areas at high risk is set to increase by 2055, including:</p> <ul style="list-style-type: none"> • an increase of around 20,000-135,000 properties in areas at high risk due to the impacts of climate change, which will increase the intensity and frequency of heavy rainfall • an increase of around 35,000-95,000 properties due to new development putting more pressure on drainage systems. <p>A further 50,000-65,000 properties may be put in areas at high risk due to unplanned increases in impermeable surfaces (e.g. front gardens being paved over), which, alongside new development, is part of ‘urbanisation’– the conversion of natural (often permeable) environments to urban ones where rainwater cannot enter natural drainage systems.</p> <p>The greenfield site off Short Street is a natural run off for surface water and as such a natural mitigator of flood risks for existing properties along Short Street as well the noted heritage site of The Grange.</p> <p>Recently reported changes to the Levelling Up an Regeneration Bill state that the former targets for Local Authorities will no longer be relevant or compulsory. This means an abandoning of damaging centralised mandatory housing targets that have led to needless, unaffordable and poorly designed greenfield developments in favour of an advisory system that takes local character and need into account.</p>

	Despite further registered concerns at the Reg 18 stage regards heritage (proximity to a listed building of significant historical importance) , environment (removal of hedgerows, destruction of wildlife habitat and hunting grounds for owls and bats), access and egress (site is approached on a single track road and has 3 other access points for local inhabitants), it is disappointing that the comments of the local community and Parish Council have been ignored and disregarded without consultation or direct contact. This leads to the conclusion that the process is fundamentally a tick box exercise and does not have communities' best interests as the central pillar.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The removal of the site from the Local Plan as suitable for development due to the location and heritage of the site as well as its importance as a surface water run-off.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	To explain to the Inspector why the site is not suitable for development.
Include files	1025 Short Street, Chillenden - QVA Tech. Note - SW Assessment & Flood Study (2022 12 06) (1).pdf
Local Plan Consultation Point	Strategic Policy 1 - Planning for Climate Change
Rep ID	SDLP1206
Rep Status	Processed
Consultee ID	1332924
Consultee Full Name	Amy Aldridge
Consultee Company / Organisation	Gladman Developments Ltd
Agent Full Name	Amy Aldridge
Agent Company / Organisation	Gladman Developments Ltd
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP1
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>SP1- Planning for Climate Change Gladman recognise the increasing importance of tackling climate change and encourage the recognition of sustainable development to mitigate the impacts. The Council should continue to take account of climate change in its plan-making, monitoring updates to the NPPF and PPG. Mitigating and adapting to climate change must be compatible with the vision and objectives of the District, the wider objectives of the planning system and the overarching aim to boost housing delivery and build a strong, competitive economy. Dover District Council have declared a climate emergency, and Gladman is committed to contributing to solutions to address these concerns. Our sites at Cross Road, Deal and East Langdon can deliver numerous environmental commitments to assist the Council in meeting its climate change objectives. In line with the criteria identified within draft policy SP1, the schemes will include multifunctional green infrastructure (h), reducing vulnerability to the impacts of climate change through tree shading and CO2 absorption (g). All our sites deliver a comprehensive package of pedestrian and cycle infrastructure including a suite of measures to reduce traffic impact and the need to travel (f). All sites could potentially deliver renewable and low carbon technologies (c) through new electric vehicle charging points and low carbon design approaches (a) and sustainable construction techniques (b) can be considered at the detailed design stage.</p> <p>(DDC Note - Text Extracted from Document sent from Gladman Developments Ltd. Full attachment can be found under the introduction comment reference SDLP1192)</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 1 - Planning for Climate Change
Rep ID	SDLP1643
Rep Status	Processed
Consultee ID	1333394
Consultee Full Name	Shelley Miller (Clerk)
Consultee Company / Organisation	Tilmanstone Parish Council
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	In view of DDC's declaration of a climate emergency and cost of living crisis we are disappointed to see that the Council does not intend to use its powers under the Planning and Energy Act 2008 to set energy efficiency standards which go beyond the minimum required by Building Regulations for new homes. <i>(DDC note - this is an extract of full representation SDLP1639)</i>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 1 - Planning for Climate Change
Rep ID	SDLP1776
Rep Status	Processed
Consultee ID	1331526
Consultee Full Name	Mrs Mairi Jones
Consultee Company / Organisation	

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note: Please see detailed representation (attached at 1770) which has been divided against numerous consultation points. The representation has images within the text. The text below is an extract from the detailed representation 'by an Alkham resident'.</p> <p>4 Planning for Climate Change</p> <p>The Plan identifies several measures , including sustainable design, reduction of NOX emissions, modal transport shifts etc</p> <p>Comment 4: I support the broad principles of low carbon design , incorporating low carbon technologies , maximising green infrastructure and consideration of sustainable transport modes and will return to this latter point later in the transport section</p> <p>No comment is made on the introduction of wind turbine development nor on the potential for solar hillside panels on the south facing sides of the valley, as I am not aware of any locally planned development in this respect.</p> <p>I welcome the steps being made which relate to water efficiency and would advise that through local action, the Water Authorities, the Parish Council and local landowners have tried to mitigate risk of flooding as the aquifer fills and manage surface water problems as they arise in Alkham. However I have concerns that as sewage regularly backs up in the base of the valley in winter, this possibly indicates a lack of capacity for housing expansion, an infrastructure problem which requires addressing.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Please see appended report
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I can speak to any of the points raised in the attached document
Include files	
Local Plan Consultation Point	Strategic Policy 1 - Planning for Climate Change

Rep ID	SDLP1444
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>SP1 Planning for Climate Change</p> <p>The local plan is not compliant with legality (legally binding Net Zero Strategy, Climate Emergency Declaration 2019 and Climate Change Act 2008), in that it is too weak. 'contributes to . . .' encourages tokenism from developers. Developers would not starve if their return on investment were reduced from 29 or 30%.</p> <p>To become effective and sound and compliant with the law to make Dover and UK zero carbon by 2050, the following should be added: (based on Plymouth and South Devon Joint Local Plan 27 adopted 2019 by 3 LPAs West Devon BC, South Hams DC, Plymouth CC)</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>The following should be added:</p> <p><u>Delivering low carbon development</u></p> <p>The need to deliver a low carbon future for Dover district should be considered in the design and implementation of all developments, in support of a 2019 commitment to make Dover district net zero carbon emissions by 2050, it is necessary to halve 2005 levels of carbon emissions by 2034, and to increase the use and production of decentralised energy. The following provisions apply:</p> <p>Developments should identify opportunities to minimise the use of natural resources in the development over its lifetime, such as water, minerals and consumable products, by reuse or recycling of materials in construction, and by making best use of existing buildings and infrastructure.</p> <p>Major development should take account of projected changes in temperature, rainfall, wind and sea level in its design with the aim of mitigating and remaining resilient to the effects of changing climate.</p> <p>Development proposals will be considered in relation to the 'energy hierarchy' set out below:</p> <p>Reducing the energy load of the development.</p> <p>Maximising the energy efficiency of fabric.</p>

	<p>Delivering on-site low carbon or renewable energy systems.</p> <p>Delivering carbon reductions through off-site measures.</p> <p>Developments should reduce the energy load of the development by good layout, orientation and design to maximise natural heating, cooling and lighting, and reduce the heat loss area.</p> <p>For major developments, a solar master plan should show how access to natural light has been optimised in the development, aiming to achieve a minimum daylight standard of 27 per cent Vertical Sky Component and 10 per cent Winter Probable Sunlight Hours.</p> <p>All major development proposals should incorporate low carbon or renewable energy generation to achieve regulated carbon emissions levels of 20 per cent less than that required to comply with Building Regulations Part L.</p> <p>Developments will be required to connect to existing district energy networks in the locality or, where there is a future network planned, to be designed to be capable of connection to that network. Where appropriate, proportionate contributions will be sought to enable a network to be established or completed.</p> <p>(This is stronger than Mitigation a, b, c, d. and nothing less will put DDC on track to meet its legal commitment to be net zero by 2050, or be compliant with UK legal commitment to be net zero by 2050) Cross referenced with DM policies CC1 and CC2 and CC3.</p> <p>'Mitigation' should include the following in order to become effective and sound. ' All new developments of over 40 dwellings must contribute to a Community Infrastructure Levy so that engineered kerbed cycle routes can enhance cycle paths 1, 2,15,16,17, and new engineered cycle tracks must be made safe in winter dark afternoons, new engineered cycle routes must link Whitfield Urban Development with Kearsney and Martin Mill stations and Elvington with Snowdown and Aylesham and Shepherdswell Stations, especially given the rural bus cuts implemented in these villages in 2022. Also trains and buses on the key commuter routes should be equipped to carry (electric + cargo) bikes. Cross referenced with DM policy TI1. CIL is also needed to pay for other infrastructure essential for the local plan to be sound which is referred to below.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	

Strategic Policy 2 - Planning for Healthy and Inclusive Communities

Local Plan Consultation Point	Strategic Policy 2 - Planning for Healthy and Inclusive Communities
Rep ID	SDLP38
Rep Status	Processed
Consultee ID	1254085
Consultee Full Name	Mrs Sue Ward
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	It is not sufficient to talk about tackling the 20% obesity levels, actions speak louder than words. Despite the requests for an ice rink or bowling alley when the St James' development was open for consultation, it was decided to build a multiplex cinema and fast food outlets! Public Rights of Way get very little mention in this plan, despite walking, cycling and horse riding being excellent activities for health and outdoor exercise. Public rights of way are free to use, but become totally pointless and unattractive when surrounded by a housing estate.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	To actually do something to tackle obesity by promoting activity, such as a bowling alley or ice rink when planning new developments. The pop up ice rinks at Christmas were exceedingly popular. An ice rink or bowling alley would also help to regenerate the town centre, making it a "go to" place.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 2 - Planning for Healthy and Inclusive Communities
Rep ID	SDLP138
Rep Status	Processed
Consultee ID	1330827
Consultee Full Name	Christopher Shilling
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	My comments relate to 1.46, 2.2, 3.17 and SP2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I am confining my comments to the area in which I live, and make my representation as a concerned citizen who believes the plan is unsound and possibly not legally compliant.</p> <ul style="list-style-type: none"> - I fail to see how the sustainability report can be adequate. The buildings proposed at the back of St Andrews will interfere with the habitat of significant numbers of bats. This has not been taken into account. - The plan does not meet the stated goal of mitigating climate change (1.46). Building in and around Shepherdswell (and other villages) will result in a large number of additional journeys by car. There are virtually no employment opportunities in Shepherdswell or these areas, and the large majority of journeys will be by car. - The plans fails to address its stated aim of ensuring safe air quality (SP2). The extra buildings in shephedswell will inevitably increase pollution. More particularly, exhaust fumes will increase given that the roads in the village are mostly single track with passing places. There is already much congestion at rush hour times. Extra journeys will make this worse. - Extra houses in Shepherdswell, and the additional traffic that will follow, contradicts the Council's aim to 'Promote sustainable transport initiatives' (1.46 and 2.2). Traffic levels are already such as to make cycling and walking difficult (the roads in and around Shepherdswell are often without pavements. Many school children use Church Hill to walk to and from school / bus stops taking them to school. They compete with cars for space, often having to duck in between parked cars. The road is not safe as things stand. More building resulting in more car journeys would make this worse)

	<p>- The plan contradicts the council's aim to ensure the health and well being of communities. My reasoning here is as above i.e. Traffic levels are already such as to make cycling and walking difficult (the roads in and around Shepherdswell are often without pavements. Many school children use Church Hill to walk to and from school / bus stops taking them to school. They compete with cars for space, often having to duck in between parked cars. The road is not safe as things stand. There are no pavements on this road, and no room for a pavement to be built. More building resulting in more car journeys would make this worse)</p> <p>- I fail to see that the plan meets its objective of 'conserving and enhancing' the district's 'natural environment.' Building behind St. Andrews in Shepherdswell will destroy an outstanding view which stretches presently to the sea.</p> <p>- It does not seem to take into account covenants on the plots of land earmarked for building. For example, I understand the plot of land in Mill Lane, Shepherdswell, on which 10 houses are planned has attached to it a covenant stating that the maximum houses built should be two.</p> <p>- In addition to these objections I am concerned that the District has not provided adequate means for those affected by the plan to express their views. This website has proven unreliable (I had to phone for guidance approx 3.45pm 14 November) and the features on the site enabling comment were not functioning. The site would not register me (I followed the steps and was only registered after phoning for help). I feel these problems will have made it unreasonably difficult for people to contribute their comments.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	No
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	Strategic Policy 2 - Planning for Healthy and Inclusive Communities
<p>Rep ID</p>	SDLP452
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1266351
<p>Consultee Full Name</p>	Dr Sharon Danby
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP2 - planning for healthy and inclusive communities
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	3.18, 3.19 The plan is unsound in this respect. The physical and mental health of communities in Dover District is being compromised by the excessive rate of development. Air quality is suffering due to congested roads and idling traffic. Green spaces are being lost which have a high amenity value. Cycling and walking are becoming more difficult as increased development increases traffic to dangerous levels on our arterial roads. Infrastructure is not being put in place to connect rural communities to main public transport hubs. 3.21 - The plan is unsound - As the population is aging, small manageable homes and retirement complexes are needed, not huge 5 and 6 bedrooomed executive homes which are springing up around Whitfield, resulting in maximum profits for developers. I agree that more access and provision of green spaces for peoples physical and mental health are necessary.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	More facilities for cyclists and pedestrians, better connectivity of rural communities to transport hubs.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 2 - Planning for Healthy and Inclusive Communities
Rep ID	SDLP299
Rep Status	Processed
Consultee ID	1331112
Consultee Full Name	Miss

	Emma Waller
Consultee Company / Organisation	Kent Wildlife Trust
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP2 - Planning for a Healthy and Inclusive Communities
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SP2 - Planning for Healthy and Inclusive Communities should include the importance of nature for human health and wellbeing. Protecting the natural environment and increasing biodiversity with varied natural areas should be a priority for Policy SP2.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 2 - Planning for Healthy and Inclusive Communities
Rep ID	SDLP307
Rep Status	Processed
Consultee ID	1331395

Consultee Full Name	Ms Jo Edwards
Consultee Company / Organisation	Sport England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP2
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Sport England fully supports this policy
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Sport England fully supports this policy
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 2 - Planning for Healthy and Inclusive Communities
Rep ID	SDLP711
Rep Status	Processed

Consultee ID	1261008
Consultee Full Name	Dr John Garcia-Rodriguez
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Strategic Policy 2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Many laudable objectives - that communities are well-served can participate in active travel etc. This is undone by developing large housing estates in rural areas like Elvington and Aylesham. There are not many facilities or services there be it health, schooling, public transport or safe bike lanes to Dover, Canterbury or Sandwich for those who could be more active or use ebikes.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The solution from the housing development point of view is to have more housing at scale in Dover, Deal or Sandwich where there already are community facilities and where you can walk and take a bus. For those already in rural areas it would be good to see more safe cycle routes already being built or on the drawing board. Bus services seem not to be viable - how can we make them so and attractive to car drivers?
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 2 - Planning for Healthy and Inclusive Communities

Rep ID	SDLP1052
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	There is a large proportion of people living in unhealthy, damp, outdated housing within Dover town's most deprived wards, sometimes owner-occupied, sometimes privately rented, less often council housing. As AirB&Bs push tenants out of coastal Deal, the demand for poor housing, EPC rated E, F, G, is increasing and the rising rental price traps people in fuel and food poverty. Any Strategic Policy on Planning for Healthy communities has to address this, or be judged as very ineffective, unsound and non-compliant with NPPF and legally binding Net Zero Strategy, Climate Emergency Declaration 2019 and Climate Change Act 2008.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The SP2 encourages developers of new mostly greenfield sites to make them healthy, (it should word this more strongly to compel developers to do what is in the public interest to become effective and sound). But it fails conspicuously to provide a plan to replace or transform unhealthy, damp, outdated housing within deprived wards so that they become future-proofed zero carbon homes on those same streets of our deprived wards, thus saving the public purse costly curative health bills. For those who pretend the impoverished residents of deprived wards will be able to move to the new Whitfield Urban Development, we have to ask what do they expect to happen to the unhealthy properties they move out of in town? Is a ghetto or a ghost town envisaged? In the case of private rented properties, either compulsory purchase or schemes to incentivise private landlords would be needed, to upgrade these properties. Without such a plan, claims about planning for healthy communities ring hollow. We recognise that the DDC planning team have had to do much of the preparation of the Local Plan before the cost-of-living crisis and economic turmoil of autumn 2022 crashed upon us all. But harsh realities are upon us and changes are needed. (See our comment below on SP5, on the policy of Dover Urban Area nil provision of affordable housing which we consider both unsound and non-legally compliant, and unjustified on 'viability' / developers expected return on investment grounds). Specifically it does not apply to the proposal to build houses over the catchment area of the aquifer to the south of Deal (SAP 14 / 15), or a number of similar proposals, or with the scale of internal migration into the area as shown in Evidence base.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	Strategic Policy 2 - Planning for Healthy and Inclusive Communities
Rep ID	SDLP740
Rep Status	Processed
Consultee ID	1331585
Consultee Full Name	Terence Hopper
Consultee Company / Organisation	
Agent Full Name	Terence Hopper
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Strategic Policy SP2 Planning For Healthy and Inclusive Communities.
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The Local Plan seems set on centralising employment, education, and leisure facilities. To such an extent that residents are less able to work within their communities and will need to travel more, meaning more cars on the roads and more stress to the individual. Likewise, by centralising sports and leisure facilities, fewer residents will be encouraged to take regular exercise, particularly those that need more encouragement to take exercise and those that do not have the means of the ability to travel to sites at the other end of the district.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Provide facilities where there is a need. Reconsider the change of allocation for site SAP21

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 2 - Planning for Healthy and Inclusive Communities
Rep ID	SDLP593
Rep Status	Processed
Consultee ID	1331781
Consultee Full Name	Mr John Townsend
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	AIR QUALITY: Strategic Policy 2 - Planning for Healthy and Inclusive Communities point 8
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>AIR QUALITY</p> <p>Strategic Policy 2 - Planning for Healthy and Inclusive Communities point 8, is "Seeking to improve the District's air quality, reducing public exposure to poor air quality and minimising inequalities in levels of exposure to air pollution."</p> <p>By its failure to consider the additional air pollution from the future additional traffic congestion on local roads, the implementation of this laudable aspiration of the Plan is not consistent with paragraph 174e) of the NPPF, and therefore unsound. Paragraph 11.38 of the Plan mentions "Measures can include adhering to high quality design standards in the development. These can include preventing the creation of new "street canyons", ..." but this only relates to <i>within</i> the development: it does nothing about the creation of new "street canyons" in <i>existing</i> streets from traffic in nearby developments.</p> <p>NE4 - Air Quality puts the onus on developers, when required, to submit an Air Quality Assessment and/or "to demonstrate a shift to the use of sustainable low emission transport", consciously postponing any consideration of the additional air pollution from the future additional traffic congestion on local roads.</p>

	<p>As an example (see representation submitted on REGULATION 19 TRANSPORT MODELLING FORECASTING REPORT), traffic on the (relatively) main road between the A2 and A256, through Shepherdswell and Eythorne, is projected to grow at 67-91% on the DS1 (do something 1) scenario. In rush hour, this route is already noticeably congested at the pinch points (see appendix for example) and increases of 67% and 91% respectively will jam at each: a classic illustration of 'bottlenecks' in traffic flow.</p> <p>Note that the first four pinch points in point 3 of the aforementioned representation are places surrounded by homes, many of which are very close to the carriageway, and these are where additional pollution caused by the jams will be.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>A full assessment of traffic (of all varieties) on local roads, taking into account an up-to-date assessment of traffic now and of likely growth in the scenarios of minimal, some and maximum planned building growth should be made; in co-operation with KCC plans should then be developed for the appropriate infrastructure enhancements and the planned growth reassessed in the light of this (an iterative process). These plans should not only consider the consequences of traffic growth when building is completed but also take into account</p> <p>a) traffic during construction & b) traffic from completed construction before the enhancements from S106 contributions are made.</p> <p>For each of the likely pinch points, for each of the scenarios, likely air quality should be modelled and fed in to the iterative process of developing the Plan.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	to provide any necessary clarification
<p>Include files</p>	APPENDIX.pdf
<p>Local Plan Consultation Point</p>	Strategic Policy 2 - Planning for Healthy and Inclusive Communities
<p>Rep ID</p>	SDLP919
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1331999
<p>Consultee Full Name</p>	Claire Pamberi
<p>Consultee Company / Organisation</p>	Kent County Council
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	SP2
<p>2 - Do you consider this part of the Plan sound?</p>	Yes
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	Not Applicable

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The County Council welcomes paragraph 1 of this policy, and the County Council commits to providing assessment of County infrastructure contributions in order to mitigate the impact of new development on existing services.</p> <p>The County Council requests that the wording paragraph 1 of the policy is broadened to encompass social care – a service which is requiring ever greater investment as a result of our ageing population and one which is not necessarily covered by the reference to health care and community. The inclusion is demonstrated below.</p> <p>1 <i>Ensuring that new development is well served by services and facilities (for example, education, health and social care, community, cultural facilities, play youth, recreation, sports, faith and emergency facilities) and that a mix of uses are provided in new development that support daily lift.</i></p> <p>The County Council emphasises the importance of ensuring that all new and existing community facilities are made as accessible as possible – for example through the provision or retro-fit of Changing Places.</p> <p>With reference to paragraph 3 of the policy, the County Council will consider the use of county developer contributions to increase the capacity of existing community facilities if they are considered appropriate to deliver services which meet the needs of local residents at the time of needs.</p> <p>The County Council also supports the policy that seeks to ensure that new developments are designed to be safe and accessible, to minimise the threat of crime and improve public safety.</p> <p>The County Council supports the objective of promoting quality design in the built environment and would recommend reference is made to the emerging County Council Design Guide which promotes the principles of quality design in new development.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>1 <i>Ensuring that new development is well served by services and facilities (for example, education, health and social care, community, cultural facilities, play youth, recreation, sports, faith and emergency facilities) and that a mix of uses are provided in new development that support daily lift.</i></p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 2 - Planning for Healthy and Inclusive Communities
Rep ID	SDLP1347
Rep Status	Processed
Consultee ID	1333128
Consultee Full Name	David Powell

Consultee Company / Organisation	
Agent Full Name	Klaire Lander
Agent Company / Organisation	Lander Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP2
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Lander Planning sent a PDF document which has been split across the relevant sections of the Plan. See Original Attachment on SDLP1346) Planning for healthy and inclusive communities is consistent with the NPPF and government direction and this policy is 'effective' and 'justified'. This policy is supported.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 2 - Planning for Healthy and Inclusive Communities
Rep ID	SDLP1445
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr

	John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note The text below is an extract from the original representation which is attached to SDLP1438.</p> <p>SP2 Planning for Healthy and Inclusive Communities There is a large proportion of people living in unhealthy, damp, outdated housing within Dover town's most deprived wards, sometimes owner-occupied, sometimes privately rented, less often council housing. The growth of Airbnb's might be pushing tenants out of coastal Deal, the demand for poor housing, EPC rated E, F, G, is increasing and the rising rental price traps people in fuel and food poverty. Any Strategic Policy on Planning for Healthy communities should address this, or be judged as very ineffective, unsound and non-compliant with NPPF and legally binding Net Zero Strategy, Climate Emergency Declaration 2019 and Climate Change Act 2008.</p> <p>The SP2 encourages developers of new mostly greenfield sites to make them healthy, (it should word this more strongly to compel developers to do what is in the public interest to become effective and sound). But it fails conspicuously to provide a plan to replace or transform unhealthy, damp, outdated housing within deprived wards so that they become future-proofed zero carbon homes on those same streets of our deprived wards, thus saving the public purse costly curative health bills. For those who pretend the impoverished residents of deprived wards will be able to move to the new Whitfield Urban Development, we have to ask what do they expect to happen to the unhealthy properties they move out of in town? Is a ghetto or a ghost town envisaged? In the case of private rented properties, either compulsory purchase or schemes to incentivise private landlords would be needed, to upgrade these properties. Without such a plan, claims about planning for healthy community's will ring hollow.</p> <p>We recognise that the DDC planning team have had to do much of the preparation of the Local Plan before the cost-of-living crisis and economic turmoil of autumn 2022 crashed upon us all. But harsh realities are upon us, and changes are needed.</p> <p>(See our comment below on SP5, on the policy of Dover Urban Area nil provision of affordable housing which we consider both unsound and non-legally compliant, and unjustified on 'viability' / developers expected return on investment grounds).</p> <p>Specifically it does not apply to the proposal to build houses over the catchment area of the aquifer to the south of Deal (SAP 14 / 15), or a number of similar proposals, or with the scale of internal migration into the area as shown in Evidence base.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 2 - Planning for Healthy and Inclusive Communities
Rep ID	SDLP1792
Rep Status	Processed
Consultee ID	1331526
Consultee Full Name	Mrs Mairi Jones
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note: Please see detailed representation (attached at 1770) which has been divided against numerous consultation points. The representation has images within the text. The text below is an extract from the detailed representation 'by an Alkham resident'.</p> <p>10 Footpaths, Cycleways, Bridleways and BOATS</p> <p>The Dover District Plan clearly identifies a wish to achieve a modal shift from car to public transport and develop a network of cycle routes and walkways through the district and I believe Alkham can help the District achieve its aims in this respect.</p> <p>10.1 The Parish is crisscrossed by a series of bridleways and footpaths . Several walks have been written up in detail and can be downloaded from the village web site.</p> <p>10.2 Several problems have been experienced with some of the footpaths, particularly the Bull Run and Pimlico owing to the misuse by vehicles.</p> <p>10.3 A comprehensive plan is therefore required for maintenance, preservation and use of this amenity as part of the local planning proposal.</p>

	<p>Comment 10 In line with the proposals contained within the District Plan I believe thought could also be given to additional paths and cycle routes which should be created to give access safely along the Valley and to develop it as a recreational resource bearing in mind the points raised above about the need to conserve the AONB and SSSIs. If new routes are proposed it is important to consider the ongoing maintenance costs given the problems encountered already on existing routes. This would go some way to achieving the modal shift referenced within the plan.</p> <p>11 Bridleways</p> <p>11.1 Horse riding is a popular pastime within the parish. Figure 2 shows the abundance of bridle paths throughout the parish but again difficulties have been experienced in maintaining these to an acceptable standard.</p> <p>Comment 11</p> <p>Again in line with the Dover Plan this could further be developed as part of a recreational plan for a conservation Area</p> <p>It should be noted that there are four crossing sites along the Alkham Valley Road. Risk assessments by the Traffic Action Group identified these crossings and the short length of Alkham Valley Road between Pimlico and Megget Lane used by riders as very dangerous given current traffic volumes</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Please see appended report.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>I can speak to any of the points raised in the attached document</p>
<p>Include files</p>	

Strategic Policy 3 - Housing Growth

Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP12
Rep Status	Processed
Consultee ID	1264821
Consultee Full Name	Mr Martin Brandon
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3 Housing Growth Table 3.1. Paragraph 3.51.
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Paragraph 3.51 indicates 76% of homes proposed will be on greenfield land. The government is quite clear there is a 'brownfield first' policy with respect to housing. Why does Dover Council think this doesn't apply to them. If the brownfield land isn't large enough to accommodate the required number of houses then at least there should be a policy of developing the brownfield land first which is not in the plan..</p> <p>Developers obviously prefer greenfield sites. By including so many greenfield sites in the plan all that will happen is developers will pick these off leaving the brownfield sites undeveloped while green spaces disappear. This is totally wrong and completely contrary to the brownfield first policy.</p> <p>The plan envisages 10998 new homes to 2040 . It is patently absurd to suggest the district requires this many houses. I appreciate the NPPF leads to this calculation but as the plan itself says the council can depart from this in 'exceptional circumstances' that reflect 'market signals'.</p> <p>The fact we have just suffered a pandemic, and are in the midst of an economic and cost of living crisis is ample evidence of 'exceptional circumstances'. We need a reasonable provision of new homes not the wholly absurd number the council is proposing.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>A reasonable assessment of new home requirements given prevailing market conditions that is far less than the 10998 proposed.</p> <p>Implementation of the governments brownfield first policy via site allocations or constraints on timing and sequence of development. As it stands the Local Plan fails totally in this regard and so is unacceptable.</p>

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	N
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP119
Rep Status	Processed
Consultee ID	1330576
Consultee Full Name	Dr Vince Croud
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 28, 4.208-4.214
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I object to the proposal in the 2040 Local Plan that Eythorne and Elvington become a "Local Centre". I also object to the proposed building around Elvington. The reasons for both objections are set out below.</p> <p>Elvington and Eythorne, although geographically close, have their own distinct heritage, character, culture and community. Elvington was mostly built in the early 20th century to serve the nearby coal mine at Tilmanstone. Eythorne is very much older, with evidence of occupation from the stone age and in the heart of the village are many buildings from the 18th and 19th century. Eythorne is essentially a community founded on agriculture and it is not, and has never been, a mining village. The development of Tilmanstone colliery did not lead to significant housebuilding in Eythorne. In the late 1960s and early 1970s, however, small housing developments sprang up on land originally used for farming and latterly used by the local school and community.</p> <p>There are no existing problems, or conceivable future ones, that would be better served by combining these two individual communities as opposed to keeping them separate. Indeed, it might well be the case that better, more consensual, decision making would occur if the communities</p>

were kept unique (for example Coldred and its community driven management of the village centre). It is also evidentially the case that communities that keep their identities have less societal problems and better mental health because of the developed relationships and contacts within the community (people looking out for each other etc). As it stands the countryside is in easy walking or cycling distance for anyone no matter where they live in either community, young or old, and this access is enjoyed by many to the benefit of their mental wellbeing. Where there is urban sprawl, loss of green space and loss of identity, quality of life plummets (cf Thanet). Unnecessary and unsympathetic "planning" has irrevocably harmed many communities, villages and towns over the years, resulting in poor and problematic living environments for future generations to inherit.

There is also no conceivable opportunity that could arise that would only be possible by combining the two communities rather than keeping them as they are now.

The issues facing these communities are many but none are due to them not being combined.

It is proposed that the two separate villages of Eythorne and Elvington are developed as a "Local Centre" based on them "having a very good range of services and facilities". This is a considerable overstatement as the two villages have, in fact, a very limited range of both.

In terms of existing GP services, the nearest is Shepherdswell which is only open between 8.30-10.30 a.m., Monday to Friday, and does not routinely offer an actual GP surgery but only "administrative" or nurse appointments. Overall, the other GP services in the area are stretched to the limit and will struggle to take up the amount of new patients that will arise with significant further new house building in this area. Additional patient numbers will introduce further frustration from the community with getting GP appointments when wanted. Unless GP provision is significantly improved, is properly delivered to time, and is written into the DDC plan then there will be a healthcare crisis in this District.

As well as insufficient GP provision, the area also suffers from inadequate response times from the Ambulance Service, SECAMB. April 2022 saw the worse response times on record for SECAMB. Although things have improved slightly since then, it is still poor and inadequate. Hospital waiting times especially for A&E are also poor. In part, the long waiting times for both hospital appointments and for A&E, as well as poor ambulance response times, are due to the inadequate GP primary care driving people to attend hospital rather than their own GP.

It is practically impossible to get an NHS dentist in this area and most surgeries are not taking on any new patients. This means new arrivals into the area are forced to go private pushing up their cost of living and ultimately leading to further degradation of the NHS provision even though we have all paid for it and it should be readily available.

Local policing is entirely absent in the main and incidences of anti social behaviour, vandalism and theft (for example frequent van break-ins for tools) that have occurred in both villages are largely not dealt with at all by the Police. Most certainly the Police are not being proactive in preventing such crimes. There is also a local drug taking and drug dealing problem, again not tackled.

The bus service for Elvington and Eythorne was always poor and inadequate for it to be used to commute to work. Now KCC has cut bus services further, there will be no public transport serving the villages. This has caused a major problem for school children attending secondary education in Canterbury, Dover and Sandwich and great difficulties for parents in trying to find alternative transport methods that also accommodate their need to attend work. Many in the village have mentioned considering moving away from this area to one that does have public transport for the school trip.

In Section 4.2.11 it mentions a range of tourist attractions available including Wingham Wildlife park, The "Historic park and Garden of Waldershare" and the EKR (East Kent (Heritage) Railway). The first is certainly an excellent attraction. Waldershare Park is, however, a private estate not open to the public. The heritage EKR line runs only one day a week (Sunday) and some bank holidays (not just "a few times a year" as stated in 4.216) from approximately April to October. Although it has a charm of its own and continues to be developed, it is currently of very limited appeal to the general public as it has a short track length and no steam engines.

In the Section on Eythorne and Elvington, and as shown in the plan in Section 4.214, land is shown "Allocated for Employment". This is all very laudable but the employment opportunities must be such that they provide opportunities, careers and suitable salaries for the local population. To date, attracting blue chip employers into this area has not met with tangible success. The Pike Road Industrial Estate businesses such as Tilmanstone Salads, which is a minimum wage employer, are not likely to be attractive to the majority of residents of employable age. More of the same is not going to adequately provide opportunities to deliver a sustainable community. The biggest employers for the communities will probably remain Dover docks and first responders, with others working for service industries from home.

Section 4.218 listing services and facilities has several errors. Eythorne does not have two village halls. It has one pre-cast concrete structure which could be considered a village hall behind Ss Peter and Pauls' Church. It is at the border of Eythorne and Elvington and hence poorly placed for Eythorne residents. It is barely used because of that and is most noted for being a polling station. Eythorne does not have a Cafe and to the best of my knowledge hasn't had one since the last century. It does have a village shop and Post Office combined (they are not separate amenities as might be supposed from the text as written in 4.218). Thus the actual "amenities" in Eythorne are one pub, one "village hall", and one Post Office/shop. It does have two churches (Baptist and CoE) but these are used by a tiny minority of residents and so can hardly be considered to be a significant amenity. According to the Church of England's own figures (2019), less than 1 % of the population attend church regularly. Over 50 % of the UK population are irreligious.

In terms of Elvington, it does not have a church as stated. The rest of the statement regarding Elvington amenities is correct. However, with the advent of services such as Uber Eats, Deliveroo and "Just Eat" etc the community attractiveness of the takeaways is diminished.

Regarding the statement in 4.219, and as clarified above, the settlements do not have much in the way of services and facilities that make them stand out as a place to create a new "Local Centre" unless the critical criteria you are using are possession of a pub, a shop, and unused churches.

Tilmanstone Colliery Welfare Sports Ground, as mentioned in 4.221, is an good facility for sports in the Eythorne and Elvington communities. As a non-profit making charity, however, it requires membership fees or hire fees for use of its facilities and the facilities are thus not freely available. These fees are not onerous however.

The entrance to the primary school which sits on the boundary between lower Eythorne and Elvington, and serves both communities, is on a corner and is a blind bend coming up Church Hill which is problematic for parents dropping off and picking up their children. Church Hill itself is narrow in parts, permitting passage of a vehicle only in one direction at a time, and is a bottle neck. Children arriving by foot from Upper Eythorne have to travel along Shooters hill which already has issues with child safety due to the narrowness of the road and traffic density, resulting in vehicles mounting the pavements to pass. Additional vehicle movements due to more house building will only exacerbate the problem. Traffic build up is also a problem at the staggered junction between Wigmore Lane, Shooters hill and Church hill which has visibility issues. If the new estate exits through Elvington, there will be a build up of traffic on Church Hill trying to exit onto Wigmore Lane using the Staggered junction. If the estate exits through Wigmore Lane then the increased traffic will cause problem trying to cross the staggered junction from Shooters Hill or Church Hill directions.

For sustainability of the community any new building must contain a large component of genuinely affordable housing. At the moment new houses are beyond the reach of the local young and are being bought up by people outside the community, diluting the community common values, or by buy-to-let investors.

It goes without saying that any new development must have searches done to ensure that subsidence and any ground contamination from the extensive Tilmanstone mining activity will not be an issue. Also the area around Elvington village has been found to contain much live WWII ordnance from troops stationed here during the war and this needs to be factored in to pre-building work.

	<p>The building on the proposed area will substantially diminish an important green corridor for wildlife movement (especially insects) and a source of food for many types of wildlife.</p> <p>It is very dissapointing to read in Section 4.2.11 that Dover Dictict Council believe that "Shepherdswell, Eythorne and Elvington have their roots in the short-lived East Kent coalfields". Whilst it is certainly the case that Elvington is a (model) colliery village, the roots of both Shepherswell and Eythorne precede the development of the coal fields by a considerbale margin. Both have been occupied since the stone age, have evidence of Roman occupation, are mentioned in the doomeday book and have recorded history since then. Incidentally, it is stated in section 4.211 (and repeated in 4.216) that the EKR line was originally built to serve the Colliery at Tilmansstone. This is factually incorrect as the line was built to serve any colliery in the area that might prove to be productive and reached as far as Wingham and also to Richborough at its peak. http://www.dover-kent.com/VILLAGES/18-Eythorne.html</p> <p>In conclusion there is clearly not the necessary infrastructure to support the proposed development and nowhere near enough amenities to justify development as a Local Centre. Progressing with the latter is wholly unnecessary. It would be much better if new villages were developed to support increased population, as was done when coal mining took off, to stop urban sprawl.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>For one, it needs to have guarantees on increases in health care, public transport, policing and schooling written in, commensurate with the increased number of houses, for it to be creditable as a plan to deliver sustainable communities.. Rather than continue "urban sprawl" by having "Local Centres" and diminishing sense of community etc, a much better policy would be to build new villages/towns to accomodate the additional housing as was done when mining started in Kent.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>Strategic Policy 3 - Housing Growth</p>
<p>Rep ID</p>	<p>SDLP131</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1254085</p>
<p>Consultee Full Name</p>	<p>Mrs Sue Ward</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	

Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	In order to combat climate change, we need to reduce vehicle use and maximise carbon sequestration by protecting farm land, green space, trees and hedging. Given that Dover is a net exporter of labour to towns such as Canterbury, Folkestone, Ashford et al, it make no sense to build ever more houses in the wider Dover region, where there are insufficient jobs. Building more houses just means their residents will increase traffic volumes to get to jobs, especially at Whitfield, where there is no nearby rail link. Each new build home emits 80 tons of CO2 in its construction, so we need to be really sure that we can justify each and every house in each and every area. In addition, building on farmland reduces the capacity of the area to sequester carbon and the increased hard surfaces from building augment the damaging impact of surface water run off. The consequent loss of arable land reduces the district's ability to supply its own food, food which therefore has to be brought in from elsewhere at additional cost to the environment. This is contrary to Section 2.8 and 2.11 of the NPPF as it is unsustainable development.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Reduce the number of houses proposed in Dover district, prioritise brownfield sites in Dover Town and only build houses where there are sufficient jobs for the local population. Take seriously the climate emergency, instead of merely paying lip service to this catastrophe.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	It is vital that this issue is taken seriously. Everyone needs to take steps immediately to tackle the problem. The Dover plan is totally inadequate in this respect and in fact can only exacerbate the problem of global warming. The issue of global warming and climate change must be given a much higher priority.
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP154

Rep Status	Processed
Consultee ID	1329874
Consultee Full Name	Ms Nicola Purcell
Consultee Company / Organisation	Aylesham Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3 Housing growth
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Aylesham Parish Council agrees that there is a need to increase housing stock both nationally and within the Dover district. Over recent years, Aylesham has greatly assisted in helping to increase the numbers of homes within the local community (having delivered 917 homes so far with a further 443 to come). However, it is felt that any future development should be kept to a minimum. This relates to SP3 – Housing Growth.</p> <p>South Aylesham (SAP24) includes a large number of positives (such as inclusion of play parks, open spaces, cycle links and protecting and enhancing wildlife) but there is a lack of firm commitments to facilities. The development makes reference to “a new small convenience shop” which is wholly insufficient for the proposed number of new homes.</p> <p>Dover District Council is looking at updating its parking policy for future developments. Currently the Kent Design Guide and the Kent Design Guide Review: Interim Guidance Note 3 to apply planning constraints. It is welcome to see this referenced in the Draft Local Plan. It is important that future developments allow for independently accessible parking spaces (as opposed to tandem spaces) and that car ports or garages are not included as parking.</p> <p>This will greatly improve parking, especially in rural developments.</p> <p>More considerate parking will greatly improve access for pedestrians as well as safety for pedestrians and cyclists.</p> <p>Aylesham Parish Council believes that a new small convenience shop in any new development would be wholly insufficient. Dover District Council should also look to adopt more stringent parking policy reform.</p> <p>It has been noted on previous planning applications that the sewerage pipes in the village may be at their capacity, so any further developments could push them past their breaking point.</p> <p>This should be addressed before any further development can be considered.</p> <p>Current planes for housing development do not go far enough in providing homes that are suitable for disable people or homes that can be easily adapted in the future to meet the needs of home owners. An increase in the number of dwellings built to an accessible standard would be welcomed</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant	

and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP278
Rep Status	Processed
Consultee ID	1268017
Consultee Full Name	Ms Penelope James
Consultee Company / Organisation	Dover and Deal Liberal Democrats
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	3
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	n/a

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Any new developments must be assessed in terms of increased traffic impact on highways and local transport provision. We need new houses, but local bus / rail transport needs to be provided to serve the new developments. We are unsure how London Road, Deal is going to cope with the increased traffic created by the new developments proposed at Sholden for instance. And a primary school is located on that road.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	n/a
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP416
Rep Status	Processed
Consultee ID	1266351
Consultee Full Name	Dr Sharon Danby
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3 Housing growth
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes

6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

Due to the governments announcement 5/12/22 the plan is not positively prepared as the development needs must be reassessed. This means it is no longer justified as there now is the room without central government pressure to find reasonable alternatives. It is also not effective as the pressure put on local communities and existing infrastructure is unreasonable and means that it is not deliverable. The plan is also not consistent with NPPF 2021 as the many landscape and heritage assets in Dover District are being compromised by the level of unsustainable overdevelopment which the current plan has allowed.

The Housing Growth statement that the aim is to , “provide a greater choice of high-quality housing to meet the needs of Dover districts’s growing population and changing demographic and address affordability issues”, does not seem internally consistent with the details provided in the plan which underestimates the evidence showing a large part of district population growth is due to aging. The details thus render SP 3 and SP 5 less effective and less sound.

Under the current LDP developers have shied away from the badly needed regeneration of Dover and concentrated on building maximum profit, minimum affordability developments of large homes around the more desirable town of Deal and out in Whitfield. The supposed regeneration of Dover has resulted in another generic shopping centre and a more depressed high street and has not lifted the rest of Dover. The promenade area is uplifted but there seems to be little connectivity to the rest of Dover.

The government department (DLUHC) decision that Dover needs 611 new dwellings a year and a minimum of 10,998 new homes between now and 2040 we find very incompatible with legally binding Net Zero Strategy, Climate Emergency Declaration 2019 and Climate Change Act 2008, and unsound. We should be transforming existing housing stock into zero carbon homes as is happening in East Sussex, led by Lewes DC. Combining these numbers with 3.51 and the statement ‘76.7% of the new homes are on greenfield sites, while 23.3% are on brownfield sites’ is unsound and unacceptable to the public.

We feel that our communities are being harvested by developers and our worries are not being heard or needs met in terms of infrastructure. Thanks to certain national newspaper Sunday supplements, Deal is desired as a 2nd home location by the wealthy from London and elsewhere. Holiday homes which spend most of the year empty in Deal, Dover and coastal villages of Kingsdown and St Margarets are stopping locals from buying affordable homes in their own area from existing housing stock.

It must also be pointed out that at least one of the sites included in the 23.3% of brownfield sites is actually a site intended by SEEDA as local nature reserve having rewilded on unstable slag (only rendered stable by tree-planting, a site which DDC forgot to make a local nature reserve in 2004, and it has become a biodiversity hotspot well known to genuine ecologists nationally; Betteshanger Park.

Central government in London, according to Housing Today is imposing a disproportionate amount of housing growth on Kent and the SE. There is a grievous lack of democratic accountability across Kent. So the chances of protecting Kent, of achieving a Growth Strategy that creates climate-friendly jobs and suitably sized, suitably-priced zero-carbon homes for the next generation of local families, are not good. The space available for infrastructure, functions well for compact coastal towns of the size that Deal / Walmer and Sandwich were 5 years ago.

The level of greenfield overdevelopment which has been disastrous under the current weak LDP is putting Deal infrastructure under strain now, so in-fill should make up the majority of the allocations for Deal and that the housing growth specified for District Centre of Deal and around its boundaries needs to be stopped or radically reduced. Either or both of SAP 15 / SAP 34 would destroy the only road access alternative for diverted traffic. (See detailed comments under SAP 15/ SAP 34 below). Housing Growth that threatens gridlock, blocking off a conurbation of 30,000 from access by emergency vehicles, commuters, school buses is not sustainable housing growth and is very unsound.

3.29 I note and welcome a degree of shift from the Reg 18 draft, in that more sites have been selected with a view to using ‘existing infrastructure, facilities and services, with a greater professed purpose to ensure development contributes to the sustainability of local communities and services’.

I note with appreciation both the increase in the number of sites in Dover town SAP 6 – SAP 13, and the SAP 26 Former Snowdown Colliery, Aylesham near a rail station for example. It should be possible to state a determination to ‘make best use of brownfield – non-rewilded – land) without giving developers the opt-out qualification ‘wherever possible’.

On Five Year Housing Land Supply. 3.39 Having stated the Council had 6.03 years land supply plus a 5% buffer; it is not sound, effective or legally compliant to then state ‘the provision of additional sites within the first 5 years of plan period is needed to ensure resilience and promote flexibility;’! Instead of ensuring resilience, it will create exactly the destructive suburbanisation of a rural district that many, many of the resident electorate are most worried about.

3.46 It is the conspicuous lack of a secondary school in Aylesham that prevents Aylesham becoming the small garden town planners aspire to. The provision of a secondary school by 2028 should be a condition of SAP 23. There seems to be a complete lack of planning in the statement that now

3.48 Many, many of the current residents of ex mining village Elvington were / are dependent on buses that have recently (2022) been cut, (following KCC cut to bus subsidies) to get to work in Canterbury, Folkestone, Sandwich, Thanet or Dover, or to get to secondary school, or to get to doctors, or to shop. These people had environmentally sustainable public transport service that has been cut. KCC is saying it is looking

	<p>at potential bankruptcy in 2023, so promises of new services and facilities are met with some disbelief. The selection of this site is ONLY sound with cast-iron conditions to provide all of the services we mention below, including new drainage infrastructure. Council housing in Elvington has been subject to flooding from the sewage system, long overdue for replacement. As in Dover deprived wards, there are unhealthy EPC EFG homes in Elvington that need to be transformed into zero carbon home to lift residents out of fuel and therefore food poverty.</p> <p>3.68 Windfall. Unless existing settlement boundaries are respected, there is suburban ribbon development creep from field to field to field. To render the plan sound it should contain a statement 'Previously existing settlement boundaries will be respected, until such time as town and parish councils may have agreed changes with Dover District Council, in accordance with the principles of Localism Act 2011.' In the current economic climate, it seems very naïve to hope that 'new housing in villages can help them retain existing services such as public transport, retail (many pubs are going under because lack of staff and sky high energy bills) and schools'. Indeed we have lost a large proportion of our bus services in the district.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Push back to central government and demand a reduction in the housing allocation of 10,998 new homes. Now possible after announcements 5/12/22 from Prime Minister.</p> <p>Regenerate Dover as a priority, retrofitting existing housing stock to provide well insulated renewable energy powered homes. Windfall development only should be allowed in Deal, Sandwich and surrounding villages. Create a self sufficient sustainable garden village at Aylesham with secondary school and green infrastructure and homes far beyond future homes standard.</p> <p>Provide better facilities and transport links for Whitfield to ensure that homeowners are not car dependent.</p> <p>Lobby central government for changes to the rules for ownership of second homes. Priority should be given to locals.</p> <p>Make the wording in the plan stronger in favour of brownfield sites eg 3.32 <i>sufficient amount and variety of land</i> should also state that brownfield must be used before greenfield as per stated in NPPF 21.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	No
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP174
Rep Status	Processed
Consultee ID	1329874
Consultee Full Name	Ms Nicola Purcell
Consultee Company / Organisation	Aylesham Parish Council
Agent Full Name	
Agent Company / Organisation	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	Settlement Hierachy. (SP3 and SP10)
<p>2 - Do you consider this part of the Plan sound?</p>	No

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Aylesham is designated as a "Rural Service Centre" on par with the town of Sandwich. Although Sandwich and Aylesham have equal weighting in the settlement hierarchy, they are not getting an equal weighting in housing development or in terms of investment. The Site Allocations refer to the district's "existing larger settlements of Dover, Deal and Sandwich" but in reality Aylesham is now likely to have a larger population than Sandwich.</p> <p>Aylesham is receiving 649 new homes (SAP24 and SAP27), whilst Sandwich has a proposed development of just over 200 homes.</p> <p>The Draft Local Plan proposes investment in Sandwich to improve the town and protect its historic environment. In addition, it will see investment in culture. This is not the same for Aylesham.</p> <p>This relates to SP3 – Housing Growth and SP10 – Sandwich Town Centre.</p> <p>The residents of Aylesham should also see their cultural capital widened and enriched in such an extensive Draft Local Plan. Other than house building, there seems to be little else on offer. Funding should be provided for organisations such as cinemas, museums, galleries etc that will help to enrich people's lives.</p> <p>For a rural settlement, a further 640 houses, on top of a recent development of 1,360 seems to be somewhat excessive.</p> <p>Aylesham Parish Council believes that Aylesham is being left behind. Aylesham must receive equal investment in comparison to other Rural Service centres to ensure the village thrives.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP300
Rep Status	Processed
Consultee ID	1331112
Consultee Full Name	Miss

	Emma Waller
Consultee Company / Organisation	Kent Wildlife Trust
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3 - Housing Growth
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SP3 - Housing Growth makes no reference to biodiversity. It is essential that the Plan be prepared with biodiversity at its core, allocating development in locations that avoid harm to existing assets, and that development contributes to the creation and enhancement of habitats to create robust ecological networks. The NPPF and the Environment Act makes provisions for the creation of these networks in the form of Local Nature Recovery Strategies.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP333
Rep Status	Processed

Consultee ID	1331451
Consultee Full Name	Mrs Vanessa Broughton
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP1, SP2, SP3, SP9, SP15, SP16, SP17, SP18, plus DM4, DM6, DM7, DM9, DM29, DM37
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	See attached letters DDC note: Please see the extract below (added to this comment by DDC) from the attached consultation letter "ALTERNATIVE SITES Much better alternative sites exist. Namely: Those sites on Brownfield land and those sites which have many fewer restrictions that can be more easily overcome or mitigate without such detrimental effects to the environment. I mention Ellens Road, Walmer site and particularly Betteshanger site Application No. DOV/20/00419, recently put forward for 210 houses and apparently not included in the Draft Plan. To attempt to build on site WAL002 is completely inappropriate. Therefore, if you truly care for the environment as you claim you do, please remove it from your Plan. The protection of the environment & history of this country is the responsibility of all of us, not just for ourselves, but for future generations. It is not just about meeting government housing targets."
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Remove WAL002 Proposal from Plan
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	See below attached detailed letters for reasons
Include files	SDLP0333 Broughton - Att 2_Redacted.pdf SDLP0333 Broughton - Att 1_Redacted.pdf
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP976
Rep Status	Processed
Consultee ID	1259612
Consultee Full Name	Mr Chris Shaw
Consultee Company / Organisation	Langdon Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP4 - Residential Windfall Development, Paragraph 1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Langdon Parish remains concerned about the categorisation of East Langdon as a 'Large Village'— see comments below this table. It is unclear as to whether the settlement confines are to be amended to incorporate the proposed site allocation at East Langdon (Policy SAP46 - Land adjacent Langdon Court Bungalow, The Street, East Langdon (LAN003)). The Parish Council would like to see clarity on this, as extending the boundary would potentially open up additional countryside to windfall development. As an aside, the Policies map describes these as the 'settlement confines' as opposed to the 'settlement boundaries'
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	12Settlement hierarchy- East Langdon as a 'larger village': The Parish Council remains concerned about the categorisation of East Langdon as a 'larger village' The criteria for this category states that larger villages have a good range of services and facilities, which serve their own residents and those of nearby hamlets. East Langdon village has no retail facilities. There is a Post Office operated from the village hall two mornings per week. One bus serves the village 5 times a day, although there is no evening service. The main facility is the primary school, however it is unclear as to the viability of the school. The KCC Schools Plan states that there is likely to be a surplus of spaces in the coming years:

<p>if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p><u>“District commentary:</u> We forecast a significant surplus of Year R and Year R-6 places over the Plan period. This surplus is the result of the falling birth rate, with some planning groups having around one quarter increase of Year R surplus in the coming years. As schools are primarily funded on the number of pupils on roll, low Year R numbers will impact on future budgets with some schools choosing to reduce their published admissions numbers.”</p> <p><u>“Dover East Planning Group:</u> Surplus places are forecast throughout the Plan period. However, in the longer term places will be required to support the planned development of Connaught Barracks. Ideally this will be via the expansion of Guston Church of England Primary School. We are continuing to work with interested parties to secure the additional land that will be required to enable the expansion to happen.”</p> <p>The supporting text for the policy says that to help sustain and strengthen the role of these larger villages, additional housing over the lifetime of this Plan is considered appropriate. Criteria (a) of the policy itself states that any development is to be of “a scale that is appropriate to the size of the settlement and the range of services and community facilities that serve it, taking account of the cumulative impact of any allocated sites and committed development”.</p> <p>This is further emphasised in Policy SP2 (Planning for Healthy and Inclusive Communities) which includes the following text: “Ensuring that new development is well served by services and facilities (for example education, health care, community, cultural facilities, play, youth, recreation, sports, faith and emergency facilities) and that a mix of uses are provided in new development that support daily life.”</p> <p>East Langdon currently comprises some 87 dwelling, 69 being concentrated central to the village in the vicinity of The Street, a narrow through-route to other hamlets of the parish. The proposed land allocation SAP46 at East Langdon is for 40 dwellings adjacent to the current north-eastern settlement boundary on BMV quality agricultural land.</p> <p>This location would be accessed via the network of narrow country lanes which lead from the A258 – A256 – A2 district highways into East Langdon Road and The Street. Although SAP46 has been identified as the most suitable allocation site in East Langdon, increasing the village core from 69 to 109 dwellings (58%) would have a profound impact on the local infrastructure, road network and access to services.</p> <p>It is considered that there is a discrepancy between the allocation of 40 additional dwellings to the village (with no requirement for mixed development to include space for other services/ retail/ economic use etc.) in the context of Policy SP2 and clause (a) of Policy SP4 particularly in the context of lack of certainty over the school, which is the primary service in the village, and the rural nature of the road network. The Parish Council consider that either the categorisation of East Langdon as a larger village should be reconsidered, or the number of dwellings in the proposed site allocation should be reconsidered to ensure that it is sustainable in the context of the lack of local services.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>Langdon Parish Council wishes the opportunity to explain the specific issues with East Langdon being categorised as a "Large Village" and the consequential issues it raises if a development was proposed which would increase the dwellings by nearly 60% on the infrastructure, road safety and infrastructure services.</p>
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>Strategic Policy 3 - Housing Growth</p>
<p>Rep ID</p>	<p>SDLP956</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1266351</p>
<p>Consultee Full Name</p>	<p>Dr Sharon Danby</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	

Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I object strongly to KIN002 being included in the draft LDP for the following reasons:</p> <p>The inclusion of SAP 34 is not legally compliant with NPPF 2021 item 11. (b)ii 'SPs should provide for objectively assessed needs for housing & other uses, . . . unless(ii) any adverse impacts of doing so would significantly & demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole'. The following arguments show why this development would not be sustainable as is a requirement of the NPPF and would have more adverse impacts than benefits. Also as the government have decided on 5/12/22 to stop putting pressure on local authorities with their unsustainable housing targets; the LDP now needs reviewing with respect to how it is putting pressure on rural communities to accept unreasonable developments of this nature.</p> <p>The continued inclusion of SAP34 / KIN002 land at Woodhill Farm, Kingsdown in the LDP is unsound. Despite many concerns and reasoned arguments from residents the only concession seems to have been to reduce the housing numbers from 90 to 50; and it is doubtful that 50 would be the maximum if the proposal were to go ahead. Developers would likely try to negotiate the number back up to 90. The site has now been given a green allocation in the HELAA report despite its many issues and the fact that an adequate full highways assessment has not yet been carried out and the HELAA highways assessment remains amber. The latest HELAA report states that the many failings can be mitigated for within the LDP. I would argue that this is unsound and not justified or consistent with National Policy NPPF 21. The evidence from DDC has not been used correctly. NE2 Landscape character and the Kent Downs; states in section 11.13 that DDC aims: <i>To ensure that all development coming forward over the plan period respects and reflects the character of the landscape in which it is located.</i> The DDC landscape character assessment of 2020 (LCA) shows that SAP34 / KIN002 falls within Ripple F3, <i>open chalk farmland and woodland.</i> NE2 states <i>The classification identifies 17 LCAs and defines issues of landscape management and development management which should be delivered over the plan period.</i></p> <p>Development Management guidelines for LCA F3 include:</p> <ul style="list-style-type: none"> -<i>Conserve the rural character of the landscape ensuring that it continues to play a role in providing a rural separation between Deal and Kingsdown as well as a rural setting for the Kent Downs AONB.-Seek to reduce lighting and noise impacts on this landscape and in longer views through sensitive highway design/management. Conserve the distinctive narrow winding lanes and grassy verges.</i> - <i>Conserve the open skyline, avoiding the introduction of vertical elements such as pylons, telecommunications masts etc.- Protect and enhance views from more elevated areas and from the coast out to sea and towards landmark features such as Walmer Castle.</i> - <i>Protect the open character of the chalk landscape, preserving elements of tranquillity associated with it.</i> <p>The development of SAP34 would result in the loss of an important buffer between the built environment of Kingsdown along Glen Rd and the AONB. The mitigation measures proposed would also include changes to Ringwould Rd to provide a better access to the site. Guidance for F3 suggests that the narrow winding lanes and grassy verges should be preserved. Ringwould Rd would certainly lose its character and the main entrance to the village would be altered. From within F3 views across to Kingsdown and the sea would be altered by the development of SAP34, the open character of the landscape would be lost and pollution from light and traffic would increase. The HELAA sustainability appraisal incorrectly states; <i>The site has been judged by Council officers to have the potential to moderately affect the District's landscapes, townscapes or seascapes.</i> I would argue that this is not justified due to inclusion in LCA F3 and proximity to the AONB.</p>

NE2 11.19 states *The setting of the AONB comprises land adjacent to or within close proximity of its boundary, including but not limited to land which is visible from the AONB and from which the AONB can be seen.....Within the setting of the AONBs, priority will be given over other planning considerations to the conservation or enhancement of natural beauty, including landscape, wildlife habitats, tranquillity, dark skies, and geological features.*

SAP34 is on the boundary of the AONB and within F3 Ripple on land which should provide a clear buffer between Kingsdown built environment and the setting of the AONB. Priority should therefore be given to conservation of the natural beauty of the AONB.

SP13 states that *the NPPF 2021 requires local plan policies to conserve and enhance the natural environment, to recognise the intrinsic character and beauty of the countryside and the wider benefits from natural capital and ecosystems.* It is unsound to include SAP34 in the LDP as it would detract from the beauty of the countryside particularly the adjacent AONB. The Kent Downs AONB management plan 2021-26 says *the Kent Downs AONB, perhaps more than any other of Britain's protected landscapes – AONBs, Heritage Coasts or National Parks, has experienced and is experiencing severe development pressure.* DEFRA evidence shows *'The Kent Downs AONB stands out as an area which has experienced major, but expected, change, showing a rate of urban growth of almost 10%.pa, with the urban area spreading by 14 ha over the decade'*. The AONB in Dover District has suffered development at a disproportionate rate which indicates that planning pressures on our district are unsustainable. National Planning Practice Guidance (NPPG) confirms that the Duty of Regard is "relevant in considering development proposals that are situated outside National Park or Area of Outstanding Natural Beauty boundaries, but which might have an impact on the setting of, and implementation of, the statutory purposes of these protected areas." I would argue that because the entrance onto Ringwold Rd requires widening and changing of the road which will encroach into the AONB, to mitigate for it being unsafe, this will be detrimental to the setting and indeed directly upon the AONB.

NPPF 2021 11 – making effective use of land - Planning policies and decisions should: 120 b *recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production.* As food security is such a national issue, including SAP34 for development is unsound and unsustainable as good agricultural land would be better served in producing food.

Local Centres: I would argue that the designation of Kingsdown as a local centre is unsound and not justified. Due to the unique nature of its location with AONB to the South as a border, the Sea to the East, heritage coast and cliffs to the South. The 3 narrow access roads serving Kingsdown do not link up easily to other hamlets and smaller villages to provide services. The main settlement of Ringwold is the other side of the A258 arterial road from Kingsdown and better served by Deal or Dover. There is no doctors, a recently reduced bus service, poor transport links for pedestrians and cyclists, no train station. A small village shop with post office and butchers. It is necessary to run a car to get to Deal or Dover for a food shop. The services within the village are by no means comprehensive and running a car is necessary.

The number of 2nd homes and Air BandB's in the village proves that dwellings outnumber homes required, so there is NOT an 'objectively assessed need for housing within the Parish'. To include SAP34 /KIN002 is therefore unsound and not consistent with NPPF 21.

SAP 34 /KIN002 is outside the village boundary and is part of the green space surrounding the village. In the housing section of the draft LDP strategic policy SP4 which refers to residential windfall developments -ie small scale developments there are strict criteria with regards to development.

a -The scale must be appropriate to the size of the settlement and existing facilities - This development would create problems for Kingsdown as the school is small and oversubscribed, we do not have a doctors surgery and few shops. Inadequate public transport makes travelling to secondary schools difficult as well. Between the Regulation 18 and 19 consultations bus services have been further cut. The HELAA highways assessment indicates it is unlikely that the proposed development will generate enough additional patronage to lead to an increase in bus service provision. This contravenes SP1 as the need to travel by private car would be increased.

Allocated money from the developers would not do any good as there is no space and parking in the village for improving infrastructure. The narrow single track roads through the village which are an inherent part of the character and charm of the village are also a limiting factor for the village in terms of further development. Residents of KIN002 would therefore have to use their cars for everything, creating pollution and congestion.

b - development must be compatible with the layout, density, fabric and appearance of the existing settlement and would not result in merging of separate settlements - Kingsdown has a sizeable conservation area and is a pretty seaside village with a shingle beach, woodland, chalk grassland and AONB. This would be a blight on the character and heritage of the village and would set the tone for people as they drive into the village. The HELAA assessment indicates that the entrance to the site would require the road to be widened at this point. Land is apparently available on the other side of the road. I would argue that this contravenes NE2 – the AONB would be compromised by

taking a section of it to widen the road. This would also be detrimental to the character of the village as it would be the first thing that is seen as you drive into the village and would go against the development guidance for Ripple F3 in the LCA 2020.

C and d- There must not be harm to important green spaces - the site is directly opposite the AONB which is highlighted throughout the draft LDP (NE2) as being an important constraint to development. The AONB must be protected. Green fields around the village are very important to the communities health and happiness and this field is surrounded by busy footpaths and bridleways. This has been shown during the current pandemic to be of vital importance. There is also an area of land on Ringwoud Rd in front of the site which is managed for nature by the owner and has a large number of nesting birds in the spring and overwintering birds. To the west of the site is an area of managed rare chalk grassland and woodland which has been the nesting and roosting site for many bird species including buzzards and skylarks.

f and g. It would not result in the loss of best and most versatile agricultural land currently used for agriculture and ...It includes an appropriately sized and designed landscape buffer to the open countryside;

NE2 states that proposals affecting the setting of the AONB will only be supported where the development is sensitively located and designed to avoid or minimise adverse impacts on the AONB and its setting and the development would enhance the special qualities, distinctive character and tranquillity of the AONB.

Having a wide access for good sight lines and widening Ringwoud Rd using part of the AONB would be contrary to this. Also due to the contours of the land it would be very difficult to adequately screen the site from the AONB and therefore would have a negative impact on it. The site would also be visible from the Dover Road and would change the character of the landscape which is LCA Ripple F3.

h It would not have a significant adverse impact on the living conditions of existing adjoining residents;-

All residents of Glen Road would have their gardens overlooked and their privacy compromised. This would be contrary to their legal human right to enjoy their homes peacefully. During the building phase there would be a lot of noise, disruption and dust. Their views across the AONB would be blighted. The large number of cars would also create localised pollution and noise once such a development was completed. There would also be an increase in light pollution.

i Where development would result in the loss of active employment, open space, sport or community facilities within the settlement that such development is consistent with the requirements of policies EN2, PM5 and PM6 of this Plan; This development would not be sustainable as it would result in the loss of active employment in the village as the special character of the village would be affected and it would not be as desirable to visitors from outside the area.

j. Traffic movements generated from the development do not result in severe impacts to the highway network that cannot be mitigated

- residents of this proposal would all have to use their cars to travel to nearby towns or to join trains or bus routes safely for work. This would create extra pollution contrary to the SP1 climate change strategy. The HELAA highways assessment shows that the site is still designated as orange. However the viability assessment shows it is now green so that the site can be pushed forward to reg 19 stage and concerns can be mitigated within the LDP. I consider this to be unsound. The mitigation is chiefly concerned with using some of the AONB to widen the road. This contravenes the NPPF as it would cause more adverse impacts than benefits to the village and AONB. It is unsound to put any more pressure on the 3 narrow, characterful roads into the village as emergency vehicles will not be able to safely gain access. When the A258 is closed as it was recently due to a fatal accident and traffic diverted into our village the gridlock in Kingsdown is dangerous. The HELAA assessment is also assuming that there is a good bus service; however, this has been cut. The HELAA assessment is underestimating the number of car movements that a development of this size would generate at 60 – 70 at peak times. It is more likely with the large 4 or 5 bed homes that would be built here that this would be in excess of 100.

TI1 Development should, in so far as its size, characteristic and location -Give priority to the needs of pedestrians, cyclists, users of public transport, car sharers and users of low and ultra-low emission vehicles. This site is outside the village boundary and not well served by footpaths or cycle paths. The site is crossed by a footpath ER5 which connects to the village along a dirt track with no lighting. The site will exit onto Ringwoud Rd which is not safe for children to cycle down and does not have any footpaths. The HELAA Sustainability appraisal is incorrect with its summation of minor negative with regards to climate change mitigation and sustainable transport. This has not taken into account the cutting of bus services to the village and the fact that it is not easy to walk or cycle to Deal or Dover.

TI2 New accesses and intensified use of existing accesses onto the road network will not be permitted if it would result in a clear risk of crashes or traffic delays unless the proposals can incorporate measures that provide sufficient mitigation. I consider this site to be unsound as there would be an increase in crashes and traffic delays. Widening the junction at the exit would not do anything for the rest of Ringwoud Rd. Land either side (opposite the AONB) is not owned by the same party as KIN002 and so cannot make up part of this development. The access is also very complicated. It is used by visitors to the play area and the landowner to the left as you enter the field from the road. No mention is made in the HELAA highways assessment of the landowner needing access. ER5 also crosses the entrance which would therefore be dangerous to pedestrians crossing from the field back to the village. ER5 is a very busy path used by dog walkers on a daily basis. The sight

	<p>lines onto Ringwould road from either direction are poor. Ringwould Rd is very narrow in places and in places, 2 vehicles cannot pass each other. Turning left out of the site would be onto a narrow road going into a 20mph zone. Turning right is in a 50mph zone with a bridleway and footpath crossing with poor visibility and slow tractors turning out onto the road. There has already been an RTC resulting in a fatality and serious injury on Ringwould Rd. I would argue that issues with access alone mean that this site is not suitable and unsound for development. A medium pressure gas main crosses KIN002 diagonally and crosses the road at this access point which would require careful consideration when changing the access. This would cause a lot of disruption to the villagers as this is the only classified road in and out of the village and as poor as it is, is the main route to the A258. If traffic had to divert via Deal this would create extra pollution and congestion for a protracted period of time which would be contrary to SP1 and the climate emergency declaration by DDC.</p> <p>T12 Applicants must demonstrate that traffic movements to and from the development can be accommodated, resolved, or mitigated to avoid severe cumulative residual impacts.</p> <p>The streets of Kingsdown particularly in the conservation areas are narrow and some unmade and unadopted. There are no footpaths in Upper Street where pedestrians are often to be found walking down the road to the shops. Lorries have repeatedly damaged property in Upper Street and the Rise and this is why there is a weight limit of 7.5 tonnes on Ringwould Rd. During the development phase the construction traffic would not safely be able to get in and out of the site. Also how can construction traffic get to the site if there is a 7.5 tonne weight limit on Ringwould Rd? An increase in 50 houses would result in far more car movements than the 60 – 70 car movements in rush hour predicted by the HELAA highways assessment. There would also be all the delivery vans, workmen etc. If these then turn left down the village to avoid the difficult junction at Ringwould onto the A258 they would cause gridlock in the village. The current windfall developments of a few homes per year is enough to cause problems within the village due to vehicle movements.</p> <p>These criteria refer to windfall developments which is how Kingsdown has grown slowly over the last planning period. These criteria are very sensible when applied to a rural settlement with poor infrastructure such as this. Any large scale development other than windfall would have a devastating effect on the community and could be considered as a disproportionate and unsustainable development in terms of this settlement.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Remove SAP34 from the LDP.</p> <p>Housing targets particularly with respect to characterful rural settlements need to be renegotiated in light of new government rulings.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>Strategic Policy 3 - Housing Growth</p>
<p>Rep ID</p>	<p>SDLP948</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1330746</p>
<p>Consultee Full Name</p>	<p>Mr Jac</p>

	Lewis
Consultee Company / Organisation	Town and Country Housing
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	3.80, 3.82, 3.85, SP5.2
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	N/A
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>In relation to policy 3.80 the evidence to discount Dover Centre from any and all obligations to provide affordable housing seems weak. The area is a large one, and developments can be assessed individually for viability and the timespan of this local plan means that developments to have no contribution to affordable housing is both unjustified. This policy will only create an imbalance of house pricing in the area, one deeper than if the 30% was beholden too. Shared ownership and Intermediate Rent are other forms of affordable housing that would not impact viability. By not providing affordable housing there is an inherent discrimination between who is able to live in Dover Centre. Those not able to live in the centre how had previously done so will be pushed away from their jobs, childrens schools etc. There is also a shorter term consideration - the impact of the cost of living crisis which will likely push more towards needing affordable housing. If there is no provision for affordable housing in the centre the issues I raised above about being forced out will affect these people.</p> <p>In regards to policy 3.82 the need for affordable housing continues to grow and therefore the possibility of all-affordable housing schemes become more and more important. With the grant funding that can be tapped into with all-affordable developments they can be both financially viable for the developer and provide the type of social development that only all-affordable schemes can.</p> <p>Policy 3.85 - Stress if the local connection/key worker/income cap requirements will or will not be implemented rather than it being discussed as possibility. A feature like that needs to be concrete. It also needs to be drafted without affecting mortgageability of intermediate (SO or rent) for Registered providers and prospective purchasers.</p> <p>Policy SP5.2 - Stress the necessity of social rented housing over affordable rented, SR can gain higher grant funding and therefore can be both competitive to the developer and more affordable to those moving into the units.</p> <p>To summarise:</p> <ul style="list-style-type: none"> • S106 levels to be maintained at policy (national policy) levels. • Tenure split should again follow. • Affordable Home Ownership Shared Ownership to have option to convert to Intermediate Rent to Homebuy • SP5 to stipulate Social rent not Affordable Rent • First Homes should not be introduced at the expense of rented housing. • First Homes technically are not as affordable as SO in our opinion. • Management/Estate charges should be apportioned on a floor area and not on a unit basis. • 100% affordable projects should be prioritised and supported through the local plan.

	<ul style="list-style-type: none"> Large sites should be broken into smaller parcels to allow SME's and RP's to develop – thereby allowing a competitive position against housebuilders and to increase the rate of construction.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	N/A
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP558
Rep Status	Processed
Consultee ID	1267584
Consultee Full Name	Jason Ransley
Consultee Company / Organisation	Dover Harbour Board
Agent Full Name	John Bowles
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Strategic Policy SP3 – Housing Growth
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Dover Harbour Board supports Strategic Policy SP3 – Housing Growth which seeks to focus new development where it supports regeneration and makes best use of brownfield land.</p> <p>Dover Harbour Board welcomes the increase in the indicative housing capacity of 263 units shown in Table 4.1.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	N/A

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	N/A
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP499
Rep Status	Processed
Consultee ID	1268017
Consultee Full Name	Ms Penelope James
Consultee Company / Organisation	Dover and Deal Liberal Democrats
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	n/a
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance	n/a

with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	The Council should require all new homes to be built to zero-carbon standards with immediate effect and adopt a zero carbon heat strategy - eg installation of heat pumps in all new homes. Improve local transport and encourage network wide ticketing. Improve and develop more cycle routes
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP718
Rep Status	Processed
Consultee ID	1268340
Consultee Full Name	Nick Banks
Consultee Company / Organisation	Richborough Estates Limited
Agent Full Name	Mike O'Brien
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy SP3 and supporting text
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Housing Requirement (Paras 3.30 - 3.38 inclusive of Table 3.1) The Regulation 19 Local Development Plan (LDP) proposes to cover the eighteen year period from 2022 up to 2040. This approach is line with paragraph 22 of the NPPF and is supported. For the purposes of calculating housing needs, DDC have used the 2022 standard method calculation results, which equates to 611 dwellings per annum (dpa). This results in a total Local Housing Need figure of 10,998 dwellings. Whilst this is line with paragraph 61 of the NPPF, it

represents the minimum figure, and the evidence base suggests that no consideration has been given to uplifting this to support economic growth.

The Regulation 18 LDP suggested a 10% supply resilience buffer to the Local Plan housing target (Table 6.1 of the Regulation 18 LDP) in order “to maintain a healthy supply of housing”. It was confirmed in the supporting text that this was justified in order to “provide flexibility and choice, and to account for changing circumstances and under-delivery”.

There is a history of under-delivery of housing in the authority. The adopted Core Strategy established a housing requirement of 10,100 homes over a 20-year plan period. The most recent Authority Monitoring Report (AMR) identifies that housing delivery up to March 2021 has seen 5,388 dwellings delivered over the 15-year period up to that point. This equates to an average of 359 dpa against an annual requirement of 505 dpa. There has been just one year in fifteen when the housing target has been met.

One of the principal reasons for the lack of delivery is due to strategic allocations being slow to come forward. As a result of this, the Regulation 18 LDP also included a 10% non-implementation discount to the extant supply.

Richborough raised concern with these figures as part of the consultation exercise and suggested a higher rate of 20% was more appropriate for both the supply resilience buffer and the non-implementation discount.

The Housing Topic Paper 2022 states at paragraph 8.7 that an 8.4% contingency buffer is to be added to the total housing need figure for the 18 year plan period to allow for supply resilience. Whilst Richborough supports the intention of DDC to plan to meet the Local Housing Need figure calculated using the standard method, as required by paragraph 61 of the NPPF, poor housing delivery over the last fifteen years (both district-wide and specifically at the Whitfield urban extension) means 8.4% supply resilience buffer is insufficient and not justified. Given the level of infrastructure which is required to deliver the allocation combined with the conclusions of the Whole Plan Viability Study and the track record of the supply trajectory, Richborough remain of the view that this should be increased to 20%.

Paragraph 9.6 of the Housing Topic Paper and Table 3.1 of the LDP confirm that a 5% non-implementation discount has been applied (with the exception of the extant permissions for the Whitfield Urban Expansion). The Housing Topic Paper seeks to justify this lower discount by referring to completions data for the 4 year period 2018/19 - 2021/22. Richborough does not consider this approach to be justified as there are too few sample years and the period mostly covers the period of significant market fluctuation caused by the Covid 19 pandemic.

The calculation for the non-implementation discount should include a greater timeframe, including years prior to 2018/19. Richborough considers a higher non-implementation discount of 20% should be applied to ensure the Local Plan is sound. This is in addition to increasing the non-implementation discount to 20%.

Housing Distribution (Paragraphs 3.41 - 3.48)

DDC established the principle of the current settlement hierarchy in order to support the preparation of the adopted Dover District Core Strategy (DDCS). It was deemed that a clear approach towards planning for the variety of settlements was required which was based upon an understanding of current characteristics and function as well as any aspirations for the future. The stated intention at paragraph 3.7 of the DDCS is that the settlement hierarchy should set out the general role of individual settlements and provide a basis for the distribution of development across the District.

DDC therefore carried out the ‘Dover District Settlement Review and Hierarchy’ (2008) in order to develop the settlement hierarchy. This assessed the facilities, functions and accessibility of the District’s towns and villages and the resultant hierarchy was set out in DDCS Policy CP1.

Dover was identified as a ‘Secondary Regional Centre’ through the Regional Spatial Strategy and comprises the major focus for development in the district.

It was also identified that the town of Deal (incorporating the built-up parts of the parishes of Sholden, Walmer and Great Mongeham) comprises the only District Centre and that its function was to act as a ‘secondary focus for development’.

The supporting text to Policy CP1 (paragraph 3.9 of the DDCS) highlights that the rural area is a strong feature of the District and outside of the top two settlements of Dover and Deal, the remaining tiers provide a focus for development outside of the urban areas. Sandwich was identified as a Rural Service Centre, with the remaining settlements comprising Local Centre, Village or Hamlet.

Policy CP1 reiterated that the location and scale of development in the District must comply with the Settlement Hierarchy.

Updated Settlement Hierarchy

In order to inform the preparation of the Regulation 18 Local Development Plan (LDP), DDC undertook an updated Settlement Hierarchy Study (2020) with the aim of identifying the most sustainable settlements based on the range of facilities and services present. However, the assessment focuses principally on the rural area settlements, given that the sustainability credentials of the three main centres of Dover, Deal and Sandwich

are well established. Richborough is of the view that the LDP would be more effective had Dover, Deal and Sandwich been included within the study and the LDP was therefore informed as to the comparative sustainability of these top three settlements.

An updated Settlement Hierarchy is provided within Appendix E of the Regulation 19 LDP and is referenced within the supporting text to Strategic Policy 3: Housing Growth. This retains Deal as the sole District Centre above Sandwich and Aylesham, but below Dover as the Regional Centre. Deal is therefore a strategic location for new development with a range of sustainable transport options, as well as extensive services and facilities accessible within the town. Paragraph 1.13 of the updated 2022 Settlement Study highlights that Deal is the 'second town in the District' with a population in 2020 of 30,824. This comprises 26% of the district's population, which is significantly more than Sandwich with around 5%.

Richborough supports the principle of reviewing the settlement hierarchy based on sustainability, as well as including the hierarchy within policy in the Local Plan. Richborough also supports the inclusion of Sholden within Deal. This approach is supported by paragraph 79 of the NPPF which highlights that *"housing should be located where it will enhance or maintain the vitality of rural communities. Planning Policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby"*.

As noted elsewhere in these representations, Richborough has an interest in Land South West of Sandwich Road, Sholden. Part of this site secured outline planning permission (Ref: 21/00402) for up to 110 dwellings in March 2022. However, Richborough is of the view that the draft allocation should be expanded to include a larger area of land, which is also under their control, to deliver approximately 250 new dwellings. The deliverability of the wider site and benefits associated with the development are covered in response to Chapter 4 (Housing and Employment Allocations) of the Regulation 19 LDP.

Distribution of Development

Core Strategy Approach

Policy CP2 of the DDCCS addresses the overall development requirements and confirms that the strategy sought to allocate land for up to 14,000 homes and to deliver a minimum of 10,100 homes (equivalent to 505dpa) by 2026, as required by the South East Plan. The table provided in the policy confirms that of the 14,000 homes, land for 7,750 is allocated through the strategic allocations and that land to accommodate the balance of 6,250 was to be allocated through the Site Allocations Document, which followed.

Policy CP3 of the DDCCS is titled 'Distribution of Housing Allocations' and sought to establish where the housing requirement set out in CP2 will be met. Paragraph 3.27 confirms that the broad distribution will be guided by the strategy objectives and the settlement hierarchy. Paragraph 3.28 highlights that whilst further investigation into the Middle/North Deal area will be undertaken, the provision in Deal will be of a 'lower order', geared around meeting the local rather than strategic needs. This approach clearly went against the findings of the Settlement Hierarchy which supported the DDCCS, as it identified Deal as the 'secondary focus for development in the District; suitable for urban scale development'.

Policy CP3 identified the following distribution:

"Land will be allocated to meet the housing provisions of Policy CP2 in accordance with the following distribution:

Dover: 9,700 (70%)

Deal: 1,600 (10%)

Sandwich: 500 (5%)

Aylesham: 1,000 (7%)

Rural: 1,200 (8%)

Total: 14,000 (100%)"

The DDCCS therefore placed an emphasis on housing delivery within the Dover Town area, with the strategic urban extension at Whitfield being the primary focus. Based on this distribution, delivery of less than a third of all dwellings was allowed for within the other settlement areas and rural hinterland of the District.

Historic Housing Delivery

DDCCS established a housing requirement of 10,100 homes over a 20-year plan period. However, Figure 4.3 of the 2020/21 AMR confirms that housing delivery to date has seen 5,388 dwellings delivered over the 15-year period of the DDCCS. This equates to an average of 359 dpa against a requirement of 505 dpa. There has been just one year in fifteen when the housing target has been met.

There is evidence of the negative social impact of the failure to deliver sufficient housing in the DDC over this period, with the median house price to income ratio in the District deteriorating from 6.1 in 2009 to 9.25 in 2021 (ONS 2022) and a worsening by 30% in the year 2020/21

alone. The under-delivery of housing has contributed to deteriorating affordability in the District. Affordability is a critical social component of sustainable development that acts as a barrier to local people being able to access housing. It should be accepted that there is an urgent need to boost housing delivery within DDC.

Analysis within the Housing Topic Paper (2022) confirms that the delivery of housing since 2010 has largely been through windfall development with a significant deviation away from the planned distribution set out in the DDCS. Over a 10-year period from 2010, windfall development has accounted for nearly half of all completed dwellings within the district (44%) and that 71% of these were new builds.

Paragraph 3.33 of the DDCS seeks to ensure that maximum use is made of suitable brownfield land in order to reduce the use of greenfield land wherever possible. Paragraph 3.34 provides more detail on the expected split between greenfield and brownfield and states:

“The Council has extensively researched the availability of brownfield land that could be suitable for housing redevelopment. The Strategic Housing Land Availability Assessment has been used to inform the expected contribution from brownfield land (around 43%) and therefore also the scale of greenfield land (around 57%), that would be needed to meet the overall requirements.”

Figure 7 of the Housing Topic Paper (2022) provides a breakdown of brownfield / greenfield completions between 2010/11 and 2020/21. This table confirms that during that period, 4,241 were completed with 2,241 (53%) on greenfield sites and 2,000 (47%) on brownfield sites. This demonstrates that brownfield sites overdelivered as a proportion of completions based on the expectation at the time of adoption.

The Whitfield Urban Expansion is a greenfield site located on the edge of Dover and was allocated for development in the DDCS and anticipated to deliver 5,750 new homes before the end of the plan period in 2026. Although planning permission has been granted for 1,483 dwellings, as of April 2021, only 363 dwellings have been completed on the site. Whilst the delivery of required infrastructure has been a constraint to development (including upgrades to the Whitfield and Duke of York roundabouts) the Housing Delivery Forum presentation also highlights the fact that the land is controlled by only a few landowners. There are clearly issues with viability given that an application was recently approved on Phase 1C for 249 dwellings (22/00029) and only 4 dwellings are to be provided as affordable.

As acknowledged in the Housing Topic Paper (2022), and highlighted above, windfall development has made an important and sustained contribution to the provision of additional homes in DDC. The level of windfall development in settlements such as Deal has taken up much of the slack in regard to housing delivery, rather than plan led development, since the adoption of the DDCS. Figure 4 of the Housing Topic Paper highlights that overall housing delivery in Deal (28%) falls only slightly short of Dover (31%) in spite of the distribution pattern established by Policy CP3. It is clear that the failure of the DDCS to meet the housing targets is not due to overreliance on brownfield sites, but the proportion of development which was skewed unnecessarily towards to unviable locations in and around Dover. This is further evidence by the fact that draft Policy SP5 confirms that schemes within the Dover Urban Area cannot viably provide affordable housing and is therefore not required.

There was a lack of justification for the proportions set out in Policy CP3, particularly in light of the conclusions drawn by the Settlement Hierarchy Study, which highlighted that Deal should accommodate development of an ‘urban scale’.

Sustainability Appraisal

Paragraph 3.33 of the Regulation 19 LDP confirms that as part of the preparation of the Local Plan, DDC identified and appraised a range of growth and spatial options through the Sustainability Appraisal (SA). These are set out below:

- Spatial Option A: Distributing growth to the District’s suitable and potentially suitable housing and employment site options (informed by the HELAA and ELR).
- Spatial Option B: Distributing growth proportionately amongst the District’s existing settlements based on their population.
- Spatial Option C: Distributing growth proportionately amongst the District’s existing settlements based on the District’s defined settlement hierarchy (informed by the Settlement Hierarchy Topic Paper).
- Spatial Option D: Distributing growth in the same way as the adopted Local Plan, focussing most growth in and around Dover.
- Spatial Option E: Distributing growth more equally across the District’s settlements: Dover, Deal, Sandwich and Aylesham, as well as the rural villages.

Paragraph 5.8 of the Housing Topic Paper (2022) states that *“the conclusion of the SA was that Spatial Options C (settlement hierarchy) and D (adopted Plan Dover focus) generally perform the most strongly against the SA objectives, particularly when delivering the baseline growth scenario”*. After undertaking its own review of the SA, Richborough strongly rebuts this assertion.

Table 4.2 of the SA provides a summary of the likely sustainability effects when the Sustainability Appraisal objectives are considered. This clearly demonstrates that by any measure Spatial Option C performs much more strongly than any other spatial option. For the preferred growth option (medium), Spatial Option C scores significant positive effects (without significant negative effects) in six of the eleven categories. This is twice as many as any other option.

Spatial Objective 1 (SA1) relates to housing, and specifically the aim: 'to help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home'.

Paragraph 4.67 of the SA highlights the issue that providing new housing in areas of the District where house prices are currently highest would respond positively to areas of highest demand. Sandwich and Deal are more expensive than Dover and provision in these locations will help to address affordability by increasing housing choice and providing new affordable homes (paragraph 4.66 of the 2022 SA). Richborough agrees with this assumption and that Spatial Option C scores highest as it will spread delivery evenly across the district, particularly in areas where there is certainty that delivery is viable.

However, it is also worth noting that paragraph 4.68 states that *"the provision of housing at larger sites, most likely through urban extensions in the case of Dover District, will provide most opportunities for the delivery of higher numbers of affordable dwellings"*.

The large strategic locations and the ability to provide affordable housing has been tested as part of the Whole Plan Viability Study (2020). Table 12.6a of the Study demonstrates that when including the recommended policy mix of affordable housing as well as other matters such as bio-diversity net gain and Future Homes Standard, the strategic locations at Aylesham and Whitfield are either not viable or only marginally viable. The Regulation 19 LDP addresses this point in paragraph 3.82 and states the following:

"In terms of the rest of the district, there are three different value areas which impact upon the ability of development to deliver affordable housing. Within the higher and medium value areas the viability evidence demonstrates that development can support a requirement for 30% affordable housing. Within the lower value areas, the delivery of 30% is more marginal and would depend upon the level of developer contribution being sought for other infrastructure. However, the 30% requirement for the rest of the District outside of the Dover Urban Area is the starting point for the policy position."

Richborough is of the view that the viability of sites and the ability to contribute affordable housing is crucial to the selection of growth options and specific sites in DDC. The failure of the DDCS in meeting housing needs was the result of not rigorously testing the viability of the strategic allocations, combined with the skewed distribution towards Dover.

DDC has also failed to fully update the Whole Plan Viability Assessment for the Regulation 19 LDP, and merely produced an update note. Many factors relating to the cost of construction, including the availability of labour, price of materials, increased interest rates and the availability of development finance have altered significantly since that time and warrants a full update to understand the consequences.

Richborough is therefore of the view that the SA has not correctly assessed the options against SA1. The significant negative effects associated with Spatial Options A and D should be noted accordingly as they would be unlikely to meet the overall housing needs for the District. Given the infrastructure costs associated with urban extensions and based on the specific findings of the Whole Plan Viability Study, Richborough is of the view that the SA is incorrect to assume that larger sites will deliver higher numbers of affordable dwellings.

SA4 relates to reducing travel and encouraging sustainable alternatives. Paragraph 4.78 highlights that where new development has easy access to services and facilities and employment opportunities it is more likely that there will be a reduced need for travel. It is concluded that the options that perform the best against SA4 are those that deliver growth in close proximity to major settlements and sustainable transport links and the more even the spread of growth the less likely that road congestion will be generated. Similar conclusions can be drawn for SA6, which relates to air pollution. Richborough agree that Spatial Option C is clearly the highest scoring option in this case for SA4 and SA6.

Whilst the SA highlights significant effects on natural resources, climate change, biodiversity, historic environment and landscape, this is most likely the case for any spatial option that is selected. Richborough is therefore of the view that the results of the SA assessment should clearly highlight Spatial Option C as the strongest performing option. This should be carried through more definitively into the distribution of development set out in the Local Plan at Strategic Policy 3. A more even spread of development which is focused on the results of Settlement Hierarchy and the SA would be more effective and would ensure the Local Plan is justified.

Preferred Spatial Option

Paragraph 5.9 of the Housing Topic Paper 2022 confirms that despite the preferred Spatial Options in the Sustainability Appraisal being Options C and D: *"given the environmental constraints that exist around Deal and Sandwich, very few suitable and potentially suitable sites have been identified in these towns. Given this, the Council's preferred option for the distribution of housing and economic growth will comprise a combination of options A (HELAA sites), C (settlement hierarchy) and D (Dover focus). The distribution of housing and economic growth in the District will therefore primarily be based on the settlement hierarchy, and influenced by site availability, environmental constraints and factors of delivery."*

Paragraph 9.19 of the Housing Topic Paper relates to the 'distribution of housing across the district'. This states that Table 10 provides a percentage breakdown of the distribution of housing to each settlement and includes Local Plan Allocations and the Ash Neighbourhood Plan. However, this is incorrect as it only provides a breakdown of distribution for the allocations, which total 5,788 dwellings. Richborough is of the view that the distribution of the claimed supply of 11,924 dwellings (from Table 3.1 of the Regulation 19 LDP) should be provided.

Deal (including Walmer, Sholden, Gt Mongeham), the second most sustainable settlement in the District as a District Centre is identified as contributing only 3.85% of the total housing to be delivered through allocations, up to 2040. This apportionment of housing growth sees Deal receive less housing growth through allocations than the settlements in the tier below, Rural Service Centres. This figure is only 0.46% higher than Ash which is identified as a Local Centre in the settlement hierarchy, and which are defined as providing “*services for a local rural area and a secondary focus for development in the rural area at a scale that would reinforce their roles*” (Regulation 19 LDP Appendix E)

Richborough considers the preferred Spatial Option to be inconsistent with the supporting evidence base, the Sustainability Appraisal, and the Local Plan is therefore not justified or legally compliant and may not deliver sustainable development in compliance with national policy. The LDP fails to provide sufficient evidence as to why Deal cannot accommodate more housing during the plan period. Deal is a District Centre in DDC’s settlement hierarchy, is highly sustainable and is referenced as being a secondary focus for development in the District (Appendix E). Despite this, Deal and its supporting centres are apportioned less than 4% of the housing allocations across the next 18 year period.

We note that Option C is the only option that scores significantly positively for transport of the five options tested and is clearly the best option in transport terms. This option would distribute growth proportionally amongst the settlements based on the settlement hierarchy.

As a secondary focus for development Deal, by definition, must be well served by active and sustainable travel options. Deal is well served by rail, with direct train services to London, Deal and destinations towards Faversham. As expected for a settlement of the scale of Deal it is also well served by buses.

By concentrating development in Dover, the Regulation 19 LDP will also concentrate traffic impacts on a network that is already under pressure at certain key locations. By way of example, it is noted from the latest WSP Regulation 19 Transport Modelling Forecasting Report that, even after mitigation is put in place, drivers approaching the roundabout from the A256 Whitfield Hill in the ‘Do Something’ scenario during the PM peak hour are forecast to experience delays of over 13 minutes in 2040. By distributing the housing in a manner more proportional to the settlement hierarchy, the traffic impact of the development would also be more evenly spread.

It is also clear that the highway network in Deal is forecast to be under far less pressure than that in Dover as shown at Table 6-13 of the WSP Regulation 19 Transport Modelling Forecasting Report clearly indicates. The table shows the forecast 2040 Do-Minimum scenario of the Dover and Deal Traffic Model.

Table 6-13 highlights those links and junctions (nodes) within the model that are beyond (red) or approaching (amber) capacity in one or other of the peak hours. The great majority of those links are within Dover and only one link in Deal is identified as having a volume/capacity ratio that exceeds 100%. The District Council’s preferred distribution of so little housing to Deal is, in transport terms, illogical.

Commentary in Table 6-16 of the WSP Regulation 19 Transport Modelling Forecasting Report seems to suggest that the sole transport reason for directing growth away from Deal relates to the future forecast operation of the London Road/Manor Road and London Road/Mongeham Road junctions in one or other of the peak periods. It is also suggested that no network mitigation would be possible. This is despite evidence that the highway network taken across Deal as a whole will operate more efficiently than the highway network in Dover where growth is concentrated.

If DDC is so concerned about the operation of the highway network in Deal, despite evidence to the contrary, then more detailed consideration should have been given to the Deal Bypass/Relief Road option which it is understood was discussed and dismissed at an early stage of the Local Plan review without due thought and investigation. Furthermore, there are network management options that could be pursued to give further priority along London Road and reduce delay at both the Manor Road and Mongeham Road junctions. No such options have been sufficiently investigated by DDC through the plan-making process.

To ensure the LDP is justified and effective, greater weight should be given to Spatial Option C in the Sustainability Appraisal and the housing land supply should reflect the adopted and emerging settlement hierarchy with a more appropriate and sustainable apportionment of new houses to Deal and Sholden.

Table 3.1 of the Regulation 19 Local Development Plan (LDP) confirms that the claimed overall supply figure of 11,924 dwellings exceeds the housing requirement figure of 10,998, by 926 dwellings. This includes 3,829 dwellings from the Extant Supply, which is defined as permitted development not yet built. However, the sites which make up the extant supply are not listed anywhere within the evidence base and isn’t broken down sufficiently within the Housing Trajectory provided at Appendix D of the Regulation 19 LDP. Richborough is of the view that this supply, and how it contributes to the housing trajectory, should be clearly evidenced and broken down site by site. The evidence should also demonstrate how the supply reflects the defined settlement hierarchy by confirming where development has been distributed.

Policy SP3 confirms that the majority of housing will be in Dover Town and Whitfield Urban Extension. Reliance on these areas is evidenced in the Regulation 19 Local Development Plan (LDP) which states that additional land beyond the existing commitments has been identified with an approximate capacity of 1,112 dwellings.

Whitfield Urban Extension (UE) is estimated to deliver 6,350 dwellings (including emerging allocations and existing allocations partly built out). The adopted Whitfield UE is the subject of an adopted Masterplan (adopted April 2011). Despite this allocation and the adopted Masterplan there have been only 363 completions on site. DDC suggest an expected increase in the rate of delivery at the Whitfield UE once key infrastructure is complete or construction has begun.

Richborough has concerns with the proposed spatial strategy and the distribution of such significant levels of development to Whitfield UE and Dover town, particularly as the DDC evidence base highlights viability issues within these areas.

The Whole Plan Viability Study provides the following description of the various value areas across the District:

- Higher – north of the District
- Medium – Coastal towns to the east of the District and the rural areas and settlements to the south of the District
- Lower – sites within and adjacent to Aylesham, sites adjacent to wider Dover, principally to the north and west of the built-up area and Whitfield.
- Dover Town – relatively tightly defined built-up area

Whitfield and Dover are in lower value areas, with Dover Town being the lowest value area. The previous under delivery of housing in the Whitfield UE is likely to have been impacted by viability concerns, which have not improved.

Deal and supporting settlements, including Sholden, are within the medium viability area and the only District Centre with the function of acting as a 'secondary focus for development'. Despite this, the proportion of housing site allocations to this location is only 4% of the total for the District (Referencing figures from Table 3.3 of the Regulation 19 LDP).

The identified supply of housing is not effective or justified and it has not been sufficiently demonstrated that the identified housing allocations are viable. Additional allocations are required in Medium and Higher zones and in accordance with the adopted settlement hierarchy. Significantly more growth should be focussed within Deal and outlying settlements including Sandwich.

Table 3.2 (page 32) of the Regulation 19 LDP explains that DDC considers it can demonstrate a deliverable 5 year housing land supply (5YHLS) of 4,143 dwellings which against the proposed housing requirement and a 10% buffer equates to 6.16 years. We make the following comments.

- The base date of the 5YHLS calculation is the date the requirement and the supply relate to. Table 3.2 and the trajectory set out at Appendix D use a base date for calculating the 5YHLS of 1st April 2022. However, by the time the Local Plan is examined, it is likely that the most up to date position will be at 1st April 2023 and therefore we respectfully request the opportunity to comment on the Council's position at the most up to date base date through the examination of the Local Plan.
- In terms of the requirement, in accordance with paragraph 74 of the Framework, the proposed housing requirement of 611 dwellings should be used. However, any shortfall from the base date of the plan period of 1st April 2022 should also be added to the 5YHLS requirement. This should be addressed in full in the five year period (i.e. the Sedgefield method) in accordance with paragraph 68-031 of the PPG. This will need to be reassessed at the new base date during the examination.
- In accordance with paragraphs 74 and 75 of the Framework, the 10% buffer should be used if the Council's 5YHLS is confirmed through the Local Plan unless the latest Housing Delivery Test (HDT) result when the Local Plan is adopted is less than 85% and then the 20% buffer would apply.
- On the supply side, we note that table 3.2 of the draft Local Plan states that the deliverable supply at 1st April 2022 is 4,143 dwellings. This does not align with the trajectory in Appendix D, which is 3,993 dwellings. It is also different to the position set out in the Council's latest 5YHLS statement, which is 3,868 dwellings. Nevertheless, it is likely to change again by the time the Local Plan is examined when the base date is changed.
- Whilst we respectfully request the opportunity to comment on the latest 5YHLS figure at the time of the Local Plan examination, the Council will need to provide clear evidence for any sites that it seeks to rely on in its 5YHLS which are within category b) of the definition of deliverable as set out in the Glossary on page 66 of the Framework. This would include sites with outline planning permission for major development, allocations without planning permission as well as other sites such as those pending S106 agreements. Once the clear evidence the Council relies on for the inclusion of these sites has been published, we respectfully request the opportunity to comment on it.
- In terms of the windfall allowance, the Council will need to provide compelling evidence in accordance with paragraph 71 of the Framework to justify the inclusion of a windfall allowance of 70 dwellings in years 4 and 5 of the 5YHLS period on sites of less than 5 dwellings. This is based on an annual average of past delivery rates on such sites. Therefore, the Council will need to ensure that the combination of a windfall allowance and small sites with planning permission for less than 5 dwellings does not exceed past trends otherwise there would be double counting.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The calculation for the non-implementation discount (as shown in Table 3.1) should include a greater timeframe, including years prior to 2018/19. The supply contingency buffer referenced in Table 3.1, as well as the non-implementation discount, should both be increased to 20% respectively. To make the LDP sound, the distribution of housing land needs to reflect the clear preferred Spatial Option within the SA (Spatial Option C), and allocate new housing sites in line with the settlement hierarchy at Appendix E of the LDP. Additional allocations are also required in Medium and Higher zones in order to accord with and justify the adopted settlement hierarchy. Significantly more growth should be focussed within Deal.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Richborough has a strong track record of promoting sites through the local plan system and believe they can assist the Inspector in exploring the issues with the most up to date information and therefore wish to participate orally in the examination.
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP829
Rep Status	Processed
Consultee ID	1330970
Consultee Full Name	Mr Paul Henley
Consultee Company / Organisation	Womenswold Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	<u>Comments on the Dover District Draft Local Plan from Womenswold Parish Council</u> Womenswold Parish Council is submitting comments based on discussion at the Parish Council meeting on 8th November 2022.

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

The Council wishes to comment as follows on the proposed housing estate SAP 24 of 640 houses on land between Aylesham and Snowdown:-

Rural Nature

- The proposed site of the housing estate is on a greenfield site in a rural community. This proposal would severely impact on the rural nature of the area. In addition, valuable farm land will be lost to the production of food. This is clearly much needed in these difficult times

Water

- The area in question lies in a drought stricken part of the South East. This summer and most summers we have water shortages. This development can only exacerbate the problem. In addition, Canterbury City Council is planning a total of 3620 (minimum) houses in the adjacent area, adding to the burden of water shortage.

Sewage

- The whole of the South East suffers from extremely poor infrastructure for the disposal of raw sewage. There have been many recent instances whereby Water Companies have pumped raw sewage into the sea which has resulted in large fines. Clearly the addition of nearly 4000 home will only add to this problem.

Traffic

- The proposal, together with Canterbury City Council's proposal will increase the strain on the rural road infrastructure. In particular, the B2046 is already extremely busy. There have been many accidents at the junction to the entrance to Womenswold Parish. In addition the slip road on the A2 (London Bound) is far too short. The increase in traffic created by these developments will only make this worse.
- The roundabout on the A260 by the A2 was built to deal with the huge increase in traffic coming from Aylesham under the current Aylesham expansion. It does not take into account the further proposed increases.

Infrastructure

- Currently there is a major shortage of facilities which contribute to facilitate supporting the community:-
 - Doctor surgeries.
 -
 - There are no secondary schools in the area. The nearest schools are in Canterbury, Sandwich and Dover. This necessitates a bus ride on overcrowded and unreliable buses. This also contributes to increased Greenhouse gasses and increased traffic congestion. The addition of so many houses will seriously exacerbate the problem.
 - There is only one small Coop in Aylesham which hardly copes with current levels of business.

Public Transport

- Buses: The bus service is already poor with little sight of improvement
- Trains: There is a station at Snowdown but the service is slow, once an hour to London for a 2 hour journey. The stations at Snowdown and Aylesham also do not cope with current levels of use. Parking is an issue and walking is difficult along narrow country lanes with no footway.

Summation

Womenswold Parish Council objects to the proposed Housing Estate SAP 24.

It is too large, and when the adjacent Canterbury City Council plans (R20 and R1) are taken into account, it effectively creates an Aylesham/Womenswold Conurbation in a very rural area of Outstanding Natural Beauty.

There is currently little infrastructure to support existing communities. The proposal would seriously impact on this.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance

Comments on the Dover District Draft Local Plan from

Womenswold Parish Council

Womenswold Parish Council is submitting comments based on discussion at the Parish Council meeting on 8th November 2022.

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with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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- The roundabout on the A260 by the A2 was built to deal with the huge increase in traffic coming from Aylesham under the current Aylesham expansion. It does not take into account the further proposed increases.

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There is currently little infrastructure to support existing communities. The proposal would seriously impact on this.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Not Applicable

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP858
Rep Status	Processed
Consultee ID	1331163
Consultee Full Name	Mr Matthew Cook
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP28 Development between Elvington & Eythorne
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Infrastructure - rural roads unable to cope with 700+ more vehicles</p> <p>Environmental - bats, skylark, woodpecker, buzzard to name but a few are all active within this area. Development means habitat loss</p> <p>Education - One small school already to capacity, How are so many new families expected to source schooling? This will mean travelling into nearby towns. Stress on road and further environmental impact via pollution</p> <p>Health - No available GP surgeries. Again, requires travel to nearby towns. Shepherdswell surgery is not viable as has very limited operating hours</p> <p>Integrity of village heritage - This development connects Elvington & Eythorne. Individual village status will be lost. How are the villages to be named?</p> <p>Buses - Local services recently withdrawn. Proposed community will be isolated for non-drivers</p> <p>Green space - the area is used by hundreds of local residents per week. Exercise, dog walking and leisure via open space and connecting footpaths. Where are they supposed to go? Through a housing estate?</p> <p>Landscape - Views from surrounding properties (Elvington, Lower Eythorne) all compromised by the development. Countryside surroundings sought by these residents, lost.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness	To develop one of the many derelict areas around the district or closer to towns and their amenities. Many area in Dover town with crumbling, disused buildings where the investment/spending would be better placed. Develop in already built-up areas that have the services to cope. The solution to the need for more housing shouldn't be to concrete the countryside - especially when there are so many run down areas in need of the investment.

matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP863
Rep Status	Processed
Consultee ID	1331164
Consultee Full Name	Miss Leanne Turner
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP28 Development between Elvington & Eythorne
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Lack of Amenities - Busses have been stopped to our area due to spend cuts. Isolating many villagers already, before the proposal to bring hundreds more people here. Closest GP surgery is Shepherdswell. Due to GP shortages their opening hours have been reduced. More potential patients will not enable them to reach GPs that aren't there. Roads - I myself have moved from Thanet where it can take an hour to get from one side to the other, to live in the countryside. Many people living here have done the same, having bought houses to live here, they would now be plagued by 700 + more cars than we currently have living in the area. Not only that the roads through the villages are small and where historical old buildings line them cannot be widened.

	<p>Quality of life - People who live here use the proposed area for excersize, walking dogs, running, cycling close to their homes where they do not need to drive to get there. Should this area become houses, they will be forced to travel further to do this which many may not do, or will find themselves having to drive to a green space.</p> <p>Schools. Local schools are small and full to capacity. Secondary schools are only in the towns which is a long drive for families.</p> <p>People who buy houses in the new development will likely need to comute. meaning likely driving to Dover and parking near the train station all day. overloading roads and carparks there.</p> <p>We are currently in a cost of living crisis. the houses proposed would not be affordable by the people already living in the area and only by people who are already wealthy.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>I would recomend redeveloping areas in the towns where building have fallen into disrepair or derelict land. Pottentially for appartments mixed with small houses for people of lower incoms and first time buyers. where he build would put less strain on wildlife. roads and amenities are already bigger and can be made to better cope with the increased population.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>Strategic Policy 3 - Housing Growth</p>
<p>Rep ID</p>	<p>SDLP884</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1273295</p>
<p>Consultee Full Name</p>	<p>Mr Martin Garside</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to?Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>Chapter 2 - Vision and objectives (Overarching vision)</p>

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The central aims set out in Chapter 2 - 'Vision and objectives (Overarching vision)' misses both the main housing challenges this part of south east England faces and misses a huge opportunity to revitalise the town of Dover itself.</p> <p>Taken overall, the plans for new housing in the whole plan show a depressing and unsustainable reliance on building on greenfield and agricultural land. And the housing mix proposed indicates a large part of this new housing will be three / four or more bedroom large houses.</p> <p>However - south east England faces a massive housing crisis. This manifests itself in a dire shortage of decent and affordable rental property. And a related shortage of affordable 'starter' flats and homes for young people.</p> <p>Yet staring Dover District Council in the face is the opportunity to revitalise the town of Dover itself. Dover is potentially a very fine town with a remarkable history. Sadly - for a number of reasons - much of the town is neglected and in urgent need of investment and growth. The image and reputation of the town has suffered as a result of this neglect.</p> <p>Indeed, the future growth and prosperity of the wider district is held back by the decline of the town. The local district plan is a huge opportunity to grab hold of this long term failure and rebuild and renovate this key historic town.</p> <p>Key steps should include:</p> <ul style="list-style-type: none"> • building affordable flats and homes for purchase and rent on both brown field sites and on derelict sites (including some locations where existing buildings are of poor quality) • much of the older housing may be suitable for 'retrofitting' with modern insulation standards and other improvements • looking to increase the number of flats above retail premises • where a retail premises is simply now unviable - appropriate and sensitive redevelopment should be enabled to turn the former retail unit into good quality housing • existing car park provision should be reviewed to see if any could be used to build new housing. <p>Such steps would meet the actual housing needs of local people as well as improving both the visual appearance and the image of the town. Other benefits would include bringing life back into the economic life of existing high street which otherwise faces continuing decline. The superb asset of the highspeed rail link from London; Ashford and Canterbury into Dover Priory remains a massive - and still largely unrealised - opportunity to rejuvenate Dover.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Dover District Council should focus instead like a laser beam on the rejuvenation and improvement of the town of Dover. Plans to build considerable new housing on green field agricultural land on the edge of rural villages are largely not sustainable and fail to meet both current urgent needs and challenges of the future.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1056
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The Housing Growth statement that the aim is to , “provide a greater choice of high-quality housing to meet the needs of Dover districts’s growing population and changing demographic and address affordability issues”, does not seem internally consistent with the details provided in the plan which underestimates the evidence showing a large part of district population growth is due to aging. The details thus render SP 3 and SP 5 ineffective, unsound. Moreover with the announcement by Prime Minister Sunak on 5 Dec 2022 that compulsory housebuilding targets are to be dropped, the DDC numbers are not compliant with emerging government policy.</p> <p>The government department (DLUHC) decision that Dover needs 611 new dwellings a year and a minimum of 10,998 new homes between now and 2040 we find very incompatible with legally binding Net Zero Strategy, Climate Emergency Declaration 2019 and Climate Change Act 2008, and unsound. We should be transforming homes into zero carbon homes as is happening in East Sussex, led by Lewes DC. Combining these numbers with 3.51 and the statement ‘76.7% of the new homes are on greenfield sites, while 23.3% are on brownfield sites’ is unsound and unacceptable to the public. It must also be pointed out that at least one of the sites included in the 23.3% of brownfield sites is actually a site intended by SEEDA as local nature reserve having rewilded on unstable slag (only rendered stable by tree-planting), a site which DDC forgot to make a local nature reserve in 2004, and it has become a biodiversity hotspot well known to genuine ecologists nationally, Betteshanger Park, and ought to be designated a Biodiversity Opportunity Area.</p> <p>We note that central government in London, according to Housing Today is imposing a disproportionate amount of housing growth on Kent and the SE. The FT has shown a quarter of Con party donation come from the property developer lobby. We note that the supposed national New</p>

	<p>Homes Ombudsman, is not neutral in this matter and gets on well with volume developers and there is with a grievous lack of democratic accountability across Kent. So the chances, of protecting Kent, of achieving a Growth Strategy that creates climate-friendly jobs and suitably-sized, suitably-priced zero-carbon homes for the next generation of local families, are not good. The space available for infrastructure, functions well for compact coastal towns of the size that Deal / Walmer and Sandwich were 5 years ago. The level of greenfield overdevelopment is putting Deal infrastructure under strain now, so in-fill should make up the majority of the allocations for Deal and that the housing growth specified for District Centre of Deal and around its boundaries needs to be stopped or radically reduced. For example either or both of SAP 15 / SAP 34 would destroy the only road access alternative for diverted traffic. (See detailed comments under SAP 15/ SAP 34 below). Housing Growth that threatens gridlock, blocking off a conurbation of 30,000 from access by emergency vehicles, commuters, school buses is not sustainable housing growth and is very unsound.</p> <p>3.29 We note and welcome a degree of shift from the Reg 18 draft, in that more sites have been selected with a view to using 'existing infrastructure, facilities and services, with a greater professed purpose to ensure development contributes to the sustainability of local communities and services'. We note with appreciation both the increase in the number of sites in Dover town SAP 6 – SAP 13, and the SAP 26 Former Snowdown Colliery, Aylesham near a rail station for example.</p> <p>On Five Year Housing Land Supply. 3.39 Having stated the Council had 6.03 years land supply plus a 5% buffer; it is not sound, effective or legally compliant to then state 'the provision of additional sites within the first 5 years of plan period is needed to ensure resilience and promote flexibility;'. Instead of ensuring resilience, it will create exactly the destructive suburbanisation of a rural district that many, many of the resident electorate are most worried about. The 10 year buffer proposed, 3.40 is worse and demonstrates the culture of 'whatever developer partners ask for' referred to above.</p> <p>In Nov 2022, it seems very naïve to hope that 'new housing in villages can help them retain existing services such as public transport, retail (many pubs are going under because lack of staff and sky high energy bills) and schools (again oversubscribed local schools fear they will go bankrupt with sky-high energy bills).</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>It should be possible to state a determination to 'make best use of brownfield – non-rewilded – land) without giving developers the opt-out qualification 'wherever possible'.</p> <p>3.68 Windfall. Unless existing settlement boundaries are respected, there is suburban ribbon development creep from field to field to field. To render the plan sound it should contain a statement '<i>Previously existing settlement boundaries will be respected, until such time as town and parish councils may have agreed changes with Dover District Council, in accordance with the principles of Localism Act 2011.</i>'</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.</p>
<p>Include files</p>	<p>v4 D&D Greens response 2022 Reg 19 new Local Plan .docx</p>
<p>Local Plan Consultation Point</p>	<p>Strategic Policy 3 - Housing Growth</p>
<p>Rep ID</p>	<p>SDLP585</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331709</p>
<p>Consultee Full Name</p>	<p>Ben Pridgeon</p>

Consultee Company / Organisation	Emmanuel College
Agent Full Name	Ben Pridgeon
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy SP3, paragraph 3.29, paragraph 3.42
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	We object to an over-reliance of the Plan to deliver dwellings in the medium and long term parts of the Plan. There appears to be little delivery of dwellings in the early part of the Plan period and this will not make a positive contribution to the Council's housing land supply. The strategic, urban extensions will take time to deliver due to the requirement for a masterplan and prolonged planning process. This will not aid 'upfront' delivery for dwellings in the district. Please see representations for further information
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The lack of housing delivery in the early part of the Plan period should be rectified by allocating new, smaller sites for development in appropriate locations in the district. This includes development at Ash, for which we have promoted a site which is cognisant with its classification as a 'Local Centre'. Please see representations for further information
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	To contribute to the assessment of housing demand and potential requirement to assess when housing across the deistrict would be delivered.
Include files	221206-EAS-Access and drainage assessment.pdf 221208-Representation to Local Plan.pdf 221206-Site and ownership plan.pdf
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP742
Rep Status	Processed

Consultee ID	1331585
Consultee Full Name	Terence Hopper
Consultee Company / Organisation	
Agent Full Name	Terence Hopper
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Strategic Policy SP3 Housing Growth.
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The plan deviates from the settlement hierarchy because it claims that suitable land for development cannot be found in Sandwich. However, it has excluded SAN019 and SAN 010 from the plan for reasons that are not well evidenced and in some cases, contrary to the evidence in the hands of DDC (planning documents for part of SAN010 (Rose Nursery) local planning reference 21/01309. Sandwich Town Council asked DDC to reevaluate the evidence on these two sites in its response to the Regulation 18 draft Document, but it seems that DDC had made up its mind by that stage.</p> <p>DDC recognised the potential of site SAN024 to substantially increase the housing provision to the district, however, this land has yet to be made available for development.</p> <p>For some reason, DDC seems hell-bent on excluding the two neighboring sites SAN010 and SAV019 from the plan, even though they are sequentially the next best options and the development of those two sites would likely encourage some of SAN024 to come forward for development in the future. This has had wide-ranging implications for the plan as a whole, Particularly in terms of reducing the need to travel, reducing the district's carbon footprint, and supporting and enhancing the vitality of the town of Sandwich.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>Reconsider sites SAN010 and SAN019. and the part they could play in a more joined up housing plan for Sandwich</p> <p>Reconsider the Garden Village Concept</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP841
Rep Status	Processed
Consultee ID	1331761
Consultee Full Name	Catherine Hoyte
Consultee Company / Organisation	Plainview Planning Ltd
Agent Full Name	Catherine Hoyte
Agent Company / Organisation	Plainview Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	3.32, 3.35, 3.36, SP3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We note that previous comments in relation to this site made by Chris Moore (same agent) were not taken on board. His comments noted that if the minimum OAN number is adhered to, there is no backup option to come forwards should any of the proposed elements of housing supply not come forwards or be delayed.</p> <p>An example of this is reliance on larger strategic allocations. It is already acknowledged that the delivery of the WUE is some 3 to 4 years behind the Core Strategy 2010 timetable.</p> <p>The HELAA discounts sites with planning permission from further consideration to avoid double counting for the purposes of supply calculations. However, the fact that a site has planning permission for development has not been taken into account and has not been carried forward to the Selection of Site Allocations Reg 19 Sept 2022 to address the matter of DELIVERY.</p> <p>The Selection of Site Allocations document notes that of the 365 sites in the existing HELAA, 46 have gained planning permission or are subject to permission and are awaiting completions of a S106 agreement. These sites are automatically set aside from further consideration.</p> <p>Taking numbers from Appendix 1a HELAA 2022-Housing Site Assessments and Appendix 3e HELAA 2020 Initial Assessment Housing Sites Eliminated, shows that planning permission has been granted for a total of 2,182 dwellings on these eliminated sites (excluding sites on brownfield registers or site that are unimplemented allocations).</p> <p>Clearly not all sites will be suitable for allocation perhaps due to size or location, but not allocating those sites that are suitable, and waiting to see if they are built out rather than proactively and positively planning for their future could have significant impact on housing delivery.</p>

	<p>The authority has a track record of underdelivery shown through Housing Delivery Test Results. In 2018 Dover was at 131% of housing delivery with no further action required, in 2019 this fell to 92% requiring an action plan then it fell again to 80% in 2020 again requiring an action plan and 20% buffer on the LPA 5 Year Housing Land Supply Requirements. In 2021 housing delivery was at 88%.</p> <p>The HDT Action plan July 2022 identifies that Whitfield, 2010 Core Strategy allocation for 5,750 dwellings, has had minimal delivery, circa 250 completions up to 2020/21.</p> <p>This 'ignoring' of sites with planning permission is a shortsighted approach. Particularly in the current economic climate. While build, labour and lending costs are so high, delays in bringing forward development may result. Allocating sites which already have planning permission can underpin the likelihood of delivery in difficult economic times. It also underpins the LPA's housing supply.</p> <p>The growth strategy is not sound in that it is not positively prepared. Sites with planning permission must be considered for allocation within the local plan to underpin housing delivery and supply.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Mr Moore's reg 18 representation set out that the LPA must attempt to meet a higher growth figure to ensure a robust housing supply available in the event of strategic allocation delays and to ensure that opportunities for speculative development are restricted to suitable and sustainable windfall sites. This could be achieved by utilising suitable sites identified in the HELAA, particularly those within existing settlement boundaries or immediately adjacent to them. More sites should be allocated for development.</p> <p>WHI009 is a clear example of where allocation is a suitable approach given its location. The Site has outline planning permission for up to 28 units with reserved matters currently under consideration. It is already accepted that the site is suitable for development and there is an opportunity to positively reinforce that through allocation. A suggested change is proposed to policy SAP 13 to reflect the above</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	No
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	Strategic Policy 3 - Housing Growth
<p>Rep ID</p>	SDLP602
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1331790
<p>Consultee Full Name</p>	Julie Davies
<p>Consultee Company / Organisation</p>	CPRE Kent
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	SP3
<p>2 - Do you consider this part of the Plan sound?</p>	No

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>CPRE Kent questions whether this strategy meets the Council's vision of a creating spectacular and sustainable environment and whether it is sound, on the basis that:</p> <ul style="list-style-type: none"> • the strategy is a continuation of the 2010 strategy of concentrating development at Whitfield – which has a proven track record of failure; • failure to deliver on the 2010 strategy has resulted in Deal being overwhelmed by windfall development; and • this has resulted in the political decision to set aside the findings of the updated settlement hierarchy and focus development at lower order, less sustainable locations, including development at the two villages of Eythorne and Elvington which have been incorrectly elevated to the status of local centres. <p>CPRE Kent welcomes development that will underpin sustainable communities. While the Council sets out that its strategy for the distribution of growth is primarily based on the settlement hierarchy and influenced by site availability, environmental constraints and delivery factors, we would query whether this has actually resulted in a sustainable strategy.</p> <p>Our concern is that too much reliance has been placed on development that is purported to be deliverable (and may not be suitably located in terms of sustainability and environmental constraints) – such that the Council's stated vision with the aim of a “spectacular and sustainable environment” may well be undermined.</p> <p>Instead, the Council should be working with landowners to bring forward development in the most sustainable locations.</p> <p>While strategic development is welcomed, in principle, at Whitfield (being a regional centre), it is not clear whether the previous delivery issues have been resolved. Allocating almost half of the required dwellings to meet housing need at Whitfield will place the Council's strategy at huge risk, if delivery continues to be delayed.</p> <p>Since Whitfield was originally allocated for development (2010 Core Strategy – 5,570 dwellings), the SPD approved (2011) and planning permissions granted, only 363 homes have been delivered to date. Carrying forward the original allocation, plus an additional 2,200 dwellings (6,350 total) in the current local plan means that Council's spatial strategy is being underpinned by a site that has a proven record of failure in terms of delivery. Issues around fragmented land ownership, ransom strips and the resolution of highways issues will need to be resolved before this strategy can be considered sound.</p> <p>As the Council is placing its housing delivery in a basket of three strategic allocations, if one fails to deliver this will impact on the strategy as a whole and place the Council at the whim of the unintended consequences of speculative development to fill the housing need gap.</p> <p>This has already happened in respect of the 2010 Core Strategy, whereby Deal has been subject to a high number of windfall developments. The town has borne the brunt of the unintended consequences of windfall development (in response to unmet need/the failure of Whitfield to deliver as anticipated). As Deal occupies a key position in the settlement hierarchy, it should be at the heart of the Council's planned strategy for growth.</p> <p>However, no strategic allocations are planned at Deal. Instead, development is being focussed at the rural service centre of Aylesham, which is lower down the settlement hierarchy - despite the fact that satisfactory mitigation of environmental and highway constraints remains unresolved; and at the two villages of Eythorne and Elvington.</p> <p>The purported commensurate scale development in rural areas will result, in the case of Eythorne and Elvington, in the coalescence of two separate villages – with the intention that these two villages become one combined, larger, local centre. It is noted that these two separate villages are subject to environmental and highway constraints.</p> <p>With facilities being shared between the two existing communities, CPRE Kent is very concerned that opportunities for active travel will be hazardous – particularly when the narrow pavement flanking one side of the Adelaide Road would not seemingly allow two-way pedestrian traffic to safely pass (including mobility scooters, prams/buggies and children's scooters); and changes in topography across the allocation will make connectivity that avoids Adelaide Road exceptionally challenging.</p>

While development that would facilitate the retention and strengthening of existing services and community facilities is welcomed, it is not clear how – in the case of Eythorne and Elvington - this fits with climate change aspirations, when interconnectivity using Adelaide Road does not offer an safe/welcoming travelling environment; such that reliance on car travel is likely to be the norm. The sustainability of this strategic allocation is further called into question now that KCC has withdrawn its bus funding subsidy and access to secondary school education, GP/dental services and weekly food shopping outlets are not possible without a car.

The growing (ie merging) of the adjacent villages of Eythorne and Elvington will mean a loss of their individual communities/character, which could have a major impact on social cohesion. The strategy of placing roughly half of all local centre development at these two villages – which currently sit below the level of local centre in the settlement hierarchy - is likely to lead to devastating impacts. That is, of the 774 dwellings proposed at local centres, 355 (46%) would be provided at Eythorne and Elvington – which will outperform Deal as a district centre, which is set to accommodate just 223 dwellings.

Almost half of the Council's proposed local centre development is at Eythorne and Elvington. These settlements are currently considered to be large villages – by virtue of shared services - and will only be elevated to the local centre tier of the settlement hierarchy on completion of development.

CPRE disagrees with this assessment and believes for the reasons stated above that both settlements should be considered small villages by virtue of the lack of safe, sustainable active travel routes between the two.

While paragraph 79 of the NPPF states that “development in one village may support services in a village nearby” this should not be interpreted as a one size fits all justification for growth, particularly when accessing the services and facilities of a nearby village involves an unpleasant/unsafe walking environment, with no local bus service. The reasonable expectation will be that development will car dependant in the case of Eythorne and Elvington, which does not align with the Council's climate change aspirations.

[See paragraph 4.5 of the settlement hierarchy topic paper settlement-hierarchy-and-confines-topic-paper-aug-2022.pdf.]

As can be seen at page 24 of the settlement hierarchy topic paper, Eythorne scores 20; and Elvington 22 (with Elvington being reliant on Eythorne for services, which is not justified for the reasons stated above) – see table at 5.1 (scores on p.24).

CPRE queries whether this strategic allocation would still be promoted, if in fact the interconnectivity between Eythorne and Elvington was re-assessed and reflected in the scoring matrix. That is, that the two settlements be assessed as two separate settlements, instead of a combined village – if so, the current Elvington score of 22, may well dictate that it falls into the next, lower tier.

CPRE queries what evidence there is that there should be a change in the status of the two villages of Eythorne and Elvington from being categorised as villages in the 2010 settlement hierarchy, to being elevated to a local centre in the current local plan.

While CPRE Kent notes that the Council states it has made every effort made to use brownfield sites, but was hampered by them being constrained, with viability issues, deliverability problems and being limited in supply – it is disappointing that more cannot be done by the Council to proactively unlock these sites. Of the 69 sites allocated, 45 are greenfield (76.7%) and just 24 brownfield (23.3%).

The breakdown of housing numbers in reveals the extent to which the spatial strategy which seeks to distribute development in accordance with the settlement hierarchy, doesn't actually pay regard to the settlement hierarchy, as a proxy for sustainable development.

Sites at Dover and Whitfield will provide 3,381 dwellings (as would be expected from a regional centre), even though there is risk associated with actual delivery at Whitfield.

Below this tier, the rural service centres (Sandwich and Aylesham) will contribute 876 dwellings; the local centres 774 and the larger villages 265, which means all these lower order settlements take a greater portion of the district's housing requirement than Deal (223) as set out at table 3.3 at paragraph 3.53 of the plan.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	CPRE Kent would wish to participate at the examination hearings to explore these issues further.
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP971
Rep Status	Processed
Consultee ID	1331790
Consultee Full Name	Julie Davies
Consultee Company / Organisation	CPRE Kent
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We are CPRE, the countryside charity. Formed in 1926, CPRE is a registered charity and one of the longest established and most respected environmental groups in England, with over 40,000 members and supporters living in our cities, towns, villages and the countryside. CPRE Kent is the largest of the CPRE County branches</p> <p>Our vision is of a beautiful and thriving countryside that enriches all our lives, and our mission is to promote, enhance and protect that countryside. We believe that the planning system is a toolbox for achieving better – for people, for nature and for the economy – while supporting the delivery of more badly-needed homes to end the housing crisis.</p> <p>In general, CPRE Kent supports a development strategy which meets the following criteria:</p> <ol style="list-style-type: none"> 1 brownfield first, especially in urban areas and not in rural areas where it would result in unsustainable patterns of development 2 development should result in sustainable communities 3 housing provision in rural areas where there is an identified local need, and the scale of development is appropriate for the size of the settlement 4 plans should promote development in locations:

- 1 that are well supported by, or that will support, sustainable transport and active travel and
- 2 that are well served by regular public transport services and social and community facilities, that are in safe walking and cycling distance or would support, or result in, a sustainable settlement.

Overall, it is our position that local planning authorities should seek to ensure that the impact of development on the countryside, both directly and indirectly, is kept to a minimum and that development is sustainable in accordance with national planning policy.

This response has been prepared jointly by the Kent Branch office of CPRE Kent and by the Dover District Committee of CPRE Kent, but for brevity our comments are expressed as being from 'CPRE Kent' throughout.

We would welcome attending the examination to provide additional clarity on any of the points which we have raised.

SP1 Planning for Climate Change

CPRE Kent welcomes the fact that the first strategic policy relates to climate change, but queries whether climate change is actually at the heart of the Council's spatial strategy?

SP1(f) refers to climate change mitigation, by "reducing the need to travel and maximising opportunities for 'smarter' sustainable travel" and at SP1(e) reference is made to climate mitigation by "maximising green infrastructure".

It is not clear how the Council's spatial strategy addresses the aim of reducing the need to travel – especially as a one of the proposed strategic allocations is at the rural villages of Eythorne and Elvington – which are car dependent communities, as evidenced by the huge issues they face in terms of rat running (in combination with pinch points in the local rural road network). In addition, funding has been withdrawn from the 92/92A bus service, and in terms of public transport these two villages are served only by a heritage railway line giving connectivity to nearby Shepherdswell, but not to places of local employment, such as Whitfield or Dover.

We would query what the effectiveness of climate change mitigation (by maximising green infrastructure) will be, when the majority of the plan's allocations are on greenfield land – which already plays a huge role in carbon sequestration (SP14 Enhancing Green Infrastructure and Biodiversity). With a brownfield first strategy and a bold understanding of the benefits of increased densities, more greenfield sites could be retained for the contribution they already make towards carbon sequestration, food security and the health and wellbeing of the community.

It is not clear from policy SP1 how the energy load of developments will be reduced to maximise natural heating, cooling and lighting – if this is the intention of SP1(a), then it should be more clearly stated.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

CPRE Kent would wish to participate at the examination hearings to explore these issues further.

Include files

Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1062
Rep Status	Processed
Consultee ID	1331808
Consultee Full Name	Mr Robert Hogben
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	1 Introduction
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The plan is unsound as it does not comply with the legally binding commitment made by DDC when they declared a climate emergency in 2020 and prepared their climate change strategy. The plan will not do enough to meet the target of the district being net zero by 2050. DDC should be much more ambitious about the green credentials of new housing. If new homes generated their own power, were insulated to the highest standards, and collected rain water, it would greatly help stretched local services and go a long way towards making the housing stock fit for the coming decades.</p> <p>The regulation 19 stage of the consultation is not fit for purpose as it is overly complicated and very difficult to use. The process has left many members of the public including me and my wife feeling overwhelmed and confused as to how to make a representation. For those who are working full time this has been a task for which they do not have enough time. As a result those who may have wanted to make a submission have not been able to. The format of the submission form is also difficult to navigate. Without prior experience of planning law it is difficult to say whether a part of the plan is legal or not. As to the duty to cooperate it is impossible to know. The unsound plan needs updating after the government announcement on 5/12/22 that mandatory housing targets are not to be imposed. The figure of nearly 11,000 is unsustainable and should now be reviewed, particularly with respect to allocated land around Station Rd Walmer and proposed developments around villages.</p> <p>The character and landscape value of the district is being rapidly eroded under the current plan and this must not continue as it is contrary to NPPF 21. It is not sustainable to build on agricultural land which is in short supply as we are only 50% self sufficient in producing food in the UK. The CPRE has found that almost 14,500 hectares of farmland has been permanently lost to development since 2010. The contribution from the districts agricultural land is of vital importance. Much of the agricultural land is also vital for flood protection, and field margins are important for wildlife and biodiversity, forming corridors between habitats for vertebrates and nesting and roosting sites for birds. Dover District also has a wealth of character landscapes, AONB, heritage coast, nature reserves, internationally rare chalk grassland and rewilded areas such as Betteshanger Park. Overdevelopment under the last weak plan has meant that these areas are under pressure and being denuded as their boundaries are eroded and wildlife corridors between sites are cut off. The new plan does not do enough to protect these areas, wildlife and</p>

	<p>biodiversity. Developments should not be allowed to remove ancient woodlands and trees and biodiverse rich habitats even if it is argued that this is for the greater good. This is not sustainable as all nature is interconnected and if it fails then we all fail. The UK is one of the worst countries in the world for biodiversity loss, we have lost half of our biodiversity since the 1970's.</p> <p>Development has been at such a pace that infrastructure cannot keep up. Buses have been cut recently, cycle and pedestrian routes have not been upgraded sufficiently to connect some developments to main bus and train routes without car dependence. Aylesham has not had a secondary school which would mean children could walk to school. Many rural communities are entirely car dependent due to lack of buses and the roads not being safe to use their bikes. Not enough emphasis is put on renovating existing housing stock to provide greener, insulated, fuel efficient homes. Each new build generates around 56 tonnes of embedded carbon. The NPPF states that we should prioritise brownfield sites over greenfield but although there are many opportunities to develop brownfield sites in Dover, this has not been prioritised. Many developments have been for larger houses in villages and there is not enough provision for affordable housing.</p> <p>The wording of the local plan is not definitive, it leaves too many loop holes and vague preferences which enable large developers to argue and get what they want, to maximise profits, not what the people of the Dover area need.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Better mapping and understanding of the Dover District, taking into account internationally rare areas of chalk grassland, woodland and trees wherever they occur.</p> <p>Large buffers around the AONB to protect its character from the built environment. Stronger protection for the AONB and the Ripple LCA F3.</p> <p>Tighter protections on our remaining biodiversity.</p> <p>Tighter definitions in the local plan so that developers have no room to argue what has been specified in the local plan.</p> <p>Hire several biodiversity officers to monitor closely and prevent loss of ancient woodland, chalk grassland, veteran trees, protected wildlife and rich habitats and to actively go out into the community, looking for ways to improve biodiversity by such things as accessing grants for hedge planting and the creation of ponds where ever possible in our district.</p> <p>Employ experts to liaise with farmers in our area to encourage the most environmentally friendly farming and land management practices which will encourage maximum biodiversity in the countryside and maximum sequestration of carbon in soils and biomass.</p> <p>Stop the use of agricultural land for development.</p> <p>Renovate and insulate rather than build new houses, brownfield not greenfield.</p> <p>Turn attention away from destroying village communities with unsustainable housing estates outside their village boundaries.</p> <p>Do not give developers the get out clause of financial mitigation for destruction of wildlife and habitat. No development should further deplete our critically low levels of biodiversity.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>Strategic Policy 3 - Housing Growth</p>
<p>Rep ID</p>	<p>SDLP827</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331908</p>
<p>Consultee Full Name</p>	<p>Sam Silcocks</p>

Consultee Company / Organisation	Harris Lamb
Agent Full Name	Sam Silcocks
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Strategic Policy 3 - Housing Growth
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Harris Lamb have been instructed by the owner of proposed residential allocation STM003 to submit this representation in support of the Council's Housing Growth strategy.</p> <p>It is our view that the proposed housing requirement and proposed distribution of these houses represent an appropriate strategy in accordance with Paragraph 35 b) of the National Planning Policy Framework (NPPF).</p> <p>Paragraph 35 b) of the NPPF sets out that for plans to be justified local planning authorities need to determine an appropriate strategy. It does not require the most appropriate strategy, rather that on balance an appropriate strategy is being proposed. It may well be that others present a case for higher/lower housing requirement and/or an alternate distribution strategy for these dwellings. These alternatives may also generate certain benefits, but there will also be down sides through reducing the benefits generated by the proposed strategy. However, none of these things mean the proposed strategy is not an acceptable strategy. Instead, these are just other strategies that might be appropriate and so the question remains is this an appropriate strategy, and the answer is unquestionably yes.</p> <p>The housing target set within the plan is based on the Standard Method figure. This generates a requirement of 611 houses per annum when the latest affordability ratio is applied or 10,998 houses across the plan period. There may be an argument for more or less houses presented by others, but it cannot be argued that progressing with a housing target based on the Standard Method is not an appropriate strategy. There might be other strategies, but that does not make this one inappropriate.</p> <p>In seeking to meet this housing requirement, the proposed submission Plan sets out a settlement hierarchy which sees different settlements take on different levels of housing allocations depending on their role and function within the Local Authority area. In the rural area this continues to allocate housing at the largest villages to sustain their role and function as Local Centres. These are settlements that have an appropriate level of services and facilities to support an element of housing growth. This approach sees new housing directed towards the more sustainable locations within the District and will help to support the important role and function the Local Centres perform in providing services and facilities for residents in the surrounding countryside and hamlets. Villages like St Margaret's at Cliffe are in the Kent Downs AONB and the South Forelands Heritage Coast, but these designations do not restrict development as evidenced by Paragraph 177 of the NPPF. Instead, it sets out when development can be appropriate, which includes respecting the special landscape qualities in these areas. At this juncture it is important to remember that the larger villages are a longstanding part of these landscapes. Housing in these locations is therefore an established part of the landscape and so new development should not automatically be seen as a negative addition. Indeed, there will be opportunities to better integrate some of the villages into the surrounding landscape where there is currently a stark relationship between the two. For example this could be where the existing village edge is exposed, forms an abrupt transition with the surrounding countryside and/or uses inappropriate materials that draw the eye and make these edges more prominent than they need to be.</p> <p>The proposed distribution does, therefore, represent an appropriate strategy for delivering the housing target identified. There may be other strategies that seek to push and pull the numbers slightly between the different settlements, and they may also be an appropriate strategy, but that does not make the strategy proposed within the pre-submission plan unacceptable.</p> <p>It is, therefore, our view that the emerging housing target and spatial distribution of these homes is clearly an appropriate strategy and meets the statutory and policy tests in this regard</p>

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1016
Rep Status	Processed
Consultee ID	1331919
Consultee Full Name	Alison Heine
Consultee Company / Organisation	
Agent Full Name	Alison Heine
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	H3 and H4
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

Para 7.24- The need for 42 pitches has been demonstrated at appeal to underestimate the true need in this district. The Evidence Base relies on the ARC4 GTAA 2018 which was based on field work carried out Oct-Dec 2017. It is now out of date. The Council claim the study has been updated as part of Site Options review but this was not a proper update. The Council has never provided information to show that turnover on sites can be relied on to meet need. The study does not meet the requirements in PPTs (par 7 (c) for a robust evidence base and the Council has been made aware of this at appeals for sites in this district. It is disheartening to once again be making these comments and discover that no one is listening or paying attention to these concerns. Very few agents are willing/ able to work on behalf of Travellers. Most of those who do so, do not have the time or inclination to also respond to local plan consultations. Yet the Travelling community relies on agents like myself to submit representations to local plans. This is an incredibly time consuming process. I am not funded to do this. The system expects and relies on Councils to be honest, transparent and fair. The Travelling community should not feel disenfranchised by the cost of generating evidence to refute the policies proposed by Councils but from experience I am aware that EIP Inspectors will not question the submitted policies if no one makes representations.

The 2018 GTAA identified a need for 30 pitches of which 18 would be PPTS 2017-2037 and a need to front load this with provision of 15 pitches (of which 12 PPTS) within the first 5 years. The number of pitches granted since 2018 has already exceeded that recommended in the 2018 report for those complying with the PPTS need and there remains outstanding need.

It is not clear if the approach taken by Dover Council incorporates the findings of the Lisa Smith judgment October 2022 which found that the Planning Definition in Annex 1 PPTS discriminates against all Travellers and allocations should be made to address the needs of all Travellers. However according to the 2018 GTAA there was a significant need for those who did not meet the PPTS planning permission and who have not to date been provided for on any sites granted permission since 2018.

In 2018 only 23% of those surveyed were Irish Travellers. The ARC4 study assumed 6 pitches for in migration in the first 5 years and nothing for the remainder of the plan period. Yet since 2017 the following permissions granted have been for Irish Travellers who have moved into the district from elsewhere ie

DDC Note: Names redacted. Available on request.

-Westmarsh 8 pitches (various Irish Traveller families, different to original appeal decision)

-(name redacted) The Meadows Alkham +16 statics claimed for family

-(name redacted) plot 2b Hay Hill

-(name redacted) plot 2a Hay Hill

-(name redacted) Strawberry Place, Hay Hill, Eastry 12 statics

This exceeds the assumptions in the GTAA and is further evidence that the 2018 assessment greatly underestimated the need for more pitches in this District.

PARA 7.25-Whilst I agree that a pitch should be approximately 600sq m in size, there should be room for more than a static caravan. Many Travellers want twin unit mobile homes which are much larger than a static caravan. Also pitches should have space for 2 vehicles of which one will often be a larger works vehicle eg transit van. Given the acceptance that pitches should be around 600sqm in size does the Council now acknowledge that permissions granted for additional static caravans at sites on Hay Hill and Alkham Valley should not count as pitches as they were not for additional self contained pitches as now defined by the Council and should not count towards meeting the need in Dover for additional pitches?

7.26-It is not clear why the council is only proposing to allocate sites for 5 pitches. This will be insufficient to meet the need identified in 2020 for proper Traveller pitches. There is an outstanding appeal 8 pitches at Westmarsh for a site previously granted temporary permission. There is a site with 2 pitches due for renewal in 2023 at Alkham, there are current applications pending for 8 pitches at Ash Rd Sandwich, 4 pitches at Falconview and 3 pitches at Sherleys Farm. Permission has been refused for 3 pitches at Ferne Lane Alkham and an appeal dismissed for another site at Barnsole Rd Staple for 1 pitch. This would suggest an immediate need for as many as 29 pitches not 5 pitches-and that is just the cases that I am aware of. Since this policy was drafted the Council has granted an additional 8 pitches at Waldershare (8th December 2022) that are not included in this policy. The council appear to be acknowledging that this policy approach is wrong before it has even been examined. Policy as prepared fails to address the need identified in 2018 and as such it is not PPTS compliant.

H3/ H4 criteria-Is there a need to two policies when they appear to seek/ address the same matters?

	<p>Given that that the Council has failed to follow some of this guidance for infill development on plots at Hay Hill Eastry, the Inspector should visit these sites and be provided with details of what has been approved by the Council on these sites to decide if the permissions granted should count towards meeting the needs of genuine Gypsy Travellers or whether the intensification granted has resulted in layouts that fail to meet site licencing requirements and are sub standard, cramped and unacceptable.</p> <p>Table 7.1-The site at Half Acres Alkham was granted permission on appeal earlier in 2022. It is surprising that the Council is now conceding that a site refused permission for 1 pitch is now suitable for 3 pitches. This is a private family site. The additional pitches would be for a need not identified in the 2018 ARC study.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The policy needs to be informed by a robust up-to-date need assessment.</p> <p>Policy needs to reflect the Lisa Smith judgment issued October 2022 and revisions to the planning definition in PPTS. (see attachment)</p> <p>The Council needs to decide if permissions previously granted for intensification (ie additional caravans not pitches) on land at Hay Hill addresses the needs for Travellers and are suitable for occupation by Travellers given the acceptance at para 7.25 of what a pitch should provide.</p> <p>Additional pitches need to be allocated to address existing and future need in Dover.</p> <p>There is a need for transit provision. Many Travellers pass through Dover to the continent.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	No
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	lisa smith judgment october 2022 on ppts definition.pdf
<p>Local Plan Consultation Point</p>	Strategic Policy 3 - Housing Growth
<p>Rep ID</p>	SDLP765
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1331834
<p>Consultee Full Name</p>	Kitewood
<p>Consultee Company / Organisation</p>	Kitewood
<p>Agent Full Name</p>	Lucy Wilford
<p>Agent Company / Organisation</p>	DHA Planning
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	Strategic Policies, Policy SP3, tables 3.1 and 3.3.
<p>2 - Do you consider this part of the Plan sound?</p>	No
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared</p> <p>Justified</p> <p>Effective</p>

	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>See supporting statement attached.</p> <p>Text below (copied from attached statement) added by DDC</p> <p><i>Settlement Hierarchy & Spatial Strategy</i></p> <p><i>2.2.1 The "Settlement Hierarchy and Confines Topic Paper" confirms that Kingsdown enjoys a wide range of services that are regularly identified as key indicators of sustainability, offering a good and sustainable range of facilities, including all key services (para 5.10). Kitewood therefore support its identification as a "Local Centre", within the settlement hierarchy, identified as a tertiary focus for development that would reinforce its role. The village of Kingsdown is therefore well positioned to support the Council's spatial strategy, which owing environmental constraints in the District, seeks to combine a number of spatial options (as confirmed in the "Housing Topic Paper"), based on dispersing development across the district, informed by the spatial hierarchy, but with a focus on development in Dover. The general distribution of development across the settlement hierarchy, as set out in Table 3.3. is therefore also supported.</i></p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>See supporting statement attached.</p> <p>Text below (copied from attached statement) added by DDC</p> <p><i>Settlement Hierarchy & Spatial Strategy</i></p> <p><i>2.2.2 However, for the reasons set out below and in Section 3 of this Statement, the indicative number of dwellings allocated to Kingsdown as identified in table 3.3, should be increased from 55 to 95 dwellings. Compared to the overall quantum of development allocated to the "Local Centres" the level of increase is not significant and would not be contrary to the settlement hierarchy, with the overall levels of growth still being less than is planned for in Dover (inc Whitfield) as well as the District and Rural Centres, which are higher up the hierarchy. For a "Local Centre" the level of development is also not disproportionate, being comparable with and not more than the level of growth supported in the Plan in other "Local Centre" villages, such as St Margate and Wingham.</i></p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	In order to ensure that our case is properly put forward and understood, and to provide the opportunity to respond to any questions/points raised by the Council and Local Plan Inspector which might result outside the written representations made and following discussion at the EIP.
Include files	Kitewood Estates Limited Reg19 Dover Local Plan Reprs.pdf
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP700
Rep Status	Processed
Consultee ID	1331831
Consultee Full Name	Catesby Estates
Consultee Company / Organisation	Catesby Estates
Agent Full Name	Lucy Wilford

Agent Company / Organisation	DHA Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Strategic Policies - Policy SP3 and Tables 3.1 and 3.3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Please refer to supporting statement attached</p> <p>Text below (copied from attached statement) added by DDC</p> <p>Housing Need & Delivery – Policy SP3</p> <p>2.1.1 The Standard Method for assessing housing need, issued alongside the Ministerial Statement on 16 December 2020, sets an indicative housing need figure for Dover District of 596 dwellings per annum. The affordability ratio which factors into the local housing need assessment is updated annually. For Dover District the latest calculation is 611 dwellings per annum (dpa), equating to a total housing need of 10,998 dwellings for the Plan period to 2040. The Reg 19 Local Plan seeks to meet this need in full. In addition to the minimum figures, DDC has set a contingency buffer of 926 dwellings (8.4%) over the Plan period.</p> <p>2.1.2 For context, the current adopted Core Strategy, 2010 requirement is 700dpa. This followed the adoption of a high-growth strategy in 2010 of 14,000 homes to 2026 based on the recommendations of the Dover Regeneration Strategy. This was above the minimum 10,100 required across the same period, as set out in the emerging (at the time) Regional Spatial Strategy. This relied heavily on the delivery of the Whitfield expansion, intended to deliver “at least” 5,750 homes. As set out in the “Housing Topic Paper, September 2022”, to date planning permission has only been granted for just 1,483 homes (25.7%) of which 363 homes have been completed (just 6.3% of the total allocation).</p> <p>2.1.3 Accounting for the committed supply of 5,282 dwellings, the Plan allocates 6,642 new homes over the remaining plan period to 2040. This is derived from the following sources: - Whitfield Urban Expansion Allocation: 2,200 dwellings - Local Plan Allocations (excluding Whitfield): 3,392 dwellings - Windfall Allowance (70 a year from year 4): 1,050 dwellings</p> <p>2.1.4 On this basis, it is evident that a substantial quantum of Plan-led housing delivery will be required in order to meet the new Local Plan housing target with a significant proportion of greenfield land due to the dwindling brownfield supply, especially in the Dover Town Centre.</p> <p>2.1.5 The release of sustainable and accessible sites logically located in Sandwich, a higher order settlement (Rural Service Centre), represent a sustainable and reliable source of growth for the Plan Period. The continued allocation of “Land adjacent to Sandwich Technology School, Deal Road, Sandwich” (Policy SAP21) for residential development, therefore remains entirely appropriate, adding to the supply and variety of allocations as a medium sized site (NPPF, para 69). Catesby Estates therefore fully supports the allocation and the spatial strategy set out in Policy</p> <p>SP3. 2.1.6 Notwithstanding, it objects to the reliance placed on Whitfield and the windfall allowance for the following reasons:</p> <ul style="list-style-type: none"> • Over a 13 year period, since its allocation Whitfield has consistently underdelivered, delivering just 363 new homes or 28dpa. There is no objection in principle to the development at Whitfield, but the Council places to high a reliance in its delivery, where it equates to circa 42% of its allocated supply (excluding commitments). The delivery issues around Whitfield are clearly complex, both in respect of landownership but also infrastructure delivery. It is noted in the Infrastructure Delivery Plan (IDP, 2022), that delivery in Whitfield is already limited by Whitfield roundabout which is already at capacity (IDP para 3.21). Whilst short term improvements are proposed, significant highway mitigation schemes are required, at a cost of £6million each, to be delivered by KCC Highways or National Highways. In the absence of secured funding, significant delivery at Whitfield cannot be relied upon in the short term.

	<ul style="list-style-type: none"> • Whilst it is noted that the windfall allowance is based on past trends having excluded sites of 5 units and above. The continuation of the previous delivery trends fails to take into account the changed policy context. The Reg 19 Plan now introduces a new “Residential Infilling policy” (Policy SP4). which significantly restricts where development can occur adjacent to and within settlement boundaries (limited to certain settlements) and subject to meeting 11 separate criterion. Development, which is not within or adjoining the listed settlements, is further even more severally restricted. It therefore cannot be assumed that a past annual delivery rate of 70dpa from windfall sites will and can continue through the introduction of a more restrictive policy framework. <p>2.1.7 Whilst it is noted that the total proposed housing supply (Table 3.1) secures a contingency buffer of 926 homes (8.5%), this is not considered sufficient or suitability flexible to account for potential under delivery. Generally, at least a 10% buffer is required. This is especially essential taking into account the above.</p> <p>2.1.8 The development potential of existing/proposed allocations should therefore be maximised, such as “Land adjacent to Sandwich Technology School, Deal Road, Sandwich”, to ensure that the Plan is “Sound” in satisfying the following tests:</p> <ul style="list-style-type: none"> • “Positively Prepared”: Ensuring the identified objectively assessed need is met, by optimising the potential of proposed housing land allocations and increasing their proportion of the housing land supply. • “Justified”: The evidence base does not support the reliance being placed on Whitfield Urban Expansion, with the Local Plan relying on housing being delivered early in the Plan period (based on the Local Plan Housing Trajectory). Moreover, it does not support the proposed windfall allowance, for the reasons above. • “Effective”: Ensuring there is sufficient deliverable sites, where their development potential has been optimised. This is on sites that have already been allocated. Their efficient development can secure a suitable housing buffer meaning identified housing needs are met over the Plan period, so the Plan is effective in meeting its objectives. It further provides flexibility, should other elements of the Council’s housing land supply be delayed in coming forward. • “Consistent with National Policy”: The NPPF (Section 11), expressly requires planning policies to support the efficient use of land (para 124). For the reasons set out in the following section, the proposed allocation of “Land adjacent to Sandwich Technology School, Deal Road, Sandwich”, does not make the most efficient use of this greenfield site.
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Please refer to supporting statement attached</p> <p>Text below (copied from attached statement) added by DDC</p> <p>2.9 To make the Plan “Sound” the following changes are necessary: • Supporting Tables 3.1 and 3.3 should be adjusted to account for the more efficient use of allocated sites and increase the proportion of homes which make up the “allocated” part of the housing supply. • The above changes are reflected in the Policy SP3.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>In order to ensure that our case is properly put forward and understood, and to provide the opportunity to respond to any questions/points raised by the Council and Local Plan Inspector which might result outside the written representations made and following discussion at the EIP.</p>
<p>Include files</p>	<p>Catesby Final Dover District Council Reps .pdf</p>
<p>Local Plan Consultation Point</p>	<p>Strategic Policy 3 - Housing Growth</p>
<p>Rep ID</p>	<p>SDLP1003</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331834</p>

Consultee Full Name	Kitewood
Consultee Company / Organisation	Kitewood
Agent Full Name	Lucy Wilford
Agent Company / Organisation	DHA Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Strategic Policies, Policy SP3, tables 3.1 and 3.3.
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>See supporting statement attached.</p> <p>Text below (copied from attached statement) added by DDC</p> <p>Housing Supply & Delivery</p> <p>2.3.1 Accounting for the committed supply of 5,282 dwellings, the Plan allocates 6,642 new homes over the remaining plan period to 2040. This is derived from the sources listed below, as taken from Table 3.1 and Policy SP3: - Whitfield Urban Expansion Allocation: 2,200 dwellings - Local Plan Allocations (excluding Whitfield): 3,392 dwellings - Windfall Allowance (70 a year from year 4): 1,050 dwellings</p> <p>2.3.2 On this basis, it is evident that a substantial quantum of Plan-led housing delivery will be required in order to meet the new Local Plan housing target with a significant proportion of greenfield land required due to reducing available supply of brownfield sites especially in Dover Town Centre.</p> <p>2.3.3 The release of sustainable and accessible sites logically located across sustainable settlements in the District, therefore provide a sustainable and reliable source of growth for the Plan Period and supports the reinforcement of the settlement hierarchy considered above. As considered under Section 3 of this Statement, any such uplift has previously been assessed as part of the Reg18 Sustainability Appraisal and found acceptable.</p> <p>2.3.4 In this context, the allocation "Land at Woodhill Farm, Ringwould Road" (allocation SAP34) is fully supported and is considered appropriate, especially taking into account its sustainable location. Furthermore, as noted in the Regulation 19 Sustainability Appraisal, it was the only site that was identified in HELAA as being potentially suitable for development and this is best placed to support Kingsdown's role as a "Local Centre".</p> <p>2.3.5 Notwithstanding the above, Kitewood objections to the reliance placed on Whitfield and the windfall allowance, as part of the overall housing land supply set out in Policy SP3 for the following reasons:</p> <ul style="list-style-type: none"> • There is no objection in principle to the allocation of development at Whitefield. It is acknowledged that in part this already benefits from Outline planning permission and the strategy for development here has long since been established via the currently adopted Core Strategy. However, it has been allocated for over 13 yrs. Over this time, it has delivered 363 new homes, equating to 28dpa. Whilst it is acknowledged that the delivery issues around Whitfield are complex and inevitably with a development of the scale proposed, sites such as this take longer to secure consistent and higher delivery rates, normally due to the need to deliver a lot of infrastructure upfront to support the wider development. Based on past delivery and noting that in the "Infrastructure Delivery Plan" (IDP, 2022), that development here is currently limited by Whitfield roundabout which is already at capacity and the Duke of York Roundabout (IDP para 3.21), it is considered that the Council places to high a reliance in its delivery. Whilst short term highway improvements are proposed, significant highway mitigation schemes are required, at a cost of £6million

	<p>each, to be delivered by KCC Highways or National Highways. In the absence of secured funding, significant delivery at Whitfield cannot be relied upon in the short term and based on delivery performance to date. Whilst it is acknowledged that Kingsdown and other settlements within a defined zone could be restricted until these highway improvements are secured (which they will also contribute to), the nature of strategic developments is such that these take longer to mobilise, unlike smaller developments that are also less constrained by infrastructure.</p> <ul style="list-style-type: none"> • It is acknowledged that the proposed windfall allowance of 1,050 homes is based on past trends having excluded sites of 5 units and above. The continuation of the previous delivery trends however, fails to take into account the changed policy context introduced through the Reg 19 Local Plan, via Policy SP4: Residential Infilling Policy”, which significantly restricts where development can occur adjacent to and within settlement boundaries (limited to certain settlements) and subject to meeting 11 separate criterion. Development, which is not within or adjoining the listed settlements, is further even more severally restricted. It therefore cannot be assumed that a past annual delivery rate of 70dpa from windfall sites will and can continue through the introduction of a more restrictive policy framework. <p>2.3.6 The housing supply Table 3.1 identifies that a contingency buffer of 926 homes (8.5%) is secured. However, in the context of the above, this is not considered sufficient or suitability flexible to account for potential under delivery. More generally, at least a 10% buffer is required.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>See supporting statement attached.</p> <p>Text below (copied from attached statement) added by DDC</p> <p>Compliance with the Tests of Soundness</p> <p>2.4.1 To secure a reliable and robust housing supply, which ensures the Plan is deliverable, the development potential of proposed allocations must therefore be maximised, especially sustainably located Sites, such as that at “Land at Woodhill Farm, Ringwould Road” (allocation SAP34) and therefore the level of development which makes up the allocated proportion of the housing land supply, must be increased to satisfy the tests of “Soundness” as identified below:</p> <ul style="list-style-type: none"> • “Positively Prepared”: Ensuring the identified objectively assessed need is met, by optimising the potential of proposed housing land allocations and increasing their proportion of the housing land supply. • “Justified”: The evidence to date does not support the reliance being placed on the Whitfield Urban Expansion, with the Local Plan relying on housing being delivered early in the Plan period (based on the Local Plan Housing Trajectory). Moreover, it does not support the proposed windfall allowance, for the reasons above. • “Effective”: Ensuring there is sufficient deliverable sites, where their development potential has been optimised. The efficient development of sites can secure a suitable housing buffer meaning identified housing needs are met over the Plan period, so the Plan is effective in meeting its objectives. It further provides flexibility, should other elements of the Council’s housing land supply be delayed in coming forward. • “Consistent with National Policy”: The NPPF (Section 11) requires planning policies to support the efficient use of land (para 124). For the reasons set out in the following section, the proposed allocation of “Land at Woodhill Farm, Ringwould Road” (allocation SAP34) does not make the most efficient use of this greenfield site and the proposed reduction in the indicative capacity of the Site, is unjustified, taking into account the available evidence. <p>2.5 Required Changes</p> <p>2.5.1 To make the Plan “Sound” the following changes are necessary:</p> <ul style="list-style-type: none"> • Supporting Tables 3.1 and 3.3 should be adjusted to account for the more efficient use of allocated sites and increase the proportion of homes which make up the “allocated” part of the housing supply. • The above changes are reflected in the Policy SP3.
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	

Include files	Kitewood Estates Limited Reg19 Dover Local Plan Reps.pdf
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP819
Rep Status	Processed
Consultee ID	1331879
Consultee Full Name	Northbourne Estate c/o Agent
Consultee Company / Organisation	
Agent Full Name	Rory Baker
Agent Company / Organisation	Frazer Halls Associates
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy SP3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Please refer to the accompanying representations.</p> <p>Text below (copied from attached statement) added by DDC. See attachment for full representation.</p> <p>SP3 – Housing Growth Draft Policy</p> <p><i>SP3 (Housing Growth) uses the Standard Method to calculate the housing need for DDC up to 2040, seeking to deliver a minimum of 10,988 net additional homes over the plan period throughout the district, equating to the delivery of a minimum of 3,381 homes per annum once existing commitments are accounted for.</i></p> <p><i>The National Planning Policy Framework (NPPF) makes clear at paragraph 60, that use of the Standard Method to calculate a Local Authority's housing requirements is the preferred methodology, unless exceptional circumstances apply. The draft Plan draws reference to the NPPF in this regard and is explicit in the use of the Standard Method to calculate the housing requirements for DDC over the Plan period.</i></p> <p><i>The Planning Practice Guidance (PPG) (ref: Paragraph: 002 Reference ID: 2a-002-20190220) provides further detail on how it expects the Standard Method to be applied. The PPG makes it clear that the Standard Method is used to, explicitly, identify the minimum number of homes to be planned for across an LPA over the plan period. It recognises that in applying a minimum figure, other factors such as historic under-delivery and unmet housing need within neighbouring areas should also be considered in determining the actual need.</i></p> <p><i>SP3 is also expressly clear that the identified housing requirements for Dover represents a minimum figure for delivering housing over the Plan period, consistent with the aims and objectives of the NPPF to significantly boost housing supply. The draft Plan, and the approach to calculating its housing needs through the Standard Method whilst applying the need as a minimum figure is consistent with national policy and considered sound in this regard.</i></p> <p><i>Whilst we support the housing requirement being a minimum figure, it is concerning to see the significant reliance on existing commitments (i.e., extant permissions) in their contribution to the Council's proposed housing supply to meet their Local Plan housing need of 10,988 homes. The extant supply comprises a significant portion of extant supply from the Whitefield Urban Expansion and other permitted development not yet built. We have concerns over the soundness of such reliance on extant permissions, as planning permissions can lapse, become commercial</i></p>

unviable or undeliverable in response to rapid changes in market conditions and can often stall / become delayed. Overreliance on the extant supply of the Whitfield Urban Expansion i.e., one location for growth can stall the delivery of housing if problems arise with the delivery of the outstanding homes as consented. We do not consider this a sound approach.

We would urge the Council to place less reliance on extant supply to meet its housing need over the plan period and ensure sufficient land to bring forward residential development of all scales is accounted for in the spatial strategy to ensure the Local Plan and its approach to housing growth and delivery can be found sound. Smaller Sites such as The Former Packhouse can help ease the reliance on extant supply and can form an immediate deliverable part of the housing supply and trajectory in the early years of the plan period.

The Council propose a buffer of 8.5% as a contingency buffer to maintain a healthy supply of housing, provide flexibility and choice and to account for changing circumstances and under-delivery.

Use of a buffer is also consistent with national policy, with the NPPF not only requiring a Local Plan to meet its objectively assessed development needs in full but to do so through a considered strategy which engenders sufficient flexibility to adapt and respond to rapid change. To ensure sufficient flexibility, the Local Plan must account for the fact that both housing need and housing supply will inevitably fluctuate throughout the plan period due to several factors, including changes to population projections and affordability ratios, and sites failing to come forward as anticipated. Sufficient headroom is required over the Plan period to respond rapidly to these changes. A buffer is therefore important to account for these fluctuations, and overall housing need / supply and is necessary to ensure the Local Plan is effective, consistent with national policy, and positively prepared. It is for these reasons the application of a buffer is considered sound.

We do however have concerns over whether an 8% buffer is the most appropriate buffer to be applied to ensure the Plan, and its ability to deliver its housing need in full, is robust, and therefore an appropriate strategy.

We also have concerns over the appropriateness of the spatial distribution of housing growth across the district. SP3 proposes to direct the majority of new housing development in Dover Town and at Whitfield (through the proposed allocation SAP 1) with development then focused in the District Centre of Deal and the Rural Centres of Sandwich and Aylesham. Development in the rural areas will be of a scale consistent with the relevant settlement's accessibility, with land allocated to deliver in the region of 1,112 homes in addition to existing commitments.

Whilst we recognise the importance of focusing development towards urban settlements, such as Dover Town and Whitfield we have major concerns that approximately half of the district's new housing development is planned here with the majority to be delivered through SAP 1. Notwithstanding the concerns we have over the reliance on strategic allocations and its reliability in delivering all the extant supply, there is a risk of skewing most of the growth towards only several large locations across the district and disproportionately away from rural areas, resulting in an unsustainable pattern of growth. This is further exacerbated through the remaining housing growth to be delivered through the strategic expansion of Aylesham (draft allocation SAP 23).

Paragraph 78 of the NPPF makes clear that to promote sustainable development in rural locations, new housing should be located where it will enhance or maintain the vitality of rural communities, and that planning policies should support and identify opportunities for rural villages to grow and thrive, especially where it will support local services.

Whilst we recognise that the distribution of growth to rural areas in supporting the continued rural vitality and choice of housing must be balanced with the sustainability of settlements across the district (access to services, proximity to facilities, strategic road network etc.), we consider that insufficient housing has been allocated for rural areas, including but not limited to, Larger Villages, as per the Settlement Hierarchy. One should not slavishly adhere to the Settlement Hierarchy as a blunt tool to determine the sustainability of a settlement and its appropriateness for additional housing growth.

There is also an imbalance between the proposed scale of growth and number of dwellings various rural settlements have been proposed to accommodate, with some smaller villages receiving a greater portion of housing growth than some larger villages, and notable differences between settlement growth within the same category. We also note that not all large villages have been apportioned housing growth through residential site allocations, such as Northbourne, and therefore is a very real risk that in apportioning such low levels of housing to larger villages over the plan period could stagnate these communities, and stunt future growth essential for the continued vitality and prosperity of these thriving rural settlements.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance

Please refer to the accompanying representations.

Text below (copied from attached statement) added by DDC. See attachment for full representation.

As such, we urge the Council to revisit its spatial distribution of housing as it is currently unsound, ensuring that there is a great proportion of the housing supply directed to rural areas across the borough and less of a reliance on extant supply in a smaller concentration of larger urban

with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	settlements. Sites such as The Former Packhouse can help to deliver additional housing in sustainable rural villages such as Northbourne, ensuring modest and sympathetic housing is delivered in the early years of the plan period.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	To ensure that that the spatial strategy and distribution of growth is amended to rebalance the portionality of housing growth across the district, requiring additional smaller rural sites that are deliverable.
Include files	SDLP0819 Northbourne Estate - Att 2.pdf SDLP0819 Northbourne Estate - Att 1.pdf
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1006
Rep Status	Processed
Consultee ID	1331879
Consultee Full Name	Northbourne Estate c/o Agent
Consultee Company / Organisation	
Agent Full Name	Rory Baker
Agent Company / Organisation	Frazer Halls Associates
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy SP3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Please refer to the accompanying representations. Text below (copied from attached statement) added by DDC. See attachment for full representation. SP3 – Housing Growth Draft Policy <i>Draft Policy SP3 (Housing Growth) uses the Standard Method to calculate the housing need for DDC up to 2040, seeking to deliver a minimum of 10,988 net additional homes over the plan period throughout the district, equating to the delivery of a minimum of 3,381 homes per annum once existing commitments are accounted for.</i>

The National Planning Policy Framework (NPPF) makes clear at paragraph 60, that use of the Standard Method to calculate a Local Authority's housing requirements is the preferred methodology, unless exceptional circumstances apply. The draft Plan draws reference to the NPPF in this regard and is explicit in the use of the Standard Method to calculate the housing requirements for DDC over the Plan period.

The Planning Practice Guidance (PPG) (ref: Paragraph: 002 Reference ID: 2a-002-20190220) provides further detail on how it expects the Standard Method to be applied. The PPG makes it clear that the Standard Method is used to, explicitly, identify the minimum number of homes to be planned for across an LPA over the plan period. It recognises that in applying a minimum figure, other factors such as historic under-delivery and unmet housing need within neighbouring areas should also be considered in determining the actual need.

SP3 is also expressly clear that the identified housing requirements for Dover represents a minimum figure for delivering housing over the Plan period, consistent with the aims and objectives of the NPPF to significantly boost housing supply. The draft Plan, and the approach to calculating its housing needs through the Standard Method whilst applying the need as a minimum figure is consistent with national policy and considered sound in this regard.

Whilst support the housing requirement being a minimum figure, it is concerning to see the significant reliance on existing commitments (i.e., extant permissions) in their contribution to the Council's proposed housing supply to meet their Local Plan housing need of 10,988 homes. The extant supply comprises a significant portion of extant supply from the Whitefield Urban Expansion and other permitted development not yet built. We have concerns over the soundness of such reliance on extant permissions, as planning permissions can lapse, become commercial unviable or undeliverable in response to rapid changes in market conditions and can often stall / become delayed. Overreliance on the extant supply of the Whitfield Urban Expansion i.e., one location for growth can stall the delivery of housing if problems arise with the delivery of the outstanding homes as consented. We do not consider this a sound approach.

We would urge the Council to place less reliance on extant supply to meet its housing need over the plan period and ensure sufficient land to bring forward residential development of all scales is accounted for in the spatial strategy to ensure the Local Plan and its approach to housing growth and delivery can be found sound. Smaller Sites such as Land at Jubilee Road can help ease the reliance on extant supply and can form an immediate deliverable part of the housing supply and trajectory in the early years of the plan period.

The Council propose a buffer of 8.5% as a contingency buffer to maintain a healthy supply of housing, provide flexibility and choice and to account for changing circumstances and under-delivery.

Use of a buffer is also consistent with national policy, with the NPPF not only requiring a Local Plan to meet its objectively assessed development needs in full but to do so through a considered strategy which engenders sufficient flexibility to adapt and respond to rapid change. To ensure sufficient flexibility, the Local Plan must account for the fact that both housing need and housing supply will inevitably fluctuate throughout the plan period due to several factors, including changes to population projections and affordability ratios, and sites failing to come forward as anticipated. Sufficient headroom is required over the Plan period to respond rapidly to these changes. A buffer is therefore important to account for these fluctuations, and overall housing need / supply and is necessary to ensure the Local Plan is effective, consistent with national policy, and positively prepared. It is for these reasons the application of a buffer is considered sound.

We do however have concerns over whether an 8% buffer is the most appropriate buffer to be applied to ensure the Plan, and its ability to deliver its housing need in full, is robust, and therefore an appropriate strategy.

We also have concerns over the appropriateness of the spatial distribution of housing growth across the district. SP3 proposes to direct the majority of new housing development in Dover Town and at Whitfield (through the proposed allocation SAP 1) with development then focused in the District Centre of Deal and the Rural Centres of Sandwich and Aylesham. Development in the rural areas will be of a scale consistent with the relevant settlement's accessibility, with land allocated to deliver in the region of 1,112 homes in addition to existing commitments

Whilst we recognise the importance of focusing development towards urban settlements, such as Dover Town and Whitfield we have major concerns that approximately half of the district's new housing development is planned here with the majority to be delivered through SAP 1. Notwithstanding the concerns we have over the reliance on strategic allocations and its reliability in delivering all the extant supply, there is a risk of skewing most of the growth towards only several large locations across the district and disproportionately away from rural areas, resulting in an unsustainable pattern of growth. This is further exacerbated through the remaining housing growth to be delivered through the strategic expansion of Aylesham (draft allocation SAP 23).

Paragraph 78 of the NPPF makes clear that to promote sustainable development in rural locations, new housing should be located where it will enhance or maintain the vitality of rural communities, and that planning policies should support and identify opportunities for rural villages to grow and thrive, especially where it will support local services.

Whilst we recognise that the distribution of growth to rural areas in supporting the continued rural vitality and choice of housing must be balanced with the sustainability of settlements across the district (access to services, proximity to facilities, strategic road network etc.), we consider that

	<p><i>insufficient housing has been allocated for rural areas, including but not limited to, Larger Villages, as per the Settlement Hierarchy. One should not slavishly adhere to the Settlement Hierarchy as a blunt tool to determine the sustainability of a settlement and its appropriateness for additional housing growth.</i></p> <p><i>There is also an imbalance between the proposed scale of growth and number of dwellings various rural settlements have been proposed to accommodate, with some smaller villages receiving a greater portion of housing growth than some larger villages, and notable differences between settlement growth within the same category.</i></p> <p><i>For example, the 'large' village of Worth is proposed to deliver 25 homes, whereas the 'smaller' village of Norrington is proposed to deliver 35 dwellings. Equally the larger villages of East Langdon, Preston, Lydden and Capel le Ferne all have significantly higher portions of housing growth, with Capel le Ferne expected to deliver 380% more housing than Worth.</i></p> <p><i>Worth benefits from access to the Strategic Road Network onto the A265 via Deal Road, and benefits from proximity to Sandwich and Sandwich train station. Worth as a larger village is therefore capable of accommodating greater levels of growth as a sustainable location benefitting from its relationship with Sandwich and the nearby highways network.</i></p> <p><i>There is a very real risk that in apportioning such low levels of housing to larger villages over the plan period the Council stagnate these communities, and stunt future growth essential for the continued vitality and prosperity of these thriving rural settlements.</i></p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Please refer to the accompanying representations.</p> <p><i>Text below (copied from attached statement) added by DDC. See attachment for full representation.</i></p> <p><i>As such, we urge the Council to revisit its spatial distribution of housing as it is currently unsound, ensuring that there is a great proportion of the housing supply directed to rural areas across the borough and less of a reliance on extant supply in a smaller concentration of larger urban settlements. Sites such as Land at Jubilee Road can help to deliver additional housing in sustainable rural villages such as Worth, ensuring modest and sympathetic housing is delivered in the early years of the plan period.</i></p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>To ensure that that the spatial strategy and distribution of growth is amended to rebalance the portionality of housing growth across the district, requiring additional smaller rural sites that are deliverable.</p>
<p>Include files</p>	<p>SDLP1006 Northbourne Estate - Att 2.pdf SDLP1006 Northbourne Estate - Att 1.pdf (1)</p>
<p>Local Plan Consultation Point</p>	<p>Strategic Policy 3 - Housing Growth</p>
<p>Rep ID</p>	<p>SDLP1010</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331932</p>
<p>Consultee Full Name</p>	<p>Ms CHRIS GRAHAM</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	

Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>This area is within Open Arable Chalk Farmland with Woodland. Proximity of this site to the boundary of the AONB requires it to be kept as a buffer between the existing built environment and open countryside in order that the special character of the area is maintained.</p> <p>The village has lots of character, includes a conservation area, has narrow roads, a small school, limited amenities such as no medical services, limited bus service, recently reduced, no immediate access to rail services and therefore very dependent on car use. This results in frequent congestion in the village. There are limited footpaths in the village, unlit so access becomes increasingly dependent on motor transport.</p> <p>The site is opposite the AONB where there is normally pedestrian access for health and wellbeing.</p> <p>The proposal would result in the loss of agricultural land, recently becoming a topic of concern as continuity of food supply is threatened.</p> <p>Access is compromised and becomes dangerous on an already difficult road.</p> <p>This village has narrow roads which are already congested and at times blocked, as heavy vehicles try to gain access.</p> <p>My question is why there is a proposal for development here when it is within the zone of influence of both an SSI and AONB.</p> <p>The elevated views from routes to and from Wood Hill cannot be mitigated against with planting alone. Sensitive view points are 25m above the site from both the lynch and the woods. A screen of planting cannot satisfactorily mitigate the impact on these sensitive views from a nationally important designated sites.</p> <p>I think the access is also a major issue. The Ringwould road is not suitable for pedestrians and cyclists - unsafe for both modes given the bend in the road on the approach to the village and lack of forward visibility. With no pavement there is no safe active travel route to the village, and therefore the entire development will be based on car travel, and is therefore unsustainable.</p> <p>It is not suitable to redesign/ provide offsite 'improvements' - lights/tarmac etc to pedestrian path through the trees as it is an important bat corridor (must remain dark) and important ecological corridor (that makes a strategic green link to the green corridor at Knights bottom and along the Glen)</p> <p>Moreover, the access to the site will require tree/hedge/scrub removal and impede movement of wildlife from the Butts ecological zone and the woodland to the west of the site.</p> <p>With regards to site access, given the high banks and bend in the road, the junction is poorly located, particularly given the speed of peoples approach from the A 258 and the width of the carriageway.</p> <p>I would also question the principle of development in Kingsdown to this scale as there is no public transport or jobs/services in the village. It will change the character of the village- rural, historic, coastal village etc, particularly when viewed from the special zones that they have identified.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1699
Rep Status	Processed
Consultee ID	1252327
Consultee Full Name	Mr Guy Osborne
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3 (SHE003)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Full Representation attached to SDLP1698. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1698.) 3.1 In our view the Spatial Strategy adopted by Dover District Council is flawed by virtue of; 3.1.1 The new housing provision to the Secondary Regional Centre's of Dover and Whitfield, makes up some 60.5% of Housing Allocations across the borough, providing a minimum of 3,381 homes. Policy SP3 states that the majority of housing will be in Dover Town and at Whitfield. While this is the case, 60.5% of the District's growth located either in Dover or adjacent to Dover at Whitfield, is not a sustainable

strategy for the District's Growth going forward.

3.1.2 This level of Growth in a single location over an 18 year period from 2022 to 2040 would not only result in an oversupply of housing within Dover, most likely resulting in the sales of these homes to struggle. Additionally, from these Regulation 19 alterations housing delivery in Rural Service Centres and Local Centres has fallen by 7% of the total allocations within the Borough. This will lead to an undersupply of housing in these areas, negatively affect residents who wish to remain within the villages in which they are brought up within and a subsequent further increase in housing prices to these locations.

3.1.3 The changes from the Regulation 18 version of the Local Plan Review to Regulation 19, have resulted in 530 fewer homes in Rural Service Centres, 195 fewer homes in Local Centres and 95 fewer homes in Larger Villages.

3.1.4 These revisions will result in 820 less homes within the Rural Locations of the District. This will sufficiently harm the growth of the Borough going forward in the Plan Period and does not meet with the outlined Spatial Strategy at SP3. We would argue that 60% of housing located in the Secondary Regional Centre,

while representing a 'majority' of new housing development, is an excessive amount of housing growth in one location, that will prove to be undeliverable at the annual rate advocated by the Council.

3.1.6 It is commonly accepted that urban expansions that are akin to Garden Village scale proposals will not deliver at the rate the Council expects due to the quantum of new homes being located in one location, where developments will compete against each other for housing sales.

3.1.7 Additionally locating the relevant proportion of affordable homes within the Whitfield expansion area will lead to future residents being isolated from Dover centre and again prevent residents from being able to remain within the villages from which they are from.

3.1.8 Given that Rural Services Centres are noted as being 'the secondary focus for housing development' we are unable to countenance as to why such low numbers of new homes have been identified within the Allocated Sites for these highly sustainable locations.

3.1.9 Para's 68 & 69 of the NPPF states;

Para 68. Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

- a) specific, deliverable sites for years one to five of the plan period³⁴; and
- b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.

Para 69. Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:

- a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;
- b) use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward;

c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and d) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.

3.1.10 It is our opinion that the Council is not able to identify sites in accordance with Para 69 of the NPPF given that the sites identified have not been proven to be deliverable or viable, as required under Para 68 of the NPPF.

3.1.11 It is important to refer to analyse the build-out rate to Garden Villages of the 2000+, noting that this scale of delivery is accepted as being 130 per annum when there are more than 3 outlets operating at one time. This is evidenced by the Lichfields Feb 2020 'Start to Finish' document at Page 14, a copy of which is attached at Appendix 1 below.

3.1.12 Given our understanding of delivery, evidence provided by Lichfields and the historic slow rate at which homes are delivered within the urban area of Dover, we are of the view that the proposed strategy is unsound, that the Council has too great a reliance on the Whitfield urban expansion and that greater focus to Rural Services Centres, Local Centres and Larger Villages is required to meet the Housing Land Supply for the Plan Period.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Local Plan Consultation Point

Strategic Policy 3 - Housing Growth

Rep ID

SDLP1527

Rep Status

Processed

Consultee ID

1252440

Consultee Full Name

Martin
Leggatt

Consultee Company / Organisation

Dover District Council

Agent Full Name	Grace Martin
Agent Company / Organisation	Hume Planning Consultancy Ltd
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Representation submitted by Hume Planning. Full Representation attached to SDLP1525. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1525.)</p> <p>SP3: Housing Growth</p> <p>We welcome DDC's commitment to meeting its housing need, with Strategic Policy SP3 committing to providing at least 10,998 net additional homes over the Plan period. Within the Policy, reference is made to the Council's overall spatial strategy i.e. the majority of growth will be focused towards the principal town, Dover, and the further expansion of Whitfield. Reference is made to growth then being focusing on the next layer of settlements, Deal (district centre), Sandwich and Aylesham (both rural service centres). It is noted that Eythorne and Elvington, as a designated local centre, will be allocated for up to 300 dwellings under Policy SAP 28. Accordingly, we consider it would provide greater transparency if Policy SP3 made reference to the growth proposed in this location within the spatial hierarchy referenced at Policy SP3.</p> <p>We consider it is appropriate to direct development towards the land between Eythorne and Elvington which will be separated by the central playing fields and open space known as the Tilmanstone Colliery Sports and Welfare Club which is situated adjacent to the south of the allocation. Housing along with community facilities and local convenience store in this central position separated by the open space will enhance the sustainable credentials and degree of containment of the adjoining settlements. Both Eythorne and Elvington are well served by local facilities including, amongst other things, village halls, a primary school, public house, post office and local shops. There is also an established employment area to the east. The growth proposed, along with the expansion of Pike Industrial Estate, will also create a sustainable expanded settlement within the district. As well as improved cycleway and footpath linkages delivered by the allocations bus linkages will be improved and the villages are also served by the nearby railway stations 2 miles away at Shepherdswell and 2.3 miles away at Snowdown.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1326
Rep Status	Processed
Consultee ID	1252620
Consultee Full Name	Mr William Hickson
Consultee Company / Organisation	
Agent Full Name	Emily Harris
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails	(DDC Note: Text has been extracted from PDF document sent by Savills - Attachment and Full Rep on SDLP1324) Strategic Policy 3: Planning for Housing growth 5.2. Table 6.1 sets out the Council's current housing supply position and shows that in order to meet the Local Housing Need for the District, the Council will need to allocate housing sites in the Local Plan to deliver 5,288 homes over the Plan period. 5.3. DDC has outlined that their proposed growth strategy will focus on the development and regeneration of Dover Town, with further development concentrated towards Aylesham. The remainder of the housing growth will then be distributed across Local Centres and Villages in the rural area. In accordance with this, c. 0.84% of the housing growth will be distributed to smaller villages and hamlets. 5.4. Whilst our Client broadly agrees with the proposed housing strategy set out in the Local Plan, it is pertinent that it is very similar to the adopted Local Plan. 5.5. While this does not amount to the current strategy being flawed, the adopted growth strategy has been ineffective in delivering the requisite housing in the past, establishing a precedent of under delivery within the District – as highlighted in paragraph 3.67 of the Regulation 19 Draft Plan which states the following of

<p>to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>windfall permissions: “Over this period, the spatial distribution of windfall development has largely followed the settlement hierarchy, with 39% of windfall permissions being located at Dover, 31% at Deal and 12% within the defined settlement confines of rural villages.” 5.6. The Council should consider the influence of market signals on housing in the relevant plan policies – as set out in policy 31 of the National Planning Policy Framework (NPPF) – and increase the proportion of housing growth allocated within the rural areas to reflect this. 5.7. This representation highlights the capacity to deliver additional dwellings at the Site in a sympathetic manner, demonstrating that there is scope to increase housing provision across the Site and improve its contribution to the requisite growth in the District.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	Strategic Policy 3 - Housing Growth
<p>Rep ID</p>	SDLP1017
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1331955
<p>Consultee Full Name</p>	Matthew Porter
<p>Consultee Company / Organisation</p>	Danescroft Land Ltd and Pentland Homes Ltd
<p>Agent Full Name</p>	Matt Porter
<p>Agent Company / Organisation</p>	DHA Planning
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	Policy SAP1 - Whitfield Urban Extension Policy SP3 - Housing Growth Policy SP4 - Windfall Development Policy SP11 - Infrastructure and Developer Contributions Policy SP12 - Strategic Transport Infrastructure
<p>2 - Do you consider this part of the Plan sound?</p>	Yes

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	We consider that the plan is sound, for the reasons set out in the consultation response submitted on behalf of Danescroft Land Ltd and Pentland Homes Ltd (ref DHA/30242).
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	For the reasons set out in the consultation response submitted on behalf of Danescroft Land Ltd and Pentland Homes Ltd ref DHA/302 42, no modifications are proposed.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	On account of the scale of the allocation proposed at Whitfield, we consider it necessary for our clients to participate in the oral part of the examination. Please refer to the consultation response submitted on behalf of Danescroft Land Ltd and Pentland Homes Ltd (ref DHA/30242).
Include files	DHA_30242_DDC Regulation 19 Consultation Response.pdf
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1519
Rep Status	Processed
Consultee ID	1271202
Consultee Full Name	Easton Builders
Consultee Company / Organisation	
Agent Full Name	Grace Martin
Agent Company / Organisation	Hume Planning Consultancy Ltd
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3
2 - Do you consider this part of the Plan sound?	No

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Representation submitted by Hume Planning. Full Representation attached to SDLP1502. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1502.) SP3: Housing Growth Whilst we welcome DDC's commitment to meeting its housing need, with Strategic Policy SP3 committing to providing at least 10,998 net additional homes over the Plan period, it is considered additional sites if suitable and available should be included within the Plan. A large proportion of growth is being directed towards the new settlement at Whitfield(over 2,000), and with large strategic sites delivery rates can easily slow down during the plan period and under-deliver. Whilst there is a buffer within the Plan, it is considered appropriate not use this as a limit, and allocate other suitable sites in sustainable locations where available. In this respect, it is noted that Sandwich sits towards the top of the settlement hierarchy, alongside Aylesham, as a rural service centre. Only Deal, Dover/ Whitfield sit above. Yet, due to the constraints in Sandwich, only 227 units are being allocated in this settlement compared to over 600 in Aylesham. As detailed above, land at Whitefriars, HEELA site SAN014 is considered suitable for residential development. It is also available and can be delivered within the short to medium term, and in our view this site should be allocated within the Plan.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP886
Rep Status	Processed
Consultee ID	1331942

Consultee Full Name	Matt Porter
Consultee Company / Organisation	Persimmon Homes South East
Agent Full Name	Matt Porter
Agent Company / Organisation	DHA Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy SAP16 - Deal Small Housing Sites Policy SP3 - Housing Growth Policy SP4 - Windfall Development
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>*Comments on SP3 here, SP4 comments are on SDLP1290 and omission site reps are on SDLP1291*</p> <p>Our client supports DDC's new Local Plan in principle, however our client objects to a component of the Plan, such that the Plan should be considered 'unsound'. It is put forward that a minor modification to the growth strategy is required in order for the Plan to be found 'sound'. These objections are set out in the consultation response submitted on behalf of Persimmon Homes South East (ref DHA/30289)</p> <p>1 Introduction</p> <p>1.1 Context</p> <p>1.1.1 This representation has been prepared by DHA Planning on behalf of Persimmon Homes South East in response to the Dover District Council 'DDC' Local Plan (Regulation 19) consultation which runs until 9th December 2022.</p> <p>1.1.2 We understand that DDC is in the process of preparing a new Local Plan to set out a strategy for development for the period to 2040 and that the Council are presently seeking comments on the pre-submission Plan prior to its submission for examination in early 2023.</p> <p>1.1.3 The new Local Plan will set out the vision, strategic objectives and overarching development strategy for the growth of the District over the period to 2040. It provides the planning policy framework to guide the future development of the area, addressing needs and opportunities for housing, the economy, community facilities and infrastructure, as well as the basis for conserving and enhancing the natural and historic environments, mitigating and adapting to climate change, and achieving well designed places.</p> <p>1.1.4 The new Local Plan will be examined by an Inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is 'sound'. This submission will comment with reference to the above, highlighting where we believe any areas of concern lie or where modifications may be required.</p> <p>1.2 Purpose of this Representation</p> <p>1.2.1 Our client controls 'Land Golf Road, Deal' (hereafter referred to as 'Land at Golf Road' or 'the Site') and is promoting the residential allocation of the Site as part of the new Dover District Local Plan preparation process. The Site was submitted as an available, suitable and deliverable location for residential development with capacity for approximately 60 dwellings as part of the new Local Plan preparation, however the Site has not been taken forward within the Regulation 19 Pre- submission Plan.</p> <p>1.2.2 The purpose of this representation is to support DDC's new Local Plan in principle, however our client objects to a component of the Plan, such that the Plan should be considered 'unsound'. It is put forward that a minor modification to the growth strategy is required in order for the Plan to be found 'sound', in which the quantum of Plan-led housing delivery within Deal should be increased to accurately reflect its second tier settlement status. Our client considers that given historic strategic under delivery in the district and wider uncertainties in the planning system,</p>

the Council should sensibly demonstrate an oversupply of reliable, deliverable sites early in the Plan period to ensure sufficient flexibility in housing delivery, should extant permissions or larger allocated sites not come forward or deliver as anticipated.

1.2.3 To be clear, Persimmon Homes South East support the premise of DDC's growth strategy, which includes further Plan-led development within Deal in line with its higher-order settlement status. However, we are concerned that DDC have planned at a significantly reduced level of growth in Deal, citing a dwindling supply of available land within and around the settlement. Consequently, the Plan fails to appropriately maximise the sustainable credentials of Deal and has resulted in a marginal supply of available, deliverable small and medium sites, insufficient to provide the flexibility in housing delivery that is required in accordance with national planning policy.

1.2.4 The Plan is predicated on the delivery of a major urban extension at Whitfield, Dover comprising a new community and a minimum of 2,200 homes within the Plan period. It is anticipated that Whitfield will deliver a significant quantum of new homes primarily towards the latter half of the forthcoming Plan period. Consequently, DDC must demonstrate a sufficient supply of reliable small and medium sized sites capable of delivery early in the Plan period to ensure consistent housing delivery in accordance with national planning policy and Plan-making guidance.

1.2.5 This representation provides comment on the consistency of our client's proposed allocation site with the proposed strategy, draft policies and sets out our client's position in respect of the 'soundness' of the Plan. To reiterate, whilst our client is supportive of DDC's new Local Plan in principle, Persimmon Homes South East object to a component of the Plan, such that the Plan is considered 'unsound'. Our client is concerned that the growth strategy as drafted fails to fully maximise available sites within the higher order settlement of Deal and by extension, our client objects to the exclusion of Land at Golf Road within the Regulation 19 Local Plan.

1.2.6 Our client is also concerned that given the recent constraints to housing delivery associated with nutrient neutrality in East Kent, the historic under delivery previously experienced at Whitfield and the wider uncertainty within the planning system more generally, the growth strategy as drafted may not include sufficient small and medium sites to demonstrate the necessary flexibility should allocated sites not come forward or deliver as anticipated.

1.2.7 In this regard, our client remains wholly supportive of the premise of further residential development within Deal and agree that it represents a logical and sustainable location to direct growth consistent with the growth strategy of the Plan as a whole. However, it is submitted that Deal is capable of making a far greater contribution to the delivery of new homes within the forthcoming Plan period than drafted. In line with its higher-order status within the settlement hierarchy and excellent access to day-to-day services and amenities, it is put forward that Deal is wholly capable of delivery significantly greater than the 223 dwellings allocated.

1.2.8 For the reasons set out within this representation, we say that available and suitable sites do exist, including that of our client's Land at Golf Road, Deal capable of delivering logically located, highly sustainable new homes in accessible location early in the Plan period, sufficient to provide greater flexibility and assurance of steady and sustained housing delivery across the Plan period, balance the scale of delivery from strategic urban extensions and further assist in reducing the need to develop into more rural, typically less accessible and more sensitive locations within the district to otherwise deliver the growth that is required.

1.2.9 The inclusion of Golf Road, Deal would provide a medium sized site for the Council that could come forward quickly, complying with the Framework's requirement to provide a mix of sites and include specific sites for years 1-5 of the Plan period. Accordingly, we say that Land at Golf Road, Deal can further assist the Council in meeting the growing need for new homes in the district and is necessary to ensure the Council can have greater confidence in meeting its market and affordable housing targets in full as well as delivering wider public benefits to the local community within Deal.

1.2.10 Based on the current national and local planning context, we consider the Site to be a highly suitable edge-of-settlement location to allocate land for housing to help meet the need for new homes in the district. Its effective use should therefore be appropriately maximised in accordance with national policy objectives.

1.2.11 Further details regarding the Site and commentary on the consistency of the Site with the proposed strategy, draft policies and our client's position in respect of the 'soundness' of the Plan are set out in the following sections of this document.

1.3 About Persimmon Homes

1.3.1 Building over 13,500 beautifully-designed new homes a year in more than 350 prime locations nationwide, Persimmon is proud to be one of the UK's most successful housebuilders, committed to the highest standards of design, construction and service. As a reflection of their commitment to delivering excellence always and delivering great customer care, the Home Builder's Federation (HBF) have awarded Persimmon 5 stars. Persimmon have a track record of delivery, and have been building new homes for over 50 years. Local Authorities up and down the country rely on national-scale housebuilders to deliver significant quantities of new homes each year, to meet the ever growing demand for new housing. Persimmon Homes remains committed to building new houses in the Dover District area and has over the last few years been developing two sites in the district, one in Aylesham which is a joint venture with Barratt Homes and one in Deal.

1.3.2 Persimmon's approach is to work positively and proactively with local planning authorities (LPAs), both during the preparation of local plans and at planning application stage. Persimmon Homes South East are fully committed to engaging with Dover District Council in the preparation of its Local Plan, and firmly subscribe to the national policy approach set out in paragraphs 15 and 16 c) of the NPPF that "the planning system should be genuinely plan-led" and should be shaped by early, proportionate and effective engagement between LPAs and others, including businesses and developers. Accordingly, Persimmon Homes South East would welcome the opportunity to discuss the matters contained in this representation, including the availability, suitability, deliverability and capacity of Land at Golf Road, Deal directly with Dover District Council members and officers, ahead of the submission of the Local Plan for examination.

1.4 Representation Structure

1.4.1 The representation structure is outlined below for ease of reference:

Chapter 2 (Housing Need) - Consideration of market and affordable housing need and assessment of proposed housing allocations and supply sources.

Chapter 3 (Assessment of Suitability) - Re-introduces our client's Site and provides a summary of planning constraints and opportunities, including the quantum of development that could be accommodated, why the Site is suitable for development and why the principle of the draft allocation for residential development is both justified and consistent with the Council's strategy for growth in the district. It also sets out why we consider there is scope for a higher number of dwellings at the site. This consideration amounts to an objection to one element of the strategy – namely that those sites around the most sustainable settlements should be maximised.

Chapter 4 (Conclusion) - Summarises the key points raised throughout the representation and re-affirms our client's support for the Site's allocation and proposed strategy ahead of the submission of the Plan for examination.

2 Housing Need

2.1 Context

2.1.1 Paragraph 11 of the NPPF is explicit in its requirement for strategic policy-making authorities to promote a sustainable pattern of development that seeks to meet the need in full.

2.1.2 Paragraph 20 of the Framework is equally clear that strategic policies should set out an overall strategy for the pattern, scale and design quality of places. Policies should make sufficient provision for the development that is required as well as associated infrastructure, community facilities and should set out a strategy for the conservation and enhancement of the natural, built and historic environment.

2.1.3 Given this national planning context, the emerging Local Plan should provide a comprehensive and cohesive approach to future development in Dover district, capable of making sufficient provision for the identified needs, whilst balancing the conservation and enhancement of the natural, built and historic environment.

2.1.4 National guidance states that strategic policy-making authorities will need to calculate their local housing need figure at the start of the plan-making process. This number should be kept under review and revised where appropriate.

2.1.5 In calculating the local housing need, paragraph 61 of the NPPF states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance - unless exceptional circumstances justify an alternative approach.

2.1.6 Paragraph 68 is clear in its requirement that strategic policy-making authorities should have a clear understanding of the land available in their area and should ensure that planning policies identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

a) specific, deliverable sites for years one to five of the plan period

b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.

2.1.7 In this vein, paragraph 69 of the Framework goes on to stress that small and medium sized sites (such as that of our client's land at Golf Road) can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly.

2.1.8 Further, in addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

2.2 DDC's Housing Need

2.2.1 The Standard Method for assessing housing need, issued alongside the Ministerial Statement on 16 December 2020, sets an indicative housing need figure for Dover

District of 596 dwellings per annum. However, the affordability ratio which factors into the local housing need assessment is updated annually. For Dover District the latest housing need calculation is 611 dwellings per annum (dpa), equating to a total minimum housing need of 10,998 dwellings for the Plan period to 2040. We understand that the Regulation 19 Local Plan seeks to meet this need in full and in addition to the minimum figures, DDC have a set a contingency buffer of 926 dwellings for the Plan period, equating to 8.4% of the total Plan period figure.

2.2.2 For context, the current adopted CS requirement is 700 dwellings per annum. This followed the adoption of a high-growth strategy in 2010 of 14,000 homes to 2026 based around the recommendations of the Dover Regeneration Strategy and above the minimum 10,100 requirement across the same period, as set out in the emerging (at the time) Regional Spatial Strategy.

2.2.3 For the avoidance of doubt, accounting for the Committed Supply Total of 5,282 dwellings, the new Local Plan will be required to allocate sufficient land to accommodate a minimum of 6,642 new homes over the remaining plan period to 2040. It is understood that this will be derived from the following sources:

- Whitfield Urban Expansion Allocation: 2,200 dwellings

- Local Plan Allocations (excluding Whitfield): 3,392 dwellings

- Windfall Allowance (70 a year from year 4): 1,050 dwellings

2.2.4 On this basis, it is evident that a substantial quantum of Plan-led housing delivery will be required in order to meet the new Local Plan's housing target. Due to the nature and dwindling supply of available urban land in Dover town and the remaining higher order settlements of Deal and Sandwich, the restrictive effect of the coast, the Kent Downs AONB, environmental constraints and the limited capacity of the district's remaining mid- and lower order settlements to accommodate significant levels of growth, meeting Dover's housing needs inevitably will require the release of significant greenfield land.

2.2.5 In our view, sustainable and accessible sites logically located adjacent to existing urban areas, including Deal, represent the most sustainable and reliable sources of growth for the Plan period, consistent with the overarching strategic objectives of draft policy SP3 within the emerging Plan.

2.2.6 Such sites are best placed to deliver the significant number of new homes that are required and are most capable of making meaningful contributions to the associated public infrastructure, affordable housing and mix of new homes that is urgently needed in the District as well as further balancing the role of strategic- scale development at Whitfield within the emerging Plan's proposed growth pattern in the event that Whitfield or indeed any of the major allocations upon which DDC seek to rely to not come forward or do not deliver as anticipated.

2.2.7 On this basis, we set out below why our client's site Land at Golf Road, Deal is suitable to be included within the submission Dover Local Plan and is necessary for inclusion in order for DDC to demonstrate sufficient supply and flexibility within the early phase of the housing trajectory as required by national planning policy, such that the Plan may be considered 'sound'.

3 Site Specific Assessment

3.1 Overview

3.1.1 The previous chapters of this representation outline our client's position relating to the soundness of the Plan in which our client is confirmed to be supportive in principle of the Local Plan as a strategy for the growth of the district to 2040, however our client objects to a component of the Plan, such that the Plan should be considered 'unsound'. It is put forward that a minor modification to the growth strategy is required in order for the Plan to be found 'sound', in which the quantum of Plan-led housing delivery within Deal should be increased to accurately reflect its second tier settlement status.

3.1.2 Paragraph 4.146 of the Local Plan states that the urban area of Deal encompasses the built-up areas of the parishes of Walmer and Sholden. Deal is identified in the Settlement Hierarchy and Confines Topic Paper (2022) as a 'District Centre', where there is a secondary focus for development.

3.1.3 It is clear that Deal must continue to form a principal location for focusing sustainable housing delivery in Dover district and will assist in ensuring an appropriate balance of sites are identified, capable of supporting the strategic role of Whitfield within the forthcoming Plan Period and minimising the need for housing growth in typically less accessible and more sensitive rural settlement with limited development capacity.

3.1.4 As introduced in the preceding sections, our client controls 'Land Golf Road, Deal' and is promoting the residential allocation of the Site as part of the new Dover District Local Plan preparation process. The Site was submitted for residential development with capacity for approximately 60 units as part of the new Local Plan preparation, however the Site has not been taken forward within the Regulation 19 Pre-submission Plan.

3.1.5 Land at Golf Road represents an excellent opportunity for the delivery of approximately 60 high-quality new homes in a logical, highly accessible location in north Deal with capability to deliver a policy compliant quantum of much-needed affordable housing, a mix of house types, sizes and tenures and ability to make a significant contribution to wider public infrastructure through developer contributions. The land itself is of no particular ecological value and is in private ownership, offering limited public benefit. The Site is capable of delivering strong biodiversity net gain, attractive internal and boundary landscaping, open space, play facilities and a development pattern which facilitates pedestrian permeability and encourages active travel in north Deal.

3.1.6 Given the dwindling supply of available sites within the District and the growing housing need, it is imperative that the sustainable credentials of these higher-order settlement sites are appropriately maximised to deliver the housing that is required in accordance with the underlying objectives of draft policy SP3, and wider policies seeking to otherwise conserve and enhance the district's natural and historic environment and national planning policy objectives. We are concerned that this has not been fully undertaken and our client objects solely on the basis that the growth strategy component of the Plan as drafted is 'unsound'.

3.1.7 Consequently, our clients object to policy SP3 as drafted. On the basis that there is a clear need to maximise the delivery of housing sites within Deal, our clients consider the Plan 'unsound'. Our site, Land at Golf Road, Deal, has been excluded from the Plan primarily on flood risk grounds, without further consideration or detailed evidence; without acknowledging the presence of high-quality 1 in 200 year flood defences and without any regard to the prevalence of recent residential developments permitted nearby (having passed the Sequential and Exception test with Environment Agency support on flood risk). Additionally, we submit that the Site is capable of providing a residential development which would be safe for its lifetime, owing to the high-quality flood defences and on-site mitigation measures.

3.1.8 The consequent omission of potentially circa 60 units, in our view fails to make effective use of Dover's second tier settlement and will otherwise require further new homes to be delivered elsewhere in the district, in potentially less accessible and more sensitive locations.

3.1.9 Without prejudice to our client's support to the premise of the growth strategy, which primarily directs growth at higher order settlements, we would urge the Council to re-visit its growth strategy and proposed allocations to allow a greater quantum of development within Deal, by including suitable sites such as Land at Golf Road to fully reflect its excellent sustainability credentials and provide a pragmatic oversupply of reliable, deliverable small and medium sites capable of delivery early in the Plan period.

3.1.10 We submit that Deal is wholly capable of delivering significantly greater than the 223 dwellings allocated. We say that available and suitable sites do exist, including that of our client's Land at Golf Road, Deal which is being promoted by a national housebuilder fully committed to the Site and with an excellent track record of delivery.

3.1.11 It is put forward that Deal is capable of delivering further logically located, highly sustainable new homes in accessible locations early in the Plan period. An additional supply would; provide greater assurance of steady and sustained housing delivery across the Plan period, balance the scale of delivery from strategic urban extensions and, further assist in reducing the need to develop into more rural, less accessible and sensitive locations within the district to otherwise deliver the growth that is required.

3.1.12 We agree that Deal represents a logical and sustainable location to direct the growth required within the district and consider that the land promoted at Golf Road, Deal should be included as a future housing allocation within the Dover District emerging Local Plan. The Site is considered to be wholly consistent with the objectives of the Plan and would form part of a sound growth strategy for the district to 2040 whilst delivering policy compliant affordable homes, a mix of house types and tenures and wider ecological, landscape and public benefits.

3.1.13 Our client is firmly of the view that the allocation of additional housing sites is necessary to ensure that balanced growth strategy put forward within the Pre-submission Dover District Local Plan is 'sound', comprising an appropriate balance of small, medium and strategic-scale sites deliverable across the Plan period. The allocation of well-located, reliable, greenfield sites such as our client's at Land at Golf Road is necessary for DDC to meet the growing housing need. The Site is being promoted by Persimmon, a firmly committed national housebuilder with an excellent track record for delivery, and the inclusion of the Site would ensure that DDC can have confidence in consistently meeting its market and affordable housing targets in full throughout the life of the new Dover District Plan in the event that identified sources of housing do not come forward or fail to deliver as anticipated.

3.2 Site and Surroundings

3.2.1 The Site is situated to the west of Golf Road, north of West Lea and west of the Fairway on the north-western edge of Deal.

Figure 3.1: Approximate Site Location (courtesy of Google Earth)

3.2.2 The Site comprises an undeveloped regular parcel of land in agricultural use totalling approximately 1.9 hectares. The site is bound by residential development on three sides which detached the site from the wider open countryside to the west. The Site is consequently characterised by its edge-of-settlement location with typical suburban residential development the predominant development pattern in the area.

3.2.3 In terms of overarching planning constraints, the site is not subject to any overarching landscape or ecological designations and is not itself subject to any heritage constraints. The site is located within defended Flood Zone 3, albeit this covers the majority of this part of north Deal which is subject to coastal flood defences.

3.2.4 In terms of accessibility, the Site enjoys excellent access to a number of day-to-day facilities and services which are within a reasonable walk distance, including primary and secondary schools, local shops, healthcare, employment, and public transport links within Deal and Walmer including Deal mainline station and frequent buses along Dover Road between Dover, Deal, Sandwich and Canterbury.

Consideration of Flood Risk

3.2.5 The site is located entirely within Flood Zone 3a as defined by the Environment Agency Flood Risk mapping.

3.2.6 Owing to its strategic nature, Deal is subject to significant coastal defences. These defences provide protection from coastal erosion as much as they do flooding, and are actively maintained, as part of a 'hold the line' policy in this Shoreline Management Plan area (SMP).

3.2.7 As part of the Deal Coastal Flood Defence Scheme (completed in 2013), a recurved concrete sea wall was constructed from Sandown Castle to Deal Castle. Beach renourishment provides an additional level of protection to this frontage.

3.2.8 The NPPF requires the actual risk of flooding to a development to be appraised. The actual risk considers the likelihood of flooding under extreme conditions (e.g. the design flood event), whilst considering the influence of any defence infrastructure, or drainage systems, which may provide a level of protection to the site. Given the presence of high-quality defences at Deal, it is evident that the actual risk of flooding under the design event is reduced, leaving only the residual risk, which falls outside of the scope of the NPPF and relates to extreme circumstances in the event the defences, or drainage system were to fail (i.e. due to a breach or a blockage), or if an event greater than the design flood event was to occur and overtop the defences.

3.2.9 The Strategic Flood Risk Assessment (2019) prepared by Herringtons Consulting is included within the DDC Local Plan Evidence Base and has identified that the coastal towns of Deal and Dover are protected from sea flooding under an extreme storm event with a 1 in 200 year return period (0.5% AEP) and the construction of the defence infrastructure has significantly reduced the actual risk of flooding at these coastal locations. The risk of coastal flooding to these two towns is therefore limited to a residual risk event only, which would require a catastrophic failure of the new defence infrastructure (e.g. a failure in the seawall).

3.2.10 On account of the above, we do not consider it appropriate for the Plan-led growth of north Deal to be automatically excluded on account of flood risk. DDC acknowledge that following high-levels of windfall development within the previous (adopted) Plan period, there are limited available and suitable sites for development within Deal and consequently have sought to reduce the level of Plan-led growth within the forthcoming Plan period, with a greater reliance on strategic development at Whitfield and alternative third tier settlements in response. Our client's disagree with this approach and object to the proposed growth strategy as an unsound basis on which to reliably deliver the growth that is required in the district.

3.2.11 Our client's site, Land at Golf Road, Deal is evidence that suitable small and medium sites are available in Deal and are being promoted for delivery early in the Plan period. It is accepted that sites such as that of our client's will be subject to Flood Risk Assessment and be required to pass both the Sequential and Exception tests.

3.2.12 Taking each test in turn, the Sequential Test is a risk-based test which aims to steer development to areas at the lowest risk of flooding. DDC already acknowledge that there is a dwindling supply of available sites in Deal. Moreover, we emphasise that two small sites within Deal have been allocated for residential development under policy SAP16 'Deal Small Housing Sites' (Ethelbert Road Garages (5 units) and 104 Northwall Road, Deal (8 units)). Both sites as shown in figure 3.2 below are in close proximity to our client's site. Both sites are in Flood Zone 3a and protected by the Deal coastal defences. Land at 104 Northwall Road is plainly highly comparable to our client's site and there appears no sound justification for the exclusion of Land at Golf Road on this basis. For the purposes of the Sequential Test, the allocation of sites within Flood Zone 3a is clear acknowledgment that sequentially preferable sites do not exist in Deal and some development within the defended flood zone is required in order to deliver the growth that is required.

Figure 3.2: Extract of Reg 19 Policies Map showing our client's site (red line) and proposed residential allocations (green shading). Flood Zone 3 shown in blue.

3.2.13 In addition to the Sequential Test, the Exception Test must also be passed which requires proposals to demonstrate
a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and

b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

3.2.14 In this regard, the provision of the housing that is required, in addition to wider biodiversity, accessibility, open space and public infrastructure benefits is considered sufficient to outweigh the flood risk. With respect to (b), exact details would be provided as part of a detailed planning application, however in combination with the existing flood defences, it is anticipated that any future development could be subject to land level raising and all living and sleeping accommodation is proposed above the ground floor level, above the predicted design flood level. Further early flood warning systems, evacuation plans and a raised area of safe refuge could be included to ensure the development would be safe for its lifetime.

3.2.15 Further to the above, we note the following planning applications for residential development have also been permitted recently in north Deal, within Flood Zone

3a and without Environment Agency objection having passed both the Sequential and Exception tests without issue. Examples of granted planning applications within Flood Zone 3a include:

- 21/01233 – 17 Godwyn Road, Deal (1no. dwelling)
- 20/00341 – 269 Sandown Road, Deal (1no. dwelling)
- 20/00787 – Land adjacent 56 Golf Road, Deal (1no. dwelling)
- 19/00425 – Land rear of 92 & 94 Northwall Road, Deal (1no. dwelling)
- 15/00176 – Site at 90 Golf Road, Deal (2no. dwellings)
- 14/01211 – Land off Ark Lane, Deal (14no. dwellings)
- 14/00852 - 22 Harold Road, Deal (1no. dwelling)
- 13/00522 – Bede and Dunstan Houses, College Road, Deal (16no. dwellings)

3.3 Development Capacity

3.3.1 At this early stage, significant design work has not yet progressed. However, for the purposes of this representation, Land at Golf Road, Deal is submitted with capacity for approximately 60 residential dwellings (subject to detailed design and flood risk assessment) deliverable early in the Plan period.

3.3.2 The scale and nature of the Site is considered highly conducive to the delivery of a high-quality, landscape-led scheme capable of making a significant contribution to the delivery of market and affordable housing in a logically contained location that would assimilate with the existing pattern of development.

3.3.3 Land at Golf Road represents an excellent opportunity for the delivery of approximately 60 high-quality new homes in a logical, highly accessible location in north Deal with capability to deliver a policy compliant quantum of much-needed affordable housing, a mix of house types, sizes and tenures and ability to make significant developer contributions to support existing and future public infrastructure.

3.3.4 The land itself is of no particular ecological value and is in private ownership, offering limited public benefit. To the contrary, the Site is capable of delivering strong biodiversity net gain, attractive internal and boundary landscaping, opening up public access to open space, play facilities and a development pattern that facilitates pedestrian permeability and encourages active travel in north Deal.

3.3.5 Detailed proposals have not yet been advanced, however it is anticipated that any future development of the site will be of an appropriate density, reflecting the local character of development and responding to local needs for housing. Any future development will be sensitively designed to respect the existing character and materiality of the area, the topography of the site and to allow a positive transition to the rural landscape and respond to its coastal location.

3.3.6 It is acknowledged that the site is located within Flood Zone 3a, however this is true of the majority of north Deal which is nonetheless protected by coastal flood defences. Subject to detailed flood risk assessment and site layout design, for the reasons set out above, flood risk is not considered to represent an absolute constraint preventing the future development of the site.

3.3.7 Exact flood risk design details would be provided as part of a detailed planning application, however in combination with the existing flood defences, it is anticipated that any future development could be subject to land level raising and all living and sleeping accommodation is proposed above the ground floor level, above the predicted design flood level. Further early flood warning systems, evacuation plans and a raised area of safe refuge could be included to ensure the development would be safe for its lifetime.

3.3.8 Particular care will also be taken with regard to opportunities for biodiversity habitat creation and enhancement, publicly accessible open space and high-quality play space to serve the local community.

3.3.9 In terms of access, opportunities for safe, direct and convenient primary vehicular, pedestrian and cycle access are achievable onto the adopted highway. The Site will be capable of facilitating a permeable pattern of development in northwest Deal, providing convenient access for future and existing residents to a range of day-to-day facilities including grocery stores, medical facilities and Deal train station.

3.3.10 To be clear, our client agrees that Deal represents a logical and sustainable location to direct growth consistent with the growth strategy of the Plan as a whole, however we submit that more effective use of available land within Deal can be made – and therefore object to policy SP3 ‘housing growth strategy’ and the exclusion of Land at Golf Road on this basis.

3.3.11 Accordingly, we say that Land at Golf Road is not subject to any absolute development constraints and can further assist the Council in meeting the growing need for new homes in the district and help to ensure the Council can have greater confidence in meeting its market and affordable housing targets in full.

3.4 Strategic Justification for Development

Spatial Strategy

3.4.1 The proposed Housing Distribution for the district across the Plan period is established within Policy SP3 ‘Housing Growth’ which sets out that the distribution of housing growth in the district is primarily based on the settlement hierarchy and influenced by site availability, environmental constraints and factors of delivery.

3.4.2 Rightly, a key aim of the growth strategy is to focus development in the least sensitive areas of the district in order to conserve and enhance the Dover’s rich natural and historical environment.

3.4.3 A retained theme from the adopted Plan, is that DDC’s settlement strategy continues to focus on the development and regeneration of Dover Town and Whitfield (3381 dwellings). Approximately half of the district’s planned housing is in this location, the majority of which again is to come forward as part of the strategic urban expansion of Whitfield ‘SAP1’ (2200 minimum dwellings).

3.4.4 Development will then be focused in the District Centre of Deal (223 dwellings), and the Rural Service Centres of Sandwich (227 dwellings) and Aylesham (649 dwellings). Following the settlement hierarchy rigidly would distribute housing in the preceding order, however the Plan recognises that housing delivery in Deal and Sandwich continues to be constrained by a number of factors including flood risk, ecological designations, heritage and highways. Further, Deal has experienced generally high levels of windfall development across the previous Plan period and accordingly there is now a dwindling supply of available, suitable sites in both settlements. On account of this context, DDC have sought to direct the majority of the remaining higher order settlement growth (outside of Dover & Whitfield) to Aylesham, through the strategic expansion to the town.

3.4.5 Outside of the four principal district settlements, the Rural Settlement Hierarchy (August 2022) identified that the majority of lower-order settlements in the district emerge as having a low level of facilities within the hierarchy and six settlements having none of the key indicators of sustainable services. Plainly, these settlements offer very limited opportunities for growth and it is evident that the forthcoming Plan will be reliant on the settlements of Dover (including Whitfield), Deal, Sandwich and Aylesham to deliver the housing growth that is required.

3.4.6 Given this context, it is clear that where available and suitable opportunities for residential development do exist within the district’s higher order settlements, such as our client’s site Land at Golf Road, which can provide a policy compliant level of affordable housing, it is imperative that the effective use of these sites are secured and appropriately maximised consistent with draft policy SP3 of the emerging Plan and national policy objectives.

3.4.7 Notwithstanding our client’s in support of the premise of the proposed strategy, we are concerned that highly sustainable, edge-of-settlement sites, particularly in higher tier settlements such as Deal have been omitted to reflect their accessible location and capability to accommodate a significant quantum of high-quality development. On this basis, our client is concerned that the strategic objectives underlying draft policy SP3 ‘Housing Growth’ may not be fully realised, to the detriment of market and affordable housing delivery and the wider policies seeking to conserve and enhance the district’s natural and historic environment.

3.4.8 Consequently, our client objects to policy SP3 which is considered ‘unsound’ as drafted, on the basis that there is a clear need to maximise the delivery of housing at sites around Deal, and this has not been undertaken – for example at Land at Golf Road, where the Site has the site has been omitted despite clear justification for the suitability of development in Flood Zone 3a and indeed site allocations being included for residential development in the immediate vicinity. The Site has sufficient capacity to deliver approximately 60 additional units over the draft allocations for Deal, which will otherwise be required to be delivered elsewhere in the district, in potentially less accessible and more sensitive locations.

Greenfield Development and Consistency with Housing Trajectory

3.4.9 Due to the nature and dwindling supply of available urban land in Dover town and the remaining higher order settlements of Deal and Sandwich, the restrictive effect of the coast, the Kent Downs Area of Outstanding Natural Beauty, environmental constraints and the limited capacity of the district's remaining mid- and lower order settlements to accommodate significant levels of growth, release will be required if DDC is to meet its housing and development commitments moving forward.

3.4.10 In our view, sustainable and accessible sites logically located adjacent to existing urban areas, including Deal, represent the most sustainable and reliable sources of growth for the Plan period, to support the role and timescales of strategic urban extensions and to deliver the significant number of new homes that are required within the forthcoming Plan period.

3.4.11 In terms of housing delivery within Deal, just 223 new dwellings are proposed to be delivered, the fourth most number of dwellings despite Deal's secondary status within the settlement hierarchy. We understand this reflects the previously high levels of growth seen within the previous (adopted) Plan period and the reduced supply of sites now available in the town. However, our client's site is testament to the continuing availability of sites and in our view, delivery within the previous Plan period does not preclude further development within the following Plan period, particularly where a settlement has proven to provide a reliable and sustainable source of much-needed new housing in a highly accessible location.

3.4.12 Moreover, greenfield edge-of-settlement sites are, in our experience, typically most capable of making meaningful contributions to the associated public infrastructure, affordable housing and mix of new homes that is urgently needed in the district.

3.4.13 The Sustainability Appraisal Scoping Report (2018) sets out that over the course of the adopted Plan period, the key sustainability issues facing Dover District in relation to housing are as follows:

Population growth, household growth and demographic change will place additional demand on key services and facilities such as housing, health, education and social care. The Local Plan offers a new opportunity to manage these pressures, encouraging mixed communities;

There is a need for affordable housing across the District. At present, the mean price of dwellings is higher than the national average. The Local Plan will help to expedite its delivery; and,

There is the need for a mix of housing types that cater for the needs of a range of people, including the growing number of single person and elderly households. Without an up-to date Local Plan, the required housing is less likely to be delivered.

3.4.14 It is evident that the new Dover Local Plan must allocate a mix of reliable sites capable of steadily delivering not only the quantum of housing that is required, but also the associated public infrastructure, affordable housing and a mix of unit types and tenures suitable for a wide range of future occupants.

3.4.15 The Housing Topic Paper (September 2022) provides further context and summarises under Chapter 7 'Historical Housing Delivery' that Dover has historically placed significant reliance on windfall development over the current adopted Plan period, with windfall sites accounting for 44% of all completed dwellings over the preceding 10-year period.

3.4.16 Moreover, it is highlighted that at the beginning of the 10 year period, the majority of new dwellings were being built on brownfield land. However, from the monitoring year 2013-14 onward development on greenfield land began to play a much greater part in the location for new development as show in figure 1 below. This trend of increased housing development on greenfield land is a result of the allocations within the CS and Land Allocation DPD being built out and is associated with an approximate doubling of completions in the district. From 2013-14 onwards the average number of completed dwellings per annum has doubled to that of the early years of the CS, as the strong delivery rates of greenfield sites form the predominant source of housing. This is despite an overall declining trend of brownfield completions towards the latter half of the Plan period. This is generally not an uncommon trend in the majority of local planning authority areas, where opportunities for available and suitable sites in urban centres dwindle throughout the Plan period.

Figure 1: DDC Brownfield / Greenfield Completions 2010/11 to 2020/21 (source: Housing Topic Paper September 2022)

3.4.17 In light of the above context, it is clear that the adopted Dover Local Plan suffered from an initial under delivery of Plan-led housing growth in which windfall development sources were largely required to take up the slack in the early phases of the Plan period, as major allocated sites failed to deliver at the rates initially expected.

3.4.18 It is equally apparent that initial slow completion rates were quickly addressed once greenfield allocations commenced development, feeding into strong completions in the latter half of the Plan period. In our experience, greenfield sites are typically

associated with stronger delivery rates and provide a reliable source of housing growth. The allocation of an appropriate mix of sites and scales is required in order to ensure steady and sustained Plan-led housing delivery across the Plan period and to avoid a reliance on windfall development to address the shortfall.

3.4.19 Consequently, given all of the above, it is imperative that the new Local Plan allocates a sufficient variety and scales of site capable of both ensuring steady and sustained housing completions and capable of making necessary contributions to public infrastructure and services, affordable housing and mix of unit types to address the key issues raised in the Sustainability Appraisal.

3.4.20 In our view, edge-of-settlement greenfield sites such as our client's Site, Land at Golf Road, represents one of the most reliable and sustainable source of housing delivery for the Plan period. Such sites are typically less constrained by wider factors and less affected by unforeseen delays such as land contamination. Moreover, greenfield sites typically are more capable of delivering the policy compliant affordable housing, unit mix and developer contributions that are urgently needed.

3.4.21 It is understood that the Plan is predicated on the delivery of strategic scale development at Whitfield comprising the development of circa 2,200 new homes. Consequently, in order to avoid a repetition of the previous Plan, the Council have sought to ensure that a pool of reliable greenfield allocation, including sites not dissimilar to that of our client are included within the Plan, capable of delivering the early growth that is required within the housing trajectory prior to the commencement of major allocations later in the Plan period.

3.4.22 We note that within the Housing Trajectory 'Appendix D', the Council have included allocated units from Years 4 onwards, with extant permissions (accounting for 5% non-implementation) demonstrated to be solely capable of delivering the growth required in Years 1-3. Notwithstanding our client's commitment to the Site, we support this pragmatic approach and suggest this represents a sound basis on which to set the district's housing trajectory. We note also the inclusion of an appropriate windfall allowance and the included contingency buffer to further ensure reasonable flexibility in the housing supply.

3.4.23 On account of all of the above, we submit that Land at Golf Road, Deal is required as a minor modification to form part of a sound strategy for growth in the district for the forthcoming Plan period. Land at Golf Road is capable of delivery early in the Plan period, representing a reliable source of housing growth in a highly sustainable and accessible location adjacent to the existing settlement boundary of Deal, consistent with the Council's preferred settlement strategy.

3.4.24 Our client objects to the omission of the Site and objects to policy SP3 as drafted, on the basis that there is a clear need to maximise the delivery of housing at sites within Deal, and this has not been undertaken – for example at Land at Golf Road, Deal.

3.4.25 Without prejudice to our client's support in for the premise of the proposed growth strategy which primarily directs growth at higher order settlements, we would urge the Council to re-visit its growth strategy and proposed allocations through a minor modification to allow a greater quantum of development within Deal to fully reflect its excellent sustainability credentials.

Policy SP4 'Windfall Development'

3.4.26 Separately, we note the provisions of policy SP4 windfall development. Proposals at Land at Golf Road would likely be acceptable in principle under this provision and we support the policy inclusion for appropriate, proportionate windfall development.

3.4.27 Our client is fully committed to the delivery of the Site which is available and suitable for delivery early in the Plan period. Notwithstanding the provisions of SP4, it is reiterated that our client fully supports the promotion of the Site for allocation as the most appropriate mechanism for delivery of the Site. The inclusion of Land at Golf Road would provide the opportunity for genuinely Plan-led development in Deal and the provision of associated benefits to public services and infrastructure, contribution to affordable housing supply and the delivering of a mix of house types and tenures.

Alignment with Sustainability Appraisal Findings

3.4.28 As part of the preparation of the Local Plan, the Council has identified and appraised a range of growth and spatial options through the Sustainability Appraisal (SA) which provides an assessment of how different options perform in environmental, social and economic terms, to help inform which option should be taken forward and combined with wider evidence documents, have been used to determine the growth and spatial strategy set out in the Plan.

3.4.29 Five potential distributions of growth were identified during preparation of the draft Regulation 18 Local Plan:

- Spatial Option A: Distributing growth to the District's suitable and potentially suitable housing and employment site options (as needed to deliver the scale of growth required).
- Spatial Option B: Distributing growth proportionately amongst the District's

existing settlements based on their population.

- **Spatial Option C:** Distributing growth proportionately amongst the District's existing settlements based on the District's defined settlement hierarchy.
- **Spatial Option D:** Distributing growth in the same way as the adopted Local Plan, focussing most growth in and around Dover town.
- **Spatial Option E:** Distributing growth more equally across the District's settlements: Dover, Deal, Sandwich and Aylesham, as well as the rural villages.

3.4.30 The conclusion of the SA was that Spatial Options C (settlement hierarchy) and D (adopted Core Strategy with Dover focus) generally perform the most strongly against the SA objectives, particularly when delivering the baseline growth scenario. However, given the environmental constraints that exist around Deal and Sandwich, very few suitable and potentially suitable sites have been identified in these towns. Given this, the Council's preferred option for the distribution of housing and economic growth comprises a combination of options A (HELAA sites), C (settlement hierarchy) and D (Dover focus). The distribution of housing and economic growth in the District is therefore primarily based on the settlement hierarchy, and influenced by site availability, environmental constraints and factors of delivery.

3.4.31 On account of the above, our client agrees that the proposed growth strategy, and by extension, policy SP3 in principle represents a sound and evidence-led strategy for growth. However, given the clear acknowledgement of the dwindling supply of available sites in the higher order settlements of Deal and Sandwich, which has necessitated a minor deviation from the strongest performing spatial options, we submit that where sites are available and suitable for development in Deal and Sandwich, these must be fully maximised, reflecting their accessible location and their ability to reduce the need to develop into less accessible and more sensitive sites elsewhere in the district to accommodate the growth that is required.

3.5 Site Specific Justification for Allocation

3.5.1 Land at Golf Road is considered highly conducive to the delivery of a high-quality, landscape-led scheme capable of making a significant contribution to the delivery of market and affordable housing in a logically contained location that would assimilate with existing patterns of development and is demonstrated to be acceptable in terms of flood risk.

3.5.2 Land at Golf Road represents an excellent opportunity for the delivery of approximately 60 high-quality new homes in a logical, highly accessible location in north Deal with capability to deliver a policy compliant quantum of much-needed affordable housing, a mix of house types, sizes and tenures and ability to make significant developer contributions to support existing and future public infrastructure.

3.5.3 The land itself is of no particular ecological value and is in private ownership, offering limited public benefit. To the contrary, the Site is capable of delivering strong biodiversity net gain, attractive internal and boundary landscaping, opening up public access to open space, play facilities and a development pattern that facilitates pedestrian permeability and encourages active travel in north Deal.

3.5.4 In terms of flood risk, it is apparent that no sequentially preferable sites are available and the allocation of sites in this location is justified. We note that two other sites in north Deal have been allocated under policy SAP16 'Deal Small Housing Sites'. However, neither of these sites meet the threshold of 'major development' and are highly unlikely to deliver affordable housing or meaningful developer contributions and are not of a scale conducive to delivering a genuine mix of house types, tenures and sizes. Moreover, neither site is anticipated to deliver any further public benefit beyond housing, with no capacity for open space, play space and limited scope of significant biodiversity or landscape enhancement. To the contrary, our client's site is capable of delivering significant benefits in all of the above areas and can assist in achieving the government's objectives of creating mixed and balanced communities as set out within the Framework and is the only site capable of delivering direct benefits to existing and future residents of north Deal.

Site Specific Sustainability Appraisal

3.5.5 Land at Golf Road, Deal was removed from consideration following the 2022 HELAA assessment (ref: DEA004) which defined the site 'unsuitable' primarily due to flood risk. The Site consequently was not considered against the SA objectives, however for the purposes of this representation, we consider the Site in the context of the SA objectives below.

3.5.6 We consider that the Site would generally perform strongly, with particular positives associated with SA Objectives related to housing, accessibility, the economy, sustainable transport and climate change mitigation, in large parts due to the edge-of-settlement location and proximity of the site to key services in Deal.

3.5.7 We accept likely disbenefits associated with the development of a greenfield site, including loss of agricultural land, however this would be true of the majority of greenfield sites and it is abundantly clear that Dover's housing need cannot be met solely on brownfield sites. We suggest that potential minor negatives / uncertainty associated with biodiversity and landscape, however these could be overcome via high-quality design, biodiversity enhancement and landscape mitigation proposed under a future planning application. Irrespective, these would not be

considered to outweigh the clear and tangible sustainability benefits associated with edge-of-settlement development and the site's consistency with the preferred spatial options.

Summary

3.5.8 Taking all of the above into consideration, our client is supportive of the premise of the growth strategy, however objects to the quantum of allocations within Deal, which in our view fails to fully maximise the sustainability credentials of the settlement and the capacity for growth, such that the Plan is unsound as drafted and requires minor modification to the growth strategy component. Land at Golf Road is considered wholly consistent with the objectives of the Plan and would form part of a sound evidence-led growth strategy consistent with the recommendations of the Sustainability Appraisal for the district to 2040, sufficient to ensure the Plan is found sound.

3.6 Deliverability

3.6.1 There are not considered to be any impediments to the Site being allocated for development commencing within the first five years of the Plan period. Combined with an appropriate number and scale of wider allocations in Deal and elsewhere across the district, this would ensure steady delivery of housing in Dover district across the majority of the Plan period and support the role and timescales of strategic housing delivery at Whitfield towards the latter half of the Plan period.

3.6.2 Persimmon Homes South East – a national housebuilder with a strong history and track record of delivery, together with an adopted and robust business plan for growth – has control over the site, and are committed to delivery of the site for residential development early in the Plan period.

3.6.3 For the reasons set out in this representation, the Site is considered suitable for the residential development of approximately 60 dwellings. The Site is adjacent and well contained by the urban area of Deal, one of the four higher order settlements in the district and the Council's preferred locations for Plan-led growth within the district. Development at Land at Golf Road would form a natural and logical development in Deal with excellent accessibility to day-to-day services and amenities via active travel modes within Deal itself and convenient access to public transport infrastructure (including Deal train station) for onward travel to key neighbouring settlements including Dover, Ramsgate, Canterbury and Ashford.

3.6.4 Finally, in respect of suitability, there are no physical limitations or problems such as access, infrastructure, hazardous risks, pollution, flood risk or contamination that would prevent development coming forward. It is acknowledged that the site is located within Flood Zone 3a, however this is true of the majority of north Deal which is protected by coastal flood defences. For the reasons set out within this representation, flood risk is not considered to represent an absolute constraint preventing the future development of the site, subject to detailed flood risk assessment and site layout design.

3.6.5 On behalf of our client, we submit that there are no known financial restrictions that would impact upon the viability of a future housing scheme or that would prohibit development coming forward within the early stages of the Plan period. To the contrary, we consider there to be an opportunity to deliver a high-quality, sustainably located residential development scheme consistent with the Council's proposed growth strategy comprising an appropriate mix of market and affordable housing and capable of contributing to a range of community facilities, public infrastructure and services locally.

3.6.6 At the time of writing, proposals at Land at Golf Road, Deal remain at an early stage, however our clients are firmly committed to progressing work on a future planning application in the short term and have a strong record of steady and sustained housing delivery once permission is secured.

3.6.7 The Site is in single ownership and there are no complicated legal agreements or covenants that would prohibit the ability to bring forward the Site early in the Plan period. The Site is therefore considered available and achievable for the purposes of the tests of deliverability.

4 Conclusion

4.1 Summary

4.1.1 This representation has been prepared by DHA Planning on behalf of Persimmon Homes South East in response to the Dover District Council Local Plan (Regulation 19) consultation which runs until 9th December 2022.

4.1.2 Our client controls 'Land Golf Road, Deal' and is promoting the residential allocation of the Site as part of the new Dover District Local Plan preparation process. The Site was submitted for residential development with capacity for approximately 60 units as part of the new Local Plan preparation, however the Site has not been taken forward within the Regulation 19 Pre-submission Plan.

4.1.3 Taking all of the above into consideration, we consider that the Site promoted at Land at Golf Road should have been included as a future housing allocation within the Dover District emerging Local Plan. The Site is considered, in principle, wholly consistent with the objectives of the Plan and would form part of a sound growth strategy for the district to 2040.

4.1.4 Our client is supportive of DDC's new Local Plan in principle, however our client objects to a component of the Plan, such that the Plan should be considered 'unsound'. It is put forward that a minor modification to the growth strategy is required in order for the Plan to be found 'sound', in which the quantum of Plan-led housing delivery within Deal should be increased to accurately reflect its second tier settlement status. Our client considers that given historic strategic under delivery in the district and wider uncertainties in the planning system, the Council should sensibly demonstrate an oversupply of reliable, deliverable sites early in the Plan period to ensure sufficient flexibility in housing delivery, should extant permissions or larger allocated sites not come forward or deliver as anticipated.

4.1.5 To be clear, Persimmon Homes South East support the premise of DDC's growth strategy, which includes further Plan-led development within Deal in line with its higher-order settlement status. However, we are concerned that DDC have planned at a significantly reduced level of growth in Deal, citing a dwindling supply of available land within and around the settlement. Consequently, the Plan fails to appropriately maximise the sustainable credentials of Deal and has resulted in a marginal supply of available, deliverable small and medium sites, insufficient to provide the flexibility in housing delivery that is required in accordance with national planning policy.

4.1.6 Given the dwindling supply of available sites within the District and the growing housing need, it is imperative that the sustainable credentials of these higher-order settlement sites are appropriately maximised to deliver the housing that is required in accordance with draft policy SP3 of the emerging Plan, and wider policies seeking to otherwise conserve and enhance the district's natural and historic environment and national planning policy objectives. We are concerned that this has not been fully undertaken and object solely on this basis.

4.1.7 Consequently, our clients object to the growth strategy component as drafted, on the basis that there is a clear need to maximise the delivery of housing at sites within Deal, and this has not been undertaken – for example at Land at Golf Road, Deal, where it the Site has been excluded primarily on flood risk ground without further consideration of detailed evidence or the capability of suitable mitigation to be put in place. The consequent omission of potentially circa 60 units, will otherwise be required to be delivered elsewhere in the district, in potentially less accessible and more sensitive locations.

4.1.8 Without prejudice to our client's support in principle of the proposed growth strategy which primarily directs growth at higher order settlements, we would urge the Council to re-visit its growth strategy and proposed allocations to allow a greater quantum of development within Deal to fully reflect its excellent sustainability credentials.

4.1.9 We submit that Deal is wholly capable of delivery significantly greater than the 223 dwellings allocated. We say that available and suitable sites exist, including that of our client's at Land at Golf Road, Deal capable of delivering logically located, highly sustainable new homes in accessible location early in the Plan period, sufficient to provide greater assurance of steady and sustained housing delivery across the Plan period, balance the scale of delivery from strategic urban extensions and further assist in reducing the need to develop into more rural, typically less accessible and more sensitive locations within the district to otherwise deliver the growth that is required.

4.1.10 Accordingly, we submit that the inclusion of Golf Road, Deal would provide a medium sized site for the Council that could come forward quickly, complying with the Framework's requirement to provide a mix of sites and include specific sites for years 1-5 of the Plan period. Accordingly, we say that Land at Golf Road, Deal can further assist the Council in meeting the growing need for new homes in the district and is necessary to ensure the Council can have greater confidence in meeting its market and affordable housing targets in full as well as delivering wider public benefits to the local community within Deal.

4.1.11 In addition to being a highly sustainable and logical edge-of-settlement allocation, the Site is deliverable in a single land ownership with no viability issues, legal or third-party constraints present. Our client is fully committed to the delivery of Land at Golf Road and there are no impediments to the Site being capable of delivery within the initial 0-5 years of the Plan period.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful

For the reasons set out in the consultation response submitted on behalf of Persimmon Homes South East, it is put forward that a minor modification to the growth strategy is required in order for the Plan to be found 'sound'. These suggest modifications are set out in the consultation response submitted on behalf of Persimmon Homes South East (ref DHA/30289).

Allocate additional land in Deal

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Please refer to the consultation response submitted on behalf of Persimmon Homes South East (ref DHA/30289).
Include files	DHA_30289 DDC Reg 19 Representation - Golf Road Deal - Final.pdf
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP921
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The County Council welcomes the commitment to resist development that cannot be supported by the necessary infrastructure and services or that would result in a loss of services facilities.</p> <p>The County Council would wish to emphasise the necessity to provide the appropriate infrastructure mitigation in timely manner to support housing growth provision in the district over the plan period. The County Council has provided detailed comments on the Infrastructure Delivery Plan within this response.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will	

make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1310
Rep Status	Processed
Consultee ID	1252081
Consultee Full Name	Planning Department
Consultee Company / Organisation	Canterbury City Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	We observe that the Regulation 19 Dover District Local Plan proposes to meet the district's housing and employment needs within the district boundary. This is consistent with national policies and our agreed Statement of Common Ground and is welcomed by CCC.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1304
Rep Status	Processed
Consultee ID	1271717
Consultee Full Name	Quinn Estates
Consultee Company / Organisation	Quinn Estates Ltd
Agent Full Name	Lydia Frimley
Agent Company / Organisation	Iceni Projects
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3 (RE: Land at Ringwoud Alpines)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Text relating to Strategic Policy Extracted from SDLP1298. For Full representation including attachments please see original representation.) Housing needs Strategic Policy 3 (Housing Growth) addresses that Dover will make provision for at least 10,998 homes in the District over the Plan period, up to 2040. This target will be met through a mix of committed schemes, site allocations and suitable windfall proposals, however not all these are guaranteed to come through and be developed within this time. This along with the fact that the housing target is a minimum means that the Plan should be seeking to optimise development at designated settlements in Policy SP3 and SP4 such as Ringwoud. The HELAA that was undertaken identifies that just one part of the site, that was previously referred to as RIN002, has the capacity to accommodate up to 30 homes on just that land alone at average density without the remainder of the site. The other section of the site, that was previously referred to as RIN004, was identified to have the capacity to accommodate 7 homes at average density. All together the Site was identified to

	<p>have capacity for 37 homes at average density, yet the site is only allocated for 10 homes in the draft Local Plan. Quinn Homes aspires to deliver a minimum of 12 homes in this location to maximise the socio-economic benefits of development at this site.</p> <p>The allocation area has the potential to be expanded directly south to the Site to bring in additional land that Quinn Homes is promoting. This land can be brought forward for development should the Council need additional dwellings to achieve its housing target. An option 2 plan is contained at Appendix 2 of this representation showing how a scheme of 18 homes could be successfully be delivered if the allocation area is extended to the south.</p> <p>Of all the allocated sites in the Plan, 76.7% are greenfield sites and just 23.3% are brownfield. The subject land is part brownfield and therefore the site makes a positive contribution towards the brownfield: greenfield ratio in the District.</p> <p>The site is located within the Area of Outstanding Natural Beauty (AONB), however parts of the landholding have previously been developed, the land is well screened through existing field boundaries and boundary hedges and trees and the visual harm to the AONB is therefore expected to be minimal, with te development seen against the backdrop of the existing settlement.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	Strategic Policy 3 - Housing Growth
<p>Rep ID</p>	SDLP1150
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1330769
<p>Consultee Full Name</p>	Mr Beat Hochstrasser
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	P. 260, para 6.81: "..facility which demonstrably provides a net benefit to the community"
<p>2 - Do you consider this part of the Plan sound?</p>	No

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>To allow a small loss of Open Space as outlined below will provide a greater net benefit to the community as it will enable a larger area of Open Space to be restored and improved. The Evidence Base does not justify the current designation which will prevent recommended site improvements (see DDC Evidence Base OPEN SPACE AND PLAY STANDARDS PAPER Dec. 2019 p.17 Table 4.1.4: Rural Analysis Area Quality Summary).</p> <p>The site Off Mill Lane Eastry (site ref 393) is quite large at 0.53 ha and is designated as Amenity Greenspace but with the exception of several trees towards the north of the site. Visually (see pictures attached) this former builders yard and tile manufacturing site is more akin to a brown field site. The site is overgrown by brambles and covered with roof tiles and slag heaps of several tons of building rubble. We argue that while the trees must be protected, the rest of the site has been wrongly classified. This position is also supported by the DDC Evidence Reports: out of all the 120 Open Space sites assessed in the 2019 Open Space Assessment Report, this site is identified as the very lowest scoring amenity green-space in terms of quality (34.4%) and second lowest in terms of value (28.0%).</p> <p>Additional text insert by DDC from comment SDLP468</p> <p>This comment is an amendment to my previous comment in relation to PM5:</p> <p>If the proposed amendment to the Local Plan is approved and subsequent planning application to Dover district Council for a single dwelling is also authorised, provisions will be made to alleviate the current congestion on Mill Lane traffic by providing a car parking space for the adjacent property to the site's East access road, Bushley house. This will result in a further measurable and concrete net benefit to the community.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	This representation seeks to remove a small area from the open space designation of that site. This would enable a single dwelling unit to come forward (self build) under Strategic Policy 3 and taking account of all other Development Management Policies at the time of making the application. Living on site would enable us to restore, improve and manage the remaining open space, improve the quality of the overall site, including both access roads belonging to the site and tree maintenance, resulting in a measured enhancement to Eastry's open space provision and in a net benefit to the community.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	<p>The Open Space and Play Standards Paper (2019, page 17, table 4.1.4) rates 10 Amenity Greenspace sites, including the site "Off Mill Lane Eastry" as being "below quality" and recommends "Enhancing site quality should be explored where possible (e.g. exploring options for improved maintenance, drainage and enhancement of general appearance)."</p> <p>We wish to participate in the oral part of the examination to present how this amendment to the Plan will enhance the site quality and appearance of the area.</p>
Include files	Pics for Land off Mill Lane Eastry.docx Eastry.docx (5)
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1317

Rep Status	Processed
Consultee ID	1267622
Consultee Full Name	Rosalind Cox
Consultee Company / Organisation	Womenswold Residents
Agent Full Name	Rosalind Cox
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Land to the South of Aylesham
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note: No further details received on who is represented</p> <p>I think this plan should be scrapped because:-</p> <ol style="list-style-type: none"> 1. the land proposed for this development should be for agriculture ONLY and would not be suitable for development of an enormous housing estate. Brownfield sites are available and could accommodate housing. 2. increased traffic in this area of Outstanding Natural Beauty would be unsustainable and there is no public transport whereas the Colliery at Snowdown would be far more suitable for limited housing being next to a station. The Adisham Road is already under pressure and would not be able to sustain increased traffic volumes from thousands of houses. 3. Stress on public services in an area already at its peak. There are insufficient shops, doctors, dentists and schools 4. Sewage and Water Supplies - we are already in a 'Water Stressed Area' - increased sewage into a system already unable to cope with water companies continuing to dump sewage into our seas. 5. The loss of wild flower meadows, natural woodlands and farmland would be a travesty
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	That it be scrapped and replaced with a plan that either uses brownfield sites or does not expose the local community and area to pressures it cannot withstand; loss of wild flower meadows, natural woodlands and farmland would be a travesty

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1159
Rep Status	Processed
Consultee ID	1331449
Consultee Full Name	Mr Lance Austin
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP15 SITE WAL002
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	See attached detailed Objection
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness	See Conclusions on page 4 of attached detailed Objection

matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	Lance Austin Redacted.pdf
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1179
Rep Status	Processed
Consultee ID	1331629
Consultee Full Name	Mr Andy Beeching
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP50 - Land adjacent to Short Street, Chillenden (GOO006)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The evidence detailed in the Dover Local Plan regarding the potential to develop site SAP50 - Land adjacent to Short Street, Chillenden (GOO006) is flawed and inaccurate. It is further inconsistent with the Climate Emergency declaration of November 4th 2019 as it makes no consideration for the impact of this development on surrounding properties. An independent assessment of the site conducted by QVA Consulting (attached) provides an evidence based analysis of the site and identifies the following key conclusions

	<p>- current EA/SFRA surface water mapping does not reflect specific topography at the site</p> <p>- 98% of the site is at a high risk of surface water flooding</p> <p>- Conventional or SuDS drainage of the development is precluded by topography (no outfall), hydrogeology (no infiltration) and statutory flood risk obligations (increased flood risk offsite)</p> <p>- Measures required to pass the Exception Test would increase flood risk offsite.</p> <p>As regards the Climate Emergency declaration and duty of care, I refer you to Section 19 (1A) of the Planning and Compulsory Purchase Act 2004, which states</p> <p>“Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority’s area contribute to the mitigation of, and adaptation to, climate change.”</p> <p>Clearly a development that has the potential in increase the impacts of climate change on the local area including neighbouring properties is contra to the clear direction of said Act and the Climate Emergency declaration by DDC.</p> <p>Also attached is the final report of the National Infrastructure Committee on Reducing the Risks of Surface Water Flooding. It states</p> <p>Climate change and urbanisation are set to put more properties at risk. The number of properties in areas at high risk is set to increase by 2055, including:</p> <ul style="list-style-type: none"> • an increase of around 20,000-135,000 properties in areas at high risk due to the impacts of climate change, which will increase the intensity and frequency of heavy rainfall • an increase of around 35,000-95,000 properties due to new development putting more pressure on drainage systems. <p>A further 50,000-65,000 properties may be put in areas at high risk due to unplanned increases in impermeable surfaces (e.g. front gardens being paved over), which, alongside new development, is part of ‘urbanisation’– the conversion of natural (often permeable) environments to urban ones where rainwater cannot enter natural drainage systems.</p> <p>The greenfield site off Short Street is a natural run off for surface water and as such a natural mitigator of flood risks for existing properties along Short Street as well the noted heritage site of The Grange.</p> <p>Recently reported changes to the Levelling Up an Regeneration Bill state that the former targets for Local Authorities will no longer be relevant or compulsory. This means an abandoning of damaging centralised mandatory housing targets that have led to needless, unaffordable and poorly designed greenfield developments in favour of an advisory system that takes local character and need into account.</p> <p>Despite further registered concerns at the Reg 18 stage regards heritage (proximity to a listed building of significant historical importance) , environment (removal of hedgerows, destruction of wildlife habitat and hunting grounds for owls and bats), access and egress (site is approached on a single track road and has 3 other access points for local inhabitants), it is disappointing that the comments of the local community and Parish Council have been ignored and disregarded without consultation or direct contact. This leads to the conclusion that the process is fundamentally a tick box exercise and does not have communities’ best interests as the central pillar.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Removal of SAP50 - Land adjacent to Short Street, Chillenden (GOO006) from the local plan. It is not required economically, it is not relevant to sustainability of the local community, it is contra to climate change requirements and is likely to cause immeasurable future harm to adjoining properties. It is based on flawed assumptions and should be disregarded as a potential development site.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Given the flawed evidence for the site's inclusion it is preferable to explain in person the potential impact on adjoining properties as a result of increased flood potential.
Include files	NIC-Reducing-the-Risk-of-Surface-Water-Flooding-Final-28-Nov-2022.pdf 1025 Short Street, Chillenden - QVA Tech. Note - SW Assessment & Flood Study (2022 12 06).pdf (1)
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1186
Rep Status	Processed
Consultee ID	1266501
Consultee Full Name	Mr Alex Child-Villiers
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Land at Buttsole Pond, Eastry (EAS002)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>1. These additional houses will put huge stress on the village resources, given that it has limited schooling and no medical practices, and all roads within the village are single lane due to parked cars.</p> <p>2. With the 178 houses that have been granted planning permission, Eastry will already be There is no room for a further 10 houses or the 95 in this Local Plan - see the attached 175 comments on the Eastry Community Watch Facebook page about traffic congestion and the danger to lives on Lower Street.</p> <p>3. The whole Local Plan consultation process is unsound and probably illegal. (a) The public exhibition events were poorly promoted and occurred prior to the village receiving an excellent leaflet from the Parish Council, so very few people knew about them as is evidenced by just 300 people attending. (b) Most of the marketing has been web based, excluding many people from participating, such as my parents. (c) The web-based mechanism for providing feedback is over complicated and beyond most people's ability, including mine, to raise objections or comment.</p> <p>4. Given that the government is no long setting targets for numbers of houses built by local authorities, there is no need for this development which will have a detrimental impact on Lower Street and Eastry.</p>

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Exclude the land at Land at Buttsole Pond, Eastry (EAS002) from the Local Plan. In Section 6, I have commented on why I think the Local Plan is not legally compliant but I'm not a lawyer and am not qualified to comment on changes that would make it legally compliant.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1190
Rep Status	Processed
Consultee ID	1266501
Consultee Full Name	Mr Alex Child-Villiers
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	TC4S023 SA33 Land adjacent to Cross Farm, Eastry
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p><i>DDC Note: Document titled 'Facebook: Eastry Community Watch – Lower Street Traffic Complaints' was removed from objective for Data Protection reasons. It contains comments from Facebook and names. The comments relate to traffic on Lower Street (18 pages) and will be made available to the Inspector on request.</i></p> <p>I object to the inclusion of the land adjacent to Cross Farm (TC4S023), Lower Street, Eastry, in the Dover District Council Local Plan for the following reasons:</p> <ol style="list-style-type: none"> 1. Cross Farm (TC4S023) was not included in the previous Local Plan so there has been no consultation on it, as there was with the previous Local Plan, which has led to significant site allocations being removed from the plan. This is inconsistent with the spirit of this consultation process, is undemocratic and unjust. This shows total disregard for the views of the residents of Dover District Council. 2. The location of access to Cross Farm (TC4S023) is dangerous as it's on a busy road, one of the main ones into the village, which is largely single lane due to the parking of cars, making it hard to exit the site, and adjacent to a dangerous blind corner and is likely to lead to serious injury to the public or fatalities. For this reason, this location is unsuitable for additional houses, which is probably why none were built here in the past – see the attached 175 comments on the Eastry Community Watch Facebook page about traffic congestion and the danger to lives on Lower Street. 3. Developing Cross Farm (TC4S023) will have a detrimental effect on an area of significant amenity value to the village with listed buildings, including Cross Farm, the adjoining conservation area, and the Saxon burial ground. It will also adversely impact views from the public footpath that runs along the top of The Lynch and overlooks the site. 4. Once developed Cross Farm (TC4S023) will add to the already significant traffic congestion on a busy single lane (because of parked cars) bus route into the village and will impact the rest of the village, which only has single lane traffic due to parked cars. If the parking is to be banned there is nowhere for residents to park in the village and it will cause huge inconvenience to residents – see the attached 175 comments on the Eastry Community Watch Facebook page about traffic congestion and the danger to lives on Lower Street. 5. It will be impossible to develop Cross Farm (TC4S023) without causing huge inconvenience to the village because of the narrowness of Lower Street and the large number of construction vehicles involved – see the attached 175 comments on the Eastry Community Watch Facebook page about traffic congestion and the danger to lives on Lower Street. 6. Cross Farm (TC4S023) is not served by utilities, such as gas and sewerage, and given the limited size of it, connecting them is unlikely to be economically viable. 7. These additional houses will put huge stress on the village resources, given that it has limited schooling and no medical practices, and all roads in the village are single lane due to parked cars. 8. With the 178 houses that have been granted planning permission, Eastry will already be overdeveloped. There is no room for a further 10 houses or the 95 in this Local Plan. Eastry is a village not a town. All of its streets have single file traffic, not two way. 9. Given that the government is no long setting targets for numbers of houses built by local authorities, there is no need for this development which will have a detrimental impact on Lower Street and Eastry. 10. The whole Local Plan consultation process is unsound and probably illegal. (a) The public exhibition events were poorly promoted and occurred prior to the village receiving an excellent leaflet from the Parish Council, so very few people knew about them as is evidenced by just 300 people attending. (b) Most of the marketing has been web based, excluding many people from participating, such as my parents. (c) The web-based mechanism for providing feedback is over complicated and beyond most people's ability, including mine, to raise objections or comment.
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Classify the land adjacent to Cross Farm (TSC4S023) as unsuitable for development.</p> <p>In Section 6, I have commented on why I think the Local Plan is not legally compliant but I'm not a lawyer and am not qualified to comment on changes that would make it legally compliant.</p>

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I have no idea what this means but if it helps classify the land adjacent to Cross Faarm (TSC4S023) as unsuitable for development, I would like to attend.
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1384
Rep Status	Processed
Consultee ID	1268408
Consultee Full Name	Mrs Jan Gray
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>This land has had some work on pipes for the sewage system. It is not effective for the current number of houses as there is a regular sewage stench coming from the corner in your development plan for more housing.</p> <p>There are no places for any children who would move in to this development locally in primary schools. There will be no transport by the time this is built for children to be able to go to secondary schools. None of this housing will be financially achievable by local people or their extended families. The prospective buyers for these homes can only be the cash rich or business purchasers who can avoid many taxes to create income from rents that are unaffordable to local people. There is no infrastructure proposed for this section of the New Dormitory Town encompassing and extending both Aylesham and Adisham. No supermarket, no youth centre, no police, no doctors, no dentist, no focal point where communities can meet. No accommodation whatsoever for safeguarding the community. The ability of the land to absorb heavy rainfall is compromised, the ability of the land to absorb CO2 emissions is compromised, the ability of the land to grow food for our local people is removed entirely. We are in a cost of living and coming into an availability of purchasing food for our whole population crisis.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s)	Upgrade the housing stock you have and that housing association has to be of a decent human habitable standard. You have a lot of homes that are damp and mouldy, your relevant departments do not respond adequately nor timely to emergencies such as boiler breakdowns or water

you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	leaking through houses. You could just as easily as another authority, have been sued for harm to babies from mould and damp as another local authority was. Build on brownfield sites. build to a good sustainable standard ie passive solar heating, heat pumps etc so that the tenants of the landlords the houses are sold to are warm without draughts and with a low carbon cost to heat. Properly update the water and sewage systems to cope with the massive extra load on systems that are failing with the current load. Put in protections so that our rivers and our seas are no longer discharging fecal matter into our local rivers and the channel where so many like to swim. build a school for our teenagers so poor families don't have to struggle to pay £450 for each child each year for the privilege of going to a secular state school, then being terrified that your children can't get transport to the school anyway. Your planning has a role in the educational and health comprehensive failure for SEND children and along with them secondary school children in your villages, but all this (8k in total) extra housing without any of the vital infrastructure, will make this place like a ghetto.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I consider that this would be a reasonable adjustment to make the consultation process accessible
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1187
Rep Status	Processed
Consultee ID	1331701
Consultee Full Name	Mrs Rosalind Beeching
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Chillenden 4.291
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>The evidence detailed in the Dover Local Plan regarding the potential to develop site SAP50 - Land adjacent to Short Street, Chillenden (GOO006) is flawed and inaccurate. It is further inconsistent with the Climate Emergency declaration of November 4th 2019 as it makes no consideration for the impact of this development on surrounding properties.</p> <p>An independent assessment of the site conducted by QVA Consulting (attached) provides an evidence based analysis of the site and identifies the following key conclusions</p> <ul style="list-style-type: none"> - current EA/SFRA surface water mapping does not reflect specific topography at the site - 98% of the site is at a high risk of surface water flooding - Conventional or SuDS drainage of the development is precluded by topography (no outfall), hydrogeology (no infiltration) and statutory flood risk obligations (increased flood risk offsite) - Measures required to pass the Exception Test would increase flood risk offsite. <p>As regards the Climate Emergency declaration and duty of care, I refer you to Section 19 (1A) of the Planning and Compulsory Purchase Act 2004, which states</p> <p>“Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority’s area contribute to the mitigation of, and adaptation to, climate change.”</p> <p>Clearly a development that has the potential in increase the impacts of climate change on the local area including neighbouring properties is contra to the clear direction of said Act and the Climate Emergency declaration by DDC.</p> <p>Also attached is the final report of the National Infrastructure Committee on Reducing the Risks of Surface Water Flooding. It states Climate change and urbanisation are set to put more properties at risk. The number of properties in areas at high risk is set to increase by 2055, including:</p> <ul style="list-style-type: none"> • an increase of around 20,000-135,000 properties in areas at high risk due to the impacts of climate change, which will increase the intensity and frequency of heavy rainfall • an increase of around 35,000-95,000 properties due to new development putting more pressure on drainage systems. <p>A further 50,000-65,000 properties may be put in areas at high risk due to unplanned increases in impermeable surfaces (e.g. front gardens being paved over), which, alongside new development, is part of ‘urbanisation’– the conversion of natural (often permeable) environments to urban ones where rainwater cannot enter natural drainage systems.</p> <p>The greenfield site off Short Street is a natural run off for surface water and as such a natural mitigator of flood risks for existing properties along Short Street as well the noted heritage site of The Grange.</p> <p>Recently reported changes to the Levelling Up an Regeneration Bill state that the former targets for Local Authorities will no longer be relevant or compulsory. This means an abandoning of damaging centralised mandatory housing targets that have led to needless, unaffordable and poorly designed greenfield developments in favour of an advisory system that takes local character and need into account.</p> <p>Despite further registered concerns at the Reg 18 stage regards heritage (proximity to a listed building of significant historical importance) , environment (removal of hedgerows, destruction of wildlife habitat and hunting grounds for owls and bats), access and egress (site is approached on a single track road and has 3 other access points for local inhabitants), it is disappointing that the comments of the local community and Parish Council have been ignored and disregarded without consultation or direct contact. This leads to the conclusion that the process is fundamentally a tick box exercise and does not have communities’ best interests as the central pillar.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful</p>	<p>The removal of the site from the Local Plan as suitable for development due to the location and heritage of the site as well as its importance as a surface water run-off.</p>

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	To explain to the Inspector why the site is not suitable for development.
Include files	1025 Short Street, Chillenden - QVA Tech. Note - SW Assessment & Flood Study (2022 12 06) (1).pdf
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1267
Rep Status	Processed
Consultee ID	1271353
Consultee Full Name	Church Commissioners
Consultee Company / Organisation	
Agent Full Name	Mr Andrew Watson
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Text Extracted from Document sent from Savills on Behalf of the Church Commissioners. Representation has been split across relevant areas of the Local Plan. Full attachment and introduction to Policy comments can be found under reference SDLP1265 for Shepherdswell Site and SDLP1266 for Eastry Site.) Representations This section provides Representations on the Regulation 19 Local Plan and includes observations regarding the supporting evidence base. Comments are provided on the published evidence base documents which are listed below. <ul style="list-style-type: none"> • Sustainability Appraisal (September 2022) • Housing and Economic Land Availability Assessment (October 2022) • Infrastructure Delivery Plan (October 2022)

• Level 2 Strategic Flood Risk Assessment
 Observations on the Regulation 19 Draft Local Plan Policies

Strategic Policy 3 – Housing Growth - COMMENTS Paragraph 3.31 of the draft Regulation 19 Local Plan sets out that according to DLUHC and based on the baseline 2014-based Household projections:
 “for Dover District the latest housing need calculation is 611 dwellings per annum (dpa); a minimum of 10,998 new homes over the remaining plan period to 2040”. Table 3.1 (see Figure 4.1) in the draft Local Plan demonstrates a proposed Local Plan housing supply of 11,925 homes, which meets the housing need requirement of 10,998 new homes with a buffer of 926 homes. However, 926 homes create a buffer of only 8% of the required housing need. It is recommended that a larger buffer is adopted to allow for flexibility to ensure the housing need can be delivered across the plan period. Once made, Dover District Council will be able to demonstrate a 5 Year Housing Land Supply of 6.16 years, in accordance with paragraph 74b of the NPPF.

(DDC Note - Unable to display image - see attachment for full representation)

In the latest Housing Delivery Test (2021), Dover District Council only scored 88%. This means that the Council delivered 12% fewer homes over the last 3 years than it was required to do so. The majority of this under-delivery was at the Whitfield Urban Expansion as set out within Dover’s latest Authority Monitoring Report 2020-2021 in which only 278 dwellings had been delivered of the allocated 5,750. Table 3.3 in the Regulation 19 Local Plan illustrates that the Council plans to rely heavily on Secondary Regional Centres for the distribution of housing site allocations, with 3381 of the 5592 new required dwellings located just in Dover and Whitfield. A minimum of 2,200 new homes have been allocated to the Whitfield Expansion which equates to 39% of the total housing allocations for the emerging Local Plan to be located in just one development. There is a risk that the Council’s over-reliance on large, strategic sites such as the Whitfield Urban Expansion, will result in similar under-delivery of housing as historically present. Instead, there should be a wider range of smaller sites allocated as they are quicker to come forward in the earlier parts of the Local Plan Period. This philosophy is supported in paragraph 69 of the NPPF where it is stated that: “small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly”.

Recommendation: DDC should allocate more smaller sites in order to reduce the reliance on the Whitfield Urban Expansion and provide a larger buffer in order to more reliably meet their housing need across the plan period.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Local Plan Consultation Point Strategic Policy 3 - Housing Growth

Rep ID SDLP1295

Rep Status Processed

Consultee ID	1271717
Consultee Full Name	Quinn Estates
Consultee Company / Organisation	Quinn Estates Ltd
Agent Full Name	Lydia Frimley
Agent Company / Organisation	Iceni Projects
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3 (RE: Land to the North of Discovery Drive, Preston)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Text relating to Strategic Policy Extracted from SDLP1294. For Full representation including attachments please see original representation.) Housing Need and Supply Strategic Policy 3 (Housing Growth) states that Dover will make provision for at least 10,998 homes (611dpa) in the District over the Plan period, up to 2040. This target will be met through a mix of committed schemes, site allocations and suitable windfall proposals, however not all these commitments will be delivered and arguably a higher quantum with a larger buffer should be planned for to negate those sites that will not be developed in the plan period. Of all the new homes positively allocated in the Plan, 76.7% are on greenfield sites and just 23.3% are on brownfield sites. The low ratio of brownfield housing compared to greenfield reinforces the need to optimise the development of suitable brownfield sites such as the subject land. This is considered to be a valid consideration in relation to this representation's request for increased capacity on the site. The focus of the NPPF is to achieve sustainable development (Paragraph 8) and the Council should seek to encourage housing growth in the most sustainable locations, especially when they can ensure the achievement of societal improvements, economic benefits and positive environmental outcomes. The Site is well located with various other residential developments nearby, providing the opportunity for further social and economic growth in a settlement that would benefit from housing. In this regard, the site is the only land allocation at Preston, which is designated as a larger village in the settlement hierarchy, where a commensurate level of growth should be delivered, in accordance with Strategic Policies SP3 and SP4. The requirements of the draft Local Plan must be deliverable and achievable whilst meeting the local need in order for the plan to be effective for the district. It is considered that, in its current form, the plan strategy is over reliant on the Whitfield (SAP1) Strategic Allocation to provide the district's housing needs over the plan period and that optimising the capacity of allocated sites elsewhere within the District will help to reduce the District's reliance on Whitfield whilst assisting the Council in exceeding the minimum housing number.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance	

with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1425
Rep Status	Processed
Consultee ID	1272672
Consultee Full Name	Jill Cliff
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	housing and employment site allocations & SP3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Hi, the pictures you have sent out for each beautiful area just show what we are losing every time you plant houses on what was fields and woodland. The loss of habitats is shocking and the loss of agricultural land is scary. The rural village as we know it is not going to exist if we continue in this manner. Your local plan should show houses being built on brownfield sites only, renovating present buildings and using up land that is already ruined by concrete. A lot of small houses can be built in a small space, if we are short of homes. Yet most developments seem to be a small number of massive properties which don't house many families, but I understand make more profit. You should stop people having empty properties and second homes. This would cut the need for so many houses.

	Please don't ruin our land. Please.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Your local plan should show houses being built on brownfield sites only, renovating present buildings and using up land that is already ruined by concrete. A lot of small houses can be built in a small space, if we are short of homes. Yet most developments seem to be a small number of massive properties which don't house many families, but I understand make more profit.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1329
Rep Status	Processed
Consultee ID	1274099
Consultee Full Name	Rebekah Bates
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 37
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>The recent policy change on mandatory numbers for new housing means that individual developments for houses should be reviewed and that current plans are not sound, they do not comply with policy.</p> <p>The South east is under pressure and does not have the infrastructure to cope with the demands that new housing developments bring. It is one of the driest counties and so water stress will become a more serious issue.</p> <p>In Shepherdswell access from the A2 is by two narrow lanes. Both are unsafe for pedestrians, cyclists and horses. There is nowhere local for people to ride. I often struggle to walk the 50 m from the village hall to the shop with my two dogs. There is no traffic calming and cars do not slow down.</p> <p>The many extra houses expected at Elvington will increase this traffic as will the houses planned for the village itself. This is a major concern. I support the Green Party proposal for safe, well lit cycle lanes to link villages with stations but this does not help dog walkers. People move to the countryside to be able to access and enjoy green spaces but this is difficult with so many cars. We don't see children playing out as they used to.</p> <p>I am concerned about the destruction of hedges for new build projects. Tho the plan proposes to maintain as many as possible we have recently seen the ripping out of a perimeter hedge for the community trust housing next to the village hall. I do not trust that hedges and trees will be maintained and emphasise that mature hedging and trees offer so much more habitat than new planting which would need to be on a much greater scale if it is to offer the same benefits in terms of carbon capture as well as habitat.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Policy on housing has changed and so plans should change to comply with this. The housing which our village needs is sheltered housing for the elderly, many of whom are single, living alone, wanting to stay in the village. Providing purpose built accommodation for them would free up many houses for families. Have the needs of the often ageing population of villages been considered? A limited number of affordable housing is included in larger developments but this does not meet the needs of our ageing villagers.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>Strategic Policy 3 - Housing Growth</p>
<p>Rep ID</p>	<p>SDLP1875</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1272184</p>
<p>Consultee Full Name</p>	<p>Tony and Valerie Armitage</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	3.68 Windfall, unless existing settlements either present boundaries are respected there is suburban ribbon development creep from field to field. Plans should state previously existing settlement boundaries will be respected until Town and Parish councils agree changed with DDC in accordance with localism act 2011. New housing in Kingsdown will result in traffic jams – not public transport, retail and schools (schools have no money with sky high energy bills etc.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	SP3 housing growth statement – 'provide a greater choice of high-quality housing to meet the needs of Dover Districts growing population and changing demographic and address affordability issues' Not consistent with details in plan which underestimate the evidence showing a large part of district growth pop growth is due to ageing. The details thus render SP3 and SP5 less effective – not sound judgement. Social housing and not more 4/5 bedroom houses should have been planned for.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1284
Rep Status	Processed
Consultee ID	1331808
Consultee Full Name	Mr Robert Hogben
Consultee Company / Organisation	

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I object to KIN002 (SAP 34) being included in the draft LDP for the following reasons:</p> <p>The inclusion of SAP 34 is not legally compliant with NPPF 2021 item 11. (b)ii 'SPs should provide for objectively assessed needs for housing & other uses, . . . unless (ii) any adverse impacts of doing so would significantly & demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole'.</p> <p>The following arguments show why this development would have more adverse impacts than benefits and would not be sustainable.</p> <p>Kingsdown is a quiet village which has not developed into a larger settlement because it is isolated by its geography (see my later comments on local centres). Allocated money from developers would not 'improve' the infrastructure of the village as there is no space to provide parking or for widening roads or for improving any other physical infrastructure. The narrow single track roads through the village which are an inherent part of the character and charm of the village are also a limiting factor for the village in terms of further development. The roads in the village are already adorned with parked cars wherever possible, and there are very limited pavements in the village, this means pedestrians are often forced to walk in the middle of the roads and duck in-between cars when traffic approaches. Some parts of the roads have high walls and no pavements which, with current traffic levels, make walking perilous. Any increase in cars trying to park to use services or passing through the village, would be very dangerous. Residents of KIN002 would have to use their cars for almost all of their journeys, creating pollution and congestion.</p> <p>Furthermore, as the UK government have decided on 5/12/22 to stop putting pressure on local authorities to authorise unsustainable housing targets the LDP now needs reviewing in light of the new directives. The Dover District Area has, in recent years, been subject to considerable housing development, higher than that allowed for by the current local plan, and this development has been unsustainably concentrated into certain specific areas, because much of our district is either already overdeveloped, or not suitable for large scale development as it is either designated as an area of outstanding natural beauty (AONB), or it is heritage coast, or it is very low lying and liable to flooding or needed as floodplain.</p> <p>The continued inclusion of SAP34/ KIN002 land at Woodhill Farm, Kingsdown in the LDP is unsound, because, despite many concerns and reasoned arguments from residents the only concession seems to have been to reduce the housing numbers from 90 to 50; Due to the weak wording of the local plan that only suggests what would be 'preferred' by the district council, it is highly likely that the final number of houses would be in excess of 50 and possibly in excess of 90, if the proposal were to go ahead.</p> <p>The site has now been given a green allocation in the HELAA report despite its many issues and the fact that an adequate highways assessment has not yet been carried out and the HELAA highways assessment remains amber. The latest HELAA report states that the many failings can be mitigated for within the LDP. I argue that this is unsound and not justified nor consistent with National Policy NPPF 21. The evidence from DDC has not been used correctly. NE2 Landscape character and the Kent Downs; states in section 11.13 that DDC aims: <i>To ensure that all development coming forward over the plan period respects and reflects the character of the landscape in which it is located.</i> The DDC landscape</p>

character assessment of 2020 (LCA) shows that SAP34 / KIN002 falls within Ripple F3, *open chalk farmland and woodland*. **NE2** states; *the classification identifies 17 LCAs and defines issues of landscape management and development management which should be delivered over the plan period.*

Development Management guidelines include:

- *Conserve the rural character of the landscape ensuring that it continues to play a role in providing a rural separation between Deal and Kingsdown as well as a rural setting for the Kent Downs AONB.-Seek to reduce lighting and noise impacts on this landscape and in longer views through sensitive highway design/management. Conserve the distinctive narrow winding lanes and grassy verges.*

SAP 34 would not '*conserve the rural character of the landscape*'

SAP 34 would be right next to the AONB so would clearly not '*provide a rural setting for the Kent Downs AONB*'.

SAP 34 would, in direct contravention of the guidelines, increase '*lighting and noise impacts on this landscape*'.

SAP 34 would, in direct contravention of the guidelines, due to the raised setting of the site, negatively affect the rural setting of the AONB on '*longer views*' of this landscape, both looking into and out from the AONB.

SAP 34 would also, according to the HELLA Highways assessment, require the alteration of and therefore not '*conserve the narrow winding lane and grassy verges*' which form the main entrance to and help to define the character of, the quiet village of Kingsdown.

The Development Management guidelines also include:

- *Conserve the open skyline, avoiding the introduction of vertical elements such as pylons, telecommunications masts etc.- Protect and enhance views from more elevated areas and from the coast out to sea and towards landmark features such as Walmer Castle.*

SAP 34 is in an elevated position so it would not '*Conserve the open skyline*' of this landscape area of open chalk fields with woodland.

SAP 34 is in an elevated position so it would not '*Protect and enhance views from more elevated areas*' of this special landscape area of Ripple F3.

SAP 34 is clearly visible from many viewpoints within both the AONB and the Ripple F3 special landscape area, from along the A258 and the network of footpaths, and from the locally renowned 'Nelsons seat viewpoint'. I contend that it would therefore not '*protect and enhance the views of this landscape*'.

SAP 34 can, as I have mentioned be seen from within the Ripple F3 landscape area, and from certain directions it would be in the foreground of views out to sea, it would therefore not '*Protect and enhance views out to sea*'

SAP 34 has views out to the picturesque Ripple windmill, which I contend is a '*landmark feature*', therefore this development would contravene the development guidelines, by not protecting nor enhancing views towards '*landmark features*', which would be lost.

The development of SAP34 would result in the loss of an important buffer between the built environment of Kingsdown and the AONB. Ringwould Rd would lose part of its character and the main entrance to the village would be deprived of its character. Part of the AONB would be lost as would part of the character of the AONB. From within The Ripple F3, views across to Kingsdown and the sea would be negatively impacted and the open character of the landscape would be lost and pollution from light and traffic would increase. The HELAA sustainability appraisal states; *The site has been judged by Council officers to have the potential to moderately affect the District's landscapes, townscapes or seascapes.* I argue that this is not supported by the facts, and is not a fair appraisal of the probable impact of this development, especially when considered in the light of the site forming part of the LCA F3, the proximity to the nationally important AONB and the suggested necessary alterations to the '*distinctive narrow winding lane and verges*' which lead into what is at present a quiet rural village.

NE2 11.19 states '*The setting of the AONB comprises land adjacent to or within close proximity of its boundary, including but not limited to land which is visible from the AONB and from which the AONB can be seen.....Within the setting of the AONBs, priority will be given over other planning considerations to the conservation or enhancement of natural beauty, including landscape, wildlife habitats, tranquillity, dark skies, and geological features*'.

NE2 11.19 clearly and accurately describes the proposed site for SAP34. It is adjacent to and within close proximity of the AONB, it is visible from the AONB and the AONB can be seen from it. By allowing this development to go ahead, '*conservation of natural beauty, including landscape, wildlife habitats, tranquillity and dark skies*' would not have been given '*priority over other planning considerations*' I therefore contend that the development is not sound.

SP13 states that *the NPPF 2021 requires local plan policies to conserve and enhance the natural environment, to recognise the intrinsic character and beauty of the countryside and the wider benefits from natural capital and ecosystems.* Including SAP34 in the LDP is therefore in direct contravention of the NPPF, which means it is unsound as it would detract from the beauty of the countryside particularly the adjacent AONB.

The Kent Downs AONB management plan 2021-26 says *the Kent Downs AONB, perhaps more than any other of Britain's protected landscapes – AONBs, Heritage Coasts or National Parks, has experienced and is experiencing severe development pressure.* DEFRA evidence shows *'The Kent Downs AONB stands out as an area which has experienced major change, showing a rate of urban growth of almost 10%.pa, with the urban area spreading by 14 ha over the decade'*. The AONB in Dover District has suffered development at a disproportionate rate which indicates that planning pressures on our district are unsustainable as they are overflowing into this nationally important landscape area. National Planning Practice Guidance (NPPG) confirms that the Duty of Regard is *'relevant in considering development proposals that are situated outside National Park or Area of Outstanding Natural Beauty boundaries, but which might have an impact on the setting of, and implementation of, the statutory purposes of these protected areas'*. I would argue that because the entrance onto Ringwould Rd requires widening and changing of the road which will encroach into the AONB, to mitigate for it being unsafe, this will be detrimental to the setting and directly upon the AONB.

NPPF 2021 11 – making effective use of land - Planning policies and decisions should: 120 b *recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production.* As food security is such a national issue, including SAP34 for development is unsound and unsustainable as good agricultural land would be better served in producing food. I would add that the local plan talks about sustainability for future generations, but as the UK only produces around half of the food we need domestically, and the world population is growing and with global warming crops around the world are beginning to fail, it is highly likely that in the future we will need all the agricultural land we have to feed ourselves. Developing agricultural land is not sustainable.

Allocated money from the developers would not improve things as there is no space to provide parking in the village or for widening roads or for improving infrastructure. The narrow single track roads through the village which are an inherent part of the character and charm of the village are also a limiting factor for the village in terms of further development. The roads in the village are already adorned with parked cars wherever possible, and there are very limited pavements in the village, this means pedestrians are often forced to walk in the middle of the roads and duck in-between cars when traffic approaches. Any increase in cars trying to park to use services or passing through the village would be very dangerous. Residents of KIN002 would therefore have to use their cars for everything, creating pollution and congestion

Local Centres:

I would argue that the designation of Kingsdown as a local centre is unsound. Due to the nature of its location, with the undeveloped AONB, heritage coast and cliffs to the south, with no roads for access from this direction, the Sea to the east, with no villages, inhabitants nor roads, only Walmer to the north, which is closer to the town of Deal than to Kingsdown, but in any case, itself has better facilities than Kingsdown. To the west there are several small villages, such as East and West Langdon, but they are closer to and have better links to Dover, to the north west are Studdle, Ripple and Mongeham, but they are closer to and have better links to Deal. This leaves the small settlement of Ringwould, which is close to Kingsdown, but is cut off by the Arterial A258. Ringwould Road, which joins the two settlements, is steep and narrow in parts and not suitable for occasional cyclists or walkers, so most people would tend to drive between the two villages, however, there is very limited parking and limited facilities in Kingsdown, so even people from Ringwould are much more likely to frequent Dover, Walmer or Deal for everyday needs or services. All of this probably goes a long way to explain why Kingsdown has never developed wide roads and modern infrastructure.

The high proportion of second homes and Air b and bs in the village demonstrates that dwellings outnumber homes required, so there is not an *'objectively assessed need for housing within the Parish'*. If largescale development were to take place in Kingsdown, it is highly likely that, many of them would become second homes or Air b and bs. Unless houses used for these purposes are owned by local people who already live in the village, which is unlikely, such houses would bring very little to the village. To include SAP34 /KIN002 is therefore unsound and not consistent with NPPF 21.

NPPF 2021, Paragraph 73. b) states that suitable land for development should; *'ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;* However SAP34 is unsound because there are extremely limited opportunities for employment within Kingsdown and there is not *'good access'* to larger towns. There is no rail link, the bus service is very limited and reduced since Reg 18, and the roads are narrow and already at certain times, dangerously busy.

NPPF 2021 Paragraph 79, states; *To promote sustainable development in rural areas, 'housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby'*. Because as I have outlined, Kingsdown is not at the heart of other rural settlement, the development of SAP34 will not *'enhance or maintain the vitality of rural communities'*.

The HELLA highways assessment commented that the scale of KIN002 was too small to create enough new footfall to improve the bus service, I suggest it would also be insufficient to warrant any other new services either.

I have mentioned that Kingsdown is isolated by distance and due to poor public transport, due to the position of the A258 and due to the narrow roads leading to and from the village. For these reasons, it cannot be said to be part of a 'group of smaller settlements', where 'development in one village may support services in a village nearby'. New residents at KIN002 would mostly have to use their cars to visit Dover, Deal or Walmer for services, contributing to Carbon emissions and making the roads more congested and dangerous. For these reasons I believe the KIN002 is unsound and unsustainable.

For all of the above reasons I contend that classifying Kingsdown as a 'village centre' is not justified by the facts. It should be reclassified as a 'larger village', which would mean the only development permitted would be windfall development within the village boundary.

If Kingsdown were to be classified as a larger village, which I have shown is demonstrably appropriate, then there would be strict criteria limiting developments such as KIN002, which would not be allowed to proceed as it is outside the village boundary.

When using the criteria of the draft local plan SAP34 is not sustainable and unsound for the following reasons:

T11 Development should, in so far as its size, characteristic and location -Give priority to the needs of pedestrians, cyclists, users of public transport, car sharers and users of low and ultra-low emission vehicles.

The location and size of SAP34 means it will give priority to car drivers only so it will not be in line with T11. The HELLA appraisal said it will not be large enough to warrant improvement of public transport. It is not on a train route. There are poor footpath routes to the village and only narrow and winding lanes to the village and to local towns. There is a cycle route to Deal along the seafront, but this joins Kingsdown at the other side of the village and the route would probably be too far for most casual cyclists. It is probably too far for people to walk to Deal or Dover in order to use the facilities at these towns. Any attempt to improve the cycling and walking routes to the village would result in loss of the distinctive character of the winding lanes which the 2020 LCA F3 Ripple seeks to preserve.

T12 New accesses and intensified use of existing accesses onto the road network will not be permitted if it would result in a clear risk of crashes or traffic delays unless the proposals can incorporate measures that provide sufficient mitigation. I consider this site to be unsound as there would be an increase in crashes and traffic delays. Widening the junction at the exit would not do anything to improve the narrow dangerous access through Kingsdown village. It would also not improve the access from Ringwould Road onto the very busy A258 at Ringwould. Widening the road at the access point on Ringwould Road, would mean losing part of the Kent Downs AONB and would also effect the character of the winding lane entering the village, which as I have mentioned the 2020 LCA F3 Ripple seeks to preserve. Land either side of Ringwould Road is not owned by the same party as KIN002 and so cannot make up part of this development. Furthermore, any attempt to alter Ringwould Road at any point would also result in the loss of the charming character of the road. The access is also complicated. It is used by visitors to the play area and the landowner to the left as you enter the field from the road. No mention is made in the HELAA highways assessment of the landowner needing access. ER5 also crosses the entrance which would therefore be dangerous to pedestrians crossing from the field back to the village. ER5 is a very busy path used by dog walkers on a daily basis. The sight lines onto Ringwould Road in both directions are poor. Ringwould Rd is very narrow in places and in places, 2 vehicles cannot pass each other. Turning left out of the site would be onto a narrow road going into a 20mph zone. Turning right is in a 50mph zone with a bridleway and footpath crossing with poor visibility and slow tractors turning out onto the road. There has already been an RTC resulting in a fatality and serious injury on Ringwould Rd. I would argue that issues with access alone mean that this site is not suitable and unsound for development. A medium pressure gas main crosses KIN002 diagonally and crosses the road at this access point which would require careful consideration when changing the access. This would cause a lot of disruption to the villagers as this is the only classified road in and out of the village and as poor as it is, is the main route to the A258. If traffic had to divert via Deal this would create extra pollution and congestion for a protracted period of time which would be contrary to SP1 and the climate emergency declaration by DDC.

T13 Applicants must demonstrate that traffic movements to and from the development can be accommodated, resolved, or mitigated to avoid severe cumulative residual impacts.

As I have already pointed out, traffic movements to and from the site would be on to Ringwould Road. This road is narrow, in places steep, in places it has high banks and hedgerows which preclude views along it, it sometimes floods in the dip before the hill towards Ringwould and I have known many winters when it has been impassable because of snow. If cars from the proposed development SAP34 were to turn left onto Ringwould Road they would soon enter the narrow streets of Kingsdown where there are many parked cars and very little pavement for pedestrians. If they were to turn right they would find themselves on the narrow, twisting, steep, liable to flooding and with poor sight lines, high banks and hedges, Ringwould Road. After this they would have to try to get onto the busy, at times extremely busy A258 at Ringwould. Ringwould Road is crossed by an official footpaths, and an official footpath/bridleway, both are on bends where it is difficult for pedestrians and horse riders to see what traffic is coming or to be seen by drivers. Pedestrians also use Ringwould Road to access the special needs school and Ringwould Village Hall which are both situated on the road close to the junction with the A258.

	Any increase in traffic on this Road would be impossible to mitigate for without damaging the character of the 'distinctive winding narrow lane' which the 2020 LCA F3 Ripple seeks to preserve.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	SAP34 should not be included in the LDP. DDC should now reconsider the housing allocation targets in light of the government announcement of 5/12/22, particularly with respect to rural settlements.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1204
Rep Status	Processed
Consultee ID	1331099
Consultee Full Name	Rosie Cavalier
Consultee Company / Organisation	Esquire Developments
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3, SP4
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

SP3 relevant wording in bold below

1.0 INTRODUCTION

1 i) About the Kent SME Developers Network

These representations have been prepared by the Kent SME Developer Network (the Network) a consortium of Small and Medium (SME) Developers who are located in or operate within Kent and Medway. The Group is currently chaired by Paul Henry, Managing Director of Esquire Developments, an SME Housebuilder based in Longfield near Dartford, Kent.

The Network was formed in November 2019 and presently comprises approximately 30 participants including SME Housebuilders and Developers (of varying size and scale) and Registered Providers. In addition, the Network includes representatives of Local Planning Authorities including Medway Council, Swale Borough Council, Tonbridge and Malling Borough Council, Tunbridge Wells Borough Council and Maidstone Borough Council. It is the intention that the Network grows over time to cover all of Kent including additional SME Developers and Local Planning Authorities. The Network has recently engaged with Dover District Council.

The Network was set up to provide a platform for SMEs to discuss relevant planning and delivery issues associated with bringing forward smaller developments and to positively and proactively engage with Local Planning Authorities at the plan making and decision taking stages.

The Government has recognised the need to support existing SMEs and encourage more into the market in order to diversify the housing market from the volume housebuilders and generate choice and improve quality of homes being built. The Government has described SMEs as being of 'National Importance'. Appendix 1 sets out the narrative behind the support and role for SME Housebuilders.

The Network meets on a quarterly basis to discuss and explore relevant SME related issues, including working through planning related matters. Notable attendees at past meetings including Steve Quartermain (prior to his retirement as Chief Planner at the then MHCLG) and Homes England.

In addition to the meetings acting as a discussion platform, the SME Network is also designed to act as a support and mentoring network, where land opportunities can be shared, or knowledge/experiences drawn from in-house teams in order to help each other and strengthen the SMEs. The Network can also act as a collective voice in the preparation of Local Plans or other consultations - such as this.

The Network comprises the following:

SME Housebuilders and Developers

Esquire Developments

Fernham Homes

Wealden Homes

Fernfield Homes

Meridian Construction

Aile Homes

King and Johnstone

Clarkmores

Clarendon Homes

Gillcrest Group

A&E Property Ltd

Country House Homes

Classicus Estates

Woodcroft Developments

Provectus Developments

Penenden Heath Developments

Grandera Homes

Windmill Construction
Jarvis Homes
Aspire Designer Homes
Kentish Projects
Woolbro Homes
Cooper and Cole
Hillstone Homes
RJC New Homes
Wedgewood Homes
TG Designer Homes
Endeavour Construction Limited
Unique Land

Registered Providers

Hyde Housing
MHS

Local Planning Authorities

Medway Council
Maidstone Borough Council
Swale Borough Council
Tunbridge Wells Borough Council
Tonbridge and Malling Borough Council
Dover District Council
Folkestone District Council
Canterbury City Council

Agents

Tetlow King Planning
David Hicken Associates
Barton Willmore now Stantec

The Network welcomes ongoing engagement with Dover District Council and any other interested party.

For clarity, the representation contained in this response relate to the Members of the Network that are SME Housebuilders and Developers and not the Registered Providers, LPAs or Agents.

1 ii) Content of Representations

These representations have been prepared by the Network which seek to address strategic matters. Any site-specific matters will be addressed by individual SMEs within their own representations.

The representations are structured to respond to each relevant question posed within the document.

In summary the headline points are as follows:

We support the council identifying the need to meet the small sites requirements and support SME developers.

However, we are not convinced that the requirements of Paragraph 69 have been met in respect of 10% of allocations being on 1ha or less:

We support the principle of a Policy such as SP4, however we consider that amendments to the policy wording and the defined policies map are required in order to ensure it is 'effective' and therefore 'sound'.

We encourage the Council to continue to work with the Network, including the consideration of a small sites policy to help support SME developers within the plan period.

RESPONSE

Requirement of Paragraph 69

Paragraph 69 of the NPPF requires Local Planning Authorities to identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare. This is a clear requirement and therefore 1,099 dwellings need to be allocated on sites of this nature.

Central Government recognises the problem of bringing SMEs into the market and has sought to 'level the playing field' in the context of supporting small and medium sized sites at the plan making stage. Crucially, the NPPF 2019 confirms in paragraph 68 that:

Small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:

- 1 a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;
- 2 b) use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward;
- 3 c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and
- 4 d) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.

The NPPF provides for a clear direction to LPAs, that it must identify land to accommodate at least 10% of their housing requirement that are 1ha or less.

Paragraph 3.52 of the Reg 19 plan sets out that 11.4% of the housing requirement are on small sites. These sites are listed out in Appendix 3 of the Housing Topic Paper September 2022 and the table shows that the total of 1,249 dwellings are considered to be identified for delivery on small sites.

The Local Plan states (para. 3.52) that these small sites have been identified through the Local Plan and the brownfield register. Of the 1,249 dwellings, a total of 516 dwellings are allocated under 'small sites' within the Regulation 19 plan.

The remaining dwellings (733 dwellings) are to be found in the Brownfield Register. The Register is available on the Dover District Council website and was last updated in February 2021- nearly 2 years ago. Shown at Appendix 02 of this statement is the list of sites that make up the 11.4% as suggested by the council which fulfils this requirement, alongside comments taken from the Brownfield Register. A number of the sites listed in the Brownfield Register are noted to be 'complete' or 'built out'. This equates to a total of 313 units.

We consider a site that has been noted as complete or built out can no longer be counted as a site that will contribute towards meeting the housing need. Accordingly, this element should be removed from the total supply which would reduce the figure to 936 dwellings or 8.8% of the total requirement of 10,998 dwellings.

Further to this figure, there are a number of sites that are listed as 'under construction' (209 in total). It is not clear when these comments have been added to the Brownfield Register, but for a number of the sites listed, it is clear from sold house price data that a number of these dwellings have now been completed.

We consider it important, therefore for Dover District Council acknowledge that there could be as many as 522 dwellings on the Brownfield Register that are no longer available and that the Brownfield Register should be re-assessed.

We expect that following this review, the number would fall from 1,249 dwellings to 727 dwellings or 6.6% of the required total.

The SHLAA is a critical piece of work in this regard and it is crucial that sites of this scale are identified and that they are being promoted by SME developers (or capable of being delivered by an SME developer). It is not simply a numbers game but a qualitative exercise to ensure that a sufficient number of these small sites are identified to support the intent of paragraph 69 – which is to support SME developers.

Small sites have a significant advantage as they can deliver quickly. Accordingly, in allocating smaller sites (of 1ha), or indeed supporting SME developers in bringing forward larger 'small sites' (there are a number of SME Developers capable of delivering sites in excess of 1ha and up to 100 dwellings or more per site), it will help deliver housing in the short term and firstly seek to rectify the existing housing land supply issue and deliver in early years of the plan period whilst the larger, longer term sites move through the planning and delivery process.

It is critical to have a good blend of sites and small site and SME developers are key to the success of delivery. SMEs also seek to deliver good design and set a good standard in the Borough.

Support for SME's/Small Sites

We support the principle of Policy SP4- Residential Windfall Development which seeks to deliver small scale windfall development in certain locations. This allows SME's to come forward with development in sustainable locations.

However, we consider the wording of the policy is too restrictive and will not result in an effective policy. This is in part because the wording is too restrictive when referencing land that is within our immortally adjacent to settlement boundaries and that the settlement boundaries themselves are tightly drawn around these areas. The Regulation 19 Policy Map settlement boundaries do not include all existing built form and the proposed new allocations are also excluded from within the boundaries.

In order for this policy to be effective and to meet the windfall requirement (1,050 dwellings) we consider amendments are required to the wording of the policy and that the settlement boundaries as shown on the Policies Map should be modified to include the existing built form and the built form proposed in the Local Plan.

The wording of Policy SP4 should be amended as follows:

SP4 - Residential Windfall Development

1 Residential development or infilling of a scale that is commensurate with that of the existing settlement will be permitted within, or immediately adjoining or close to the existing built up confines of the settlement boundaries, as shown on the Policies Map, of the following settlements:

Ash, Alkham, Aylesham, Capel-le-Ferne, Deal, Dover, East Langdon, Eastry, Elvington, Eythorne, Guston, Goodnestone, Kingsdown, Lydden, Northbourne, Preston, Ripple, Sandwich, Shepherdswell, St Margarets at Cliffe, Wingham, and Worth.

1 Minor residential development or infilling or adjoining or close to the existing built up confines of the settlement boundaries of a scale that is commensurate with that of the existing settlement will be permitted within the settlement boundaries, as shown on the Policies Map, of the following settlements:

Ashley, Barnsole, Betteshanger, Chillenden, Coldred, Denton, East Studdal, Finglesham, Great Mongeham, Martin, Martin Mill, Nonington, Ringwould, Staple, East Stourmouth, Sutton, Tilmanstone, West Hougham, Wingham Green, Woodnesborough and Wootton.

Subject to all of the following criteria being met:

1 a) It is of a scale that is appropriate to the size of the settlement and the range of services and community facilities that serve it, taking account of the cumulative impact of any allocated sites and committed development;

1 b) It is compatible with the layout, density, fabric and appearance of the existing settlement and individually or cumulatively, would not result in the coalescence or merging of two (or more) separate settlements, or the significant erosion of a gap between settlements, so as to result in the loss of individual settlement identity or character;

1 c) In the case of settlements in, adjoining or surrounded by, the Kent Downs AONB or Heritage

Coasts, that the proposal complies in the first instance with the primary requirement of conserving and enhancing landscape and scenic beauty, and, where this is demonstrated, that the scale and extent of development is limited, sensitively located and designed to avoid or minimise adverse impacts on these designated landscapes;

1 d) It would conserve and enhance landscape character and biodiversity and not result in an unacceptable intrusion into the open countryside or the loss of, important green spaces within the confines that contribute positively to the existing character of that settlement;

1 e) It would preserve or enhance any heritage assets within its setting;

2 f) It would not result in the significant loss of best and most versatile agricultural land currently used for agriculture;

1 g) Where the site adjoins open countryside, an appropriately designed landscape buffer is included;

2 h) It would not have an adverse impact on the living conditions of existing adjoining residents;

3 i) Where development would result in the loss of active employment, open space, sport or

community facilities within the settlement that such development is consistent with the requirements of policies EN2, PM5 and PM6 of this Plan;

1 j) Traffic movements generated from the development do not result in severe impacts to the highway network that cannot be mitigated. This should be considered through transport assessments carried out in accordance with Policy TI2 which must take account of the cumulative impact of sites allocated for development. Proposals must not prejudice the ability of sites allocated for development to come forward due to limited highway capacity; and

1 k) It would be in accordance with all other relevant policies in the Plan.

2 New dwellings (both isolated and non-isolated) elsewhere in the countryside outside of settlement

boundaries will only be permitted in exceptional circumstances under one or more of the criteria

1 to v), and subject to meeting criteria a) to k) above:

2 i) there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside;

1 ii) the development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets;

iii) the development would re-use redundant or disused buildings and enhance its immediate setting;

1 iv) the development would involve the subdivision of an existing residential building; or

2 v) the design is of exceptional quality, in that it: - is truly outstanding, reflecting the highest standards in architecture, and would help to raise standards of design more generally in rural areas; and – would significantly enhance its immediate setting, and be sensitive to the defining characteristics of the local area

In order to help meet housing needs as well as support SMEs and Self and Custom Builders, we consider the Council could still include a small sites policy or a policy which recognises the role of rural communities and supports windfall developments.

The Network is championing a small sites policy, which is presently being endorsed by a number of LPAs including Swale and Medway Council.

Any future plan should provide for a policy framework to allow SMEs to deliver throughout the lifetime of the plan, particularly in rural areas.

As part of the Network's objective, it has sought to introduce a policy into emerging Local Plans that seeks to support small and medium sized developments that builds on the 1ha site requirement but expands this into a policy framework that can allow SMEs to successfully operate within the policy framework of a Local Plan where there are limited opportunities through the allocations in which the Council has made (i.e. on larger sites).

In this respect, there is often a large windfall figure required to be met, or LPAs find themselves in a position where the presumption in favour of sustainable development is applicable. The SME policy set out below is a policy in which the Network considers would provide the opportunity for SME sites to come forward, whilst offering the LPA an enhanced development coming forward that is typically delivered by an SME – i.e. in respect of design quality or for instance carbon efficiencies.

Whilst the ideal scenario would be for the same policy to be adopted by each Council (and therefore apply a level of consistency in understanding and application of the policy), we also recognise that each LPA has a specific set of circumstances that may require the policy wording to be tweaked. This maybe the case in DDC and the Network would welcome further discussions as to how such a policy could be introduced into the Plan.

The suggested wording of the policy is as follows, but can be tailored to suite each LPA.

Policy [insert Policy Number] Small Sites

In order to recognise the value of SMEs and small scale sites, the Council will support development of unallocated or windfall small scale housing (C3) and approve applications providing the harm does not demonstrably outweigh the benefits; and where:

- 1 The site does not exceed 60 dwellings (net) and is of an appropriate scale to its location;

- 1 The site is being brought forward by a recognised SME Developer and is not part of a larger site;

III. The proposed development delivers;

- 1 A bespoke design approach;
- 2 A high quality design that is locally distinctive;
- 3 Is sympathetic to the character of its location;
- 4 All dwellings meet National Design Standards and endeavor to deliver a range of Carbon reduction build techniques;

- 1 The proposed development preserves residential amenity, designated heritage assets and core environmental assets and increase net biodiversity.

- 1 A flexible approach will be encouraged to the delivery of Affordable Housing assessed on a site by site basis. Where on site provision is demonstrated through evidence to be unviable or unattractive (less than 70% Open Market Value) to recognised Registered Providers, the Council will permit alternative levels of Affordable Housing or alternative forms of tenure, including First Homes, payment in-lieu of on site provision or another form of recognised Affordable Product as defined in the NPPF.

It is recognised that SMEs can deliver quickly and applicants are encouraged to explore if a reduced implementation period is appropriate.

A Small Sites policy will allow for SMEs to operate within the Plan Led system and will allow both Small and Medium sites to come forward (i.e. sites above 1ha and up to 60 dwellings). Such a policy will allow an SME to come forward with a planning application that meets locally defined specific criteria, such as high-quality design, low carbon footprint, reduced time limits for implementation etc and a flexible approach to the

delivery of Affordable Housing. On the other side of the coin, the Council will receive higher quality developments being submitted that are in character with more rural fringe locations (remembering the SME site typology), but that those Rural Fringe locations can be supported with an appropriate amount of growth that will assist in preventing, slowing or reversing their cycle of decline.

Such a policy would provide for additional weight to be afforded to an SME application, and thus allow greater weight to be applied to the application in the overall planning balance. This would reduce risk to an SME and increase certainty at the planning stages, as the SME can tailor their scheme to meet the specific criteria. The LPA also recognises that it would result in a development that meets Building Better Building Beautiful objectives and potentially addressing Climate Change issues.

Crucially, the policy is designed to deliver up to 60 dwellings (and thus meet the M of SME as much as the S) but is worded in a way that seeks to ensure the development coming forward in any given location is consistent and respectful to the area that it is in i.e. a scheme of 60 dwellings may not be appropriate for a small village, but 20 maybe, and therefore a policy that refers up to a figure of 60 dwellings is deemed acceptable ? i.e. the policy is fully flexible.

In addition, the 60 dwelling threshold is very much seen as the scale of developments where larger SME's start to compete with Volume housebuilders on sites. A volume housebuilder will tend not to drop below 60 dwellings and thus the Policy is desgned to really assist SME delivery and support the delivery of bespoke high-quality development, but also directly respond to certain SME challenges, such as how to deliver small numbers of Affordable Housing on any given site.

The Network recognises that other Kent LPAs are seeking to introduce a Small Sites Policy and a key aim for the policy is that there is a level of consistency in the wording across a number of LPAs, in order that the interpretation and understanding of the policy is also consistent on a cross boundary level – again seeking to reduce the risk at the planning stages to an SME.

In addition to the Policy itself, we also consider that an SME protocol should be prepared which provides guidance and clarity for SMEs at the pre-application and post-submission stages. The protocol would recognise the need to engage with SMEs and understand that a flexible approach is needed to certain issues (such as site typology/affordable housing provision).

The protocol could include a standard PPA timeframe and fixed cost to ensure that sufficient officer time is allocated to an SME application. Whilst SME applications tend to be on the smaller scale (when compared to larger volume housebuilder submissions), those applications are critical to the SME themselves, and accordingly the Network often discusses the frustration at the lack of engagement from LPAs on their applications – often perceived by SMEs in the Network as being at the bottom of the pile.

This position is especially so at the pre-application stage, where often paid pre-application advice is sought, but either never received or delayed, in some cases up to 9 months. Whilst this is a matter than may extend beyond Dover District Council, this is a 'real life' significant issue as a pre-application response is so important to an SME to determine the extent of risk that a site may carry.

The importance of a planning consent is vital to the success of an SME, no matter how small (or large) that scheme is, and greater engagement is always encouraged. This works both ways and greater engagement can improve the submission material of an SME and thus also reducing risk.

A further burden on SME's, and a point that the above policy is seeking to assist with is delivery of Affordable Housing. This is a wider matter than DDC, but it is well recognised that Registered Providers are rarely interested in sites unless the number of affordable homes being offered equates to at least 20 affordable dwellings. For DDC, this means that any site that falls under a 67-dwelling threshold will likely struggle to gain interest in a registered provider (at 30% AH requirement). The policy seeks a flexible approach to how Affordable Housing can be delivered by an SME in instances where it is the RP that is not interested, not that the SME does not wish to provide affordable homes.

Please see attached representations with appendices in full

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful

See above and attached representations in full

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	Kent SME Reps to Dover Reg 19 Nov 22 final with appendices.pdf
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1297
Rep Status	Processed
Consultee ID	1331589
Consultee Full Name	Ms Joanne Pannell
Consultee Company / Organisation	Eythorne Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Eythorne Parish Council's attached representation relates to Strategic Policy SAP29 on page 170.
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC Edit - Text extracted from attachment to SDLP484 and 486. See that attachment for full text Eythorne Parish Council Regulation 19 Consultation Response 1. Introduction 1.1 The Local Plan document interestingly contains a Leaders Forward in which is stated "there's a need for a substantial number of new homes to be built within the district". It goes on to state that "we can enjoy a wonderful, world class countryside and the protection of it is fundamental to achieving successful, sustainable growth for existing and new residents, businesses and visitors". It is therefore critical that such a 'need' is met with due consideration of the actual needs of any specific area and a comprehensive assessment completed to ensure sympathy to and protection of the area in which existing residents have lived and enjoyed for decades. To get this wrong will mean any new development will carry detrimental outcomes in perpetuity and have significant negative effects for a lifetime.

	<p>1.2 It is the opinion of Eythorne Parish Council that the above considerations, including the Leaders Forward, have been overlooked in putting forward development proposals in the new Local Plan for areas SAP28 and SAP29 and, as was its position at Regulation 18 consultation, objects to these two areas being included in the Local Plan 2040.</p> <p>2. Housing Allocations Suitability</p> <p>2.1 Both SAP28 and SAP29 areas are currently open countryside and consequently would be classed as greenfield development. Why develop greenfield land when a brownfield land stock of some 174 hectares already exists within the Dover district supporting some 5000 new homes, 10 years worth of the new local plan period. The geographical location of Elvington and Eythorne means they currently enjoy a valuable rural outlook between them (see photos below), overlooking productive agricultural land which provides a welcome relief between the built up areas of both villages. Such a valuable attribute will be lost as a result of SAP28 and the two villages will very much become one with the potential 300 homes identified, creating a sprawl of the existing built up areas and converting a part of our world class countryside into tarmac, bricks and mortar, without any credible justification.</p> <p>2.2 More than ever before is the importance of greater self sufficiency in food production and hence the Government Food Strategy policy paper. The headline to this paper states, this strategy sets out what we will do to create a more prosperous agri-food sector that delivers healthier, more sustainable and affordable diets for all. To fulfil such a vision requires investment and development but more importantly to retain existing resources and production. The local plan proposals for SAP28 and SAP29 flies directly in the face of such a vision and the Parish Council strongly opposes DDC in casting aside any consideration of the food strategy intentions and the opportunity for food security.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	No
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	Strategic Policy 3 - Housing Growth
<p>Rep ID</p>	SDLP1207
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1332924
<p>Consultee Full Name</p>	Amy Aldridge
<p>Consultee Company / Organisation</p>	Gladman Developments Ltd
<p>Agent Full Name</p>	Amy Aldridge

Agent Company / Organisation	Gladman Developments Ltd
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The previous consultation outlined a minimum requirement of 11,920 homes across the plan period, based on the standard method. However, in this iteration of the Local Plan, the housing requirement has fallen to 10,998, equating to 611 homes per annum as per the 2022 Local Housing Need Assessment. While the Local Plan has a total supply 11,924, dwellings, Gladman consider the reduction of the minimum housing requirement inappropriate and unjustified. The standard methodology and local housing need is simply the starting point for establishing the housing requirement. To safeguard the delivery of housing, Gladman suggest that a sufficient buffer be included in the housing supply. Whilst there is no rule for what this should be, Gladman support the Home Builders Federation's recommendation that local plans should seek to identify a 20% buffer between the housing requirement and supply.</p> <p>(DDC Note - Text Extracted from Document sent from Gladman Developments Ltd. Full attachment can be found under the introduction comment reference SDLP1192)</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1256
Rep Status	Processed
Consultee ID	1332985
Consultee Full Name	Dean Lewis

	Estates Ltd
Consultee Company / Organisation	Dean Lewis Estates Ltd
Agent Full Name	Nicole Burnett
Agent Company / Organisation	Burnett Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Text Extracted from Document sent from Nicole Burnett on Behalf of Dean Lewis Estates. Representation has been split across relevant areas of the Local Plan. Full attachment can be found under reference SDLP1254.)</p> <p>SP3 – Housing Growth</p> <p>3.1.1 Policy SP3 'Housing Growth' sets out that provision is made for at least 10,998 net additional homes in Dover District over the plan period. The majority of this housing development will be in Dover Town and at Whitfield, with land identified to deliver a minimum of 3,381 homes in addition to existing commitments. Development will then be focused in the District Centre of Deal, and the Rural Service Centres of Sandwich and Aylesham. The policy goes on to note that development in Deal, Sandwich and Aylesham will be at a more limited scale than Dover Town, and that land is allocated to deliver in the region of 1,099 homes in addition to existing commitments.</p> <p>3.1.2 Table 3.3 of the Local Plan (included below) sets out the overall distribution of growth for the district</p> <p>DDC Note - TABLE AVAILABLE TO VIEW IN ATTACHMENT</p> <p>In order to deliver the necessary scale of housing growth over the plan period it is of fundamental importance that the spatial strategy is fit for purpose. DLE note that a crucial element of the spatial strategy focusses on the delivery of housing on a few large sustainable urban extensions (in particular Whitfield and south of Aylsham). The urban expansion of Whitfield was identified as a Strategic Allocation in the 2010 Core Strategy for the delivery of at least 5,750 new homes. The Local Plan notes that in addition the extant permission an estimated 2,200 homes can be delivered at Whitfield over the plan period. Policy SAP1 of the new Local Plan notes that this will be a new neighbourhood comprising in the region of 6,350 homes.</p> <p>3.1.5 Whilst DLE do not dispute the inclusion of these SUEs within the Local Plan concern is raised over the scale of delivery and the significant focus placed on these developments. Any delays would jeopardise delivery of the plan as a whole. DLE note that other site allocations considered within the previous iteration of the plan could be included to increase the level of flexibility and ensure delivery over the course of the plan period. DLE make specific reference to Aylesham North, which was previously identified for the delivery of 500 dwellings, however has not been included in the Regulation 19 version of the plan. In this regard DLE refer to later sections of this submission providing further details regarding the omission of this site.</p> <p>3.1.6 When allocating sites, the Council should be mindful that to increase delivery the widest possible range of sites, by both size and market location are critical to ensure that house builders of all types and sizes have access to suitable land in order to deliver the widest range of products.</p> <p>3.1.7 As detailed later in this submission, Aylesham is a highly sustainable location and capable of delivering a greater level of housing growth within the plan period. DLE believe that a further allocation to the north of Aylesham would help provide flexibility and choice and ensure the delivery of much needed housing over the plan period.</p>

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1168
Rep Status	Processed
Consultee ID	1331713
Consultee Full Name	Woodchurch Property (BK) Ltd
Consultee Company / Organisation	Woodchurch Property (BK) Ltd
Agent Full Name	Rosie Dennis
Agent Company / Organisation	DHA Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House, Shepherdswell (SHE004 & TC4S082)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	Edit: DDC amendment: See attached representation for full test. Detailed comments on Housing Needs as follows: "4 Housing Need

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

4.1 Context

4.1.1 The NPPF is explicit in its requirement for strategic policy-making authorities to meet their needs in full. Paragraph 11 makes clear that:

4.1.2 "Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that: (1) All plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including making effective use of land in urban areas) and adapt to its effects; (2) Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless: i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits

4.1.3 Paragraph 20 goes on to state that: "Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for: (1) housing (including affordable housing), employment, retail, leisure and other commercial development; (2) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); (3) community facilities (such as health, education and cultural infrastructure); and (4) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation."

4.1.4 Given this context, the Local Plan review should set out a comprehensive and cohesive approach to future development in Dover district, capable of making sufficient provision for the identified needs, whilst balancing the conservation and enhancement of the natural, built and historic environment.

4.1.5 National guidance states that strategic policy-making authorities will need to calculate their local housing need figure at the start of the plan-making process. This number should be kept under review and revised where appropriate.

4.1.6 In calculating the local housing need, paragraph 61 of the NPPF states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance - unless exceptional circumstances justify an alternative approach.

4.1.7 Further, in addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

4.2 Dover District Council's Housing Need

4.2.1 The Standard Method for assessing housing need, issued alongside the Ministerial Statement on 16 December 2020, sets an indicative housing need figure for Dover District of 596 dwellings per annum. However, the affordability ratio which factors into the local housing need assessment is updated annually. For Dover District the latest housing need calculation is 611 dwellings per annum (dpa), equating to a total housing need of 10,998 dwellings for the Plan period to 2040. In addition to the minimum figures, Dover District Council have a set a contingency buffer of 926 dwellings of the Plan period, equating to 8.4% of the total Plan period figure.

4.2.2 For context, the current adopted Core Strategy requirement is 700 dwellings per annum. This followed the adoption of a high-growth strategy in 2010 of 14,000 homes to 2026 based around the recommendations of the Dover Regeneration Strategy and above the minimum 10,100 requirement across the same period, as set out in the emerging (at the time) Regional Spatial Strategy.

4.2.3 For the avoidance of doubt, accounting for the Committed Supply Total of 5,282 dwellings, the new Local Plan will be required to allocate land sufficient to accommodate a minimum of 6,642 new homes over the remaining plan period to 2040. It is understood that this will be derived from the following sources: - Whitfield Urban Expansion Allocation: 2,200 dwellings - Local Plan Allocations (excluding Whitfield): 3,392 dwellings - Windfall Allowance (70 a year from year 4): 1,050 dwellings

4.2.4 On this basis, it is evident that a substantial quantum of Plan-led housing delivery will be required in order to meet the new Local Plan's housing target, and, due to the nature and dwindling supply of available urban land in Dover town and the remaining higher order settlements of Deal and Sandwich, the restrictive effect of the coast, the Kent Downs Area of Outstanding Natural Beauty, environmental constraints and the limited capacity of the district's remaining mid- and lower order settlements to accommodate significant levels of growth, meeting Dover's housing needs inevitably will require the release of significant greenfield land.

4.2.5 In our view, sustainable and accessible sites logically located adjacent to existing settlements (such as Shepherdswell), represent the most sustainable and reliable sources of growth for the Plan Period, to deliver the significant number of new homes that are required and are most capable of making meaningful contributions to the associated public infrastructure, affordable housing and mix of new homes that is urgently needed in the District"

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	To be able to respond to any matters raised in relation to amendments to Draft Policy SAP36. Any changes to the allocation directly impact the ability for the site at Land Adjacent to Mill Lane to be able to be delivered by our client, thus impacting the Council's housing delivery targets.
Include files	Land Adjacent to Mill Lane_Regulation 19 Written Rep_December 2022.pdf
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1390
Rep Status	Processed
Consultee ID	1333152
Consultee Full Name	Mr P & Mrs S Laflin & Rubix Estates Ltd
Consultee Company / Organisation	
Agent Full Name	Mr Reece Lemon
Agent Company / Organisation	Lee Evans Partnership
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	POLICY SP3 – Housing Growth
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>(DDC Note - Representation submitted by Lee Evans On behalf of Mr and Mrs Labin and Rubix Estates. Full Representation attached to SDLP1387. This document has been split across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1387.)</p> <p>This policy deals with the housing strategy for the plan period. It expresses clear linkages to the overarching vision for the Plan, and its objectives in focusing growth at sustainable locations providing greater choice of high-quality housing to meet identified needs.</p> <p>3.16 Need is derived from household projections and targets set by central government, here identified as at least 611 dwellings per annum, with a minimum of 10,998 new dwellings over the plan period. The housing growth strategy at SP3 is geared towards delivery of such. This baseline position of meeting identified need is wholly supported.</p> <p>3.17 It is noted that the policy wording recognises 'a minimum of 10,998 dwellings over the plan period'. It is considered that this wording is most appropriate in encouraging sustainable growth; a cap should not be applied.</p> <p>3.18 The Plan allocates a number of sites to ensure a consistent supply of housing to facilitate demonstration of a continuous five-year housing land supply. Again, it is pleasing that the Plan seeks to clearly satisfy this basic requirement. It is essential that the Plan is able to meet identified need, and the allocation of multiple sites across the plan area at different scales should enable a reliable supply of dwellings to meet need – again as a minimum target only, rather than a capped 'ceiling' figure.</p> <p>3.19 The Settlement Hierarchy is supported, particularly as far as it concerns the higher order settlements of Dover, Whitfield, and Deal.</p> <p>3.20 It is useful that the hierarchy clarifies that – for planning purposes – Walmer is included within Deal, alongside Sholden, and Mongeham. In recognition of its role as a District Centre, Deal is ranked third in the hierarchy. It benefits from high connectivity and a range of services and facilities. It is a highly sustainable location for development and it is agreed that its place in the Settlement Hierarchy sufficiently recognises this.</p> <p>3.21 It is considered that the apportionment of growth across the hierarchy is appropriate in distributing sustainable growth to support communities in multiple locations in the District. Table 3.3. of the Plan identifies that an indicative 223 dwellings will be delivered in Deal under the Plan. As an indicative figure, this level of growth is supported in realising the overarching vision for the District. Detailed commentary on the precise quantum of development to the settlements is not provided here, though it is emphasised that the aspiration of meeting growth in sustainable locations such as Deal gains significant support from the Promoter. Assessment of the precise scale and quantum of development should be undertaken at the application stage, though the indicative capacity of circa 223 dwellings across multiple sites in Deal is supported.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	Strategic Policy 3 - Housing Growth
<p>Rep ID</p>	SDLP1446
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1333265

Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note <i>The text below is an extract from the original representation which is attached to SDLP1438.</i></p> <p>SP3 Housing Growth</p> <p>The Housing Growth statement that the aim is to , “provide a greater choice of high-quality housing to meet the needs of Dover district’s growing population and changing demographic and address affordability issues”, does not seem internally consistent with the details provided in the plan which underestimates the evidence showing a large part of district population growth is due to aging. The details thus render SP 3 and SP 5 ineffective, unsound. Moreover, with the announcement by Prime Minister Sunak on 5 Dec 2022 that compulsory housebuilding targets are to be dropped, the DDC numbers may not be compliant with emerging government policy.</p> <p>The government department (DLUHC) decision that Dover needs 611 new dwellings a year and a minimum of 10,998 new homes between now and 2040 we find very incompatible with legally binding Net Zero Strategy, Climate Emergency Declaration 2019 and Climate Change Act 2008, and unsound. We should be transforming homes into zero carbon homes as is happening in East Sussex, led by Lewes DC. Combining these numbers with 3.51 and the statement ‘76.7% of the new homes are on greenfield sites, while 23.3% are on brownfield sites’ is unsound and unacceptable to the public. It must also be pointed out that at least one of the sites included in the 23.3% of brownfield sites is actually a site intended by SEEDA as local nature reserve having rewilded on unstable slag (only rendered stable by tree-planting), a site which DDC forgot to make a local nature reserve in 2004, and it has become a biodiversity hotspot well known to genuine ecologists nationally, Betteshanger Park, and ought to be designated a Biodiversity Opportunity Area.</p> <p>We note that central government in London, according to Housing Today is imposing a disproportionate amount of housing growth on Kent and the SE. The FT has shown a quarter of Con party donation come from the property developer lobby. We note that the supposed national New Homes Ombudsman, is not neutral in this matter and gets on well with volume developers and there is with a grievous lack of democratic accountability across Kent. So the chances, of protecting Kent, of achieving a Growth Strategy that creates climate-friendly jobs and suitably-sized, suitably-priced zero carbon homes for the next generation of local families, are not good. The space available for infrastructure, functions well for compact coastal towns of the size that Deal / Walmer and Sandwich were 5 years ago. The level of greenfield overdevelopment is putting Deal infrastructure under strain now, so in-fill should make up the majority of the allocations for Deal and that the housing growth specified for District Centre of Deal and around its boundaries needs to be stopped or radically reduced.</p> <p>For example, either or both of SAP 15 / SAP 34 would destroy the only road access alternative for diverted traffic. (See detailed comments under SAP 15/ SAP 34 below). Housing Growth that threatens gridlock, blocking off a conurbation of 30,000 from access by emergency vehicles, commuters, school buses are not sustainable housing growth and is very unsound.</p>

	<p>3.29 We note and welcome a degree of shift from the Reg 18 draft, in that more sites have been selected with a view to using 'existing infrastructure, facilities and services, with a greater professed purpose to ensure development contributes to the sustainability of local communities and services. We note with appreciation both the increase in the number of sites in Dover town SAP 6 – SAP 13, and the SAP 26 Former Snowdown Colliery, Aylesham near a rail station for example. It should be possible to state a determination to 'make best use of brownfield – non-rewilded – land) without giving developers the opt-out qualification 'wherever possible'.</p> <p>On Five Year Housing Land Supply. 3.39 Having stated the Council had 6.03 years land supply plus a 5% buffer; it is not sound, effective, or legally compliant to then state 'the provision of additional sites within the first 5 years of plan period is needed to ensure resilience and promote flexibility;'.! Instead of ensuring resilience, it will create exactly the destructive suburbanisation of a rural district that many, many of the resident electorate are most worried about. The 10 year buffer proposed, 3.40 is worse and demonstrates the culture of 'whatever developer partners ask for' referred to above.</p> <p>3.46 It is the conspicuous lack of a secondary school in Aylesham that prevents Aylesham becoming the small garden town planners aspire to. The provision of a secondary school by 2028 should be a condition of SAP 23.</p> <p>3.48 Many, many of the current residents of ex mining village Elvington were / are dependent on buses that have recently (2022) been cut, (following KCC cut to bus subsidies) to get to work in Canterbury, Folkestone, Sandwich, Thanet or Dover, or to get to secondary school, or to get to doctors, or to shop. These people had an environmentally sustainable public transport service that has been cut. Kent CC is saying it is looking at potential bankruptcy in 2023, so promises of new services and facilities are met with some disbelief.</p> <p>SAP 28 is planned on the cricket field next to the Tilmanstone Welfare club, The selection of this site can only be sound if cast-iron conditions to provide all of the services mentioned , are included as well as new drainage infrastructure. Council housing in Elvington has been subject to flooding from the sewage system, long overdue for replacement. As in Dover deprived wards, there are unhealthy EPC EFG homes in Elvington that need to be transformed into zero carbon home to lift residents out of fuel and therefore food poverty.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	Strategic Policy 3 - Housing Growth
<p>Rep ID</p>	SDLP1193
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1331777
<p>Consultee Full Name</p>	Mr

	James Blomfield
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Sustainability Appraisal Reg 19 Chapter 6 - Draft Local Plan SA p74-165 / Chapter 3 Sustainability Context p15-29 / Whole Plan Viability Study Chapter 8 Local Plan Policy Requirements / Housing + Economic Land Availability Assessment HELAA - Main Report TC45 - Assessment of Sites p11
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p><u>Dover Local Plan – Section 19 Consultation</u></p> <p>SAP 44</p> <p>SOUNDNESS</p> <p>The revised Local Plan is not sound for the following reasons:</p> <p>It has not been justified and is not effective. It has not been positively prepared to meet 'objectively assessed' needs and for this reason is not consistent with National Policy.</p> <p>Why have the reasonable, sustainable alternatives for additional housing previously suggested in larger development centres such as North Aylesham, Elvington and Ethorne and Farthingloe and included within the original plan have now been removed? At the same time the proposed allowance for housing has been increased in Capel-le-Ferne and will not be deliverable.</p> <p>The original draft Local Plan has been changed so that 900 fewer houses are proposed overall and yet the number of houses proposed in Capel-le-Ferne has increased to 95.</p> <p>This is on top of recent planning permission for 34 houses off Capel Street, 15 dwellings at Longships on Cauldham Lane and 40 new dwellings in a recently completed development at Grasslands.</p> <p>Why is Dover District Council spreading development across numerous small sites which is uneconomic and unsustainable rather than concentrating in larger developments where existing services, facilities and infrastructure are already available?</p> <p>Why Dover District Council persist with this policy in relation to Capel-le-Ferne when it clearly is not in keeping with the council's stated objectives?</p> <p>SP2 - Planning for Healthy and Inclusive Communities and</p> <p>SP3 – Housing growth</p> <p>SP2 - Planning for Healthy and Inclusive Communities and</p> <p>SP3 – Housing growth</p> <p>SP2 states that <i>'The Council will support the creation of healthy, inclusive and safe communities in the District by ensuring that new development is well served by services and facilities (for example education, health care, community, cultural facilities, play, youth, recreation, sports, faith and emergency facilities) and that a mix of uses are provided in new development that support daily life.'</i></p>

SP3 states that what they are trying to achieve is 'To focus new development at accessible and sustainable locations which can utilise existing infrastructure, facilities and services, and to ensure development contributes to the sustainability of local communities and services, supporting regeneration and wherever possible make the best use of brownfield land'.

But the proposals for Capel-le-Ferne do not meet any of the objectives in the above Strategic Policies as follows:

- 1 The location of the proposed development in SAP 44 will connect to existing overloaded roads using Capel Street as its primary access point.
- 2 The proposed development is on arable land, currently in use and not brownfield land.
- 3 The development of the village is clearly not sustainable – Capel-le-Ferne has little or no facilities and services – only one small shop, no post office, no health care facilities, no doctor, no dentist, no pubs within the village confines and only a primary school. Therefore, in order to access services, residents need to drive to either Folkestone or Dover which is clearly at odds with SP1 – Planning for Climate Change.
- 4 The addition of 40 dwellings recently completed at Grasslands has not led to any benefit to the community in terms of new services or facilities.
- 5 Trying to 'grow the villages' by increasing the number of houses, but not having any plans to help develop services and facilities is unsustainable, uneconomic and unethical. It will only lead to more unnecessary travel.
- 6 There is only a single bus service and no train service at all.
- 7 The strategic policy SP6 – Economic Growth identifies areas distant from Capel-le-Ferne for economic development. Capel-le-Ferne has little opportunity for employment generation so cannot be seen to contribute to SP6.
- 8 The agreed number of number of houses for the site was originally set at 100, then reduced to 50 to allow a single point of access to the site. It has now been increased to 70 and is deemed achievable. This is not realistic and undeliverable. It would appear that the increase in the number of houses is being driven by economic needs to cover developer contributions which are likely to be substantial rather than by any need by Dover District Council to provide more housing. The development at Longships under SAP45, which has been granted planning permission, exceeds the allocated housing number by 5 dwellings on the basis that sticking to the SAP45 allocation of 10 houses would be uneconomic. The development of SAP44 is likely to encounter similar cost problems and is unlikely to be achievable in the proposed timetable (2021-2026)

Consultation With Statutory Consultees (Reg 22)

Dover Council **has not fully consulted with statutory consultees** to ensure that the existing facilities where present are sufficient or that plans are in place for future development of infrastructure.

SP11 – Infrastructure and Developer Contributions states: *Supporting infrastructure should be provided in advance of, or alongside, the development, unless there is sufficient existing capacity. The appropriate phasing for the provision of infrastructure will be determined on a case-by-case basis with reference to the most up to date Infrastructure Delivery Plan (IDP) and the priority classification along with other relevant evidence, and in consultation with the relevant providers.*

It is noted that the site at Aylesham North (AYL004) has been removed for transport reasons – essentially Kent County Council objected on transport grounds. However, given 500 homes in a sustainable location (two rail stations, large settlement), that would seem to be the obvious logical focus for development and the Council has failed its Duty to Cooperate with Kent County Council by failing to ensure the relevant transport assessments are undertaken and potential mitigation identified and agreed; rather than simply removing the large site from the plan and increasing allocations on the edge of villages (such as Capel-le-Ferne) that they hope are small enough to slip under the radar at Examination. This is not ethical.

The existing infrastructure in Capel-Le-Ferne is already struggling to cope with the existing level of housing. Water supply is weak throughout the village, power outages are common, and drainage has insufficient capacity and frequently blocks.

The addition of 90 houses along with the 49 already given planning permission will make this worse. Access to the site is proposed via Capel Street, an already congested road (little off street parking, busy cut through, primary school).

Note also the checkered history of road traffic accidents and injuries caused at the congested at the junction of Capel Street/Cauldham Lane from New Dover Road.

Looking through the supporting Infrastructure Delivery Plan (IDP), no mention is made of any suggested improvements to facilities/services or for any proposed improvements to be carried out by Kent Highways, Southern Water (drainage) or Affinity Water (water supply) in Capel-le-Ferne.

Incremental development such as extensions to villages are more difficult to plan for with respect to infrastructure as they are too fragmented and should therefore be avoided.

	<p>Transport modelling has been carried out for developments in other areas, but nothing has been done for Capel-le-Ferne where there will be over 100 new houses accessing Capel Street, a narrow congested road. This was highlighted as a significant problem during the long drawn out process of granting planning permission for 34 dwellings off Capel Street. The revised Local Plan is proposing to add a further 70 houses along with 20 dwellings on Cauldham Lane. All the traffic from these developments will exit onto the New Dover Road at the junction of Capel Street/Cauldham Lane –a poorly designed junction which has been identified in numerous surveys as a real problem for development in the area. The Local Plan does not include any transport modelling for this area.</p> <p>Kent County Council have reservations about access to the site SAP44 indicating that it is not ideal. Given the current frequent traffic congestion in the area, this is not surprising. Particular concern was raised regarding emergency vehicle access, hence the requirement for a secondary access to SAP44 and further consultation with the emergency services. However, it should be noted that this secondary access is via a single track lane. Clearly insufficient consultation has been carried out at this stage.</p> <p>Although Dover District Council have consulted with Capel-le-Ferne Parish Council as required, they have not engaged fully with the parish council as the objections raised by the council to overdevelopment of the village have been ignored both in this local plan and in planning permissions granted in the past. If the purpose of consultation is to incorporate the views of the local population, Dover District Council have clearly failed in this regard.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Changes I would make:</p> <p>Take SAP 44 out of the plan completely as it is not following the policies that the council say they are trying to Achieve and not following their own policies.</p> <p>Choose one of the alternative sites for additional housing in larger development centres such as North Aylesham, Elvington and Ethorne and Farthingloe and included within the original plan. In particular, Aylesham North (AYL004) is far more appropriate, given 500 homes in a sustainable location (two rail stations, large settlement), that would seem to be the obvious logical focus for development</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>I would like to participate as I represented the Village Council in recent Planning Committee meetings.</p>
<p>Include files</p>	<p>Crashmap.png Cauldham Lane CT18 7HG.jpeg SDLP1193 Blomfield - Att 3.jpg.jpeg (1) SDLP1193 Blomfield - Att 3.jpg.jpeg</p>
<p>Local Plan Consultation Point</p>	<p>Strategic Policy 3 - Housing Growth</p>
<p>Rep ID</p>	<p>SDLP1299</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331928</p>
<p>Consultee Full Name</p>	<p>Matthew Porter</p>

Consultee Company / Organisation	Fernham Homes Ltd
Agent Full Name	Matt Porter
Agent Company / Organisation	DHA Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy SAP15 - Land at Rays Bottom between Liverpool Road and Hawksdown, Walmer (WAL002) Policy SP3 - Housing Growth Policy SP4 - Windfall Development Policy SP11 - Infrastructure and Developer Contributions Policy SP12 - Strategic Transport Infrastructure
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We consider that the plan is sound, but object to elements of Policy SAP15 - Land at Rays Bottom between Liverpool Road and Hawksdown, Walmer (WAL002) and Policy SP3 - Housing Growth. These objections are set out in the consultation response submitted on behalf of Fernham Homes Limited (ref DHA/30359).</p> <p>1 Introduction</p> <p>1.1 Purpose of this Representation</p> <p>1.1.1 This representation has been prepared by DHA Planning on behalf of Fernham Homes Limited in response to the Dover District Council 'DDC' Local Plan (Regulation 19) consultation which runs until 9th December 2022.</p> <p>1.1.2 We understand that DDC is in the process of preparing a new Local Plan to set out a strategy for development for the period to 2040 and that the Council are presently seeking comments on the pre-submission Plan prior to its submission for examination in early 2023.</p> <p>1.1.3 Our client is promoting 'Land at Rays Bottom, Walmer, Deal' (hereafter referred to as 'Land at Rays Bottom' or 'the site') for the residential allocation of the site as part of the new Dover District Local Plan preparation process. The site is allocated for residential development in the Regulation 19 Pre-submission Plan for the provision of 75 dwellings under policy reference 'SAP15'.</p> <p>1.1.4 It is highlighted that as part of the Regulation 18 Local Plan, the Site was allocated under the 'Site Allocations Policy 1 Non-Strategic Housing Allocations' for approximately 100 dwellings (reference WAL 002).</p> <p>1.1.5 The purpose of the representation is to support the allocation of Land at Rays Bottom as a suitable and deliverable location for residential development and provide comment on the consistency of the allocation with the proposed strategy, draft policies and our client's position in respect of the 'soundness' of the Plan but to object to the indicative capacity set out in the policy.</p> <p>1.1.6 In this regard, we remain wholly supportive of the principle of the residential allocation of Land at Rays Bottom and agree that the Site represents a logical and sustainable location to direct growth in Deal consistent with the growth strategy of the Plan as a whole.</p> <p>1.1.7 Accordingly, we say that the allocation of Land at Rays Bottom is necessary in order for the Council in meeting the growing need for new homes in the district and help to ensure the DDC can have confidence in consistently meeting its market and affordable housing targets in full throughout the life of the new Dover District Plan.</p> <p>1.1.8 It is submitted that the SAP15 policy wording should be amended to reflect the capability of the Site to accommodate approximately 80 dwellings, deliverable early in the Plan period.</p> <p>1.1.9 Based on the current national and local planning context, we consider the Site to be a highly suitable edge-of-settlement location to allocate land for housing to help meet the need for new homes in the district and its effective use should be appropriately maximised in accordance with national policy objectives.</p> <p>1.1.10 Further details regarding the Site and commentary on the consistency of the allocation with the proposed strategy, draft policies and our client's position in respect of the 'soundness' of the Plan are set out in the following sections of this document.</p> <p>1.2 About Fernham Homes</p>

1.2.1 Fernham Homes Ltd are a local award winning small and medium sized (SME) housebuilder, established in 1997 and has a strong track record of delivering high quality residential and mixed use developments in Kent over the last 25 years. This has been acknowledged through the receipt of nationally recognised awards, including the gold Evening Standard Awards best family home 2022 and 2019 bronze WhatHouse Best Small Housebuilder.

1.2.2 SME housebuilders are recognised in the National Planning Policy Framework ('NPPF') at paragraph 69 as making an important contribution to meeting the housing requirements of an area, and being able to build out relatively quickly. Similarly, this has also been recognised by the Planning Inspectorate. This is particularly the case with Fernham Homes, which is privately owned with access to significant resources. This provides significantly more flexibility than national and other regional housebuilders, and allows Fernham Homes to deliver housing rapidly and to a high quality, beautiful and sustainable standard (para 126 of the NPPF).

1.2.3 Fernham Homes has embarked on a sustained period of growth, with an adopted and robust business plan to deliver around 300 houses per year in five years time.

1.2.4 A key element of Fernham Homes' operations is to take a careful approach to site selection: a huge amount of due diligence is undertaken as part of this, and therefore Fernham Homes only invests in those sites which meet the NPPF requirements of being available, suitable, and deliverable. As set out below land at Rays Bottom, Walmer ('SAP15') is firmly considered to be such a site.

1.2.5 Similarly, a key feature of Fernham Homes' approach is to work positively and proactively with local planning authorities (LPAs), both during the preparation of local plans and at planning application stage. Fernham Homes are fully committed to engaging with DDC in the preparation of its Local Plan, and firmly subscribe to the national policy approach set out in paragraphs 15 and 16 c) of the NPPF that "the planning system should be genuinely plan-led" and should be shaped by early, proportionate and effective engagement between LPAs and others, including businesses and developers. Accordingly, Fernham Homes would welcome the opportunity to discuss the matters contained in this representation, including the availability, suitability, deliverability and capacity of land Rays Bottom, Walmer ('SAP15') directly with DDC members and officers, ahead of the submission of the Local Plan for examination.

1.3 Representation Structure

1.3.1 The representation structure is outlined below for ease of reference:

Chapter 2 (Consultation Background) – Sets out the context of the Dover District new Local Plan preparation, relevant national planning requirements and a summary of our current position.

Please refer to paragraph 52 of Appeal Decisions: APP/M2270/W/21/3283924 & APP/M2270/W/21/3288645

Chapter 3 (Legal Tests of Soundness) - Assessing whether the plan is sound, having regard to the tests of soundness outlined by paragraph 35 of the NPPF.

Chapter 4 (Duty to Co-operate) - Assessing whether the plan is sound, having regard to the duty to cooperate outlined by paragraph 24 of the NPPF.

Chapter 5 (Housing Need) - Consideration of market and affordable housing need and assessment of proposed housing allocations and supply sources.

Chapter 6 (Assessment of Suitability) - Re-introduces our client's Site and provides a summary of planning constraints and opportunities, including the quantum of development that could be accommodated, why the Site is suitable for development and why the principle of the draft allocation for residential development is both justified and consistent with the DDC's strategy for growth in the district.

Chapter 7 (Conclusion) - Summarises the key points raised throughout the representation and re-affirms our client's support for the principle of the Site's allocation and the principle of proposed strategy ahead of the submission of the Plan for examination, and the objections in terms of capacity.

2 DDC – Draft for Submission Local Plan (Regulation 19)

2.1 Consultation Background

2.1.1 DDC are required to prepare a new Local Plan, as the current suite of development plan documents were adopted in 2002, 2010 and 2015. The Core Strategy (CS) (adopted 2010) in particular has a time horizon up to 2026. The plans, and the policies contained within, pre-date current national policy, practice guidance and local evidence and consequently require updating.

2.1.2 The new Local Plan will set out the vision, strategic objectives and overarching development strategy for the growth of the District over the period to 2040. It provides the planning policy framework to guide the future development of the area, addressing needs and opportunities

for housing, the economy, community facilities and infrastructure, as well as the basis for conserving and enhancing the natural and historic environments, mitigating and adapting to climate change, and achieving well designed places.

2.1.3 For the avoidance of doubt, the new Local Plan, on adoption, will replace the CS 2010 and the Land Allocations Plan 2015, as well as saved policies from the 2002 Local Plan.

2.1.4 DDC's Regulation 19 Local Plan outlines the key issues that need to be addressed between now and 2040. In particular, the Plan sets out the following key planning issues for the District:

- Ensuring that new development in the District contributes to the mitigation of, and adaptation to, climate change.
- Supporting DDC to deliver its intention to be a carbon neutral district by 2050.
- Managing flood risk and coastal change.
- Ensuring that a sufficient amount and variety of land is identified to deliver a continuous supply of housing across the Plan period and that DDC maintains a five-year housing land supply.
- Delivering growth in a way that focuses development in the least sensitive areas of the District in order to conserve and enhance the District's rich natural and historic environments.
- Supporting sustainable development in rural areas to enhance the vitality of rural communities.
- Working with partners to facilitate the delivery of the Whitfield Urban Expansion. Ensuring a range of housing tenures, types and sizes are provided across the District to meet the needs of the local community and provide choice and flexibility in the housing market.
- Promoting economic growth, tourism, and investment in the District's Town Centres in line with DDC's Economic Growth Strategy.
- To address the impact of the COVID-19 pandemic.
- Delivering strategic transport improvements, including upgrades to the Duke of York and Whitfield roundabouts to support the scale of housing and economic growth identified in the Plan.
- Promoting sustainable transport initiatives to encourage a modal shift to more sustainable forms of transport like walking and cycling.
- Ensuring that infrastructure is delivered, in the right place, at the right time, to meet the needs of the District and support the levels of development identified in the Local Plan.
- Supporting the delivery of attractive, high-quality, design led developments and the creation of healthy, inclusive and safe communities, that are well served by good quality services and facilities to support people's lives.
- Conserving and enhancing the District's rich and diverse natural landscape, including the five international sites within the district, the Kent Downs Area of Outstanding Natural Beauty (AONB), five Sites of Special Scientific Interest (SSSIs), two National Nature Reserves (NNRs), two stretches of Heritage Coasts and two Marine Conservation Zones.
- Delivering a net gain in biodiversity in the District over the plan period.
- To promote the conservation, restoration and where appropriate the enhancement of the District's heritage assets, in order to protect their significance and to ensure that they can be best appreciated and enjoyed by current and future generations.

2.1.5 The new Local Plan will be examined by an Inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is 'sound'.

2.1.6 This submission will comment on each of the above, highlighting where we believe any areas of concern lie or where modifications may be required.

2.2 DDC's Local Development Scheme

2.2.1 The District Council has a duty to review the policies contained within the development plan every five years. The 2014/2015 Authority Monitoring Report signalled the need to review key parts of DDC's adopted CS evidence base.

2.2.2 DDC's Local Development Scheme (LDS) first outlined the delivery timetable for the Local Plan Review (LPR) in the March 2017 publication. Since then, the LDS has been updated on an annual basis. The most recent September 2022 LDS summarises that following the preparation of the principal evidence base

documents, the Local Plan Review Regulation 18 consultation took place for 8 weeks in January 2021. The Regulation 19 consultation was scheduled for 7 weeks during Q4 of 2022 and is the subject of this representation.

2.2.3 Moving forward, submission of the Plan is anticipated in Q1-2 2023 with the Examination in Public in Q3-4 2023. The new Local Plan is currently scheduled for adoption in 2024.

2.2.4 As planned, DDC are now undertaking the Regulation 19 Draft Local Plan Consultation, for which this submission is made

3 Legal Test of Soundness

3.1 Legislation and Guidance

3.1.1 The new Local Plan will be examined by an Inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is 'sound'. It is a statutory requirement that every development plan document must be submitted for independent examination to assess when it is "sound", as well as whether other statutory requirements have been satisfied (s.20(5) of the 2004 Act). By s.19 of the 2004 Act, in preparing a development plan document a local planning authority must have regard to several matters including national policies and advice contained in guidance issued by the Secretary of State. Such guidance currently exists in the form of the NPPF and is summarised below. This states that Plans must be:

(a) Positively Prepared: based on a strategy which seeks to meet objectively assessed development and infrastructure requirements

3.1.2 This means that the Local Plan should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. The NPPF set out principles through which the Government expects sustainable development can be achieved.

(b) Justified: an appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence

3.1.3 This sets out the requirement that the Local Plan should be based on a robust and credible evidence base involving:

I. Research/fact finding: the choices made in the plan are backed up by facts.

II. Evidence of participation of the local community and others having a stake in the area.

3.1.4 The Local Plan should demonstrate an appropriate strategy, taking into account reasonable alternatives and based on proportionate evidence. These alternatives should be realistic and subject to sustainability appraisal. The Plan should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

(c) Effective: deliverable over its period based on effective joint working on cross-boundary strategic priorities

3.1.5 This makes clear that the Local Plan should be deliverable, requiring evidence of:

- Sound infrastructure delivery planning;
- Having no regulatory or national planning barriers to delivery;
- Delivery partners who are signed up to it; and
- Coherence with the strategies of neighbouring authorities, including neighbouring marine planning authorities.
- The new Local Plan should be flexible and able to be monitored.

3.1.6 The Local Plan should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen. The plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the Local Plan should make clear that major changes may require a formal review including public consultation. Any measures which DDC has included to make sure that targets are met should be clearly linked to an Annual Monitoring Report.

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national policy.

3.1.7 This submission comments on each of the above in further detailing, highlighting areas of support and where modifications are required as appropriate.

3.2 Legal Compliance

3.2.1 In terms of legal compliance, the main requirements for the early stages of Local Plan consultation are in relation to:

- planning for community engagement;
- the sustainability appraisal (including consultation with the statutory environment consultation bodies);
- identifying significant cross boundary and inter-authority issues; and
- ensuring that the plan rests on a credible evidence base, including meeting the Act's requirement for keeping matters affecting the development of the area under review.

3.2.2 In addition to the above, the NPPF states² that: "Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:

- a) All plans should promote a sustainable pattern of development that seeks to: meet the development needs of the area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effect.
- b) Strategic policies should as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:
 - (i) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or

Paragraph 11, National Planning Policy Framework 2021

(ii) Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

3.2.3 In addition, to the above, the NPPF states³ that Plans should:

- a) be prepared with the objective of contributing to the achievement of sustainable development;
- b) be prepared positively, in a way that is aspirational but deliverable;
- c) be shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
- d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
- e) be accessible through the use of digital tools to assist public involvement and policy presentation; and
- f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

3.2.4 It is important to note that the NPPF⁴ requires strategic policies to set out an overall strategy for the pattern, scale, and design quality of places, and make sufficient provision for:

- a) housing (including affordable housing), employment, retail, leisure and other commercial development;
- b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- c) community facilities (such as health, education and cultural infrastructure); and;
- d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

3.2.5 It is clear from the above, that any local plan should set out a comprehensive and cohesive approach to future development.

Paragraph 16, NPPF 2021

Paragraph 20, NPPF 2021

4 Duty to Co-Operate

4.1 Legal and NPPF Requirements

4.1.1 Section 33A of the Planning and Compulsory Purchase Act 2004 sets out a statutory 'Duty to Cooperate' (DtC) – i.e. a legal obligation - to all bodies as prescribed by Regulation 4 of the Town and Country Planning (Local Planning) England Regulations 2012 (the Regulations).

4.1.2 The duty requires DDC to cooperate with other persons to 'maximise the effectiveness' with which named activities are undertaken. Those activities include the preparation of development plan documents (such as this local plan) and activities that support that activity 'so far as relating to a strategic matter'.

4.1.3 A strategic matter is defined by S33A(4) in summary as: (a) 'sustainable development or use of land that has or would have a significant impact on at least two planning areas' (a planning area in this case is the area of a borough or district council); and (b) 'sustainable development or use of land in a two tier area' (as this is) 'if the development or use (i) is a county matter, or (ii) has or would have a significant impact on a county matter'. County matters broadly relate to minerals and waste and associated developments as defined by Paragraph 1 of schedule 1 to the Town and Country Planning Act 1990 (as amended).

4.1.4 Section 33A (7) requires DDC (and persons subject to the DtC) to have regard to any guidance issued by the Secretary of State about how the duty is to be complied with. In that regard Paragraph ID 9-004-29140306 of the Government's Planning Practice Guidance (PPG) confirms amongst other things that the DtC is not a duty to agree (albeit that local planning authorities should make every effort to secure the necessary cooperation on strategic cross border matters before they submit local plans for examination).

4.1.5 The NPPF establishes that effective and on-going joint working is an integral part of the plan making process that will, amongst other things, determine whether development needs that cannot be met wholly within a plan can be met elsewhere. The NPPF goes on to state at paragraph 27 that in order to demonstrate effective and on-going joint working strategic policy making authorities should: "... prepare and maintain one or more statements of common ground documenting the cross-boundary matters being addressed".

4.1.6 In addition to the District's own housing pressures, part of the DtC involves considering whether neighbouring authorities' unmet housing need can be accommodated. It is worth highlighting that recent amendments to the London Plan have identified that the City's housing need has become increasingly more difficult to deliver and therefore areas outside London will be faced with having to absorb more of London's housing need. Consequently, DDC has a duty to explore whether it can accommodate some of this overspill of London's unmet need.

4.2 Assessment of DDC's discharging of the Duty to Co-operate

4.2.1 It is recognised that work to discharge the DtC remains ongoing by DDC and will continue prior to submission as part of the preparation of the Local Plan evidence base.

4.2.2 Notwithstanding the above, at this stage it is understood that DDC have engaged with the members of the East Kent Regeneration Board including neighbouring East Kent planning authorities, Kent County Council (KCC) and its subsidiary departments:

- Folkestone and Hythe District Council
- Canterbury City Council
- Thanet District Council
- KCC
 - KCC Highways & Transportation
 - KCC Minerals & Waste
 - KCC Heritage Conservation
 - KCC Flood & Water Management
 - KCC Natural Environment & Coast
 - KCC Infrastructure including Education

4.2.3 In February 2016, DDC adopted a Memorandum of Understanding (MOU) in respect of the DtC between the East Kent Regeneration Board members. A review of the MOU took place and was agreed in January 2021.

4.2.4 The East Kent MOU sets out the framework in which the authorities will work together on strategic issues and will actively engage. It forms the overarching framework and context within which Statements of Common Ground (SoCG) will be agreed between individual authorities.

4.2.5 Further engagement is also confirmed to have taken place between the following prescribed bodies and other relevant bodies:

- Environment Agency
- National Highways
- Historic England
- Natural England
- Network Rail
- NHS Kent and Medway Clinical Commissioning Group (CCG) – now known as Integrated Care Board (ICB) since July 2022
- Kent Downs AONB Unit
- Other infrastructure providers

4.2.6 Whilst work remains ongoing, at this stage it is understood that SoCGs have been agreed and signed between the following parties:

DDC and Folkestone & Hythe District Council

DDC and Canterbury City Council

DDC and Thanet District Council

DDC and Kent County Council

DDC and National Highways

4.2.7 As part of the DtC Evidence Base documents, DDC prepared a detailed DtC Statement (dated September 2022) which sets out a summary of the engagement that has taken place, firstly by organisation, and then by issue. Whilst the statement focuses on strategic issues and duty to co-operate bodies it also includes information relating to engagement on non-strategic issues and co-operation with other bodies that are not prescribed by the regulations. In addition, Appendices 1, 3 and 4 identify the main meetings and other correspondence that has taken place throughout the plan making process.

4.3 Summary

4.3.1 On account of the above and the documents published within the DDC's Local Plan Evidence Base, we are satisfied that DDC as the strategic policy making authority has demonstrated effective and on-going joint working with neighbouring authorities, the county council, prescribed bodies and other relevant bodies. Further, we agree that DDC has prepared and maintained SoCG documenting the cross-boundary matters being addressed in accordance with the Framework and the DtC may be discharged by the Planning Inspector under Section 20(5) (c) of the Planning and Compulsory Purchase Act 2004.

4.3.2 Without prejudice to the above, should ongoing work by DDC result in significant changes in circumstances such that the signed SoCGs may be amended or withdrawn, our client reserves the right to alter their consultation response accordingly and be present at the examination of the Plan to discuss further.

5 Housing Need

5.1 Context

5.1.1 Paragraph 11 of the NPPF is explicit in its requirement for strategic policy-making authorities to promote a sustainable pattern of development that seeks to meet the need in full.

5.1.2 Paragraph 20 of the Framework is equally clear that strategic policies should set out an overall strategy for the pattern, scale and design quality of places. Policies should make sufficient provision for the development that is required as well as associated infrastructure, community facilities and should set out a strategy for the conservation and enhancement of the natural, built and historic environment.

5.1.3 Given this national planning context, the emerging Local Plan should provide a comprehensive and cohesive approach to future development in Dover district, capable of making sufficient provision for the identified needs, whilst balancing the conservation and enhancement of the natural, built and historic environment.

5.1.4 National guidance states that strategic policy-making authorities will need to calculate their local housing need figure at the start of the plan-making process. This number should be kept under review and revised where appropriate.

5.1.5 In calculating the local housing need, paragraph 61 of the NPPF states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance - unless exceptional circumstances justify an alternative approach.

5.1.6 Further, in addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

5.2 DDC's Housing Need

5.2.1 The Standard Method for assessing housing need, issued alongside the Ministerial Statement on 16 December 2020, sets an indicative housing need figure for Dover District of 596 dwellings per annum. However, the affordability ratio which factors into the local housing need assessment is updated annually. For Dover District the latest housing need calculation is 611 dwellings per annum (dpa), equating to a total housing need of 10,998 dwellings for the Plan period to 2040. We understand that the Regulation 19 Local Plan seeks to meet this need in full and in addition to the minimum figures, DDC have set an appropriate contingency buffer of 926 dwellings of the Plan period, equating to 8.4% of the total Plan period figure.

5.2.2 For context, the current adopted CS requirement is 700 dwellings per annum. This followed the adoption of a high-growth strategy in 2010 of 14,000 homes to 2026 based around the recommendations of the Dover Regeneration Strategy and above the minimum 10,100 requirement across the same period, as set out in the emerging (at the time) Regional Spatial Strategy.

5.2.3 For the avoidance of doubt, accounting for the Committed Supply Total of 5,282 dwellings, the new Local Plan will be required to allocate sufficient land to accommodate a minimum of 6,642 new homes over the remaining plan period to 2040. It is understood that this will be derived from the following sources:

- Whitfield Urban Expansion Allocation: 2,200 dwellings

- Local Plan Allocations (excluding Whitfield): 3,392 dwellings

- Windfall Allowance (70 a year from year 4): 1,050 dwellings

5.2.4 On this basis, it is evident that a substantial quantum of Plan-led housing delivery will be required in order to meet the new Local Plan's housing target. Due to the nature and dwindling supply of available urban land in Dover town and the remaining higher order settlements of Deal and Sandwich, the restrictive effect of the coast, the Kent Downs AONB, environmental constraints and the limited capacity of the district's remaining mid- and lower order settlements to accommodate significant levels of growth, meeting Dover's housing needs inevitably will require the release of significant greenfield land.

5.2.5 In our view, sustainable and accessible sites logically located adjacent to existing higher-order urban areas, including Deal, represent the most sustainable and reliable sources of growth for the Plan Period, to deliver the significant number of new homes that are required and are most capable of making meaningful contributions to the associated public infrastructure, affordable housing and mix of new homes that is urgently needed in the District.

6 Site Specific Assessment

6.1 Overview

6.1.1 The previous chapters of this representation (Chapter 3-5) outline our client's position relating to the soundness of the Plan in which our client is confirmed to be supportive of the Local Plan as a sound strategy for the growth of the district to 2040.

6.1.2 Paragraph 4.146 of the Local Plan states that the urban area of Deal encompasses the built-up areas of the parishes of Walmer and Sholden. Deal is identified in the Settlement Hierarchy and Confines Topic Paper (2022) as a 'District Centre', where there is a secondary focus for development. This position is reinforced by draft policy SP3 which states that development in Deal will be at a more limited scale than Dover Town, compatible with the more limited range of job opportunities, shops, services, and other facilities available in these locations.

6.1.3 As introduced in the preceding sections, Fernham Homes Limited are supporting the residential allocation of the Site 'Land at Rays Bottom, Walmer' and. The Site is allocated for residential development in the Regulation 19 Pre-submission Plan with an indicative capacity of 75 dwellings under policy reference 'SAP15' (WAL002).

6.1.4 Appendix 1a of the Housing and Economic Land Availability Assessment (HELAA) 2022 provides the following summary:

- No heritage concerns other than archaeology.
- Site will need to reflect character of surrounding area – low density, generous landscaping, well designed.
- Potential site for executive homes.
- Risk of surface water flooding.
- Transport Assessment required.

6.1.5 The Site was considered 'Green' in the red/amber/green (RAG) rating in terms of suitability, availability and achievability, with an anticipated timescale for delivery in the medium term (2027-2031). The information contained in the summary could be addressed as part of any future planning application.

6.1.6 We agree that the Site represents a logical and sustainable location to direct the growth required within Deal and consider that the land promoted at Rays Bottom, Walmer must remain included as a future housing allocation within the Dover District emerging Local Plan. The allocation is considered to be wholly consistent with the objectives of the Plan and forms part of a sound growth strategy for the district to 2040.

6.1.7 We are firmly of the view that the allocation of Land at Rays Bottom is a necessary component of the balanced growth strategy put forward within the Pre-submission

DDC Settlement hierarchy (2022): <https://www.doverdistrictlocalplan.co.uk/uploads/pdfs/settlement-hierarchy-and-confines-topic-paper-aug-2022.pdf>

Dover District Local Plan, comprising an appropriate mix of small, medium and strategic-scale sites deliverable across the Plan period. The allocation of well-located, reliable, greenfield sites such as our client's at Land at Rays Bottom is necessary in order for DDC to meet the growing need for new homes in the district and ensure that DDC can have confidence in consistently meeting its market and affordable housing targets in full throughout the life of the new Dover District Plan.

6.1.8 Notwithstanding our client's support of the draft allocation within the Regulation 19 Plan in principle, we suggest that the policy text be re-visited prior to submission, to allow a higher dwelling per hectare guide to ensure the Site is developed to its full potential. It is submitted that the SAP15 policy wording should be amended to more accurately reflect the capability of the Site to accommodate approximately 80 dwellings deliverable early in the Plan period. Further commentary on this point is provided below in section 6.3.

6.2 Site and Surroundings

6.2.1 The Site is situated to the south of Walmer, Deal between Liverpool Road to the east and Hawksdown to the west immediately adjacent to existing residential development.

6.2.2 The Site comprises an undeveloped regular parcel of land in arable use totalling approximately 4.43 hectares, forming part of a larger arable unit to the south. The Site is bound primarily by hedgerow vegetation to the east along Liverpool Road with dense woodland and mid-storey vegetation to the north. The west boundary comprises a mix of hedgerows and trees set along the perimeter abutting residential development on Hawksdown.

Figure 6.1: Approximate Site Location (courtesy of Google Earth)

6.2.3 The wider surroundings are characterised by its edge-of-settlement location with low density existing residential development along Hawksdown to the north and west and undeveloped agricultural land to the east and south. The landscape assessment which informed the HELAA recognises that the site is:

"...relatively discrete, having housing on two sides and being located on the side of a dry valley. The sensitivity of the site is moderate as views in are limited and the flow of housing down the slope would not detract. The impact of development on the wider landscape would be minimal and this could be reduced further by providing additional buffer of landscaping along the southern boundary".

6.2.4 The Site enjoys access to a number of day-to-day facilities and services which are within a reasonable walk distance, including primary and secondary schools, local shops, healthcare, employment, and public transport links within Walmer and Deal including Walmer mainline station and frequent buses along Dover Road between Dover, Deal, Sandwich and Canterbury.

6.2.5 In terms of overarching planning constraints, the site is not subject to any overarching landscape or ecological designations and is not itself subject to any heritage constraints.

6.2.6 To the north east of the site – with intervening land - is the grade II Registered Park and Garden of Walmer Castle which is a scheduled monument, and nearby to the east is an undesignated historic First World War Aerodrome and Second World War radar station within an area of Archaeological Potential.

6.2.7 There is a low risk of a surface water flow path through the non-wooded area of the site, and along the western boundary – both of which can be easily accommodated in a residential layout.

6.3 Development Capacity

6.3.1 As set out above, the proposed allocation is for 75 dwellings, reduced from 100 dwellings at the Regulation 18 stage. The reasoning set out in the "selection of Site Allocations" (September 2022) supporting document for the reduction in capacity is "To enable a scheme to come forward which reflects the character of the surrounding area, and enable sufficient landscaping to be provided". Excluding the wooded area to the north of the site, the provision of 75 dwellings would equate to a density of 21 dwellings per hectare, with 100 dwellings equating to 28 dwellings per hectare. For the reasons set out subsequently, we consider that sites located in sustainable locations such as Land at Rays Bottom, adjacent to Deal, should take opportunities to maximise the potential for housing – whilst respecting the context and character of the area. For this reason we consider that the appropriate capacity is a little greater at approximately 80 dwellings, as part of a high-quality, landscape-led residential scheme capable of delivery within the early phase of the Plan period.

6.3.2 At this early stage, detailed proposals have not yet been advanced, however it is anticipated that any future development of the site – at 80 dwellings - will be of appropriate density, reflecting local patterns of development and sensitively designed to respect the existing character of the area, the topography of the site and to allow transition to the rural landscape and respond to its coastal location.

6.3.3 Particular care will be taken with regard to the low-risk surface flow route, impact on nearby heritage assets and ecologically sensitive sites with a particular emphasis on opportunities for biodiversity habitat creation and enhancement. Fernham Homes have a strong track record of delivering high quality housing whilst respecting such characteristics and constraints.

6.3.4 In terms of access, primary vehicular, pedestrian and cycle access to the site shall be provided from Liverpool Road. Road widening and traffic management should be provided to Liverpool Road along the frontage of the site and where possible up to the junction with Gram's Road; along with an extension to the 30mph speed limit zone. Appendix 1 indicates how this can be achieved, with the provision of a footway and suitable carriage width which meets relevant highways requirements. Alternatively, the footway could not be provided, and instead a wider carriage way could be provided. Appendix 1 also clearly shows how the required visibility splays can be achieved on land either within the site, or within the public highway.

6.4 Draft Policy Allocation 'Land at Rays Bottom between Liverpool Road and Hawksdown, Walmer' (SAP15)

6.4.1 As introduced in the preceding sections, our client's Site at Land at Rays Bottom is allocated for residential development within the Dover Pre-submission (Regulation 19) Local Plan. For ease of reference, the draft policy wording is as follows:

"SAP15 - Land at Rays Bottom between Liverpool Road and Hawksdown, Walmer (WAL002)

The site, Land at Rays Bottom between Liverpool Road and Hawksdown, as shown on the policies map is allocated for an indicative capacity of 75 dwellings.

Development proposals for the site shall include the following:

- a) Development should be low density and sensitively designed to respect the existing character of the area, the topography of the site and to allow transition to the rural landscape;
- b) A sensitive landscaping scheme and appropriate landscape buffer to the south, determined by a Landscape Visual Impact Assessment is required to mitigate the impact of development on the wider countryside and to provide opportunities for biodiversity habitat creation and enhancement responding to the nearby BOA and local wildlife site;
- c) The existing wooded area to the north of the site and the tree and shrub line along the western boundary, shall be maintained and enhanced as areas for biodiversity habitat creation.
- d) Primary vehicular, pedestrian and cycle access to the site shall be provided from Liverpool Road. Road widening and traffic management should be provided to Liverpool Road along the frontage of the site and where possible up to the junction with Gram's Road; along with an extension to the 30mph speed limit zone;
- e) The Transport Assessment that is required to be carried out in accordance with Policy TI2, must consider and identify mitigation (potential widening/traffic management measures/junction improvements) for the surrounding local road network, taking into account the cumulative impact of this and other sites allocated in this Plan, including (but not limited to) Liverpool Road and Gram's Road up to and including the Gram's Road/Dover Road junction.
- f) A site-specific Flood Risk Assessment must be carried out in accordance with Policy CC5. This shall also inform the application of the Sequential Approach to the layout of the site by locating the most vulnerable elements in the lowest risk areas;
- g) In accordance with Policy SP13, a wintering bird survey must be undertaken in advance of a planning application on the site. If the bird survey identifies that the development will exceed the threshold of significance, mitigation will be required. A suitable scheme of mitigation will need to be submitted with the planning application for the site;
- h) An Archaeological Assessment for the site must be carried out in accordance with Policy HE3 Archaeology, the results of which should inform the layout and design of the development which is necessary to avoid harm to any archaeological assets identified through the assessment;
- i) A Heritage Assessment carried out in accordance with Policy HE1 is required to identify any necessary measures to avoid or minimise harm to the nearby heritage assets; and
- j) The occupation of the development should be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider. Development should provide a connection to the sewerage system at the nearest point of adequate capacity and ensure future access to the existing sewerage infrastructure for maintenance and upsizing purposes."

6.4.2 To be clear, our client remains wholly supportive of the principle of the allocation of the Site for residential development. Fernham Homes has a strong track record of swift delivery, and commits to being able to deliver the Site within the early phase of the Plan period. We agree that it represents a logical and sustainable location to direct growth consistent with the growth strategy of the Plan as a whole, however we submit that more effective use of our client's Site can be made – and therefore object to the capacity identified.

6.4.3 Accordingly, we say that the allocation of Land at Rays Bottom is necessary in order for DDC deliver proportionate and high-quality sustainable growth within Deal, meet the growing need for new homes in the district and ensure that DDC can have greater confidence in meeting its market and affordable housing targets in full.

6.4.4 It is submitted that the SAP15 policy wording is sound and appropriately reflects the capability of the site to deliver a sensitive, landscape-led residential development but the wording should be amended to reflect the capability of the Site to accommodate approximately 80 dwellings, deliverable with the early phase of the forthcoming Plan period.

6.4.5

6.5 Strategic Justification for Development

Spatial Strategy

6.5.1 The proposed Housing Distribution for the district across the Plan period is established within Policy SP3 'Housing Growth' which sets out that the distribution of housing growth in the district is primarily based on the settlement hierarchy and influenced by site availability, environmental constraints and factors of delivery.

6.5.2 Rightly, a key aim of the growth strategy is to focus development in the least sensitive areas of the district in order to conserve and enhance the Dover's rich natural and historical environment.

6.5.3 A retained theme from the adopted Plan, is that DDC's settlement strategy continues to focus on the development and regeneration of Dover Town and Whitfield (3381 dwellings). Approximately half of the district's planned housing is in this location, the majority of which again is to come forward as part of the strategic urban expansion of Whitfield 'SAP1' (2200 minimum dwellings).

6.5.4 Development will then be focused in the District Centre of Deal (223 dwellings), and the Rural Service Centres of Sandwich (227 dwellings) and Aylesham (649 dwellings). Following the settlement hierarchy rigidly would distribute housing in the preceding order, however the Plan recognises that housing delivery in Deal and Sandwich continues to be constrained by a number of factors including flood risk, ecological designations, heritage and highways. Further, Deal has experienced generally high levels of windfall development across the previous Plan period and accordingly there is now a dwindling supply of available, suitable sites in both settlements. On account of this context, DDC have sought to direct the majority of the remaining higher order settlement growth (outside of Dover & Whitfield) to Aylesham, through the strategic expansion to the town.

6.5.5 Outside of the four principal district settlements, the Rural Settlement Hierarchy (August 2022) identified that the majority of lower-order settlements in the district emerge as having a low level of facilities within the hierarchy and six settlements having none of the key indicators of sustainable services. Plainly, these settlements offer very limited opportunities for growth and it is evident that the forthcoming Plan will remain reliant on the settlements of Dover (including Whitfield), Deal, Sandwich and Aylesham to deliver the housing growth that is required.

6.5.6 Given this context, it is clear that where available and suitable opportunities for residential development do exist within the district's higher order settlements, including our client's Site at Land at Rays Bottom, Walmer which can provide a policy compliant level of much-needed affordable housing, it is imperative that the effective use of these sites are appropriately maximised in accordance with national policy objectives.

6.5.7 Notwithstanding our client's in principle support of the proposed strategy, we are concerned that highly sustainable, edge-of-settlement sites, particularly in higher tier settlements such as Deal have not been fully maximised to reflect their accessible location and capability to accommodate a greater quantum of development. On this basis, we are concerned that the strategic objectives underlying draft policy SP3 'Housing Growth' may not be fully realised, to the detriment of market and affordable housing delivery and the wider policies seeking to conserve and enhance the district's natural and historic environment.

6.5.8 Consequently, our clients object to policy SP3 as drafted, on the basis that there is a clear need to maximise the delivery of housing at sites around Deal (whilst ensuring that sensitive characteristics are reflected), and this has not been undertaken – for example at Rays Bottom, Liverpool Road. It is our view that the site has sufficient capacity to deliver approximately 5 additional units over the draft allocation, that will otherwise be required to be delivered elsewhere in the district, in potentially less accessible and more sensitive locations.

6.5.9

Greenfield Development and Consistency with Housing Trajectory

6.5.10 Due to the nature and dwindling supply of available urban land in Dover town and the remaining higher order settlements of Deal and Sandwich, the restrictive effect of the coast, the Kent Downs Area of Outstanding Natural Beauty, environmental constraints and the limited capacity of the district's remaining mid- and lower order settlements to accommodate significant levels of growth, greenfield development will inevitably be required if DDC is to meet its housing and development commitments in full moving forward.

6.5.11 In our view, sustainable and accessible unconstrained sites logically located adjacent to existing urban areas, including Deal, represent the most sustainable and reliable sources of growth for the Plan period, to support the role and timescales of strategic urban extensions and to deliver the significant number of new homes that are required within the forthcoming Plan period.

6.5.12 Within Deal itself, meaningful housing growth is inherently constrained on three sides due to the restrictive effect of the coast to the east and Flood Zone 2/3 land and ecologically sensitive sites including SSSIs to the north and west. Alongside overarching objectives to minimise the incursion of widespread development into the rural countryside, the scope for significant Plan-led development in Deal is becoming increasingly limited. Accordingly, we firmly agree that sites to the south of Deal, including that of our clients in Walmer, represent the least sensitive and most logical locations for future Plan-led growth, making effective use of the availability of sites in close proximity to the Urban Area and key infrastructure including Walmer train station.

6.5.13 In terms of housing delivery in Deal, the development of Land at Rays Bottom (75 dwellings) is anticipated to deliver completions with Years 9-11 of the Plan period, although as detailed above our clients have a strong track record of swift delivery, and consider that it could be delivered ahead of this. When combined with extant permissions within Deal and nearby allocations at Land off Cross Road, Deal (SAP14) and Deal Small Housing Sites (SAP16) totalling 100 dwellings and 48 dwellings respectively, our client's site will assist in delivering a steady supply of new homes within Deal across the majority of the early and middle phases of the Plan period and contribute to providing genuine choice in the market.

6.5.14 Moreover, in our experience, greenfield edge-of-settlement sites are typically most capable of making meaningful contributions to the associated public infrastructure, affordable housing and mix of new homes that are urgently needed in the district.

6.5.15 The Sustainability Appraisal Scoping Report (2018) sets out that over the course of the adopted Plan period, the key sustainability issues facing Dover District in relation to housing are as follows:

Population growth, household growth and demographic change will place additional demand on key services and facilities such as housing, health, education and social care. The Local Plan offers a new opportunity to manage these pressures, encouraging mixed communities;

There is a need for affordable housing across the District. At present, the mean price of dwellings is higher than the national average. The Local Plan will help to expedite its delivery; and,

There is the need for a mix of housing types that cater for the needs of a range of people, including the growing number of single person and elderly households. Without an up-to date Local Plan, the required housing is less likely to be delivered.

6.5.16 It is evident that the new Dover Local Plan must allocate a mix of reliable sites capable of steadily delivering not only the quantum of housing that is required, but also the associated public infrastructure, affordable housing and a mix of unit types and tenures suitable for a wide range of future occupants.

6.5.17 The Housing Topic Paper (September 2022) provides further context and summarises under Chapter 7 'Historical Housing Delivery' that Dover has historically placed significant reliance on windfall development over the current adopted Plan period, with windfall sites accounting for 44% of all completed dwellings over the preceding 10-year period.

Figure 1: DDC Brownfield / Greenfield Completions 2010/11 to 2020/21
(source: Housing Topic Paper September 2022)

6.5.18 Moreover, it is highlighted that at the beginning of the 10 year period, the majority of new dwellings were being built on brownfield land. However, from the monitoring year 2013-14 onward development on greenfield land began to play a much greater part in the location for new development as show in figure 1 above. This trend of increased housing development on greenfield land is a result of the

allocations within the CS and Land Allocation DPD being built out and is associated with an approximate doubling of completions in the district. From 2013-14 onwards the average number of completed dwellings per annum has doubled to that of the early years of the CS, as the strong delivery rates of greenfield sites formed the predominant source of housing. This is despite an overall declining trend of brownfield completions towards the latter half of the Plan period. This is not an uncommon trend whereby in the majority of local planning authorities areas, opportunities for available and suitable sites in urban centres typically dwindle throughout the Plan period.

6.5.19 In light of the above context, it is clear that the adopted Dover Local Plan suffered from an initial under delivery of Plan-led housing growth in which windfall development sources were largely required to take up the slack in the early phases of the Plan period, as major allocated sites failed to deliver at the rates initially expected.

6.5.20 It is equally apparent that initial slow completions rates were quickly renewed once greenfield allocations commenced development, feeding into strong completions in the latter half of the Plan period. In our experience, greenfield sites are typically associated with stronger delivery rates and provide a reliable source of housing growth. The allocation of an appropriate mix of sites and scales is required in order to ensure steady and sustained Plan-led housing delivery across the Plan period and to avoid a reliance on windfall development to address the shortfall.

6.5.21 Consequently, given all of the above, it is imperative that the new Local Plan allocates a sufficient variety and scales of site capable of both ensuring steady and sustained housing completions and capable of making necessary contributions to public infrastructure and services, affordable housing and mix of unit types to address the key issue raised in the Sustainability Appraisal.

6.5.22 In our view, edge-of-settlement greenfield sites such as our client's Site Land at Rays Bottom, Walmer represents the most reliable and sustainable source of housing delivery for the Plan period. Such sites are typically less constrained by wider factors and less affected by unforeseen delays such as land contamination. Moreover, greenfield sites typically are more capable of delivering the policy compliant affordable housing, unit mix and developer contributions that are urgently needed.

6.5.23 It is understood that the Plan is predicated on the delivery of strategic scale development at Whitfield comprising the development of circa 2,200 new homes. Consequently, in order to avoid a repetition of the previous Plan, DDC have sought to ensure that a pool of reliable greenfield allocation, including that of our client's are included within the Plan, capable of delivering the early and middle phase growth that is required within the housing trajectory prior to the commencement of stronger delivery from major allocations later in the Plan period.

6.5.24 We note that within the Housing Trajectory 'Appendix D', DDC have included allocated units from Years 4 onwards, with extant permissions (accounting for 5% non-implementation) demonstrated to be solely capable of delivering the growth required in Years 1-3. Notwithstanding our client's considerations that it can deliver at Land at Rays Bottom early in the plan period, we support this pragmatic approach and suggest this represents a sound basis on which to set the district's housing trajectory. We note also the inclusion of an appropriate windfall allowance and the included contingency buffer to further ensure reasonable flexibility in the housing supply.

6.5.25 On account of all of the above, we submit that the allocation of Land at Rays Bottom, Walmer forms part of a sound strategy for growth in the district for the forthcoming Plan period. The Site is capable of delivery within the early phase of the Plan period. The Site represents a reliable source of housing growth in a highly sustainable and accessible location adjacent to the existing settlement boundary of Deal and Walmer mainline station, consistent with DDC's preferred settlement strategy. Proposals remain at an early stage, however the Site is unconstrained and is considered capable of providing a high-quality landscape-led residential development including a mix of unit types and tenures, a meaningful contribution to the supply of affordable housing and contributions to public services and infrastructure, benefiting both existing residents and future occupiers. However, we object on the submission that the Site is capable of making a greater contribution to the district's housing need and suggest an amended wording of the policy to allocate the Site for approximately 80 dwellings.

Policy SP4 'Windfall Development'

6.5.26 Separately, we note the provisions of policy SP4 windfall development. Proposals at Rays Bottom, Walmer would likely be acceptable in principle under this policy and we support the inclusion within the Plan for appropriate, proportionate windfall development.

6.5.27 Our client is fully committed to the delivery of the Site which is available and anticipated for delivery in the early phase of the Plan period. Notwithstanding the provisions of SP4, it is reiterated that our client fully supports the allocation of the Site under SAP15 as the most appropriate mechanism for delivery of the Site and the opportunity for genuinely Plan-led development in Deal, the provision of associated benefits to public services and infrastructure, contribution to affordable housing supply and the delivering of a mix of house types and tenures.

Infrastructure Delivery

6.5.28 Paragraph 11 of the Framework is clear that all plans should promote a sustainable pattern of development. This includes aligning growth and infrastructure. Paragraph 20 goes on to confirm that strategic polices will be expected to make sufficient provision for associated development infrastructure.

6.5.29 In this regard, draft policies SP11 'Infrastructure and Developer Contributions' and SP12 'Strategic Transport Infrastructure' of the emerging Plan form the key strategic polices for infrastructure delivery. We agree that where development would create a need, or would have an impact, or would exacerbate an existing deficiency in infrastructure provision, appropriate developer contributions may be sought.

6.5.30 It is however emphasised that in all developments, infrastructure requirements must be demonstrated to be necessary through assessment during determination of the application on a case-by-case basis. Where new development is proposed, it does not automatically follow that major infrastructure contributions are always required or contribution to strategic infrastructure proposals are appropriate. For instance, it is our client's view that any infrastructure requirements must be demonstrated through a robust and transparent assessment at application stage, taking into account the submission of detailed supporting evidence, for example following consideration of the Transport Assessment in the case of highway infrastructure contributions.

Alignment with Sustainability Appraisal Findings

6.5.31 As part of the preparation of the Local Plan, the Council has identified and appraised a range of growth and spatial options through the Sustainability Appraisal (SA) which provides an assessment of how different options perform in environmental, social and economic terms, to help inform which option should be taken forward and combined with wider evidence documents, have been used to determine the growth and spatial strategy set out in the Plan.

6.5.32 Five potential distributions of growth were identified during preparation of the draft Regulation 18 Local Plan:

- **Spatial Option A: Distributing growth to the District's suitable and potentially suitable housing and employment site options (as needed to deliver the scale of growth required).**
- **Spatial Option B: Distributing growth proportionately amongst the District's existing settlements based on their population.**
- **Spatial Option C: Distributing growth proportionately amongst the District's existing settlements based on the District's defined settlement hierarchy.**
- **Spatial Option D: Distributing growth in the same way as the adopted Local Plan, focussing most growth in and around Dover town.**
- **Spatial Option E: Distributing growth more equally across the District's settlements: Dover, Deal, Sandwich and Aylesham, as well as the rural villages.**

6.5.33 The conclusion of the SA was that Spatial Options C (settlement hierarchy) and D (adopted Core Strategy with Dover focus) generally perform the most strongly against the SA objectives, particularly when delivering the baseline growth scenario. However, given the environmental constraints that exist around Deal and Sandwich, very few suitable and potentially suitable sites have been identified in these towns. Given this, the Council's preferred option for the distribution of housing and economic growth comprises a combination of options A (HELAA sites), C (settlement hierarchy) and D (Dover focus). The distribution of housing and economic growth in the District is therefore primarily based on the settlement hierarchy, and influenced by site availability, environmental constraints and factors of delivery.

6.5.34 On account of the above, our client agrees that the proposed growth strategy, and by extension, policy SP3 in principle represents a sound and evidence-led strategy for growth. However, given the clear acknowledgement of the dwindling supply of available sites in the higher order settlements of Deal and Sandwich, which has necessitated a minor deviation from the strongest performing spatial options, we submit that where sites are available and suitable for development in Deal and Sandwich, these must be fully maximised, reflecting their accessible location and their ability to reduce the need to develop into less accessible and more sensitive sites elsewhere in the district to accommodate the growth that is required.

Site Specific Sustainability Appraisal

6.5.35 Land at Rays Bottom between Liverpool Road and Hawksdown is included under HELAA reference 'WAL002' within the SA Site Assessment (Appendix F). The site generally performs strongly, with particular positives identified with regards to SA Objectives related to housing and the economy.

6.5.36 We contest the assessment of 'minor negative' in regard to sustainable transport. To the contrary, the site is well-located adjacent to the settlement boundary of Deal with access to a range of high-quality day-to-day services and access to Walmer train station for convenient access to larger settlements. In what is otherwise a largely rural district, we strongly disagree with the suggestion that an edge-of-settlement site represents a less than preferable location in respect of sustainable travel and day-to-day access to amenities.

6.5.37 We also note negatives associated with the development of a greenfield site, including loss of agricultural land, however this would be true of the majority of greenfield sites and it is abundantly clear that Dover's housing need cannot be met solely on brownfield sites. We note also minor negatives / uncertain associated with biodiversity, the historic environment and landscape, however it is not clear whether these take into account the potential for high-quality design, biodiversity enhancement and landscape mitigation. Irrespective, these are not considered to outweigh the clear and tangible sustainability benefits associated with edge-of-settlement development, the site's consistency with the preferred

spatial options and the wider benefits associated with reducing the need to develop into lesser accessible, more sensitive sites to otherwise deliver the housing growth that is required.

Summary

6.5.38 Taking all of the above into consideration, our client is wholly supportive of the inclusion of land promoted at Rays Bottom, Walmer as a future housing allocation within the Dover District emerging Local Plan. The allocation is considered wholly consistent with the objectives of the Plan and forms part of a sound growth strategy for the district to 2040.

6.6 Deliverability

6.6.1 Prior to the current appeal proposal, the Site has had no recent planning history of a residential nature or a history of unimplemented permissions. There are not considered to be any impediments to the Site being allocated for development commencing within the early (or mid) phase of the Plan period.

6.6.2 Fernham Homes – a local SME with a strong history and track record of delivery, together with an adopted and robust business plan for growth – is promoting the site, and are poised to commence work on its residential development promptly after the adoption of the Local Plan.

6.6.3 Combined with the delivery of extant permissions, an appropriate number and scale of wider allocations within Deal (including SAP 14 and SAP 16) and elsewhere across the district, this would ensure the steady delivery of housing both in Deal and in Dover district across the majority of the Plan period and support the role and timescales of strategic housing delivery at Whitfield towards the latter half of the Plan period.

6.6.4 For the reasons set out in this representation, the Site is considered suitable for the residential development of approximately 80 dwellings. The Site is adjacent to the overarching urban area of Deal, one of the four higher order settlements in the district and DDC's preferred locations for Plan-led growth within the district. Development at land at Rays Bottom would form a natural and logical development south of Walmer, Deal with excellent accessibility to day-to-day services and amenities via active travel modes within Deal itself and convenient access to public transport infrastructure including Walmer train station for onward travel to key neighbouring settlements including Dover, Ramsgate, Canterbury and Ashford.

6.6.5 Finally, in respect of suitability there are no physical limitations or problems such as access, infrastructure, flood risk, hazardous risks, pollution or contamination.

6.6.6 On behalf of the landowner, we submit that there are no known financial restrictions that would impact upon the viability of a future housing scheme or that would prohibit development coming forward within the mid-stages of the Plan period. To the contrary, we consider there to be an opportunity to deliver a high-quality, sustainably located residential development scheme consistent with DDC's proposed growth strategy comprising an appropriate mix of market and affordable housing and capable of contributing to a range of community facilities, public infrastructure and services locally.

6.6.7 At the time of writing, proposals at Rays Bottom, Walmer remain at an early stage, however our clients are firmly committed to progressing the delivery of the Site on adoption of the Plan. The project team therefore does not anticipate any absolute constraints to the commencement of delivery on-site early in the plan period (potentially 2025-26) and completion by 2028/9).

6.6.8 The Site is in single ownership and there are no complicated legal agreements or covenants that would prohibit the ability to bring forward the Site in line with DDC's housing trajectory within the mid-phase of the Plan period. The Site is therefore considered available and achievable for the purposes of the tests of deliverability.

7 Conclusion

7.1 Summary

7.1.1 This representation has been prepared by DHA Planning on behalf of Fernham Homes Limited in response to the DDC Local Plan (Regulation 19) consultation which runs until 9th December 2022.

7.1.2 Our client is promoting 'Land at Rays Bottom, Walmer, Deal' for the residential allocation of the Site as part of the new Dover District Local Plan preparation process. The Site is allocated for residential development in the Regulation 19 Pre-submission Plan within an indicative capacity of 75 dwellings under policy reference 'SAP15'.

7.1.3 Taking the above representation contents into consideration, we remain wholly supportive of the principle of the allocation of Land at Rays Bottom and agree that the Site represents a logical and sustainable location to direct necessary growth within Deal.

7.1.4 Accordingly, we consider that the land promoted at Rays Bottom, Walmer must remain included as a future housing allocation within the Dover District emerging Local Plan. The allocation is considered to be wholly consistent with the objectives of the Plan and forms part of a sound growth strategy for the district to 2040. However, it is imperative that the effective use of these higher-order settlement sites are appropriately maximised in accordance with draft policy SP3 of the emerging Plan, and wider policies seeking

to otherwise conserve and enhance the district's natural and historic environment and national planning policy objectives. We are concerned that this has not been fully undertaken and object solely on this basis.

7.1.5 Consequently, our clients object to policy SP3 as drafted, on the basis that there is a clear need to maximise the delivery of housing at sites around Deal, and this has not been undertaken – for example at Land at Rays Bottom, where it is considered that the site has sufficient capacity to deliver approximately 5 additional units over the draft allocation, that will otherwise be required to be delivered elsewhere in the district, in potentially less accessible and more sensitive locations.

7.1.6 Outside of the point regarding capacity, it is submitted that the SAP15 policy wording is sound and appropriately reflects the capability of the site to deliver a sensitive, landscape-led residential development with an indicative capacity of 80 dwellings, deliverable with the early phase of the forthcoming Plan period. Without prejudice to our client's support in principle of the proposed allocation, we would urge the Council to re-visit the allocation policy text and allow a higher dwelling capacity.

7.1.7 Accordingly, we say that the allocation of Land at Rays Bottom forms part of a balanced growth strategy comprising an appropriate mix of small, medium and strategic-scale sites deliverable across the Plan period. The allocation of well-located, reliable, greenfield sites such as our client's at Land at Rays Bottom is necessary in order for DDC to meet the growing need for new homes in the district and ensure that DDC can have confidence in consistently meeting its market and affordable housing targets in full throughout the life of the new Dover District Plan.

7.1.8 In addition to being a highly sustainable and logical edge-of-settlement allocation, the Site is deliverable in a single land ownership with no viability issues, legal or third-party constraints present. Our client is fully committed to the delivery of land at Rays Bottom Farm and there are no impediments to the Site being capable of delivery within the mid-phase of the Plan period.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

For the reasons set out in the consultation response submitted on behalf of Fernham Homes Limited (ref DHA/30359), the capacity of Land at Rays Bottom between Liverpool Road and Hawksdown, Walmer (WAL002) and Policy SP3 - Housing Growth should be increased to approximately 80 dwellings.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Please refer to the consultation response submitted on behalf of Fernham Homes Limited (ref DHA/30359).

Include files

[30359 DDC Rep_Walmer FINAL 09 12 22.pdf](#)

Local Plan Consultation Point

Strategic Policy 3 - Housing Growth

Rep ID

SDLP1523

Rep Status

Processed

Consultee ID

1333323

Consultee Full Name

Kavanagh Motor Services Ltd

Consultee Company / Organisation

Agent Full Name

Grace

	Martin
Agent Company / Organisation	Hume Planning Consultancy Ltd
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Representation submitted by Hume Planning. Full Representation attached to SDLP1522. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1522.) SP3: Housing Growth Whilst we welcome DDC's commitment to meeting its housing need, with Strategic Policy SP3 committing to providing at least 10,998 net additional homes over the Plan period, it is considered additional sites if suitable and available should be included within the Plan. A large proportion of growth is being directed towards the expansion of Dover/Whitfield (over 2,000), and a large proportion to land to the south of Aylesham (640). Large strategic sites delivery rates can easily slow down during the plan period and under-deliver. Whilst there is a buffer within the Plan, it is considered appropriate not use this as a limit and allocate other suitable sites in sustainable locations where available. As detailed above, the employment site at Ratling Road, is considered suitable for residential development. It is also available and can be delivered within the short to medium term, and in our view this site should be allocated within the Plan.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth

Rep ID	SDLP1607
Rep Status	Processed
Consultee ID	1333364
Consultee Full Name	Sunningdale House Ltd
Consultee Company / Organisation	
Agent Full Name	Grace Martin
Agent Company / Organisation	Hume Planning Consultancy Ltd
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Representation submitted by Hume Planning. Full Representation attached to SDLP1606. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1606.) SP3: Housing Growth We welcome DDC's commitment to meeting its housing need, with Strategic Policy SP3 committing to providing at least 10,998 net additional homes over the Plan period. Within the Policy, reference is made to the Council's overall spatial strategy i.e. the majority of growth will be focused towards the principal town, Dover, and the expansion/planned new settlement at Whitfield. It is appropriate that smaller settlements in the district, i.e. the larger and smaller villages, receive some growth to sustain their role in the settlement hierarchy over the plan period.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1349
Rep Status	Processed
Consultee ID	1333128
Consultee Full Name	David Powell
Consultee Company / Organisation	
Agent Full Name	Klaire Lander
Agent Company / Organisation	Lander Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Lander Planning sent a PDF document which has been split across the relevant sections of the Plan. See Original Attachment on SDLP1346) The identification of sufficient housing sites is crucial to the Local Plan being sound and positively prepared. This policy is supported.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1309
Rep Status	Processed
Consultee ID	1331922
Consultee Full Name	Matthew Porter
Consultee Company / Organisation	Fernham Homes Ltd & Walker Residential Ltd
Agent Full Name	Matt Porter
Agent Company / Organisation	DHA Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy SAP22 - Land at Archers Low Farm, St Georges Road Sandwich (SAN023) Policy SP3 - Housing Growth Policy SP4 - Windfall Development Policy SP11 - Infrastructure and Developer Contributions Policy SP12 - Strategic Transport Infrastructure
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We consider that the plan is sound, but object to elements of Policy SAP22 - Land at Archers Low Farm, St Georges Road Sandwich (SAN023) and Policy SP3 - Housing Growth. These objections are set out in the consultation response submitted on behalf of Fernham Homes Limited and Walker Residential Limited (ref DHA/30245).</p> <p>1 Introduction</p> <p>1.1 Purpose of this Representation</p> <p>1.1.1 This representation has been prepared by DHA Planning on behalf of Fernham Homes Limited and Walker Residential Limited in response to the Dover District Council 'DDC' Local Plan (Regulation 19) consultation which runs until 9th December 2022.</p> <p>1.1.2 We understand that DDC is in the process of preparing a new Local Plan to set out a strategy for development for the period to 2040 and that the Council are presently seeking comments on the pre-submission Plan prior to its submission for examination in early 2023.</p> <p>1.1.3 Our client controls 'Land at Archers Low Farm, Sandown Road, St Georges Road, Sandwich' (hereafter referred to as 'Land at Archers Low' or 'the Site') and is promoting the residential allocation of the Site as part of the new Dover District Local Plan preparation process. The Site is allocated for residential development in the Regulation 19 Pre-submission Plan for the provision of 35 dwellings under policy reference 'SAP22'.</p>

1.1.4 It is highlighted that as part of the Regulation 18 Local Plan, the Site was allocated under the 'Site Allocations Policy 1 Non-Strategic Housing Allocations' for approximately 40 dwellings (reference SAN023).

1.1.5 The purpose of the representation is to support the allocation of 'Land at Archers Low' for a greater quantum of development and provide comment on the consistency of the allocation with the proposed strategy, draft policies and our client's position in respect of the 'soundness' of the Plan, but to object to the indicative capacity set out in the policy.

1.1.6 In this regard, we remain wholly supportive of the principle of the residential allocation of the Site and agree that it represents a logical and sustainable location to direct growth consistent with the growth strategy of the Plan as a whole, however we submit that more effective use of our client's Site can be made – and object (solely) to this element of the policy.

1.1.7 Accordingly, we say that Land at Archers Low can further assist the Council in meeting the growing need for new homes in the district and help to ensure the Council can have greater confidence in meeting its market and affordable housing targets in full.

1.1.8 Based on the current national and local planning context, we consider the Site to be a highly suitable edge-of-settlement location to allocate land for housing to help meet the need for new homes in the district and its effective use should be appropriately maximised in accordance with national policy objectives.

1.1.9 Further details regarding the Site and commentary on the consistency of the allocation with the proposed strategy, draft policies and our client's position in respect of the 'soundness' of the Plan are set out in the following sections of this document.

1.2 About Fernham Homes

1.2.1 Fernham Homes Limited are a local award winning small and medium sized (SME) housebuilder, established in 1997 and has a strong track record of delivering high quality residential and mixed use developments in Kent over the last 25 years. This has been acknowledged through the receipt of nationally recognised awards, including the gold Evening Standard Awards best family home 2022 and 2019 bronze WhatHouse Best Small Housebuilder.

1.2.2 SME housebuilders are recognised in the National Planning Policy Framework ('NPPF') at paragraph 69 as making an important contribution to meeting the housing requirements of an area, and being able to build out relatively quickly. Similarly, this has also been recognised by the Planning Inspectorate. This is particularly the case with Fernham Homes, which is privately owned with access to significant resources. This provides significantly more flexibility than national and other regional housebuilders, and allows Fernham Homes to deliver housing rapidly and to a high quality, beautiful and sustainable standard (para 126 of the NPPF).

1.2.3 Fernham Homes Limited has embarked on a sustained period of growth, with an adopted and robust business plan to deliver around 300 houses per year in five years time.

1.2.4 A key element of Fernham Homes' operations is to take a very careful approach to site selection: a huge amount of due diligence is undertaken as part of this, and therefore Fernham Homes Limited only invests in those sites which meet the NPPF requirements of being available, suitable, and deliverable. As set out below land at Archers Low Farm, Sandwich ('SAP22') is firmly considered to be such a site.

1.2.5 Similarly, a key feature of Fernham Homes' approach is to work positively and proactively with local planning authorities (LPAs), both during the preparation of local plans and at planning application stage. Fernham Homes Limited are fully committed to engaging with Dover District Council in the preparation of its Local Plan, and firmly subscribe to the national policy approach set out in paragraphs 15 and 16 c) of the NPPF that "the planning system should be genuinely plan-led" and should be shaped by early, proportionate and effective engagement between LPAs and others, including businesses and developers. Accordingly, Fernham Homes Limited would welcome the opportunity to discuss the matters contained in this representation, including the availability, suitability, deliverability and capacity of land at Archers Low Farm, Sandwich ('SAP22') directly with Dover District Council members and officers, ahead of the submission of the Local Plan for examination.

1.3 Representation Structure

1.3.1 The representation structure is outlined below for ease of reference:

Chapter 2 (Consultation Background) – Sets out the context of the Dover District new Local Plan preparation, relevant national planning requirements and a summary of our current position.

Please refer to paragraph 52 of appeal decisions: APP/M2270/W/21/3283924 and APP/M2270/W/21/3288645

Chapter 3 (Legal Tests of Soundness) - Assessing whether the plan is sound, having regard to the tests of soundness outlined by paragraph 35 of the NPPF.

Chapter 4 (Duty to Co-operate) - Assessing whether the plan is sound, having regard to the duty to cooperate outlined by paragraph 24 of the NPPF.

Chapter 5 (Housing Need) - Consideration of market and affordable housing need and assessment of proposed housing allocations and supply sources.

Chapter 6 (Assessment of Suitability) - Re-introduces our client's Site and provides a summary of planning constraints and opportunities, including the quantum of development that could be accommodated, why the Site is suitable for development and why the principle of the draft allocation for residential development is both justified and consistent with the Council's strategy for growth in the district. It also sets out why we consider there is scope for a higher number of dwellings at the site. This consideration amounts to an objection to one element of the strategy – namely that those sites around the most sustainable settlements should be maximised.

Chapter 7 (Conclusion) - Summarises the key points raised throughout the representation and re-affirms our client's support for the principle of the Site's allocation and the principle of the proposed strategy ahead of the submission of the Plan for examination, and the objections in terms of capacity.

2 Dover District Council – Draft for Submission Local Plan (Regulation 19)

2.1 Consultation Background

2.1.1 DDC are required to prepare a new Local Plan, as the current suite of development plan documents were adopted in 2002, 2010 and 2015. The Core Strategy (CS) (adopted 2010) in particular has a time horizon up to 2026 and requires updating.

2.1.2 The new Local Plan will set out the vision, strategic objectives and overarching development strategy for the growth of the District over the period to 2040. It provides the planning policy framework to guide the future development of the area, addressing needs and opportunities for housing, the economy, community facilities and infrastructure, as well as the basis for conserving and enhancing the natural and historic environments, mitigating and adapting to climate change, and achieving well designed places.

2.1.3 For the avoidance of doubt, the new Local Plan, on adoption, will replace the CS 2010 and the Land Allocations Plan 2015, as well as saved policies from the 2002 Local Plan.

2.1.4 DDC's Regulation 19 Local Plan outlines the key issues that need to be addressed between now and 2040. In particular, the Plan sets out the following key planning issues for the District:

- Ensuring that new development in the District contributes to the mitigation of, and adaptation to, climate change.
- Supporting the Council to deliver its intention to be a carbon neutral district by 2050.
- Managing flood risk and coastal change.
- Ensuring that a sufficient amount and variety of land is identified to deliver a continuous supply of housing across the Plan period and that the Council maintains a five-year housing land supply.
- Delivering growth in a way that focuses development in the least sensitive areas of the District in order to conserve and enhance the District's rich natural and historic environments.
- Supporting sustainable development in rural areas to enhance the vitality of rural communities.
- Working with partners to facilitate the delivery of the Whitfield Urban Expansion.
- Ensuring a range of housing tenures, types and sizes are provided across the District to meet the needs of the local community and provide choice and flexibility in the housing market.
- Promoting economic growth, tourism, and investment in the District's Town Centres in line with the Council's Economic Growth Strategy.
- To address the impact of the COVID-19 pandemic.
- Delivering strategic transport improvements, including upgrades to the Duke of York and Whitfield roundabouts to support the scale of housing and economic growth identified in the Plan.
- Promoting sustainable transport initiatives to encourage a modal shift to more sustainable forms of transport like walking and cycling.
- Ensuring that infrastructure is delivered, in the right place, at the right time, to meet the needs of the District and support the levels of development identified in the Local Plan.
- Supporting the delivery of attractive, high-quality, design led developments and the creation of healthy, inclusive and safe communities, that are well served by good quality services and facilities to support people's lives.
- Conserving and enhancing the District's rich and diverse natural landscape, including the five international sites within the district, the Kent Downs Area of Outstanding Natural Beauty (AONB), five Sites of Special Scientific Interest (SSSIs), two National Nature Reserves (NNRs), two stretches of Heritage Coasts and two Marine Conservation Zones.
- Delivering a net gain in biodiversity in the District over the plan period.

- To promote the conservation, restoration and where appropriate the enhancement of the District's heritage assets, in order to protect their significance and to ensure that they can be best appreciated and enjoyed by current and future generations.

2.1.5 The new Local Plan will be examined by an Inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is 'sound'. This submission will comment on each of the above, highlighting where we believe any areas of concern lie or where modifications may be required.

2.2 DDC's Local Development Scheme

2.2.1 The District Council has a duty to review the policies contained within the development plan every five years. The 2014/2015 Authority Monitoring Report signalled the need to review key parts of the Council's adopted CS evidence base.

2.2.2 The Council's Local Development Scheme (LDS) first outlined the delivery timetable for the Local Plan Review (LPR) in the March 2017 publication. Since then, the LDS has been updated on an annual basis. The most recent September 2022 LDS summarises that following the preparation of the principal evidence base documents, the Local Plan Review Regulation 18 consultation took place for 8 weeks in January 2021. The Regulation 19 consultation was scheduled for 7 weeks during Q4 of 2022 and is the subject of this representation.

2.2.3 Moving forward, submission of the Plan is anticipated in Q1-2 2023 with the Examination in Public in Q3-4 2023. The new Local Plan is currently scheduled for adoption in 2024.

2.2.4 As planned, DDC are now undertaking the Regulation 19 Draft Local Plan Consultation, for which this submission is made

3 Legal Test of Soundness

3.1 Legislation and Guidance

3.1.1 The new Local Plan will be examined by an Inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is 'sound'. It is a statutory requirement that every development plan document must be submitted for independent examination to assess when it is "sound", as well as whether other statutory requirements have been satisfied (s.20(5) of the 2004 Act). By s.19 of the 2004 Act, in preparing a development plan document a local planning authority must have regard to several matters including national policies and advice contained in guidance issued by the Secretary of State. Such guidance currently exists in the form of the NPPF and is summarised below. This states that Plans must be:

(a) Positively Prepared: based on a strategy which seeks to meet objectively assessed development and infrastructure requirements

3.1.2 This means that the Local Plan should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. The NPPF set out principles through which the Government expects sustainable development can be achieved.

(b) Justified: an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence

3.1.3 This sets out the requirement that the Local Plan should be based on a robust and credible evidence base involving:

I. Research/fact finding: the choices made in the plan are backed up by facts.

II. Evidence of participation of the local community and others having a stake in the area.

3.1.4 The Local Plan should demonstrate an appropriate strategy, taking into account reasonable alternatives and based on proportionate evidence. These alternatives should be realistic and subject to sustainability appraisal. The Plan should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

(c) Effective: deliverable over its period based on effective joint working on cross-boundary strategic priorities

3.1.5 This makes clear that the Local Plan should be deliverable, requiring evidence of:

- Sound infrastructure delivery planning;
- Having no regulatory or national planning barriers to delivery;
- Delivery partners who are signed up to it; and
- Coherence with the strategies of neighbouring authorities, including neighbouring marine planning authorities.
- The new Local Plan should be flexible and able to be monitored.

3.1.6 The Local Plan should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen. The plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the Local Plan should make clear that major changes may require a formal review including public consultation. Any measures which the Council has included to make sure that targets are met should be clearly linked to an Annual Monitoring Report.

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national policy.

3.1.7 This submission comments on each of the above in further detailing, highlighting areas of support and where modifications are required as appropriate.

3.2 Legal Compliance

3.2.1 In terms of legal compliance, the main requirements for the early stages of Local Plan consultation are in relation to:

- planning for community engagement;
- the sustainability appraisal (including consultation with the statutory environment consultation bodies);
- identifying significant cross boundary and inter-authority issues; and
- ensuring that the plan rests on a credible evidence base, including meeting the Act's requirement for keeping matters affecting the development of the area under review.

3.2.2 In addition to the above, the NPPF states² that: "Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:

- a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;
- b) Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:
 - (i) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or

Paragraph 11, NPPF 2021

(ii) Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

3.2.3 In addition, to the above, the NPPF states³ that Plans should:

- a) be prepared with the objective of contributing to the achievement of sustainable development;
- b) be prepared positively, in a way that is aspirational but deliverable;
- c) be shaped by early, proportionate and effective engagement between plan- makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
- d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
- e) be accessible through the use of digital tools to assist public involvement and policy presentation; and
- f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

3.2.4 It is important to note that the NPPF⁴ requires strategic policies to set out an overall strategy for the pattern, scale, and design quality of places, and make sufficient provision for:

- a) housing (including affordable housing), employment, retail, leisure and other commercial development;
- b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- c) community facilities (such as health, education and cultural infrastructure); and;
- d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

3.2.5 It is clear from the above, that any local plan should set out a comprehensive and cohesive approach to future development.

Paragraph 16, NPPF 2021

Paragraph 20, NPPF 2021

4 Duty to Co-Operate

4.1 Legal and NPPF Requirements

4.1.1 Section 33A of the Planning and Compulsory Purchase Act 2004 sets out a statutory 'Duty to Cooperate' (DtC) – i.e. a legal obligation - to all bodies as prescribed by Regulation 4 of the Town and Country Planning (Local Planning) England Regulations 2012 (the Regulations).

4.1.2 The duty requires DDC to cooperate with other persons to 'maximise the effectiveness' with which named activities are undertaken. Those activities include the preparation of development plan documents (such as this Local Plan document) and activities that support that activity 'so far as relating to a strategic matter'.

4.1.3 A strategic matter is defined by S33A(4) in summary as: (a) 'sustainable development or use of land that has or would have a significant impact on at least two planning areas' (a planning area in this case is the area of a borough or district council); and (b) 'sustainable development or use of land in a two tier area' (as this is) 'if the development or use (i) is a county matter, or (ii) has or would have a significant impact on a county matter'. County matters broadly relate to minerals and waste and associated developments as defined by Paragraph 1 of schedule 1 to the Town and Country Planning Act 1990 (as amended).

4.1.4 Section 33A (7) requires DDC (and persons subject to the DtC) to have regard to any guidance issued by the Secretary of State about how the duty is to be complied with. In that regard Paragraph ID 9-004-29140306 of the Government's Planning Practice Guidance (PPG) confirms amongst other things that the DtC is not a duty to agree (albeit that local planning authorities should make every effort to secure the necessary cooperation on strategic cross border matters before they submit local plans for examination).

4.1.5 The NPPF establishes that effective and on-going joint working is an integral part of the plan making process that will, amongst other things, determine whether development needs that cannot be met wholly within a plan can be met elsewhere. The NPPF goes on to state at paragraph 27 that in order to demonstrate effective and on-going joint working strategic policy making authorities should: "... prepare and maintain one or more statements of common ground documenting the cross-boundary matters being addressed".

4.1.6 In addition to the District's own housing pressures, part of the DtC involves considering whether neighbouring authorities' unmet housing need can be accommodated. It is worth highlighting that recent amendments to the London Plan have identified that the City's housing need has become increasingly more difficult to deliver and therefore areas outside London will be faced with having to absorb more of London's housing need. Consequently, DDC has a duty to explore whether it can accommodate some of this overspill of London's unmet need.

4.2 Assessment of DDC's discharging of the Duty to Co-operate

4.2.1 It is recognised that work to discharge the DtC remains ongoing by DDC and will continue prior to submission as part of the preparation of the Local Plan evidence base.

4.2.2 Notwithstanding the above, at this stage it is understood that DDC have engaged with the members of the East Kent Regeneration Board including neighbouring East Kent planning authorities, Kent County Council (KCC) and its subsidiary departments:

- Folkestone and Hythe District Council
- Canterbury City Council
- Thanet District Council
- KCC
 - KCC Highways & Transportation
 - KCC Minerals & Waste
 - KCC Heritage Conservation
 - KCC Flood & Water Management
 - KCC Natural Environment & Coast
 - KCC Infrastructure including Education

4.2.3 In February 2016, the Council adopted a Memorandum of Understanding (MOU) in respect of the DtC between the East Kent Regeneration Board members. A review of the MOU took place and was agreed in January 2021.

4.2.4 The East Kent MOU sets out the framework in which the authorities will work together on strategic issues and will actively engage. It forms the overarching framework and context within which Statements of Common Ground (SoCG) will be agreed between individual authorities.

4.2.5 Further engagement is also confirmed to have taken place between the following prescribed bodies and other relevant bodies:

- Environment Agency
- National Highways
- Historic England
- Natural England
- Network Rail
- NHS Kent and Medway Clinical Commissioning Group (CCG) – now known as Integrated Care Board (ICB) since July 2022
- Kent Downs AONB Unit
- Other infrastructure providers

4.2.6 Whilst work remains ongoing, at this stage it is understood that SoCGs have been agreed and signed between the following parties:

- DDC and Folkestone & Hythe District Council
- DDC and Canterbury City Council
- DDC and Thanet District Council
- DDC and Kent County Council
- Dover District Council and National Highways

4.2.7 As part of the DtC Evidence Base documents, DDC prepared a detailed DtC Statement (dated September 2022) which sets out a summary of the engagement that has taken place, firstly by organisation, and then by issue. Whilst the statement focuses on strategic issues and duty to co-operate bodies it also includes information relating to engagement on non-strategic issues and co-operation with other bodies that are not prescribed by the regulations. In addition, Appendices 1, 3 and 4 identify the main meetings and other correspondence that has taken place throughout the plan making process.

4.3 Summary

4.3.1 On account of the above and the documents published within the Council's Local Plan Evidence Base, we are satisfied that the Council as the strategic policy making authority has demonstrated effective and on-going joint working with neighbouring authorities, the county council, prescribed bodies and other relevant bodies. Further, we agree that DDC has prepared and maintained SoCG documenting the cross-boundary matters being addressed in accordance with the Framework and the DtC may be discharged by the Planning Inspector under Section 20(5) (c) of the Planning and Compulsory Purchase Act 2004.

4.3.2 Without prejudice to the above, should ongoing work by the Council result in significant changes in circumstances such that the signed SoCGs may be amended or withdrawn, our client reserves the right to alter their consultation response accordingly and be present at the examination of the Plan to discuss further.

5 Housing Need

5.1 Context

5.1.1 Paragraph 11 of the NPPF is explicit in its requirement for strategic policy-making authorities to promote a sustainable pattern of development that seeks to meet the need in full.

5.1.2 Paragraph 20 of the Framework is equally clear that strategic policies should set out an overall strategy for the pattern, scale and design quality of places. Policies should make sufficient provision for the development that is required as well as associated infrastructure, community facilities and should set out a strategy for the conservation and enhancement of the natural, built and historic environment.

5.1.3 Given this national planning context, the emerging Local Plan should provide a comprehensive and cohesive approach to future development in Dover district, capable of making sufficient provision for the identified needs, whilst balancing the conservation and enhancement of the natural, built and historic environment.

5.1.4 National guidance states that strategic policy-making authorities will need to calculate their local housing need figure at the start of the plan-making process. This number should be kept under review and revised where appropriate.

5.1.5 In calculating the local housing need, paragraph 61 of the NPPF states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance - unless exceptional circumstances justify an alternative approach.

5.1.6 Further, in addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

5.2 DDC's Housing Need

5.2.1 The Standard Method for assessing housing need, issued alongside the Ministerial Statement on 16 December 2020, sets an indicative housing need figure for Dover District of 596 dwellings per annum. However, the affordability ratio which factors into the local housing need assessment is updated annually. For Dover District the latest housing need calculation is 611 dwellings per annum (dpa), equating to a total housing need of 10,998 dwellings for the Plan period to 2040. We understand that the Regulation 19 Local Plan seeks to meet this need in full and in addition to the minimum figures, DDC have set an appropriate contingency buffer of 926 dwellings of the Plan period, equating to 8.4% of the total Plan period figure.

5.2.2 For context, the current adopted CS requirement is 700 dwellings per annum. This followed the adoption of a high-growth strategy in 2010 of 14,000 homes to 2026 based around the recommendations of the Dover Regeneration Strategy and above the minimum 10,100 requirement across the same period, as set out in the emerging (at the time) Regional Spatial Strategy.

5.2.3 For the avoidance of doubt, accounting for the Committed Supply Total of 5,282 dwellings, the new Local Plan will be required to allocate sufficient land to accommodate a minimum of 6,642 new homes over the remaining plan period to 2040. It is understood that this will be derived from the following sources:

- Whitfield Urban Expansion Allocation: 2,200 dwellings

- Local Plan Allocations (excluding Whitfield): 3,392 dwellings

- Windfall Allowance (70 a year from year 4): 1,050 dwellings

5.2.4 On this basis, it is evident that a substantial quantum of Plan-led housing delivery will be required in order to meet the new Local Plan's housing target. Due to the nature and dwindling supply of available urban land in Dover town and the remaining higher order settlements of Deal and Sandwich, the restrictive effect of the coast, the Kent Downs AONB, environmental constraints and the limited capacity of the district's remaining mid- and lower order settlements to accommodate significant levels of growth, meeting Dover's housing needs inevitably will require the release of significant greenfield land.

5.2.5 In our view, sustainable and accessible sites logically located adjacent to existing urban areas, including Sandwich, represent the most sustainable and reliable sources of growth for the Plan period, consistent with the overarching strategic objectives of draft policy SP3 within the emerging Plan. Such sites are best placed to deliver the significant number of new homes that are required and are most capable of making meaningful contributions to the associated public infrastructure, affordable housing and mix of new homes that is urgently needed in the District as well as further balancing the role of strategic-scale development at Whitfield within the emerging Plan's proposed growth pattern.

6 Site Specific Assessment

6.1 Overview

6.1.1 The previous chapters of this representation (Chapter 3-5) outline our client's position relating to the soundness of the Plan in which our client is confirmed to be supportive in principle of the Local Plan as a sound strategy for the growth of the district to 2040. It is clear that Sandwich must continue to form a principal location for focusing sustainable housing delivery in Dover district and will assist in ensuring an appropriate balance of sites are identified, capable of supporting the strategic role of Whitfield within the forthcoming Plan Period.

6.1.2 As introduced in the preceding sections, Fernham Homes Limited and Walker Residential Limited control 'Land at Archers Low, Sandwich' and are continuing to promote the residential allocation of the Site. The Site is allocated for residential development in the Regulation 19 Pre-submission Plan for the provision of 35 dwellings under policy reference 'SAP22'.

6.1.3 As aforementioned, the Site was allocated in the Regulation 18 Local Plan for approximately 40 dwellings under the 'Site Allocations Policy 1 Non-Strategic Housing Allocations' (reference SAN023).

6.1.4 Notwithstanding our client's support of the draft allocation within the Regulation 19 Plan in principle, we suggest that the policy text be re-visited prior to submission, to allow a higher dwelling per hectare guide to ensure the Site is developed to its full potential. It is submitted that the SAP22 policy wording should be amended to more accurately reflect the capability of the Site to accommodate approximately 40 - 45 dwellings (broadly in line with the previous site allocation in the Regulation 18 Local Plan), deliverable early in the Plan period.

6.1.5 Fernham Homes Limited and Walker Residential Limited are fully committed to the delivery of the Site within the next five years, and subject to a grant of planning permission in Spring 2023 – please see below – anticipate starting developing on site in 2023. Indeed, for the avoidance of doubt it is confirmed that Fernham Homes Limited and Walker Residential Limited have previously submitted a planning application ('ref: 22/00274') for the residential development of the Site for 44no. dwellings with associated access, parking, open space, landscaping, drainage, and infrastructure. (Amended plans and details).

6.1.6 Following a positive recommendation to grant planning permission by Officers at the DDC Planning Committee, the application was refused following consideration at Planning Committee on 31st March 2022. The application is now the subject of an appeal with a date confirmed for a two day hearing on the 17th - 18th January 2023. The site layout is shown in Figure 6.2.

6.1.7 For the avoidance of doubt, our client's support of the proposed allocation, subject to their objection to the capacity and considerations that it can accommodate an increased capacity of approximately 40 – 45 dwellings, is made without prejudice to the ongoing appeal. Should the appeal be allowed, this would realise the delivery of the residential allocation in accordance with the policy requirement (albeit more dwellings), which is consistent in its key elements with the submitted appeal scheme.

6.2 Site and Surroundings

6.2.1 The Site is situated to the southeast of St. George's Road and southwest of Sandown Road, on the southern edge of Sandwich.

6.2.2 The Site is a predominately undeveloped parcel of land totalling approximately 2.37 hectares, with tall and dense hedge and tree planting around the perimeter of the Site and an existing agricultural access point off St Georges Road to the north-west of the Site

6.2.3 The Site comprises a level enclosed field mainly formed of uniform improved grassland bounded on all sides by trees mixed in age, species, condition and character. There are also semi-derelict agricultural buildings in the southwest corner.

Figure 6.1: Site Location Plan (Drawing no. 29923A/01)

6.2.4 The Site comprises a level enclosed field mainly formed of grassland bounded on all sides by trees mixed in age, species, condition and character. There are also semi derelict agricultural buildings in the southwest corner.

6.2.5 The Site is bounded by existing residential development along St Georges Road to the north and west, undeveloped land to the east and south, Sandown Road to the north-east and a small area of residential development fronting Sandown Road further to the east of the Site.

6.2.6 The Site enjoys access to a number of local facilities and services which are within a reasonable walking distance, including schools, local shops, healthcare, employment, and public transport links. The Sir Roger Manwood Secondary School, Sandwich railway station and the historic town centre (including convenience stores) are all located within 800m of the Site. Sandwich Junior School and the local supermarket are located just over 800m from the Site. Larger shops and supermarkets are available in the local area, including Westwood Cross 8 miles to the north and Deal, 6 miles to the south. In terms of planning constraints, a Tree Preservation Order (TPO) protects trees on the northwest boundary of the Site and the belt of trees bounding the northeast and southeast.

6.3 Development Capacity

6.3.1 For the purposes of this representation, Land at Archers Low Farm, Sandwich is submitted with capacity for approximately 40 – 45 dwellings (broadly in line with the previous site allocation in the Regulation 18 Local Plan), as part of a high- quality, landscape-led residential scheme capable of delivery early in the Plan period.

6.3.2 Significant work has already been advanced by the project team as part of the submitted planning application and the subsequent appeal in which the proposed development has been informed following a thorough analysis of the Site opportunities, constraints and surroundings. The key design principles have been to create an attractive, permeable and legible layout set with a strong landscape framework, utilising existing landscape features, to accommodate a mixture of high-quality and attractive homes, of a scale and design that reflect its setting and surroundings.

6.3.3 In summary the vision for the Site is to create a high quality residential development which includes:

Circa 40 – 45 no. residential dwellings, comprising 30% Affordable Housing and a mixture of 2, 3 and 4 bedroom properties.

A series of open spaces that perform multiple functions including informal space, a local area of play (LAP), ecological mitigation areas and incorporation of native and wildflower meadow planting.

Retention of trees on the northern and southern boundaries and the provision of new woodland planting. This will include proactive management of the retained and proposed woodland belts to encourage structural and species diversity and improve the overall health and longevity of these

assets. The provision of significant biodiversity net gain is envisaged, and has been demonstrated can be delivered through the application and appeal.

Low key principle vehicular access point onto Sandown Road through landscaped entrance with trees and vegetation maintained, introduction of wildflower planting.

Footpath connectivity onto St Georges Road.

Tree lined connecting avenue creating strong legibility and navigation throughout the layout.

Figure 6.2: Proposed Site Plan as amended in December 2021 (Produced by Clague Architects – Drawing no. 29923A/11)

6.3.4 For context, at the time of determination of application ref: '22/00274', full planning permission was sought for the erection of 44 dwellings, together with associated access to Sandown Road, a pedestrian crossing point on St Georges Road, parking, open space, landscaping, drainage, and infrastructure works.

6.3.5 It is highlighted that draft policy PM1 seeks to provide a density typically between 30-50 net dwellings per hectare (dph). In this respect, it is highlighted that at 45 dwellings, the Site would provide a density of approximately 22.5 dph. Whilst it is acknowledged that lower density development may be more appropriate in edge of settlement locations, this demonstrates that even at a capacity 45 dwellings, the density is relatively low. Furthermore, as part of the previous application 22/00274, DDC confirmed at paragraph 2.23 of the Committee Report that subject to a detailed assessment of visual impacts, a proposed scheme of 44 dwellings on the Site is considered appropriate.

6.3.6 The above proposed Site plan submitted during the determination of the application demonstrates the capability of the Site to comfortably accommodate circa 40 – 45 residential units, together with significant boundary and internal landscaping elements.

Draft Allocation in the Regulation 18 Local Plan:

6.3.7 As aforementioned, the Site was proposed to be allocated for a capacity of approximately 40 dwellings in the Regulation 18 Local Plan under the 'Site Allocations Policy 1 Non-Strategic Housing Allocations' (reference SAN023).

6.3.8 The Site was considered as part of DDC's Housing and Economic Land Availability Assessment (HELAA) (December 2020) for the development of approximately 40 dwellings. The summary of suitability as provided by DDC is summarised as follows:

- The Site is in an Area of Archaeological potential and a Heritage Assessment will be required.
- The Site clips Flood Zone 2 and 4, along the boundary and an FRA would need to be undertaken.
- The Site was removed from the LALP (Local Allocations Local Plan) by the Inspector on landscape grounds, however, with the provision of an enhanced landscape buffer to the east, south and west of the site to provide year-round screening, it is considered that the impact on the landscape can be mitigated. The housing number on the site has also been reduced to address landscape concerns.
- Access to this site would be possible via Sandown Road, however vehicle access onto St Georges Road is likely to be challenging due to limited footway width and subsequent sightline requirements, so would need to be restricted to emergency/pedestrian access only.
- The provision of 40 dwellings is unlikely to create a severe impact on the surrounding highway network, however St Georges Road and Sandown Road (including Knightrider Street and the route to the High Street/Quay) are subject to constrained geometry due to on street parking, as such, a review on-street parking controls may be required to manage any increase in traffic-flow.
- There is a general concern over the potential cumulative impact of development in and around Sandwich and on routes within the town, which should be considered as part of future traffic modelling exercises.
- A Transport Assessment is required.
- Further information should be provided to demonstrate that access is achievable. However, cumulative impact on the highways network needs to be assessed.

6.3.9 At the time, owing to the matters set out above the Site was considered 'Amber' in the reg/amber/green (RAG) rating. However the clients have since demonstrated within the planning application and subsequent appeal submission that the proposed development for 44 dwellings would address the queries above.

6.4 Draft Policy Allocation 'Land at Archers Low Farm, Sandwich Road, Sandwich' (SAP22)

6.4.1 As introduced in the preceding sections, our client's Site at Archers Low is allocated for residential development within the Dover Pre-submission (Regulation 19) Local Plan. For ease of reference, the draft policy wording is as follows:
"SAP22 – Land at Archers Low Farm, St Georges Road, Sandwich (SAN023)

The Site, Land at Archers Low Farm, St Georges Road, Sandwich, as shown on the policies map is allocated for an indicative capacity of 35 dwellings.

Development proposals for the Site shall include the following:

- a) Development should be laid out to protect the residential amenity of the existing residential properties to the north-east and designed to take account of the character of the Sandwich Walled Town Conservation Area;
- b) The existing trees on the boundaries of the site should be retained and enhanced to mitigate the impact of development on the landscape and provide opportunities for biodiversity habitat creation and enhancement;
- c) Trees which need to be removed to enable an access to be provided to the site, shall be kept to the minimum needed to provide necessary visibility, and will be required to be replaced on-site;
- d) The layout of the scheme should provide a sufficient buffer between the existing mature trees on the site and residential properties, to ensure appropriate residential amenity for future residents and the protection of existing trees once the site is developed;
- e) A site-specific Flood Risk Assessment must be carried out in accordance with Policy CC5, including a comprehensive investigation into surface water flood risk. This shall also inform the application of the Sequential Approach to the layout of the site by locating the most vulnerable elements in the lowest risk areas;
- f) Primary vehicular, pedestrian and cycle access to the site shall be provided from Sandown Road;
- g) In accordance with Policy SP13 a wintering bird survey must be undertaken in advance of a planning application on the site. If the bird survey identifies that the development will exceed the threshold of significance, mitigation will be required. A suitable scheme of mitigation will need to be submitted with the planning application for the site;
- h) Environment assessment study required to address any potential impact on the Sandwich Bay SPA and Ramsar;
- i) A Heritage Assessment, to include appropriate archaeological investigations must be carried out in accordance with Policy HE1 and Policy HE3, the results of which should inform the layout and design of the development which is necessary to avoid harm to any heritage assets identified through the assessment; and
- j) The occupation of the development should be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider. Development should provide a connection to the sewerage system at the nearest point of adequate capacity."

6.4.2 To be clear, our client remains wholly supportive of the allocation of the Site for residential development and is committed to delivering the Site early in the Plan period (start on site in 2023). We agree that it represents a logical and sustainable location to direct growth consistent with the growth strategy of the Plan as a whole, however we submit that more effective use of our client's Site can be made – and therefore object to the capacity identified.

6.4.3 Accordingly, we say that Land at Archers Low can further assist the Council in meeting the growing need for new homes in the district and help to ensure the Council can have greater confidence in meeting its market and affordable housing targets in full.

6.4.4 It is submitted that the SAP22 policy wording should be amended to reflect the capability of the Site to accommodate approximately 40 – 45 dwellings (broadly in line with the previous site allocation in the Regulation 18 Local Plan), deliverable early in the Plan period.

6.5 Strategic Justification for Development

Spatial Strategy

6.5.1 The proposed Housing Distribution for the district across the Plan period is established within Policy SP3 'Housing Growth' which sets out that the distribution of housing growth in the district is primarily based on the settlement hierarchy and influenced by site availability, environmental constraints and factors of delivery.

6.5.2 Rightly, a key aim of the growth strategy is to focus development in the least sensitive areas of the district in order to conserve and enhance the Dover's rich natural and historical environment.

6.5.3 A retained theme from the adopted Plan, is that the Council's settlement strategy continues to focus on the development and regeneration of Dover Town and Whitfield (3381 dwellings). Approximately half of the district's planned housing is in this location, the majority of which again is to come forward as part of the strategic urban expansion of Whitfield 'SAP1' (2200 minimum dwellings).

6.5.4 Development will then be focused in the District Centre of Deal (223 dwellings), and the Rural Service Centres of Sandwich (227 dwellings) and Aylesham (649 dwellings). Following the settlement hierarchy rigidly would distribute housing in the preceding order, however the Plan recognises that housing delivery in Deal and Sandwich continues to be constrained by a number of factors including flood risk, ecological designations, heritage and highways. Further, Deal has experienced generally high levels of windfall development across the previous Plan period and accordingly there is now a dwindling supply of available, suitable sites in both settlements. On account of this context, the Council have sought to direct the majority of the remaining higher order settlement growth (outside of Dover & Whitfield) to Aylesham, through the strategic expansion to the town.

6.5.5 Outside of the four principal district settlements, the Rural Settlement Hierarchy (August 2022) identified that the majority of lower-order settlements in the district emerge as having a low level of facilities within the hierarchy and six settlements having none of the key indicators of sustainable services. Plainly, these settlements offer very limited opportunities for growth and it is evident that the forthcoming Plan will be reliant on the settlements of Dover (including Whitfield), Deal, Sandwich and Aylesham to deliver the housing growth that is required.

6.5.6 We further note the findings of the Strategic Housing Market Assessment (2017) which identified that Sandwich and the north is the most expensive part of district with median property prices for all sizes of homes significant in excess of prices in Deal and Dover town and the south. It is suggested that issues of unaffordability are most likely to effect entry-level properties and result in existing residents being forced to seek more affordable properties elsewhere in Dover district or neighbouring authority areas.

6.5.7 Given this context, it is clear that where available and suitable opportunities for residential development do exist within the district's higher order settlements, including our client's Site at Land at Archers Low which can provide a policy compliant level of affordable housing, it is imperative that the effective use of these sites are appropriately maximised in accordance with draft policy SP3 of the emerging Plan and national policy objectives.

6.5.8 Notwithstanding our client's in principle support or the proposed strategy, we are concerned that highly sustainable, edge-of-settlement sites, particularly in higher tier settlements such as Sandwich have not been fully maximised to reflect their accessible location and capability to accommodate a greater quantum of development. On this basis, we are concerned that the strategic objectives underlying draft policy SP3 'Housing Growth' may not be fully realised, to the detriment of market and affordable housing delivery and the wider policies seeking to conserve and enhance the district's natural and historic environment.

6.5.9 Consequently, our clients object to policy SP3 as drafted, on the basis that there is a clear need to maximise the delivery of housing at sites around Sandwich, and this has not been undertaken – for example at Land at Archers Low, where it has previously been demonstrated that the site has sufficient capacity to deliver approximately 5-10 additional units over the draft allocation, that will otherwise be required to be delivered elsewhere in the district, in potentially less accessible and more sensitive locations.

Greenfield Development and Consistency with Housing Trajectory

6.5.10 Due to the nature and dwindling supply of available urban land in Dover town and the remaining higher order settlements of Deal and Sandwich, the restrictive effect of the coast, the Kent Downs Area of Outstanding Natural Beauty, environmental constraints and the limited capacity of the district's remaining mid- and lower order settlements to accommodate significant levels of growth, release will be required if the Council is to meet its housing and development commitments moving forward.

6.5.11 In our view, sustainable and accessible sites logically located adjacent to existing urban areas, including Sandwich, represent the most sustainable and reliable sources of growth for the Plan period, to support the role and timescales of strategic urban extensions and to deliver the significant number of new homes that are required within the forthcoming Plan period.

6.5.12 Moreover, greenfield edge-of-settlement sites are, in our experience, typically most capable of making meaningful contributions to the associated public infrastructure, affordable housing and mix of new homes that is urgently needed in the district.

6.5.13 The Sustainability Appraisal Scoping Report (2018) sets out that over the course of the adopted Plan period, the key sustainability issues facing Dover District in relation to housing are as follows:

Population growth, household growth and demographic change will place additional demand on key services and facilities such as housing, health, education and social care. The Local Plan offers a new opportunity to manage these pressures, encouraging mixed communities;

There is a need for affordable housing across the District. At present, the mean price of dwellings is higher than the national average. The Local Plan will help to expedite its delivery; and,

There is the need for a mix of housing types that cater for the needs of a range of people, including the growing number of single person and elderly households. Without an up-to date Local Plan, the required housing is less likely to be delivered.

6.5.14 It is evident that the new Dover Local Plan must allocate a mix of reliable sites capable of steadily delivering not only the quantum of housing that is required, but also the associated public infrastructure, affordable housing and a mix of unit types and tenures suitable for a wide range of future occupants.

6.5.15 The Housing Topic Paper (September 2022) provides further context and summarises under Chapter 7 'Historical Housing Delivery' that Dover has historically placed significant reliance on windfall development over the current adopted Plan period, with windfall sites accounting for 44% of all completed dwellings over the preceding 10-year period.

6.5.16 Moreover, it is highlighted that at the beginning of the 10 year period, the majority of new dwellings were being built on brownfield land. However, from the monitoring year 2013-14 onward development on greenfield land began to play a much greater part in the location for new development as show in figure 1 below. This trend of increased housing development on greenfield land is a result of the allocations within the CS and Land Allocation DPD being built out and is associated with an approximate doubling of completions in the district. From 2013-14 onwards the average number of completed dwellings per annum has doubled to that of the early years of the CS, as the strong delivery rates of greenfield sites form the predominant source of housing. This is despite an overall declining trend of brownfield completions towards the latter half of the Plan period. This is generally not an uncommon trend in the majority of local planning authorities areas, where opportunities for available and suitable sites in urban centres dwindle throughout the Plan period.

Figure 1: DDC Brownfield / Greenfield Completions 2010/11 to 2020/21 (source: Housing Topic Paper September 2022)

6.5.17 In light of the above context, it is clear that the adopted Dover Local Plan suffered from an initial under delivery of Plan-led housing growth in which windfall development sources were largely required to take up the slack in the early phases of the Plan period, as major allocated sites failed to deliver at the rates initially expected.

6.5.18 It is equally apparent that initial slow completion rates were quickly addressed once greenfield allocations commenced development, feeding into strong completions in the latter half of the Plan period. In our experience, greenfield sites are typically associated with stronger delivery rates and provide a reliable source of housing growth. The allocation of an appropriate mix of sites and scales is required in order to ensure steady and sustained Plan-led housing delivery across the Plan period and to avoid a reliance on windfall development to address the shortfall.

6.5.19 Consequently, given all of the above, it is imperative that the new Local Plan allocates a sufficient variety and scales of site capable of both ensuring steady and sustained housing completions and capable of making necessary contributions to public infrastructure and services, affordable housing and mix of unit types to address the key issues raised in the Sustainability Appraisal.

6.5.20 In our view, edge-of-settlement greenfield sites such as our client's Site Land at Archers Low represents the most reliable and sustainable source of housing delivery for the Plan period. Such sites are typically less constrained by wider factors and less affected by unforeseen delays such as land contamination. Moreover, greenfield sites typically are more capable of delivering the policy compliant affordable housing, unit mix and developer contributions that are urgently needed and in the case of our client's Site, have already been demonstrated within the present planning application and appeal submission.

6.5.21 It is understood that the Plan is predicated on the delivery of strategic scale development at Whitfield comprising the development of circa 2,200 new homes. Consequently, in order to avoid a repetition of the previous Plan, the Council have sought to ensure that a pool of reliable greenfield allocation, including that of our client's are included within the Plan, capable of delivering the early growth that is required within the housing trajectory prior to the commencement of major allocations later in the Plan period.

6.5.22 We note that within the Housing Trajectory 'Appendix D', the Council have included allocated units from Years 4 onwards, with extant permissions (accounting for 5% non-implementation) demonstrated to be solely capable of delivering the growth required in Years 1-3. Notwithstanding our client's commitment to commencement on site in 2023 and the initial delivery of units at Land at Archers Low in 2024 (subject to successful appeal), we support this pragmatic approach and suggest this represents a sound basis on which to set the district's housing trajectory. We note also the inclusion of an appropriate windfall allowance and the included contingency buffer to further ensure reasonably flexibility in the housing supply.

6.5.23 On account of all of the above, we submit that the allocation of Land at Archers Low forms part of a sound strategy for growth in the district for the forthcoming Plan period. Land at Archers Low is capable of delivery early in the Plan period, representing a reliable source of housing growth in a highly sustainable and accessible location adjacent to the existing settlement boundary of Sandwich, consistent with the Council's preferred settlement strategy. However, we object on the submission that the Site is capable

of making a greater contribution to the district's housing need and suggest an amended wording of the policy to allocate the Site for approximately 40-45 dwellings. Nonetheless, the Site is unconstrained and capable of providing a high-quality residential development including a mix of unit types and tenures, a meaningful contribution to the supply of affordable housing and contributions to public services and infrastructure, benefiting both existing residents and future occupiers.

Policy SP4 'Windfall Development'

6.5.24 Separately, we note the provisions of policy SP4 windfall development. Proposals at Land at Archers Low would likely be acceptable in principle under this provision and we support the policy inclusion for appropriate, proportionate windfall development.

6.5.25 Our client is fully committed to the delivery of the Site which is available and suitable for delivery early in the Plan period and is presently pursuing an appeal on the Site for a greater quantum of units than the allocation in the Regulation 19 Plan. There is consequently little to be gained from potentially delaying delivery of the Site by withdrawing the allocation. Notwithstanding the provisions of SP4, it is reiterated that our client fully supports the allocation of the Site under SAP22 for residential development as the most appropriate mechanism for delivery of the Site and the opportunity for genuinely Plan-led development in Sandwich and the provision of associated benefits to public services and infrastructure, contribution to affordable housing supply and the delivering of a mix of house types and tenures.

Infrastructure Delivery

6.5.26 Paragraph 11 of the Framework is clear that all plans should promote a sustainable pattern of development. This includes aligning growth and infrastructure. Paragraph 20 goes on to confirm that strategic polices will be expected to make sufficient provision for associated development infrastructure.

6.5.27 In this regard, draft policies SP11 'Infrastructure and Developer Contributions' and SP12 'Strategic Transport Infrastructure' of the emerging Plan form the key strategic polices for infrastructure delivery. We agree that where development would create a need, or would have an impact, or would exacerbate an existing deficiency in infrastructure provision, appropriate developer contributions may be sought.

6.5.28 It is however emphasised that in all developments, infrastructure requirements must be demonstrated to be necessary through assessment during determination of the application on a case-by-case basis. Where new development is proposed, it does not automatically follow that major infrastructure contributions are always required or contribution to strategic infrastructure proposals are appropriate. For instance, it is our client's view that any infrastructure requirements must be demonstrated through a robust and transparent assessment at application stage, taking into account the submission of detailed supporting evidence, for example following consideration of the Transport Assessment in the case of highway infrastructure contributions.

Alignment with Sustainability Appraisal Findings

6.5.29 As part of the preparation of the Local Plan, the Council has identified and appraised a range of growth and spatial options through the Sustainability Appraisal (SA) which provides an assessment of how different options perform in environmental, social and economic terms, to help inform which option should be taken forward and combined with wider evidence documents, have been used to determine the growth and spatial strategy set out in the Plan.

6.5.30 Five potential distributions of growth were identified during preparation of the draft Regulation 18 Local Plan:

- **Spatial Option A: Distributing growth to the District's suitable and potentially suitable housing and employment site options (as needed to deliver the scale of growth required).**
- **Spatial Option B: Distributing growth proportionately amongst the District's existing settlements based on their population.**
- **Spatial Option C: Distributing growth proportionately amongst the District's existing settlements based on the District's defined settlement hierarchy.**
- **Spatial Option D: Distributing growth in the same way as the adopted Local Plan, focussing most growth in and around Dover town.**
- **Spatial Option E: Distributing growth more equally across the District's settlements: Dover, Deal, Sandwich and Aylesham, as well as the rural villages.**

6.5.31 The conclusion of the SA was that Spatial Options C (settlement hierarchy) and D (adopted Core Strategy with Dover focus) generally perform the most strongly against the SA objectives, particularly when delivering the baseline growth scenario. However, given the environmental constraints that exist around Deal and Sandwich, very few suitable and potentially suitable sites have been identified in these towns. Given this, the Council's preferred option for the distribution of housing and economic growth comprises a combination of options A (HELAA sites), C (settlement hierarchy) and D (Dover focus). The distribution of housing and economic

growth in the District is therefore primarily based on the settlement hierarchy, and influenced by site availability, environmental constraints and factors of delivery.

6.5.32 On account of the above, our client agrees that the proposed growth strategy, and by extension, policy SP3 in principle represents a sound and evidence-led strategy for growth. However, given the clear acknowledgement of the dwindling supply of available sites in the higher order settlements of Deal and Sandwich, which has necessitated a minor deviation from the strongest performing spatial options, we submit that where sites are available and suitable for development in Deal and Sandwich, these must be fully maximised, reflecting their accessible location and their ability to reduce the need to develop into less accessible and more sensitive sites elsewhere in the district to accommodate the growth that is required.

Site Specific Sustainability Appraisal

6.5.33 Land at Archers Low Farm, St George's Road, Sandwich is included under HELAA reference 'SAN23' within the SA Site Assessment (Appendix F). The site performs strongly, with particular positives identified with regards to SA Objectives related to housing, accessibility, the economy, sustainable transport and climate change mitigation, in large parts due to the edge-of-settlement location and proximity of the site to key services in Sandwich.

6.5.34 We note negatives associated with the development of a greenfield site, including loss of agricultural land, however this would be true of the majority of greenfield sites and it is abundantly clear that Dover's housing need cannot be met solely on brownfield sites. We note also minor negatives / uncertain associated with biodiversity, the historic environment and landscape, however it is not clear whether these take into account the high-quality design, biodiversity enhancement and landscape mitigation proposed under the application/appeal. Irrespective, these are not considered to outweigh the clear and tangible sustainability benefits associated with edge-of-settlement development and the site's consistency with the preferred spatial options.

Summary

6.5.35 Taking all of the above into consideration, our client is wholly supportive of the inclusion of land promoted at Archers Low, as a future housing allocation within the Dover District emerging Local Plan. The allocation is considered wholly consistent with the objectives of the Plan and forms part of a sound evidence-led growth strategy consistent with the recommendations of the Sustainability Appraisal for the district to 2040, subject to the sole objection in relation to capacity.

6.6 Deliverability

6.6.1 Prior to the current appeal proposal, the Site has had no planning history of a residential nature or a history of unimplemented permissions. There are not considered to be any impediments to the Site being allocated for development commencing within the first five years of the Plan period. Combined with an appropriate number and scale of wider allocations in Sandwich and elsewhere across the district, this would ensure steady delivery of housing in Dover district across the majority of the Plan period and support the role and timescales of strategic housing delivery at Whitfield towards the latter half of the Plan period.

6.6.2 Fernham Homes Limited – a local SME with a strong history and track record of delivery, together with an adopted and robust business plan for growth – has control over the site, and are poised to commence work on its residential development very promptly after the receipt of planning permission, potentially (subject to the successful outcome of the current appeal) in 2023. Delivery of housing is expected from 2024.

6.6.3 For the reasons set out in this representation, the Site is considered suitable for the residential development of approximately 40 – 45 dwellings. The Site is adjacent to the urban area of Sandwich, one of the four higher order settlements in the district and the Council's preferred locations for Plan-led growth within the district. Development at Land at Archers Low would form a natural and logical development east of Sandwich with excellent accessibility to day-to-day services and amenities via active travel modes within Sandwich itself and convenient access to public transport infrastructure (including Sandwich train station) for onward travel to key neighbouring settlements including Dover, Ramsgate, Canterbury and Ashford.

6.6.4 Finally, in respect of suitability, there are no physical limitations or problems such as access, infrastructure, flood risk, hazardous risks, pollution or contamination.

6.6.5 On behalf of the landowner, we submit that there are no known financial restrictions that would impact upon the viability of a future housing scheme or that would prohibit development coming forward within the early stages of the Plan period. To the contrary, we consider there to be an opportunity to deliver a high-quality, sustainably located residential development scheme consistent with the Council's proposed growth strategy comprising an appropriate mix of market and affordable housing and capable of contributing to a range of community facilities, public infrastructure and services locally.

	<p>6.6.6 Given the advanced nature of the proposals by virtue of the submitted planning application, in terms of specific timescales, should the ongoing appeal be allowed, we understand that Fernham Homes Limited and Walker Residential Limited are capable of commencing work on-site in early 2023, with delivery in 2024 and completion of the Site anticipated in 2025.</p> <p>6.6.7 The Site is in single ownership and there are no complicated legal agreements or covenants that would prohibit the ability to bring forward the Site early in the Plan period. The Site is therefore considered available and achievable for the purposes of the tests of deliverability.</p> <p>7 Conclusion</p> <p>7.1 Summary</p> <p>7.1.1 This representation has been prepared by DHA Planning on behalf of Fernham Homes Limited and Walker Residential Limited, in response to the Dover District Council Local Plan (Regulation 19) consultation which runs until 9th December 2022.</p> <p>7.1.2 Our client controls 'Land at Archers Low Farm, Sandown Road, St Georges Road, Sandwich' and is promoting the residential allocation of the Site as part of the new Dover District Local Plan preparation process. The Site is allocated for residential development in the Regulation 19 Pre-submission Plan for the provision of 35 dwellings under policy reference 'SAP22'.</p> <p>7.1.3 Taking all of the above into consideration, we consider that the Site promoted at Land at Archers Low should remain included as a future housing allocation within the Dover District emerging Local Plan. The allocation is considered, in principle, wholly consistent with the objectives of the Plan and forms part of a sound growth strategy for the district to 2040. However, it is imperative that the effective use of these higher-order settlement sites are appropriately maximised in accordance with draft policy SP3 of the emerging Plan, and wider policies seeking to otherwise conserve and enhance the district's natural and historic environment and national planning policy objectives. We are concerned that this has not been fully undertaken and object solely on this basis.</p> <p>7.1.4 Consequently, our clients object to policy SP3 as drafted, on the basis that there is a clear need to maximise the delivery of housing at sites around Sandwich, and this has not been undertaken – for example at Land at Archers Low, where it has previously been demonstrated that the site has sufficient capacity to deliver approximately 5-10 additional units over the draft allocation, that will otherwise be required to be delivered elsewhere in the district, in potentially less accessible and more sensitive locations.</p> <p>7.1.5 Without prejudice to our client's support in principle of the proposed allocation at Land at Archers Low, we would urge the Council to re-visit the allocation policy text and allow a higher dwelling per hectare guide to ensure the Site is developed to its full potential and the objectives of draft policy SP3 are most effectively realised. It is submitted that the SAP22 policy wording should be amended to more accurately reflect the capability of the Site to accommodate approximately 40 – 45 dwellings (broadly in line with the previous site allocation in the Regulation 18 Local Plan), deliverable early in the Plan period.</p> <p>7.1.6 In addition to being a highly sustainable and logical edge-of-settlement allocation, the Site is deliverable in a single land ownership with no viability issues, legal or third-party constraints present. Our client is fully committed to the delivery of Land at Archers Low and there are no impediments to the Site being capable of delivery within the initial 0-5 years of the Plan period.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>For the reasons set out in the consultation response submitted on behalf of Fernham Homes Limited and Walker Residential Limited (ref DHA/30245), the capacity of Land at Archers Low Farm, St Georges Road Sandwich (SAN023) should be increased to 40 - 45 dwellings.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note</p>	<p>Please refer to the consultation response submitted on behalf of Fernham Homes Limited and Walker Residential Limited (ref DHA/30245).</p>

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	30245 DDC Rep_Archers Low Farm FINAL 09 12 22.pdf
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1925
Rep Status	Processed
Consultee ID	1271717
Consultee Full Name	Quinn Estates
Consultee Company / Organisation	Quinn Estates Ltd
Agent Full Name	Sarah Willson
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Iceni Projects, on behalf of Quinn Estates, welcomes the opportunity to submit representations to the Dover District Council Local Plan Regulation 19 Consultation in respect of land at St Edmunds Road, Deal. These representations should be considered alongside the following documents appended to this letter:</p> <ul style="list-style-type: none"> • Appendix 1 – Site Layout Plan <p>The land subject to this representation was previously assessed through the Call for Sites process as part of a significantly larger land parcel (GTM008 – Land North of Ellens Hill). Quinn Estates consider that the revised, smaller site makes a logical extension to Deal in this area, and that site specific constraints can be overcome to deliver housing in Deal. The Site borders the Deal settlement boundary and presents a logical extension to the town in this area. Quinn Estates considers that the land should be allocated for residential development of approximately 16 self-build and 7 affordable homes with associated access and parking, within a landscaped setting. It is considered that the scheme presents an opportunity to provide high-quality family homes, in a highly sustainable location and that the resultant effect of this redevelopment will lead to societal benefits for the local community and a more sustainable development strategy</p> <p>It is Quinn Estate's view that the current suite of allocations in the draft Plan will fail to provide a sufficient level of growth in and around Deal, and that it is over reliant upon a single urban extension to Dover to meet local housing needs, which does nothing to address local affordability issues in Deal. To ensure the soundness of the plan, further Sites, such as the one advocated in this representation, should be allocated to ensure that the Plan's ambitions for the District are delivered.</p> <p><u>a. Land at St Edmunds Road, Deal (the 'Site')</u></p>

The Site comprises approximately 1.83ha of land adjoining the Deal settlement boundary. The Site is located on the south-western edge of Deal, bound to the north-east and north-west by residential properties, and to the south-east and south-west by open farmland. The southern boundaries of the site comprise existing hedge and trees. The site is currently in use as grazing land for horses.

A public right of way (ref: 0340/ED38/12) bisects the north-eastern corner of the site from northwest to south-east. Access to the site is via an existing gate in the hedgerow joining St Edmunds Road. The closest bus stop is approximately 180m from the Site on St Richards Road and includes services

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to Deal town centre, Walmer, Sandwich, and Kingsdown. St Richard's Road GP Surgery, Payden Pharmacy, St Mary's primary School and the Betteshanger Sports and Social Club are also within approximately 500m of the Site on St Richards Road. The Site is considered to be a sustainable location for residential development.

The north-western boundary of the Site adjoins the southern edge of the Mongeham Road Conservation Area. Within the Conservation area are several Grade II listed buildings including 110 and 112 Mongeham Road, Manor Farmhouse and Brewer's Farmhouse. The Site is within Flood Zone 1. Wildlife Trust mapping identifies the Lower Stour Wetlands to the north-west of the Site beyond Mongeham Road, overlain with the Sandwich Bay to Hacklinge Marshes SSSI. There are no other wildlife designations either in the Site or in proximity.

b. Objection to Tables 3.3 and 4.2 (under the auspices of Policy SP3)

Quinn Estates suggest that the emerging spatial strategy for the District, as detailed in Tables 3.3 and 4.2 of the Regulation 19 Submission Version of the Draft Local Plan is not based on sound plan-making. The current approach does not acknowledge the sustainability of the town nor its position within the settlement hierarchy. As such, additional sites should be allocated to the town in Table 4.2. Quinn considers that the Site subject to this representation presents an ideal housing site within Deal which is able to overcome the identified constraints to contribute to sustainable housing growth within the settlement.

Sustainable distribution of growth

Sustainable development is a key aim of the National Planning Policy Framework at Paragraph 8. In terms of housing delivery, the Council should seek to encourage housing growth in the most sustainable locations, especially when they can ensure the achievement of societal improvements, economic benefits and positive environmental outcomes. In choosing sites, the Council should ensure that new residents can reach established nearby town centres using sustainable modes of transport, to limit pollution arising from motor travel and to support the vitality of the existing community and local economy, without creating environmental harm.

Deal is vibrant coastal town which benefits from access to a wide range of local services within a relatively contained urban environment. The vast majority of the town's facilities lie within walk, cycle and public transport distances. Services include a range of education provision, including primary, secondary and tertiary education. The town benefits from ample leisure opportunities at the sports centre and swimming pool, along with less formal outdoor activities on the seafront and at the Betteshanger Country Park. In addition, the town is highly sustainable in regard to public transport accessibility, being served by mainline rail, the high-speed train service to London and numerous bus routes.

Throughout the evolution of the draft Local Plan, Deal has failed to be allocated sufficient levels of growth commensurate with the sustainable nature of the town. The justification for channelling so little growth to Deal is not considered to be justified by evidence, when all the evidence points to the settlement being such a logical and sustainable location to channel growth to. The principles of sustainability and sound plan making appear to have been absent in key decision taking over spatial choices at the heart of the spatial strategy presented in the draft Plan.

Market and affordable housing delivery

Paragraph 35 of the NPPF outlines how plans are effective where they are found to be deliverable over the plan period. The disproportionately high dependence on Whitfield Strategic Allocation (SAP1) results in a plan which raises considerably uncertainty as to this key soundness test.

Quinn Estates has no objection to large-scale housing development at strategic sites playing an important role in meeting housing need. However, what looks good on paper needs to deliver in practice. However, in a District like Dover where there is a need for the benefits of growth to translate across the District, the spatial strategy should be seeking to unlock growth and inward investment at other key settlements, such as Deal, and this is a significant weakness of the Plan in its current form.

Spatial strategies should reflect that building homes is a complex and risky business. Stronger local markets have higher annual delivery rates, and where there are variations within districts, this should be factored into spatial strategy choices. Further, although

large sites can deliver more homes per year over a longer time period, they also have longer lead-in times. Research by Lichfield1 found the average lead in time for large sites prior to the submission of the first planning application is 3.9 years

This issue with delivery is found to be the case with Whitfield. Of the 5,750 dwellings proposed for the allocation, 3,483 dwellings are considered deliverable in the emerging Plan period. The Council acknowledges that the 2010 Core Strategy included provision for the Site to deliver 5,750 dwellings. Phase 1 of the SAP1 allocation (Dover ref. 10/01010) is underway and as of the 2020/2021 monitoring year, 185 dwellings had been completed with a delivery rate of approximately 50dpa for the past three years. Given this slow progress, it seems likely that although the existing outline planning permission should be completed over the Plan period, a more cautious approach should be taken in terms of the remaining dwellings allocated for the site given its proven issues in delivering housing to date.

Without clear evidence by way of a planning application for these additional dwellings, it is questioned whether Whitfield will ramp up to delivery of 120dpa from 2023/24 and then up to 200dpa from 2026/27 for the remainder of the Plan period. More consideration should therefore be made to the current planning position of the Site and the length of time it has taken so far to deliver housing. Paragraph 73D of the NPPF recommends the inclusion of realistic delivery rates within Local Plans, and the Council should therefore review those proposed for Whitfield and consider building more flexibility and more volume into the pipeline to be able to respond to delivery issues.

It is considered that, particularly with the deliverability issues of the Whitfield Urban Extension to date, additional sites should be allocated for housing to ensure that there is sufficient choice and flexibility in the supply so that the Council can meet its housing requirement throughout the Plan period, as well as to meet the Government's objective to significantly boost the supply of housing as set out in Paragraph 60 of the NPPF.

The delivery of affordable housing also paints a bleak picture within the District. The Council's existing policy on affordable housing, DM5 of the Core Strategy (2010), requires residential development of 15 or more dwellings to provide 30% of the total homes as affordable homes and the Council's affordable housing strategy remains unchanged, save for reducing the requirement to deliver affordable housing within Dover town.

The latest Authority Monitoring Report (2020-2021) profiles how the affordable housing policy has consistently struggled to deliver sufficient levels of affordable housing, with the average being 20%. The failure to deliver sufficient affordable housing is set against a backdrop of worsening affordability in the District. Affordability ratios for Deal show a continued trend of worsening to 9.25 in 2021, with year-on-year worsening from 2012-2018. For the lowest earners, this reaches 9.62 in 2021. The District is less affordable than the national average of 9.05. Median house prices in the District have soared to £285,000, compared to the UK average of £278,000.2 In addition, statutory homelessness within the District sits at 137 people and 136 households, 68 with children, are in temporary accommodation within the District as of 2021.3 Whilst there may be a number of factors contributing to these outcomes, a new spatial strategy that identifies limited housing at Deal is going to deliver limited affordable housing at Deal and the absence of housing will only exacerbate local affordability pressures.

The proposed allocation at Land at St Edmunds Road would therefore assist with relieving local affordability pressures with the proposed 7 affordable units.

Self and custom build

Policy H5 of the Draft Local Plan states that the Council will support self-build and custom house building schemes on housing sites allocated in the Local Plan and on non-allocated windfall developments subject to compliance with the other Policies in the Local Plan, and where overall this would not result in an over-provision of this type of housebuilding when compared to the Council's supply/demand evidence.

The Self-Build and Custom Housebuilding Act 2015 requires relevant authorities, including District Councils, to keep a register of individuals and associations of individuals who are seeking to acquire serviced plots of land for self-build and custom housebuilding. Councils are also required under sections 2 and 2A of the Act to have regard to this and to give enough suitable development permissions to meet the identified demand. The benefits of self and custom build housing are recognised as diversifying the housing market and increasing customer choice. The NPPF supports the delivery of a variety of land coming forward to meet the needs of groups with specific housing requirements including for those wishing to commission to build their own homes.

The Self-Build and Custom House building need as identified from the Council's register is reported annually through the Authority Monitoring Report. The latest Authority Monitoring Report (2019-20) states that since the introduction of the self-build and custom house building requirements in 2015, there has been 1 plot allowed at appeal, where at appeal it was identified as self-build (planning reference 16/01101). There have also been 18 plots marketed as self-build since April 2020 by the developer from planning application 16/01026, however these were not identified as self-build on the planning application. On 31st October 2020, there has only been one planning application identified as including self-build

and customhouse building, reference 20/00419, which is also a Quinn site, for which a reserved matters application (ref: 22/01379) is currently pending determination.

The Self-Build Need Assessment submitted as part of the application (22/01379), points towards a very strong relative demand for self-build plots in Dover and also identifies Dover as being one of the authorities with the highest demand per capita in the country. Moreover, it is important to highlight that when considering demand in the context of the Local Authority's self-build register; an Ipsos Mori poll undertaken for NaCSBA in 2016 found that only one in eight people interested in self-build were aware of the introduction of Right to Build Registers in England. As a result, the number of expressions of interest on a Local Authority's self-build register may substantially underestimate demand.

Crucially, the Council's method of updating the self and custom build register, and resultant understanding of demand within the District, is flawed. The Council reviewed and updated its register in March 2020. All persons and organisations on the first (2016) version of the register were invited to re-register in February 2020, with reminders sent out in March 2020. Those who re-registered and passed the local connectivity and financial solvency tests, had their interest back dated to their original registration date and were placed on part 1 of the register. Those who did not pass the tests but still wished to register their interest in self-build customhouse building were placed on part 2 of the register.

It is not clear from the Council's Authority Monitoring Report and evidence base for the draft Local Plan whether additional independent survey work has been undertaken to fully understand the demand for self and custom build housing in the District. As mentioned previously, public knowledge and understanding of Right to Build in England is generally low. The method of the Council to understand demand has wholly relied upon people who had joined the register in 2016 and has not sought to further publicise Right to Build or develop a clearer understanding of demand in the District through additional surveys. This results in an incomplete picture of demand in the local area and resultant lack of allocations for self-build sites within the draft Local Plan.

Quinn Estates are the leading provider of self-build in Kent and have assembled their own database of interested self-builders. Having facilitated self-build development in East Kent, the company is ideally positioned to understand the market requirements and best placed to assist the District in meeting its growing demand for plots. Quinn Estates propose the land subject to this representation as suitable for a self-build site of 16 dwellings which would assist with addressing the Council's underestimated demand for this housing type.

Land at St Edmunds Road

The land subject to this representation was previously assessed through the Call for Sites process as part of a significantly larger land parcel (GTM008 – Land North of Ellens Hill). The Call for Sites Submission proposed 450 dwellings across a 10.74ha land parcel, and was assessed to be unsuitable due to heritage and landscape impact.

Quinn Estates are pleased to submit for consideration a revised proposal for the smaller land parcel which would deliver much needed new homes, including self-build and affordable homes, for Deal, whilst respecting and responding to the site constraints, namely the sensitive historic setting of the surrounding area to the north-west.

Vehicular and pedestrian access to the Site is proposed from the end of St Edmunds Road, utilising the existing gap in the hedgerow serving the field. The indicative site layout plan submitted with this representation details the proposed scheme which would comprise 16 self and custom build plots and 7 affordable units, set within a landscaped setting. The public right of way to the eastern edge of the site is retained, forming part of the landscaped, spacious entrance to the Site. In addition, the existing hedgerows are retained and enhanced, along with an enhanced tree buffer to the north-western boundary of the site where it adjoins the Mongeham Road Conservation Area. Overall, the proposal represents a

c. Conclusion

On behalf of Quinn Estates, we thank you for the opportunity to contribute to the Dover District Local Plan Regulation 19 Consultation.

The current approach to the spatial strategy in the Draft Local Plan requires amendment to address a significant soundness issue concerning the level of growth identified for Deal, the District's second largest settlement. It is considered that the Plan currently fails to positively plan for a commensurate level of housing and employment at the settlement, as expressed in Policy SP3 and that the available evidence does not support or justify this approach. Moreover, the evidence does support channelling a greater quantum of growth to Deal.

Quinn's proposal at the Land at St Edmunds Road presents a sustainable location for growth due to its existing connections to the public transport network and close proximity to a range of services on St Richards Road. The small nature of the site would provide early and accelerated delivery and would assist with reducing the current over reliance on the Whitfield Urban Expansion to provide housing growth for the District. In addition, the site would deliver self-build and affordable housing to address local affordability issues, which the current Plan fails to address.

I trust that these comments are of assistance and that these representations will be taken into account in consideration of the current consultation. Quinn would also welcome the opportunity to participate in the forthcoming Examination-in-Public into the Plan and contribute to the debate to ensure that the best strategy for the District is found.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Include GTM008 in the Local Plan for approx 16 self-build and 7 affordable dwellings
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	SDLP1924 Willson Att1 Original Rep.pdf SDLP1924 Willson Att2 Site Layout Plan.pdf
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1433
Rep Status	Processed
Consultee ID	1333260
Consultee Full Name	Jane Marsden, Andrew Mollart and Sarah Wells
Consultee Company / Organisation	
Agent Full Name	Grace Martin
Agent Company / Organisation	Hume Planning Consultancy Ltd
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	(DDC Note - Representation submitted by Hume Planning. Full Representation attached to SDLP1427. This document has been split across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1427.)

<p>possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>SP3: Housing Growth We welcome DDC's commitment to meeting its housing need, with Strategic Policy SP3 committing to providing at least 10,998 net additional homes over the Plan period. Within the Policy, reference is made to the Council's overall spatial strategy i.e. the majority of growth will be focused towards the principal town, Dover, and the further expansion/new settlement at Whitfield. Hume Planning supports the spatial strategy which distributes a proportion of its growth to medium/smaller sized settlements in the district, i.e. local centres such as Eastry, receive some growth to sustain their role in the settlement hierarchy over the plan period, serving the needs of its own residents and those within surrounding villages and hamlets. Eastry contains a range of local services including a primary school, a local food store, a pub and Post Office facilities. The allocation of just under 100 dwellings across various sites is therefore considered appropriate for Eastry when considering its role in the settlement hierarchy.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	Strategic Policy 3 - Housing Growth
<p>Rep ID</p>	SDLP1348
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1333128
<p>Consultee Full Name</p>	David Powell
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	Klaire Lander
<p>Agent Company / Organisation</p>	Lander Planning
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	Table 3.3
<p>2 - Do you consider this part of the Plan sound?</p>	Yes

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Lander Planning sent a PDF document which has been split across the relevant sections of the Plan. See Original Attachment on SDLP1346) The identification of St Margaret's at Cliffe and Kingsdown as Local Centres and being appropriate for housing provision is supported. Housing in these local centres is important to creating sustainable development. This table is supported.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1415
Rep Status	Processed
Consultee ID	1333243
Consultee Full Name	Mr and Mrs Tobin
Consultee Company / Organisation	
Agent Full Name	Mr Reece Lemon
Agent Company / Organisation	Lee Evans Partnership

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Representation submitted by Lee Evans On behalf of Mr and Mrs Tobin. Full Representation attached to SDLP1411. This document has been split across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1411.)</p> <p>POLICY SP3 – Housing Growth</p> <p>3.12 This policy deals with the overall housing strategy for the plan period and clearly reflects the housing delivery aspirations of the overarching vision for the Plan. It is equally clear that SP3 seeks to focus growth at sustainable locations providing greater choice of high-quality housing to meet identified needs. Housing need is informed directly by household projections and targets set by central government. At least 611 dwellings per annum, with a minimum of 10,998 new dwellings over the plan period, are reflected in the LPA's housing growth strategy for the District. As an overall baseline position, this aspiration to both provide sufficient minimum growth to meet identified housing need, and to focus growth in sustainable locations is supported.</p> <p>3.13 It is essential that this figure is not viewed as a cap to development, that could otherwise unduly constrain the delivery of housing in sustainable locations. It is emphasised that policy word must continue to reflect these as 'minimum' figures. Such wording reflects an appropriate basis in encouraging sustainable growth; a cap should not be applied.</p> <p>3.14 It is agreed that the allocation of a number of sites is appropriate in ensuring a consistent and identifiable supply of housing over the plan period. It is agreed that the settlement hierarchy is a reasonable basis in assessing broad settlement sustainability credentials to underpin such, albeit site-specific assessment must be robust in the LPA's proposed allocations.</p> <p>3.15 Woodnesborough is identified as a 'Smaller Village' in the settlement hierarchy, described at Paragraph 4.288 of the Plan as having limited services and facilities but otherwise being well connected by public transport, and unconstrained in landscape terms.</p> <p>3.16 Paragraph 4.2889 confirms that: "To help sustain and strengthen the role of these smaller villages and hamlets, additional housing over the lifetime of this Plan is considered appropriate. In accordance with SP3 development in the rural areas of the District will be of a scale that is consistent with the relevant settlement's accessibility, infrastructure provision, level of services available, suitability of sites and environmental sensitivity"</p> <p>3.17 It is wholly agreed that the Plan should support growth at the Smaller Villages to support their functions.</p> <p>3.18 It is agreed that this policy should reflect the potential for further delivery to the settlements, subject to site suitability. It is recognised that SP3 seeks the allocation of 'in the region of 1,112 homes' in the rural areas. As above, it is important that this is not seen as a ceiling to development. As drafted, this policy is positively prepared insofar as it does not seek to restrict development, and as such it should be retained as drafted.</p> <p>3.19 It is also agreed that "windfall housing development will be permitted where it is consistent with the spatial strategy outlined above and is consistent with other policies of this Local Plan". It is noted that SP4 deals with Windfall Housing Development.</p>

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1431
Rep Status	Processed
Consultee ID	1333263
Consultee Full Name	Mark Behrendt
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Response by the Home Builders Federation to the consultation on the Dover District Local Plan. 1. Thank you for consulting the Home Builders Federation (HBF) on the Dover District Local Plan that is being proposed for submission to the Secretary of State for examination. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

SP3 – Housing Growth

The policy is unsound as it not effective and is not sufficiently justified by the evidence base

Housing needs

2. The housing requirement of 10,998 over the plan period 2022 to 2040 is consistent with the minimum number of homes the Council should plan for using the standard method. However, what is not clear from the Council's evidence is whether this level of growth will be sufficient to meet the growth aspirations of the Council. Strategic Policy 6 sets out the Council's aspiration to deliver a minimum of 117,290 sqm of additional employment floorspace over the plan period but we could not find evidence to indicate that this number of homes will be sufficient to support the level of economic growth the Council is aspiring to deliver. The NPPF sets out at paragraph 82c that the potential barriers to investment in an area, such as a lack of housing, needs to be addressed in the plan and the Council need to be certain that the housing requirement set out in SP3 is supportive of its aspirations around economic growth.

Older people's housing needs

3. The HBF is concerned with the limited references to the needs to provide special accommodation for older people. It is noted that the mix of homes on allocated

sites will need to take account of the need for such accommodation but there appears to be no indication of whether this will be sufficient to meet the needs identified in the 2019 SHMA update. It also completely ignores the potential to allocate standalone sites to deliver homes for older people and there is no specific policy setting out the need for such accommodation and how the Council will support such development to come forward outside of the strategic allocations. The HBF would recommend that a policy setting out the Council's support for older people's accommodation is include in the plan. In order to be effective, we would suggest that this policy sets out the need for such accommodation and that there a presumption in favour of such development where needs are not being met.

Housing supply

4. Table 3.1 in the Local Plan states that overall housing supply to meet needs is 11,924, leaving a contingency buffer of 924 homes between housing needs and supply - around 8% of needs. Whilst the HBF welcomes the provision of a buffer between needs and supply we do not consider 8% to be sufficiently large to ensure that needs are met in full over the plan period, especially given that around half of the homes will come from the Whitfield Urban Expansion. In order to ensure the Council's needs are met in full the HBF recommends that a buffer of around 20% is necessary. The additional buffer should be brought forward through the allocation of smaller sites which will deliver earlier in the plan period and provide a buffer in overall supply should there be delays in the delivery of the larger strategic sites in Dover.

Meeting affordable housing needs

5. The most recent Strategic Housing Market Assessment undertaken by the Council is the 2019 update to the 2017 SHMA. This sets out that there is a need for 3,387 new affordable homes between 2020 and 2040. No further assessments appear to have been undertaken since that period. However, the latest AMR indicates that 75 affordable homes were built in 2020/21 with permissions for a further 108 units which can be expected to come forward in 2021/22. As such if the SHMA update is used as the basis for affordable housing needs there remains a need for 3,204 homes over the plan period – around 30% of expected supply on sites that are likely to deliver affordable housing¹.

6. Whilst this would appear to show that on the basis of SP5 the need for affordable housing would be addressed we note that the delivery of affordable housing in the past has been well below what has been expected. The 2020/21 Authority Monitoring Report indicates on page 19 that delivery since 2010/11, the year the Core Strategy was adopted, has been at around 20% of housing completions. In addition, the viability study indicates that the strategic sites will find it challenging to deliver 30% affordable housing. This would suggest that in order to meet needs the Council will need to allocate additional sites.

¹ Total supply of 11,924 less small site windfall allowance of 1,050

Conclusions on housing supply

7. To conclude on housing supply the HBF would recommend that further sites are allocated in this local plan. This would have the twin benefits of meeting the need for affordable housing in the district as well as providing an additional buffer between housing needs and supply.

SP5 – Affordable housing

The policy is unsound as it is not fully justified.

8. This policy requires residential development of 10 or more units to deliver 30% of the homes provided as affordable housing. The update notes on the viability study notes at paragraph 56 that this level of affordable housing requirement is deliverable in high and medium value areas alongside the other costs placed on development by the local plan. However, the study outlines that this level of provision will be challenging on the strategic sites and shows that it would not be viable in lower value areas and in the urban area of Dover. The Council recognises these concerns in part by removing the requirement to provide affordable housing in the urban area of Dover. However, no allowance is made with regard to the lower value areas or strategic sites.

9. Whilst the Council states that aside from the strategic allocation there is little planned development in the lower value area it is still necessary for the policy should reflect this evidence presented by the Council. Paragraph 58 of the NPPF recognises that decision makers should be able to assume that development that a policy compliant scheme is viable. This requires policies that place additional costs on development to reflect the evidence and in cases such as this set different requirements for different areas regardless of the development expectations in those areas. As such the HBF would recommend that the policy is amended to remove the requirement for affordable housing contributions in the lower value areas.

10. It is also notable in tables 10.17 and 10.18 of the Whole Plan Viability Study that the outside of greenfield sites at Deal extra care and sheltered housing for older people is not able to viably deliver affordable housing. Given that such development often comes forward on sustainable PDL sites close to services such development should be specifically excluded within SP5 from providing affordable housing contributions.

CC1 – Reducing Carbon Emissions

The policy is unsound as not consistent with national policy, justified or effective.

11. Through policy CC1 the Council indicate that they expect development to meet the Future Homes Standard (FHS) if this becomes a requirement that is delivered

through local plans. However, the expectation from Government is clear that FHS will be delivered through amendments to the Building Regulations and will not be an optional standard adopted as part of a local plan. The improvements to energy efficiency standards in new buildings and the transition to FHS has already started with the improvements to part L of the Building Regulations that came into force in June of 2022. These will see a circa 30% improvement in CO2 emissions prior to the introduction of FHS which will ensure that new homes are zero carbon ready from 2025. As such it is not necessary to refer to the Future Homes Standard and the Council should remove reference to the standard in policy which will be delivered as part of changes to part L of the Building Regulations.

12. The HBF is also concerned that the Council do not appear to have tested the Future Homes Standard within the update note on the viability assessment. The update note sets out at paragraph 23 that the initial improvements to the energy efficiency introduced in June of 2022 were included but no additional costings have been made with regard to the Future Homes Standard. The Government expects this to cost the house building industry an extra £100 million per year though this fails to recognise that there is likely to be additional electricity connection costs with the move away from gas and that the assumed reduction in the cost of air source heat pumps is unlikely². Given the significant increase in costs from these new standards will come into force in 2025, not long after the expected adoption of this local plan, these costs should have been considered through the viability assessment.

NE1 – Biodiversity Net Gain

Policy is not needed as this will be delivered through the Environment Act and support regulations.

13. Given that the requirement to provide a 10% Biodiversity Net Gain is set out in legislation and supporting regulations and guidance and will be in force when the plan is adopted, the HBF would question whether it is necessary to include a detailed policy on BNG. Including a detailed policy could lead to inconsistency between policy and legislation should this change either prior to the introduction of BNG at the end of 2023, or if there be changes to regulation and guidance in future. As council notes in para 11.6 the policy is intended to reflect the requirements of the Act and as and we would suggest that it would be more appropriate to refer in policy SP14 to the need to deliver a 10% BNG in line with relevant legislation and guidance.

Conclusion

14. At present we do not consider the plan to be sound, as measured against the tests of soundness set out in paragraph 35 of the NPPF, in the following key areas:

Economic growth has not been taken into account when considering the minimum number of homes to be planned for;

Greater flexibility required in the local plan to ensure needs are met in full;

No specific policy with regard to the needs of older people

	<p>Affordable housing policy does not reflect the full evidence on viability References to Future Homes Standard in policy CC1 unnecessary and unjustified No need to include detailed policy on BNG given that this is a requirement of legislation with associated regulations and guidance</p> <p>15. We hope these representations are of assistance in taking the plan forward to the next stage of plan preparation and examination. I would also like to express my interest in attending any relevant hearing sessions at the Examination in Public. Should you require any further clarification on the issues raised in this representation please contact me.</p> <p>2 Building Homes in a changing business environment: an assessment of new and forthcoming additional costs of housing delivery. (HBF, 2022) https://www.hbf.co.uk/documents/12117/HBF report - Building Homes in a Changing Business Environment.pdf</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>To conclude on housing supply the HBF would recommend that further sites are allocated in this local plan. This would have the twin benefits of meeting the need for affordable housing in the district as well as providing an additional buffer between housing needs and supply.</p> <p>It is also notable in tables 10.17 and 10.18 of the Whole Plan Viability Study that the outside of greenfield sites at Deal extra care and sheltered housing for older people is not able to viably deliver affordable housing, Given that such development often comes forward on sustainable PDL sites close to services such development should be specifically excluded within SP5 from providing affordable housing contributions.</p> <p>The HBF is also concerned that the Council do not appear to have tested the Future Homes Standard within the update note on the viability assessment.</p> <p>Given that the requirement to provide a 10% Biodiversity Net Gain is set out in legislation and supporting regulations and guidance and will be in force when the plan is adopted, the HBF would question whether it is necessary to include a detailed policy on BNG. Including a detailed policy could lead to inconsistency between policy and legislation should this change either prior to the introduction of BNG at the end of 2023, or if there be changes to regulation and guidance in future. As council notes in para 11.6 the policy is intended to reflect the requirements of the Act and as and we would suggest that it would be more appropriate to refer in policy SP14 to the need to deliver a 10% BNG in line with relevant legislation and guidance.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>I would also like to express my interest in attending any relevant hearing sessions at the Examination in Public.</p>
<p>Include files</p>	<p>SDLP1431 Behrendt.pdf SDLP1431 Behrendt Em1.pdf</p>
<p>Local Plan Consultation Point</p>	<p>Strategic Policy 3 - Housing Growth</p>
<p>Rep ID</p>	<p>SDLP1566</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1333350</p>
<p>Consultee Full Name</p>	<p>Kent County Council</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	<p>Grace Martin</p>
<p>Agent Company / Organisation</p>	<p>Hume Planning Consultancy Ltd</p>

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Representation submitted by Hume Planning. Full Representation attached to SDLP1565. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1565.)</p> <p>SP3: Housing Growth</p> <p>Whilst we welcome DDC's commitment to meeting its housing need, with Strategic Policy SP3 committing to providing at least 10,998 net additional homes over the Plan period, it is considered additional sites if suitable and available should be included within the Plan especially brownfield opportunities in central locations that are so close to the rail station. A large proportion of growth is being directed towards the further expansion of Whitfield (over 2,000), and a large proportion to land to the south of Aylesham (640). Large strategic sites delivery rates can easily slow down during the plan period and under-deliver. Whilst there is a buffer within the Plan, it is considered appropriate not to use this as a limit, and allocate other suitable sites in sustainable locations where available.</p> <p>As detailed above, the former Youth Centre in Aylesham, as a brownfield site is considered suitable for residential development. It is also available and can be delivered within the short to medium term, and in our view this site should be allocated within the Plan.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth

Rep ID	SDLP1659
Rep Status	Processed
Consultee ID	1331868
Consultee Full Name	Ruth Marczin-Bundy (Parish Cllr)
Consultee Company / Organisation	Alkham Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>5 Housing Growth</p> <p>5.1 The Green Integration Plan and the local housing plan originally identified considerable growth for Dover District with land initially to be allocated for 14,000 new homes with a target to complete 10,100 homes by 2026. This target now appears to have been reduced and the new plan identifies the broad areas where the growth of the additional homes will be located; notably sites within the Dover urban area, Whitfield, Deal, Sholden and Sandwich.</p> <p>5.2 The Dover District Council Plan justifies its housing allocation growth on the grounds of identified need in line with NPPF and the Department of Levelling Up Housing and Communities criteria and as such has identified a number of choices for housing based on supply, demand, windfall sites etc. As a result, a number of small development sites have been identified throughout the District including one in Alkham as well as a plan for a major Urban expansion site at Whitfield.</p> <p>5.3 The District Plan identifies a requirement for an additional 42 traveller pitches throughout the district and identifies two such pitches in Alkham and three others elsewhere.</p> <p>Comment 5 New Homes (DDC Plan – 7)</p> <p><i>a) The council and community would appreciate being included in any development plans in Alkham and ask to be informed well in advance of any plans for housing or sites in the Alkham Valley, so we can provide our proposed residential plans and constructive advice on the current infrastructure and impacts on the community.</i></p> <p><i>b) I must raise severe concerns re the planned development at Whitfield</i></p> <ul style="list-style-type: none"> <i>• The DDC highlights the requirement for 6350 homes at Whitfield stating that this will be supported by education, primary health and social care, utility services retail and leisure provision as well as the development of the Whitecliff Business Park area at Whitfield which will not only have retail but also light industrial and haulage uses.</i> <i>• The Plan talks at length on the landscaping and it highlights transport networks and in particular references the upgrades required for the Whitfield and the Duke of York Roundabouts It also says that consideration must be given to the local transport links, the Alkham road, the A256 and Whitfield Hill</i>

	<ul style="list-style-type: none"> • This matter was raised in 2014 when the Transport Plan for 2015 -2030 was adopted and no action was taken. • Since that time traffic along the Alkham Valley has hugely increased. Representations have been made to the local MP, KCC and a Highway improvement plan submitted all to no avail. • The current plan makes a flawed assumption that householders and businesses will access routes to London via the A20/M20 or A2/M2 whereas in reality they use the Alkham Valley Road , a DECLASSIFIED Road to access the M20. This matter is the subject of more detailed comment later in the report under transport. <p>c) As housing increases traffic will continue to expand and radical options to consider the Valley a green space in the middle of urban development with road only open for business residents leisure use and emergency vehicles offering a range of bridleways, walks, cycle routes should be explored. This type of scheme has been successfully carried out in other areas such as the Goyt Valley Derbyshire and can lead to vibrant rural community improved air quality and improved traffic management.</p> <p>(DDC note - The full representation from Alkham PC is attached to representation SDLP1653. However, specific comments from the full representation document have been extracted into separate consultation points/policy areas, relevant to the comments made)</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1588
Rep Status	Processed
Consultee ID	1333364
Consultee Full Name	Sunningdale House Ltd
Consultee Company / Organisation	
Agent Full Name	Grace Martin
Agent Company / Organisation	Hume Planning Consultancy Ltd
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Representation submitted by Hume Planning. Full Representation attached to SDLP1587. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1587.) SP3: Housing Growth Whilst we welcome DDC's commitment to meeting its housing need, with Strategic Policy SP3 committing to providing at least 10,998 net additional homes over the Plan period, it is considered additional sites, if suitable and available, should be included within the Plan. A large proportion of growth is being directed towards Dover with further units at Whitfield (over 2,000) and with large strategic sites, delivery rates can easily slow down during the plan period and under-deliver. Whilst there is a buffer within the Plan, it is considered appropriate not to use this as a limit and allocate other suitable sites in sustainable locations where available. In this respect, it is noted that Deal sits towards the top of the settlement hierarchy, as the district's only District Centre. Yet, due to the perceived constraints in Deal, only 223 units are being allocated in this settlement compared to over 600 in Aylesham, which is a settlement located lower down the settlement hierarchy. As detailed above, land off Station Road is considered suitable for residential development for some 75 dwellings which would help to slightly rebalance the spatial strategy more toward Deal which is considered to be justified. It is also available and can be delivered by Sunningdale within the short term (as an extension to the early phases that are already under construction) and, in our view, this site should be allocated within the Plan.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1893

Rep Status	Processed
Consultee ID	1333840
Consultee Full Name	Jon Alldis
Consultee Company / Organisation	Barrat David Wilson Homes
Agent Full Name	Emily Harris
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Full Representation attached to SDLP1883. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1883.)</p> <p>(DDC Note - rep states SAP1 however more appropriate to SP3)</p> <p>Draft Site Allocation Policy 1: Non-Strategic Housing Allocations- COMMENT NPPF Paragraph 69 sets out small and medium sized sites can make an important contribution to meeting housing requirement. These sites are often built-out quickly. It is noted that non-strategic sites have been allocated through Draft Policy SA Policy 1. However, there are few sites of 100 – 200 units whereby additional benefits can be accommodated and delivered as part of planning consent. As set out above, it is considered that the DDC's Spatial Strategy is too reliant on the delivery major allocations and other larger sites. Therefore, it does not meet the requirement (b) set out at NPPF paragraph 16 which states that plans should be: "Prepared positively, in a way that is aspirational but deliverable". Instead, the Local Plan should identify further medium sized sites of 100-300 units which are able to be deliver quickly and provide wider community benefits. These type of development could be provide across Local Centres and Larger Villages allowing for gaps in housing and infrastructure needs to be met across the District.</p> <p>Recommendation: DDC reassess their Spatial Strategy and provide more medium sized sites across Local Centres and Larger Villages. This will ensure that the housing need is deliverable. The Local Plan does not seek to allocate any sites within Ash and instead DDC is relying on housing allocations in the neighbourhood plan. NPPF paragraph 30 states:</p> <p>Once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan covering the neighbourhood area, where they are in conflict; unless they are superseded by strategic or non-strategic policies that are adopted subsequently.</p> <p>The Ash Neighbourhood Plan was Made in 2021 and prepared with the currently Adopted Local Plan. Once adopted, the Local Plan will supersede the policy within the Ash Neighbourhood Plan. DDC needs to ensure that the sites allocated within the Ash Neighbourhood Plan do not conflict with the newly proposed policies within this draft Local Plan or updated national policy to ensure the allocated sites are deliverable. Therefore, DDC should undertake a comprehensive assessment of all sites available within Ash to ensure the most suitable and deliverable sites are allocated within Local Plan.</p>

	Recommendation: DDC undertake an assessment of all sites within Ash and allocated site that are able to deliver housing and employment opportunities to meet the needs of the district in accordance with the draft policies set out in the Local Plan Review.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1909
Rep Status	Processed
Consultee ID	1333860
Consultee Full Name	Mr J Jarvis
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I detail below my objections to the above development as follows:</p> <ul style="list-style-type: none"> • Brexit has shown us that the cost of food has increased greatly and that farm and in the UK should be set aside for growing (Issue relates to Government Policy) • Before building any property on farm land, building on old disused building and ex-industrial sites should be a priority (Issue relates to government policy) • With the fire services requiring a four metre (4m) gap in the road for their fire engines to pass safely, neither Capel Street, Cauldham Lane or surrounding roads are currently wide enough for the services to operate effectively particularly when cars are parked. (Issue relates to parking, highway safety, traffic, noise and disability parking/access)
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1860
Rep Status	Processed
Consultee ID	1271717
Consultee Full Name	Quinn Estates
Consultee Company / Organisation	Quinn Estates Ltd
Agent Full Name	James

	Waterhouse
Agent Company / Organisation	Iceni projects
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Full Representation attached to SDLP1860. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1860.)</p> <p>REPRESENTATION TO THE DOVER DISTRICT LOCAL PLAN REGULATION 19 CONSULTATION IN RESPECT OF THE SPATIAL DEVELOPMENT STRATEGY AND DEVELOPMENT MANAGEMENT POLICIES</p> <p>Iceni Projects, on behalf of Quinn Estates, welcomes the opportunity to submit representations to the Dover District Local Plan (Regulation 19 Consultation). Quinn Estates is one of the leading and most prominent developers in Dover, with the company promoting a range of development projects of different scale and complexity around the District. Economic, social and environmental growth and regeneration underpin all of Quinn's projects and the company always strives to work with local communities and the District Council to deliver transformational development that unlocks growth and inward investment into the District to forge significant societal benefits.</p> <p>Quinn Estates has submitted a number of separate representations to the Local Plan that are specific to individual sites, but this representation is made against the strategic policies and development management policies that are set out in the Plan, rather than site specific allocations. Quinn Estates wants the Dover District Local Plan to serve as an effective and sound Development Plan for the long term, and would like to be able to support the Council in delivering development that is wholly consistent with the District's strategic aims and objectives. Whilst the majority of the Plan is wholly supported, there are considered to be elements of the Plan that in their current form, affect the Plan's soundness, and these are articulated in the representation below.</p> <p>a. Policy SP3 and the Housing Distribution in Policy Table 3.3 Housing Quantum being Positively Planned</p> <p>Quinn Estates acknowledges the approach taken in formulating the minimum housing requirement for the District, with the minimum quantum of 10,998 homes considered to be in conformity with the standard method. However, in order to deliver the vision and objectives of the Plan, specifically the objectives of achieving growing a more prosperous economy, creating new and more vibrant communities and thriving places, it is considered that a greater level of housing is required in the Plan and a more proactive and positive spatial approach, especially at settlements such as Deal, which have been neglected and where the general principle of attributing growth based on the settlement hierarchy has been abandoned.</p> <p>Table 3.1 outlines an overall housing supply of 11,924, building in a contingency of 924 homes between supply and minimum housing need, which equates to 8% of need. The size of this buffer is</p>

not considered to be large enough, given the heavy reliance on a single location (the Whitfield Urban Expansion) to deliver such a significant proportion of growth. A buffer of around 20% is considered to be necessary and therefore Quinn would respectfully request that the Plan be amended to positively plan for and identify land for a greater level of housing. This is considered to be easily achievable through revisiting sites that have not been identified for development and reviewing those sites that have to consider their suitability for accommodating more homes. Quinn has a number of landholdings in the District that have been identified for housing in the Plan with the development capacity to unlock further housing, as well as landholdings that have not been selected for development that offer the potential to achieve high quality, sustainable development outcomes that would improve the overall spatial strategy of the Plan and correct this important issue of Plan soundness.

The Distribution of Housing

The Council's Sustainability Appraisal option testing reveals that the most strongly performing spatial option would be a combination of Option C (distributing growth by settlement hierarchy) and Option D (distributing growth in Dover town-centric way based on the existing Plan approach). However, the spatial strategy has veered away from the most strongly performing option by focusing growth away from the second most sustainable settlement in the District - namely Deal - despite the very clear evidence of need for homes and employment at this location. Quinn Estates considers that under the current draft plan, Deal's evident importance as settlement is not being reflected by commensurate amounts of growth being directed to it. It is clear that the constraints that do exist around the settlement should not preclude significantly more growth to come forward than has been identified for the settlement, as is demonstrated through site specific representations.

Making positive provision in the Plan for growth at Deal, subject to robustly resolving environmental constraints, should be considered through additional site allocations, and site specific representations have been made concerning land at Deal that we consider to be highly suitable for development and which should be proactively and positively identified for development in the Local Plan. However, if further allocations are not to be made as part of the current Local Plan, it is respectfully suggested that revision of Policy SP3 should be made as follows, to reinforce the importance of Deal as part of the District's long term spatial strategy and to cross-reference Policy SP4:

"Housing Growth Provision is made for at least 10,998 net additional homes, in the District over the Plan period. In order to achieve this target, additional housing sites are proposed to provide choice and competition in the market up to 2040.

The housing target will be met through a combination of committed schemes, site allocations and suitable windfall proposals, which could comprise traditional windfall sites within existing settlements or extensions to settlements where the growth is commensurate with the size of the existing settlement, in accordance with Policy SP4.

The majority of new housing development will be in Dover Town and at Whitfield. Land is therefore identified to deliver a minimum of 3,381 homes in addition to existing commitments. Development will then be focused in the District Centre of Deal, and the Rural Service Centres of Sandwich and Aylesham. Development in Deal, Sandwich and Aylesham will be at a more limited scale than Dover Town, compatible with the more limited range of job opportunities, shops, services and other facilities available in these locations. There may be scope for additional growth over and above that identified in the Plan at Deal, but this would be subject to addressing environmental constraints. Land is therefore allocated to deliver in the region a minimum of 1,099 homes, in addition to existing commitments...

i. Conclusion

6

Quinn Estates wishes to support Dover in bringing forward a successful, effective and sound Local Plan that can serve the District across the Plan period. In its current form, it is considered that amendments are required and that the following Strategic and Development Management policies should be amended:

- Policy SP3;
- Policy SP4;
- Policy SP6;
- Policy CC8;
- Policy PM3;
- Policy H5;
- Policy E1; and
- Policy E4

Quinn Estates would welcome the opportunity to participate in the forthcoming Examination-in-Public in respect of the above policies, as well as the opportunity to attend sessions related to individual settlements where the company has a land interest, as profiled in site-specific representations that have been made to the Regulation 19 consultation.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s)

you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Quinn Estates is a developer with significant land interests in the District, who has an important role in delivering the Plan strategy
Include files	Waterhouse Icenii (Quinn reps on DM and Strat) 1526 Att1_Redacted.pdf Waterhouse Icenii (Quinn reps on DM and Strat) 1526 Att2_Redacted.pdf
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1961
Rep Status	Processed
Consultee ID	1334273
Consultee Full Name	Mrs Pearl Thorne
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	<ul style="list-style-type: none"> • Immoral to use grade 1 / 2 for new developments. X field sites are available • Unsuitable development in South East with no infrastructure in place, high demand on doctors, hospitals/schools • Highway safety

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

Legal Compliance (1)

Land use. Grade 1 and 2 high grade agricultural farmland is being used for new housing developments because it is cheaper and quicker with housing speculators making huge profits with greenfield house building schemes. This is immoral. The Campaign for Rural England's (CPRE) latest report confirmed there are plenty of disused sites available for new homes, especially in places people want to live. 965,000 new housing units could be accommodated on currently registered brownfield land. Farmland ('food security/sustainable farming') is for growing food/raising livestock (with UK high standards of animal welfare)/flood plains. Concreting over farmland is not adapting to climate change with its increased rainfall, flooding and droughts. Cheaper imports of food are causing English farmers to go out of business therefore selling their farmland. The impact on biodiversity, particularly birds and invertebrates, is huge. The importance of field margins, trees and isolation contribute to their existence.

Soundness (2)

- 1 This plan does not achieve sustainable development (11,000 houses) in the South East and is unjustified. Areas within the South East, particularly Deal, are already overdeveloped. The 'Garden of England' is becoming a 'Concrete Jungle'
- 2 Brownfield sites (see above), as identified by the Campaign for Rural England, give alternative sites across the country. More housing and businesses should be built in the Northern areas contributing to 'levelling up'. The South East is being 'swarmed' by housing, local traffic congestion and population increases put huge demands on doctors, hospitals, schools etc. quotas should be reduced. New housing, with built in 'green' features, should serve 'local' needs.
- 3 unsustainable development. Government quotas are being decided by those not understanding local areas, local roads, traffic etc. and the implications of massive housing developments upon surrounding areas.
- 4 Type of development should be those with small carbon footprint such as modular-constructed modern homes and small developments. Traditional constructed houses produce massive waste resulting in huge carbon footprint: - example Guildcrest Homes, in their development of White Post Farm, used tons and tons of concrete due to problems with the high-water level content (flood plain).

Duty to cooperate (3)

Localism Act 2011. Residents 'know their patch'. Small areas for biodiversity, open spaces, landscape features are important and the need for housing must be plan led. Despite valid points in objection letters planning permission is usually granted ignoring local views. Results are loss of biodiversity; local village roads being used as 'rat runs' and speeding particularly on the A257 resulting in two Ash residents' death this year. Rogue farmers ripping out important habitats during the breeding season with nests of red listed species: - turtle dove, sparrow, starling, mistle and song thrush destroyed and the annihilation of every living creature. Local authorities have done nothing to address this destruction (do they even care?). government ministers should hand back power to the local people to scrutinize and influence planning decisions. They are deciding what gets built and where with Clause 83 giving favour of the national development management policy which should be scrapped otherwise quick-fix developments will be imposed on local people against their will.

Betteshanger Country Park. In 2004 section 106 was for a Nature Park which did not materialize and wildlife 'hotspots' are now to be developed for housing by Quinn estates despite objections (Localism Act) by local people, the RSPB and Campaign for Rural England. To now consider a hotel development for an aquapark is preposterous (we have one in Sandwich, why do we need another one?). Plant trees, trees and more trees and involve local school, clubs, and local people in the process. Betteshanger is a Country Park and stronger protections for wildlife and open spaces for people are essential. European Law does nothing to address the above issues and is not fit for purpose. Stronger protection for biodiversity is critical.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful

- Reduce quota of housing for stash
- Use brown field sites
- Protect farmland needed to grow food
- Protect biodiversity – local people know their 'patch' localism
- Also breaches highway safety

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1468
Rep Status	Processed
Consultee ID	1333277
Consultee Full Name	Mr George Jenkins
Consultee Company / Organisation	
Agent Full Name	Grace Martin
Agent Company / Organisation	Hume Planning Consultancy Ltd
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Representation submitted by Hume Planning. Full Representation attached to SDLP1460. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1460.) Whilst we welcome DDC's commitment to meeting its housing need, with Strategic Policy SP3 seeking to provide at least 10,998 net additional homes over the Plan period, it is considered smaller size additional sites, if suitable and available, should be additionally included within the Plan (especially where high scoring in the HELAA such as this site). This is because a large proportion of the plan's growth is again being directed towards Dover,

with further units at Whitfield (over 2,000 dwellings), and also Aylesham. With large strategic sites delivery rates can easily slow down during the plan period and under-deliver. This has been evidenced by the track record of slow delivery rates at earlier phases of planned development at Whitfield upon which previous approved development plans were very heavily reliant; a factor that explains the very high contribution of windfall opportunities to housing land supply over the last 15 years. Whilst it is acknowledged that there is a planned buffer within the emerging Local Plan, it is considered appropriate not to use this as a limit, and allocate other suitable sites in sustainable locations such as Preston where available. Whilst it is acknowledged that emerging SP4 'Residential Windfall Development' allows for residential development or infilling of a scale that is commensurate with that of the existing settlement will be permitted within or immediately adjoining the settlement boundaries of Preston, subject to all of the listed criteria being met, it is considered preferable, in order to allow more certainty for small housebuilders (for the site-specific reasons outlined below and the positive HEELA scoring compared with other land opportunities), that the site is individually allocated. We believe will provide more certainty and accelerate housing delivery.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Local Plan Consultation Point

Strategic Policy 3 - Housing Growth

Rep ID

SDLP1521

Rep Status

Processed

Consultee ID

1333294

Consultee Full Name

Guy
Van Petegem

Consultee Company / Organisation

Agent Full Name

Grace
Martin

Agent Company / Organisation

Hume Planning Consultancy Ltd

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Representation submitted by Hume Planning. Full Representation attached to SDLP1520. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1520.)</p> <p>SP3: Housing Growth</p> <p>We welcome DDC's commitment to meeting its housing need, with Strategic Policy SP3 committing to providing at least 10,998 net additional homes over the Plan period. Within the Policy, reference is made to the Council's overall spatial strategy i.e. the majority of growth will be focused towards the principal town, Dover, and the nearby further expansion of Whitfield. It is appropriate that medium/smaller sized settlements in the district, i.e. local centres such as Wingham, receive some growth to sustain their role in the settlement hierarchy over the plan period, serving the needs of its own residents and those within surrounding villages and hamlets and also to provide a good choice of sites. Wingham contains a range of local services including a primary school, a local food store, a pub and Post Office facilities. The allocation of around 100 dwellings across various sites is therefore considered appropriate for this settlement when considering its role in the settlement hierarchy. A large proportion of growth is being directed towards further expansion of Whitfield (over 2,000) where delivery rates in the past have not matched the local plan housing trajectory. Large strategic sites delivery rates can easily slow down during the plan period and under-deliver. Whilst there is a buffer within the Plan, it is considered appropriate not to use this as a limit and allocate other suitable sites in sustainable locations where available.</p> <p>Wingham is a sustainable location for growth and delivering a choice and this allocation is attractive to smaller housebuilder. The expansion of the settlement in other directions is constrained by flood risk, access, landscape and heritage considerations which are constraints which do not affect this site (if the assumption that KCC will support the detailed pedestrian crossing design which was its position at the recent Informal Hearing). It was established through the work undertaken as part of the recent planning application and support of LPA Officers that the Gobery Hill site is considered suitable for residential development. It is also available and can be delivered within the short to medium term, and in our view this site should be allocated within the Plan.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

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Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1918
Rep Status	Processed
Consultee ID	1271717
Consultee Full Name	Quinn Estates
Consultee Company / Organisation	Quinn Estates Ltd
Agent Full Name	Sarah Willson
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Full Representation attached to SDLP1915. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1915.)</p> <p>Iceni Projects, on behalf of Quinn Estates, welcomes the opportunity to submit representations to the Dover District Council Local Plan Regulation 19 Consultation in respect of a strategic proposal at Cottington (herein referenced as 'the Site'). This representation should be considered alongside and with regard to supporting technical appendices to this letter which comprise:</p> <ul style="list-style-type: none"> • Appendix 1 – Sketch Site Plan • Appendix 2 – Local Connectivity Plan • Appendix 3 – Transport Appraisal • Appendix 4 – Actual and Residual Flood Risk Plans <p>Collectively, these documents demonstrate that high quality growth of a scale commensurate to Deal's position within the settlement hierarchy can be suitably and successfully delivered at Deal. The proposals are a revision of the site previously put forward as part of the original Call for Sites and subsequent Regulation 18 Consultation, which included land within Flood Zone 3. The revised Masterplan is for a reduced level of growth that could be delivered in a way that successfully adapts to and mitigates against environmental issues at Deal. The scale of the proposal has been revised significantly throughout the Local Plan process, initially proposing 975 dwellings, the current submission now proposes up to 585 dwellings and addresses all constraints previously identified, including flood risk, wildlife designations and transport.</p> <p>The vision for the Draft Local Plan reflects the growing importance of new challenges facing local communities in regard to climate and ecological emergency, and greater emphasis on the protection and enhancement of retail, leisure, cultural and commercial development across the district</p>

area, and promoting the health and social wellbeing of communities. The corresponding objectives strive for a more prosperous economy, as well as vibrant new communities. Quinn Estates considers that there is much to welcome in the new Plan, however, the company considers the opportunity to deliver an appropriate and badly needed quantum of growth at Deal has not been positively planned for, and that the Plan would be strengthened by promoting additional growth at Deal.

Quinn Estates considers that its proposal at Cottington presents a unique opportunity to deliver a transformative development of value to the District and that it should accordingly be allocated within the new Local Plan for residential led mixed-use development to contribute towards meeting Dover District's housing and employment needs over the Local Plan period to 2040.

a. The Site and Surroundings

The wider Site comprises approximately 200ha of land in various uses including agricultural fields, and fishing lakes and a country park (Betteshanger Park). The Site adjoins Sholden and Deal to the south, beyond the settlement boundary. The Site is bound by Sandwich Road (A258) and agricultural fields to the west and by agricultural fields and Fowlmead Farm to the north, with further fields and the HS1 rail line also located further to the east. To the south it is bound by the existing residential dwellings at Sholden and Deal. The land immediately to the south-east of the Site is currently being constructed for 230 dwellings by Persimmon Homes (planning permission ref. DOV/10/1012 and DOV/13/00945).

The Site is relatively flat, with the exception of Betteshanger Country Park which includes undulating landscaped areas of the former colliery spoil tip. The Site boundary excludes Cottington Court Farm and its curtilage. A Public Right of Way (PRoW) cuts across the Site from west to east around the edge of the residential dwellings at Sholden and along the bottom of the fishing lakes. The Country Park also includes a number of walking routes alongside mountain biking trails and a road cycling track. Existing access to the Site is from Sandwich Road to the west of the Site. Deal train station is located 1.5km walking/cycling distance to the east of the Site.

Most of Betteshanger Country Park and the fields fronting onto Sandwich Road are in Flood Zone 1. Whilst the land to the rear of Cottington Court Farm and the fishing lakes across to South Wall are located within Flood Zone 2 and 3, this land is mostly benefitting from flood defences. The Site is wholly within the Lower Stour Wetlands Biodiversity Opportunity Area, whilst the fishing lakes are located within the Sandwich Bay to Hacklinge Marshes SSSI and the Thanet Coast & Sandwich Bay Ramsar. These designations also incorporate land to the north-east and north-west beyond the site boundaries. The Thanet Coast & Sandwich Bay SPA is also located to the north-east of the site

b. The refined Site proposal

The Site was previously promoted in a different and larger form in the earlier stages of the Local Plan development but was not progressed due to matters of flood risk and drainage. Detailed work has been undertaken to demonstrate that Cottington is deliverable and that the potential constraints identified can be overcome.

The refined Masterplan for Cottington proposes the delivery of up to 585 new homes for Deal, and 2,030sqm of commercial floorspace in the northernmost parcel of the scheme. Cottington will also provide new premises to support the work of The Dover Outreach Centre charity to help rough sleepers, the homeless and those threatened with homelessness. Securing premises will be a crucial step for the charity to support their existing work. Cottington would also deliver new facilities for Deal and Betteshanger Rugby Club and secure funding for new facilities for Deal Town Football Club at their current location ensuring that both clubs can grow and expand their sporting offer, community use and outreach programmes. In addition, the Cottington proposal would also fund improvements for Deal Rowing Club at their current premises on Deal seafront.

Crucially, Cottington will have a fully independent drainage network adopted by a statutory undertaker to the point of discharge including environmental permits. Quinn Estates are in advanced discussions with Severn Trent Connect on this deliverable solution which would enable housing growth around Deal town to be unlocked without increasing the flow and burden on the Southern Water network in Deal and relieving residual pressure for higher levels of development in close proximity to smaller settlements within the district. It is also proposed that the Site delivers a primary school, complimentary commercial floorspace and an electric bus park and ride facility alongside a network of pedestrian and cycle infrastructure to stimulate sustainable travel patterns and strengthen connectivity between the settlement of Deal and the natural environment that adjoins it, including an expanded Betteshanger

Country Park. The concept of creating a new community on the subject land is an intrinsic component of a wider strategy to establish Betteshanger Country Park as a thriving and successful health and community asset for the District.

c. Objection to Tables 3.3 and 4.2 (under the auspices of Policy SP3)

Quinn Estates considers that the spatial approach to the allocation of housing in Deal, as detailed in Tables 3.3 and 4.2 of the Regulation 19 Submission Version of the Draft Local Plan is not a result of sound plan-making. Quinn Estates consider that additional growth should be directed to Deal to reflect its position in the settlement hierarchy, deliver badly needed growth at the settlement and a more sustainable pattern of development. Accordingly, additional sites must be allocated to Deal in Table

4.2. The current approach to the development strategy raises several issues which can be addressed through the allocation of additional housing and employment growth to Deal, including the Site subject to this representation.

Sustainable distribution of growth

Sustainability is defined as 'meeting the needs of the present without compromising the ability of future generations to meet their own needs', and functions as a confluence of social, economic, and environmental factors. The vision for the District outlined in Paragraph 3.29 requires new development to be focused at accessible and sustainable locations which can utilise existing infrastructure, facilities, and services and to ensure that development contributes to the sustainability of local communities and services. When translating sustainability into site allocations, the Council should therefore ensure that new residents can reach established nearby town centres using sustainable modes of transport, to limit pollution arising from motor travel and to support the vitality of the existing community and local economy, without creating environmental harm.

Deal is recognised in the Draft Local Plan as the second largest settlement in the District, benefitting from a vibrant town centre, which benefits from a good level of accessibility and an attractive environment. It's well used by residents and visitors and has a low vacancy rate, as a result of the diverse retail offer. In addition, the town is highly sustainable in regard to public transport accessibility, being served by mainline rail, the high-speed train service to London and numerous bus routes. As the Transport Assessment appended to this letter notes, Deal has good connectivity within the town, as well as with wider areas in Kent and London.

Despite the sustainability of Deal, the Draft Local Plan approaches development for the town with caution. A total of 7 sites are allocated for development with a combined housing number of just 218 dwellings. This growth quantum is completely inconsistent with Deal's position in the settlement hierarchy and constitutes a disproportionately small increase in the town's size, given its population of circa 30,000. Moreover, the growth quantum assigned is more akin to that of a rural settlement with limited services, population and potential to achieve sustainable development.

It is our contention that the level of growth identified for Deal is insufficient for its position as the second most sustainable location in the District, and that the Council's strategy has skewed large amounts of growth away from one of the most sustainable locations to areas that are far less sustainable, with rural areas with lesser sustainability taking a higher housing number than the second largest settlement. The justification for channelling so little growth to Deal is not considered to be justified by evidence, when all the evidence points to the settlement being such a logical and sustainable location to channel growth to. The principles of sustainability and sound plan making appear to have been absent in key decision taking over spatial choices at the heart of the spatial strategy presented in the draft Plan.

Deal's connectivity to public transport and strategic highway infrastructure means that the settlement clearly offers greater scope to sustainably accommodate growth than has been identified in the Plan.

Quinn Estates recognises that there is land with environmental constraints at Deal, but the land at Cottington represents a significant strategic site that can sustainably and successfully deliver a vibrant mixed-use community in a manner that respects and mitigates environmental constraints and this opportunity has been overlooked in the preparation of the Plan.

Addressing identified constraints

Paragraph 4.153 of the Draft Local Plan states that 'limited site allocations have been identified in Deal due to the constraints that exist including: flood risk, wildlife sites, heritage and highways. In accordance with SP3, development in Deal should be compatible with the level and range of job opportunities, shops, services and other facilities available.' We contend that the constraints identified by the Council as the cause for the lack of site allocations to Deal are typical constraints facing any seaside town, namely flood risk, wildlife sites, heritage and highways. These constraints should not be considered insurmountable as to rule out housing growth for Deal.

The suite of technical assessments submitted with this representation letter outline how constraints at Cottington can be appropriately addressed to deliver a sustainable mixed-use scheme. The proposals for the Site have been refined to remove land from areas of residual flood risk, as detailed in the plans appended to this letter. The Transport Appraisal outlines how highways and traffic do not represent a significant constraint for Deal, stating:-

The modelling confirms earlier assertions that the traffic network in Deal is not currently, nor is forecast in the future, to be subject to significant capacity constraints. Furthermore, it is anticipated that the current and reduced development quantum on the site would result in a slight improvement in the operation of the surrounding network compared with the higher quantum incorporated within the model assessment. Although the development proposal focuses on supporting and encouraging a wide- spread shift of travel patterns to sustainable modes, it will also seek to have a minimal impact on the highway network.'

Moreover, the Transport Appraisal finds that the proposed development would not result in severe impact on the local highway network. The development would deliver an extensive and innovative package of sustainable travel measures, including a car-free Sustainable Movement

Corridor linking the development directly to the centre of Deal, prioritising movement for walking, cycling and by electric bus, supporting a wider shift in transport patterns to active modes, as well as relieving pressure on the A258 movement corridor into and out of Deal town as stated in the extract from the Transport Appraisal below:-

'The development would deliver an extensive and innovative package of sustainable travel measures, including a car-free Sustainable Movement Corridor linking the development directly to the centre of Deal, prioritising movement for walking, cycling and by bus. This will be supported by a Sustainable Movement Hub allowing the benefits of the new corridor to be used by others travelling to the centre of Deal and allow such trips to be intercepted and mode shifted before entering the town – reducing car travel and improving connectivity on the A258 corridor.'

The scheme proposes substantial open space and ecology habitat provision, including new semi-natural open space within existing arable land whilst securing long-term ecological management of the existing Betteshanger Country Park and Cottington Lakes.

Approximately 13ha of natural open space is proposed in association with the residential development parcels, forming areas for new habitat creation including wildflower grassland, mixed scrub and woodland planting and pond creation. Based on habitat creation within these areas, it is considered that a biodiversity net gain of up to 20% can be achieved within the development parcels alone.

Cottington Lakes, totalling around 50ha, is to be established as a dedicated area for wildlife and ecological enhancement, with measures such as naturalising existing fishing lakes and sensitive grassland and woodland management providing substantial wildlife benefits. The development would enable enhanced management of the existing Betteshanger Country Park in accordance with its various open space, cultural and wildlife interests, allowing for a site-wide ecological management plan, additional wardening and habitat enhancement projects.

Together, these measures will provide in the region of 150ha of open space, forming a substantial green infrastructure resource linking to existing wildlife habitats within the surrounding Sandwich Bay ecological designations.

The key site constraints referenced by the Council when discounting the site at Regulation 18 stage have therefore been addressed, and we respectfully request that the reduced and revised scheme is re-assessed.

The Council's assessment of land at Cottington

As part of the preparation of the Local Plan the Council identified and appraised a range of growth and spatial options through the Sustainability Appraisal (SA), which provides an assessment of how different options perform in environmental, social, and economic terms, to help inform which option should be taken forward. The Council's Sustainability Appraisal scores the principle of housing at the wider proposal for this site positively across effects on housing, access to services and facilities, economy, sustainable transport and climate change mitigation (site ref: DEA012A). The employment proposals for the Site similarly score well.

The sustainability of the Site is clearly demonstrated in the Transport Appraisal submitted with this representation, which concludes that development of the Site represents a 'forward-thinking proposal, bound into a strong sustainable ethos with the inclusion of a package of sustainable transport measures.' The sustainable movement corridor proposed for walkers, cyclists and buses will provide an attractive, purpose built, shorter alternative route to Deal town centre. This will benefit both new and existing residents at Deal, as well as opening up options for current users of the A258, potentially relieving pressure on this corridor into the town.

Whilst the site scored poorly on flood risk, the assessment considered a land area to accommodate in the region of 1,200 homes, with no consideration given as to whether a lower level of growth could be accommodated outside of areas of actual and residual flood risk, as currently embodied by the Cottington proposal.

New market and affordable housing delivery

Paragraph 35 of the NPPF outlines how plans are effective where they are found to be deliverable over the plan period. The disproportionately high dependence on Whitfield Strategic Allocation (SAP1) results in a plan which raises considerably uncertainty as to this key soundness test.

Quinn Estates has no objection to large-scale housing development at strategic sites playing an important role in meeting housing need. However, what looks good on paper needs to deliver in practice. However, in a District like Dover where there is a need for the benefits of growth to translate across the District, the spatial strategy should be seeking to unlock growth and inward investment at other key settlements, such as Deal, and this is a significant weakness of the Plan in its current form.

Spatial strategies should reflect that building homes is a complex and risky business. Stronger local markets have higher annual delivery rates, and where there are variations within districts, this should be factored into spatial strategy choices. Further, although large sites can deliver more homes per year over a longer time period, they also have longer lead-in times. Research by Lichfield1 found the average lead in time for large sites prior to the submission of the first planning application is 3.9 years

This issue with delivery is found to be the case with Whitfield. The delivery of Whitfield is hampered by its reasonably isolated location away from existing services and facilities. The allocation of this site has not been based on a demand for houses in this area, and has resulted in slow delivery, a need for huge infrastructure investment and public intervention for the new FastTrack rapid transit bus service to facilitate the site's sustainability.

Of the 5,750 dwellings proposed for the allocation, 3,483 dwellings are considered deliverable in the emerging Plan period. The Council acknowledges that the 2010 Core Strategy included provision for the Site to deliver 5,750 dwellings. Phase 1 of the SAP1 allocation (Dover ref. 10/01010) is underway and as of the 2020/2021 monitoring year, 185 dwellings had been completed with a delivery rate of approximately 50dpa for the past three years. Given this slow progress, it seems likely that although the existing outline planning permission should be completed over the Plan period, a more cautious approach should be taken in terms of the remaining dwellings allocated for the site given its proven issues in delivering housing to date.

Without clear evidence by way of a planning application for these additional dwellings, it is questioned whether Whitfield will ramp up to delivery of 120dpa from 2023/24 and then up to 200dpa from 2026/27 for the remainder of the Plan period. More consideration should therefore be made to the current planning position of the Site and the length of time it has taken so far to deliver housing. Paragraph 73D of the NPPF recommends the inclusion of realistic delivery rates within Local Plans, and the Council should therefore review those proposed for Whitfield and consider building more flexibility and more volume into the pipeline to be able to respond to delivery issues.

It is considered that, particularly with the deliverability issues of the Whitfield Urban Extension to date, additional sites should be allocated for housing to ensure that there is sufficient choice and flexibility in the supply so that the Council can meet its housing requirement throughout the Plan period, as well as to meet the Government's objective to significantly boost the supply of housing as set out in Paragraph 60 of the NPPF.

The delivery of affordable housing also paints a bleak picture within the District. The Council's existing policy on affordable housing, DM5 of the Core Strategy (2010), requires residential development of 15 or more dwellings to provide 30% of the total homes as affordable homes and the Council's affordable housing strategy remains unchanged, save for reducing the requirement to deliver affordable housing within Dover town. The latest Authority Monitoring Report (2020-2021) profiles how the affordable housing policy has consistently struggled to deliver sufficient levels of affordable housing, with the average being 20%. The failure to deliver sufficient affordable housing is set against a backdrop of worsening affordability in the District. Affordability ratios for Deal show a continued trend of worsening to 9.25 in 2021, with year-on-year worsening from 2012-2018. For the lowest earners, this reaches 9.62 in 2021. The District is less affordable than the national average of 9.05. Median house prices in the District have soared to £285,000, compared to the UK average of £278,000.2 In addition, statutory homelessness within the District sits at 137 people and 136 households, 68 with children, are in temporary accommodation within the District as of 2021.3 Whilst there may be a number of factors contributing to these outcomes, a new spatial strategy that identifies limited housing at Deal is going to deliver limited affordable housing at Deal and the absence of housing will only exacerbate local affordability pressures.

A compelling case can therefore be made for additional sites to be allocated for housing both at Deal and in the wider District to assist with alleviating the affordability issues facing the town and wider District. The development of Cottington would assist in ensuring a variety of housing sites are allocated in accordance with Paragraph 68 of the NPPF, the provision of circa 585 homes would be proportionate to the size of the town, and the provision of circa 176 affordable homes at Deal would likely have a significant beneficial effect in addressing local affordability needs.

d. Conclusion

On behalf of Quinn Estates, we thank you for the opportunity to contribute to the Dover District Local Plan Regulation 19 Consultation.

The current approach to the spatial strategy in the Draft Local Plan requires amendment to address a significant soundness issue concerning the level of growth identified for Deal, the District's second largest settlement. It is considered that the Plan currently fails to positively plan for a commensurate level of housing and employment at the settlement, as expressed in Policy SP3 and that the available evidence does not support or justify this approach. Moreover, the evidence does support channelling greater quantum of growth to Deal.

Quinn's proposal at Cottington constitutes a sustainable location for growth owing to its existing connections to public transport, proposed electric bus route, mixed use village centre, network of pedestrian and cycle infrastructure, relocated primary school and commercial floorspace to deliver a truly mixed-use scheme which would bring economic, social and environmental benefits to existing and future residents. The latest Masterplan can deliver a holistic development of significant benefit that addresses and sufficiently mitigates identified environmental issues at the settlement and the evidence profiling this opportunity enables the authority to evolve the Plan to provide a more commensurate level of growth to this important town.

	<p>Cottington represents the only sustainable and deliverable option at Deal to reflect the settlement's position in the hierarchy and for the settlement to play its proportionate role in meeting the District's growth requirement. The proposed development would provide early and accelerated delivery through multiple outlets, including affordable housing to address local affordability pressures, which the current draft Plan fails to address.</p> <p>Finally, as set out above and detailed in the appended documents, there are no significant constraints to the development coming forward as proposed. As such the site should be re-assessed against the new development proposal and using the updated evidence base provided. It is considered that if the Council undertake this work and consider the potential of Cottington to help Deal play a more proportionate role in meeting the District's growth in line with its position in the settlement hierarchy and status as a main town, a compelling case will exist for allocating the land for development in the emerging Local Plan.</p> <p>I trust that these comments are of assistance and that these representations will be taken into account in consideration of the current consultation. Quinn would also welcome the opportunity to participate in the forthcoming Examination-in-Public into the Plan and contribute to the debate to ensure that the best strategy for the District is found.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Allocate additional sites at Deal such as Cottington
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1930
Rep Status	Processed
Consultee ID	1271717
Consultee Full Name	Quinn Estates
Consultee Company / Organisation	Quinn Estates Ltd
Agent Full Name	Sarah Willson
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3
2 - Do you consider this part of the Plan sound?	No

<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified Effective</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Not Applicable</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Not Applicable</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>Iceni Projects Limited ('Iceni') is writing on behalf of Quinn Estates Ltd ('Quinn Estates') to submit representations to the Dover District Local Plan Regulation 19 Consultation in respect of land to the east of Great Cauldham Farm, Capel-le-Ferne ('the Site').</p> <p>These representations should be considered alongside the following supporting documents appended to this letter:</p> <ul style="list-style-type: none"> • Appendix 1 - Indicative Site Layout Plan; • Appendix 2 - Landscape Briefing Note; • Appendix 3 – Transport Note; and • Appendix 4 – Cultural Heritage and Archaeology Note. <p>Quinn Estates supports the allocation of the Site within the new Local Plan for 70 dwellings in order to support the Council's target of 11,924 homes over the Local Plan period to 2040. Nevertheless, as set out in further detail below, the Site can sustainably accommodate additional housing to deliver further dwellings in the Plan period, as demonstrated by the documents appended to this letter.</p> <p>The vision for the Draft Local Plan reflects the growing importance of new challenges facing local communities in regard to climate and ecological emergency, and greater emphasis on the protection and enhancement of retail, leisure, cultural and commercial development across the district area, and promoting the health and social wellbeing of communities. The corresponding objectives strive for a more prosperous economy, as well as vibrant new communities. Nevertheless, Quinn Estates considers that the approach to assessing settlements, and the resultant amount of housing allocated to settlements, is based on an ineffective method of understanding the sustainability of villages. Quinn Estates considers that the Plan would be strengthened by increasing the amount of housing allocated to settlements which can suitably accommodate such growth.</p> <p><u>a. Relevant Background</u></p> <p>Quinn Estates Quinn Estates is the south east's foremost mixed-use developer with numerous development interests within Dover District, Kent and the wider South East area. The company has delivered both successful community extension schemes and stand-alone development sites both within rural and urban locations within the District. Quinn Estates' track record of housing delivery should be a material consideration that should inform key planning decisions, including which sites to allocate for development. Furthermore, Quinn has demonstrated through its' actions that it can formulate and deliver development solutions of high community value, always working hard to identify through community engagement how the company's developments can support and strengthen communities by delivering community infrastructure needed. They have a track record of delivery in Dover, with over 200 new homes and 45,000 sq.ft of commercial space delivered.</p> <p>Site and Surroundings The Site adjoins the existing settlement of Capel le Ferne, though it is centrally located within the settlement given the proposed Site lies between Capel Street and Cauldham Lane. The Site is approximately 4ha and currently comprises farmland. It is located outside the settlement boundary as defined by the Core Strategy 2010.</p> <p>The Site is well connected to the local footway network with a footway running alongside Capel Street. The path is approximately 2.0m in width and provides links to the north and to the south as well as excellent connectivity to the centre of the village, including a network of interconnected public rights of way and bridleways.</p> <p>The Kent Downs Area of Outstanding Natural Beauty (AONB) borders the Site to the west and the Capel le Ferne settlement boundary bounds the site to the east. Notably, the landholding comprises the only land adjoining the settlement that lies outside of the AONB, which makes the land the best suited and the most sequentially preferable development option for the settlement. The Site is not located within a Conservation Area and there are no heritage assets or Scheduled Ancient Monuments within the site boundary. The whole of the Site is located within Flood Zone 1.</p> <p>To the north-west, the Site is bound by agricultural fields whilst the north-east corner is bound by residential properties. To the south and east of the site are further existing residential dwellings fronting onto Cauldham Lane and Capel Street. Existing dwellings also border the western boundary of the Site on the southern section and farmland on the northern section. The existing settlement is characterised by one and two</p>

storey dwellings. The rear gardens of the existing dwellings directly adjoin the Site. The gardens are generally substantial in size and therefore setback from Site.

The Site is well located in proximity to services, facilities, amenities and public transport making it a sustainable location for residential development. Capel le Ferne Primary School and Village Hall are located approximately 200m north-east of the Site (less than 5-minute walk), a convenience store is located less than 200m from the Site to south-east and so the most important components of a sustainable settlement are already in situ. In addition, the Site is served via nearby bus stops located on New Dover Road, approximately 200m to the south of the Site. The bus service runs every 15 minutes between Dover, Folkestone, New Romney, Rye and Littlestone-on-Sea and as such, there is a frequent and reliable public transport option to access a variety of high order settlements. This connectivity is an important and sometimes overlooked factor in determining the sustainability credentials of settlements such as Capel.

Capel le Ferne is defined in the adopted Dover District 2010 Core Strategy as a Local Centre providing a range of shops and services for the local communities and surroundings. There are also a variety of nearby employment areas including Folkestone and Dover that provide work opportunities for residents of Capel le Ferne and surrounding areas. Dover is the principal town in the District and therefore hosts a range of employment opportunities including those relating to the international port and retail related employment, whilst Folkestone is a sub-regional town in the Folkestone & Hythe Local Plan which provides “(inter-) national transport links, and a good choice of employment, retail, cultural/leisure and public services for the whole of the district, adjoining districts and visitors.”.

b. Response to Draft Dover District Local Plan

The draft Dover District Local Plan Regulation 19 Consultation seeks comments on the legal compliance, soundness, and compliance with the duty to cooperate of the Submission Version of the

plan. This section responds to the draft Local Plan and assesses its soundness in relation to the housing growth strategy (Policy SP3) and proposed allocation at Great Cauldham Farm (Policy SAP44).

Quinn Estates welcomes the inclusion of the Site within the Draft Local Plan for residential development. However, Quinn Estates consider that the Settlement Hierarchy, particularly for Capel- le-Ferne, is based on an assessment methodology which fails to appropriately assess the sustainability of the village. Accordingly, the village could accommodate additional growth and the Table 4.12 should be amended to propose a minimum of 70 dwellings on the site. The current approach to the development strategy raises several issues which can be addressed through the allocation of additional housing growth to Capel le Ferne, including the Site subject to this representation.

Housing Need and Supply

Table 3.1 of the draft Local Plan outlines an overall supply of 11,924 dwellings across the plan period. This equates to an 8% buffer over the minimum housing requirement derived from the standard method. This is proposed to be met through a combination of committed schemes, site allocations and windfall sites. This is not considered to be sufficient due to the over reliance on one strategic site - the Whitfield Urban Expansion.

Quinn Estates has no objection to large-scale housing development at strategic sites playing an important role in meeting housing need. However, what looks good on paper needs to deliver in practice. However, in a District like Dover where there is a need for the benefits of growth to translate across the District, the spatial strategy should be seeking to unlock growth and inward investment at other settlements, such as Capel le Ferne, and this is a significant weakness of the Plan in its current form. Paragraph 35 of the NPPF outlines how plans are effective where they are found to be deliverable over the plan period. The disproportionately high dependence on Whitfield Strategic Allocation (SAP1) results in a plan which raises considerably uncertainty as to this key soundness test.

Strategic scale sites typically have long lead-in times and often require infrastructure to be delivered up-front. As a result, they may not begin to deliver housing until the later in the Plan period. Smaller scale sites, such as the subject Site at Great Cauldham Lane, which is rightly allocated to ensure the plan is positively prepared in line with the requirements of the NPPF is supported. In this regard, Paragraph 60 of the NPPF highlights that “to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed”. The allocation of the site at Great Cauldham Lane is supported by Quinn Estates, it can come forward early in the period, it is capable of delivering a mix of housing types and tenures and therefore makes an important contribution to local housing needs in the near future.

Quinn therefore encourages Dover District Council (DDC) to make every effort to meet, and if possible, exceed this target to ensure the Government’s objective to significantly boost the supply of housing can be met. As part of this a wide range of sites of different sizes and locations should be allocated to ensure choice and flexibility in the supply, in accordance with paragraph 67 of the NPPF. Sites such as Great Cauldham Farm should therefore be utilised to their full extent to reduce this over reliance on the Whitfield Urban Expansion to deliver housing across the plan period.

Settlement Hierarchy

Quinn Estates considers that the approach taken to the delivery of housing in Dover as set out within Table 3.3 of the Regulation 19 Submission Version of the Draft Local Plan is not a result of sound plan-making. It is considered that the Settlement Hierarchy inappropriately assesses settlements using a bizarre matrix system which does not reflect how residents use services, and the resultant ability for a settlement to support additional residential development and deliver benefits to existing residents.

The Council's evidence base for the Local Plan comprises a range of technical reports and topic papers including a Rural Settlement Hierarchy Study (2022). Quinn Estates are disappointed to note that the previous comments made at Regulation 18 stage have not been taken into account, and that Capel le

Ferne remains downgraded to a 'Larger Village' rather than as a 'Local Centre' as the 2010 Dover Core Strategy currently acknowledges. Within the 2010 Dover Core Strategy Capel le Ferne was identified as a Local Centre and therefore a secondary focus for development in the rural area; suitable for a scale of development that would reinforce its role as a provider of services to its home and adjacent communities.

The Rural Settlement Hierarchy Study is an important document, as it has clearly directly led to the spatial approach presented in the Plan. However, the methodology to assess the sustainability of settlements is flawed and consequently this undermines the soundness of the whole spatial strategy. A simple matrix exercise has been used to count the number of facilities within the settlement, yet limited consideration is given to the level or value of service these facilities provide or any objective and balanced measure of sustainability of settlement based on critical elements such as their characteristics or spatial relationship in relation to other settlements and connections to them. It is disappointing to note that this matrix exercise has been used again for the Regulation 19 draft of the Local Plan.

A quantified points system has been used in which each service is awarded a certain number of points based on the amount and range of facilities provided within the settlement. It is clear there are some significant shortcomings in using this inventory method to assess the sustainability of a settlement and thus determining its position within the settlement hierarchy. For example, each shop unit is worth one point whilst a primary school or train station is only worth three points in total. The result of this is a settlement could score points if it contains shops that do not provide an everyday service to the settlement, for example a car dealership or a furniture store. It is clear that these uses will make a limited contribution to sustainability, they have a limited day to day function, they make a negligible contribution to day-to-day sustainable travel patterns and indeed, if anything, they could serve to weaken the potential to achieve more sustainable travel patterns if such uses are sited at remote settlements. As such, the methodology inflates the sustainability credentials of some settlements, whilst failing to identify the high sustainability credentials of others. When considering the sustainability of the site, the Council should consider a settlement's respective connectivity to other settlements and the way that settlements inter-relate to support and foster sustainable development. This more nuanced qualitative approach was taken through the previous Local Plan Review, but appears to have been discarded in the current Plan review for no discernible reason. As such, the method used to review settlements calls into question the soundness of the Local Plan as it would not be considered appropriately justified under Paragraph 35B of the NPPF.

In the case of Capel le Ferne, the settlement is supported by its own services, as detailed the Housing and Economic Land Availability Assessment submission for the subject site in 2022, and the Sustainability Appraisal Appendix F 2022.

These services include regular bus services to Dover and Folkestone, general public store, public house, café, village hall, two churches, weekly farmers market and a primary school. This range of services meets the everyday needs of existing and future residents of Capel le Ferne and a new residential population would ensure that the vitality and viability and the range of local service provision is enhanced. Focusing growth at the settlement offers the potential to achieve highly sustainable development through a combination of the existing facilities at the settlement to meet a day-to-day convenience function, and the settlement's superb connectivity and proximity to the main town of Dover and the Sub-Regional town of Folkestone to provide sustainable access to a host of major employment opportunities. No other rural settlement boasts such connectivity to the two primary towns in this part of the County, yet this factor has been entirely overlooked.

Quinn Estates currently have land under option adjacent to the existing primary school for expansion. A larger allocation could provide the opportunity to include additional services, such as GP surgery, which is identified as lacking in the village. Nevertheless, this can only be delivered in tandem with additional housing allocation to support it.

The downgrading of Capel le Ferne from a Local Centre to a Larger Village is unsound and appears to have resulted in the development allocation at Great Cauldham Lane being reduced in size, to the detriment of the settlement and the District. Within the existing Dover Local Plan Capel le Ferne was identified as a Local Centre to 'reinforce its role as provider of services to its home and adjacent communities'. Therefore, the settlement was presumed to support the retention of existing services and attract new services within the area. The proposed downgrading of the settlement implies this objective has been met, although there is no evidence to support this. Capel Le Ferne should therefore continue to be identified as a Local Centre to continue to support this objective, with allocations such as that at Land east of Great Cauldham Lane being able to come forward to support this.

Given the range and suitability of the services available to residents in Capel le Ferne, along with its strong connections to employment centres via public transport, the settlement should be re-designated as a Local Centre. Moreover, the allocation of Land east of Great Cauldham Farm amended to a minimum of 70 dwellings to make full use of the site, strengthen the sustainability of the village and enable Quinn Estates to explore the delivery of additional services which would further enhance the settlement for existing and future residents.

Site Allocation Policy SAP44 – Land to the east of Great Cauldham Farm (CAP006)

Quinn Estates supports the allocation of the land to the east of Great Cauldham Farm within the draft Policy SAP44 for residential development. The site is available, suitable and achievable, as confirmed by the Housing and Economic Land Availability Assessment 2022. There are no obvious barriers to delivery, including that there are no constraints on the site such as ecology, trees, flooding and heritage, and the site is not dependent on the delivery of infrastructure before coming forward.

Quinn Estates consider that the land to the east of Great Cauldham Lane can comfortably accommodate additional housing. The appended Indicative Site Layout Plan details the ability of the site to accommodate up to 100 homes whilst retaining existing trees and hedgerows and providing sufficient screening along the western boundary of the Site, in accordance with the above assessment under the HELAA.

The Landscape Briefing Note submitted confirms that the site is more closely associated with the settlement edge than the open countryside to the north-west. It is considered that views are highly localised, and the visual envelope of the site is limited to a small area to the north. The site is not considered to be reflective of the special qualities or characteristics of the AONB, nor would the proposal bear any significant or detrimental impact on its setting. Furthermore, its redevelopment provides an opportunity to reinstate hedgerow planting that was lost due to intensive agricultural use and therefore a more sensitive transition to the AONB can be achieved.

Finally, it is considered to be a logical approach to extend the allocation further to the north, due to a localised dip in the land here meaning this part of the site is far less prominent and can ensure that a robust landscape buffer can be provided. Additional dwellings in this location are therefore suitable in landscape and visual terms, and the amendment of the allocation to 'minimum 70' can be supported. It is also significant to note that the site is the only site at the settlement outside of the AONB which can deliver housing, therefore, it is imperative that the Council makes best use of the site by expanding the allocation, or at the least revising the policy wording to a minimum of 70 dwellings.

A Cultural Heritage and Archaeological Scoping Report has been prepared in relation to the site and is appended to these representations. This Report confirms that there are no heritage assets on or near the site that would be directly affected by development. It is however considered that there may be archaeological remains, however it is not clear due to the limited archaeology works undertaken in the area. As such it is proposed that as part of any planning permission, a programme of archaeological evaluation would be agreed to confirm whether any remains exist, and any mitigation required.

This provision would enable greater benefits for the wider local community to be delivered, including:

- Contributing further to the local housing need;
- More affordable housing provision;
- Provision for community facilities;
- Increased amount of open space;
- Financially enables the delivery of the additional school land and potential GP surgery; and
- Opportunities to meet local self/custom build need

c. Conclusion

Quinn Estates wishes to support Dover in bringing forward a successful, effective and sound Local Plan that can serve the District across the Plan period. The allocation of the Site within the draft local plan is welcomed by Quinn and they are committed to delivering a successful housing scheme. However, Quinn seeks a minor amendment to the wording of the policy to support additional housing numbers on site, of which it has been demonstrated that the Site is suitable to do so.

It is considered that Capel le Ferne should be reconsidered as a Local Centre due to a number of factors including the facilities and services it currently provides, its proximity to Dover and Folkestone and its sustainable transport links to these settlements and the potential for future development to support existing and new facilities in the village. The matrix exercise used to determine the settlement hierarchy has taken a very narrow view on settlement sustainability and its position in the hierarchy must be reviewed. In this regard, it is recommended that the Council exercise planning judgement to ensure that the settlement hierarchy for the District reflects the potential to achieve and deliver a sustainable growth strategy.

The benefits of increasing the size of the allocation have been detailed as providing a more significant contribution to the housing needs for the local area, provision for a community facility and enhanced provision of open space. Given the range of benefits a larger allocation would be

	<p>able to provide, Quinn Estates request the wording of the allocation in Table 4.12 to be amended to a minimum of 70 dwellings to enable these significant benefits to be utilised by new and existing residents.</p> <p>We trust that the above amendment is acceptable to the Council and that these representations will be taken into account in consideration of the current consultation. We also confirm that Quinn Estates would welcome the opportunity to be involved in the forthcoming Examination-in-Public and contribute to the debate to ensure that the best strategy for the District is found.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The site is promoted for 100 dwellings and requests the policy wording is amended to minimum 70 dwellings on the present site boundary, or expanding the site to the north to include 100 dwellings</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>SDLP1928 Willson Att1 Original rep.pdf SDLP1928 Willson Att2 Landscape briefing note.pdf SDLP1928 Willson Att3 Transport Assessment.pdf SDLP1928 Willson Att4 Cultural Heritage and Archaeological Scoping report.pdf SDLP1928 Willson Att5 Site Layout Plan.pdf</p>
<p>Local Plan Consultation Point</p>	<p>Strategic Policy 3 - Housing Growth</p>
<p>Rep ID</p>	<p>SDLP1569</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1333352</p>
<p>Consultee Full Name</p>	<p>Kentish Projects</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	<p>Grace Martin</p>
<p>Agent Company / Organisation</p>	<p>Hume Planning Consultancy Ltd</p>
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SP3</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified</p>

	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Representation submitted by Hume Planning. Full Representation attached to SDLP1568. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1568.)</p> <p>SP3: Housing Growth</p> <p>Whilst we welcome DDC's commitment to meeting its housing need, with Strategic Policy SP3 committing to providing at least 10,998 net additional homes over the Plan period, it is considered additional sites if suitable and available should be included within the Plan. A large proportion of growth is being directed towards the expansion of Dover/Whitfield (over 2,000), and with large strategic sites delivery rates can easily slow down during the plan period and under-deliver. Whilst there is a buffer within the Plan, it is considered appropriate not use this as a limit, and allocate other suitable sites in sustainable locations where available.</p> <p>In this respect, it is noted that Deal sits towards at the top of the settlement hierarchy, as the district's only District Centre. Only Dover/ Whitfield sit above Deal. Deal is also an area that has attracted strong market demand which is a relevant factor to the delivery of the district's housing requirement. The emerging Plan due to the perceived constraints in Deal, only allocates 223 units in this settlement compared to over 600 in Aylesham which is a settlement located lower down the settlement hierarchy and the provision of a greater number of small sites such as this will inbuild choice and assist with the planned delivery trajectory.</p> <p>As detailed above, land off West Lea, is considered suitable for residential development. It is also available and can be delivered within the short to medium term, and in our view this site should be allocated within the Plan.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1938

Rep Status	Processed
Consultee ID	1274293
Consultee Full Name	Jill Jones
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I am very concerned about the amount of developments scheduled in and on the outskirts of villages, as opposed to the government's dictum that Brownfield sites should be the main focus for developments. I note that many of the proposals in towns are designated as medium timescale whereas many in the villages are designated short term. I feel that the brownfield sites in towns should be developed first then, if needed, the villages should be considered.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Shepherdswell is not the place for large-scale developments, and I hope you will take this into consideration. If builders wish to build estates, they must be prepared to improve the infrastructure at their expense.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	

Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1630
Rep Status	Processed
Consultee ID	1333382
Consultee Full Name	Mr Colin and Linda Tearle
Consultee Company / Organisation	
Agent Full Name	Gurdev Moore
Agent Company / Organisation	Rubix Estates
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Representation submitted by Rubix Estates. Full Representation attached to SDLP1624. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1624.)</p> <p>POLICY SP3 – Housing Growth</p> <p>3.14 This policy deals with the housing strategy for the Plan period. It expresses clear linkages to the overarching vision for the Plan, and its objectives in focusing growth at sustainable locations providing greater choice of high quality and sustainable housing to meet identified needs.</p> <p>3.15 Need is derived from household projections and targets set by central government, here identified as at least 611 dwellings per annum, with a minimum of 10,998 new dwellings over the Plan period.</p> <p>3.16 The housing growth strategy at SP3 is geared towards delivery of such. This baseline position of meeting identified need is wholly supported. It is noted that the policy wording recognises 'a minimum of 10,998 dwellings over the Plan period'. It is considered that this wording is most appropriate in encouraging sustainable growth; a cap should not be applied.</p> <p>3.18 The Plan allocates a number of sites to ensure a consistent supply of housing to facilitate demonstration of a continuous five-year housing land supply. Again, it is pleasing that the Plan seeks to clearly satisfy this basic requirement. It is essential that the Plan is able to meet identified need, and the allocation of multiple sites across the Plan area at different scales should enable a reliable supply of dwellings to meet need – again as a minimum target only, rather than a capped 'ceiling' figure.</p>

	<p>3.19 The Settlement Hierarchy is supported, particularly as far as it concerns the higher order settlements as a Local Centre alongside Eastry, Wingham, Ash, Shepherdswell, St Margarets, Kingsdown.</p> <p>3.20 In recognition for its sustainability and its role as a Local Centre, Elvington & Eythorne is ranked highly within the district. It benefits from high connectivity and a range of services and facilities.</p> <p>3.21 It is a highly sustainable location for development and it is agreed that it's place in the Settlement Hierarchy sufficiently recognises this.</p> <p>3.22 It is considered that the apportionment of growth across the hierarchy is appropriate in distributing sustainable growth to support communities in multiple locations in the District. Table 3.3. of the Plan identifies that over 300 dwellings and employment land will be delivered in Elvington and Eythorne under the Plan.</p> <p>3.23 As an indicative figure, this ambitious level of growth is supported in realising the overarching vision for the District. Detailed commentary on the precise quantum of development to the settlements is not provided here, though it is emphasised that the aspiration of meeting growth in sustainable locations such as Elvington and Eythorne gains significant support from the Promoter.</p> <p>3.24 Assessment of precise scale and quantum of development will be undertaken at the application stage following a housing allocation, though the indicative capacity of over 300 dwellings across multiple sites in Elvington and Eythorne is supported.</p> <p>3.25 It should be noted however that revision to SP3 should look to clarify the meaning of 'disproportionate growth', which at present is too subjective to rely upon in the policy wording as drafted. Minor amendment may simply refer to [amendments in bold text]: "development that would result in disproportionate growth to any of the District's settlements, which cannot be supported by the necessary infrastructure and services or would result in a loss of services and facilities which are considered to be key to supporting local communities will be resisted".</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>Strategic Policy 3 - Housing Growth</p>
<p>Rep ID</p>	<p>SDLP1773</p>

Rep Status	Processed
Consultee ID	1331526
Consultee Full Name	Mrs Mairi Jones
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>There has been inadequate consultation with the Alkham Valley, in particular the impact of housing growth in transport and green infrastructure, the AINB and SSSI</p> <p>DDC Note: Please see detailed representation (attached at 1770) which has been divided against numerous consultation points.</p> <p>I consider it essential that for the parish to grow more young families need to be attracted to it through more affordable accommodation and that a balance between conservation recreation and planned development is struck to ensure the heritage, the SSSI green space of the valley, and a rural community can thrive in any plans being taken forward by the District Council. As can be seen later in the report I would ask that the Parish be considered for Conservation Area Status to ensure the natural resources offered by the Green Space can be maximised for the District as a whole.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Please see appended report
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I can speak to any of the points raised in the attached document

Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1906
Rep Status	Processed
Consultee ID	1333857
Consultee Full Name	Mrs J Jarvis
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP44
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Before building any housing on farm land, building on old disused buildings and ex-industrial sites should be a priority (Issue relates to government policy)
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1852
Rep Status	Processed
Consultee ID	1333792
Consultee Full Name	James Hambling
Consultee Company / Organisation	RAMAC Holdings Limited
Agent Full Name	Megan King
Agent Company / Organisation	Nexus Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Full Representation attached to SDLP1851. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1851.)</p> <p>The regeneration of the Stonar Site would accord with specific policies of the emerging Local Plan, including:</p> <ul style="list-style-type: none"> • Policy SP3 (Housing Growth), which identifies Sandwich as a sustainable location of development;
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1884
Rep Status	Processed
Consultee ID	1333838
Consultee Full Name	mrs rosemary anne Holmes
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	3.68 windfall. Unless existing settlements and their present boundaries are respected there is suburban ribbon development creep from field to field. Plan should state previously existing settlement boundaries will be respected until town and parish councils agree changes with DDC in accordance with Localism Act 2011. New housing in Kingsdown will result in traffic jams – not with public transport, retail and schools (schools have no money until sky high energy bills etc)
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	SP3 Housing Growth statement – ‘provide a greater choice of high quality housing to meet the needs of Dover Districts growing population and changing demographic and address affordability issues’. Not consistent with details in plan which underestimate the evidence showing a large part of district growth population growth is due to ageing. The details thus render SP3 and SP5 less effective – not sound judgement. Social housing and not more 4/5 bedroom houses should have been planned for. SP6. Economic growth – quality not quantity please.

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1729
Rep Status	Processed
Consultee ID	1333477
Consultee Full Name	Cllr T Byfield
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note: The text below is an extract from the original representation which is attached to SDLP1438.</p> <p>Dover District plan report on Development management</p> <p><i>I have been tasked with reviewing the Dover local plan in respect of design and development. This is a very large document, so I have tried to break it down into manageable portions.</i></p> <p><i>The Dover plan does acknowledge that there are constant improvements in design and the plan will need to evolve and to consider new technology, improvements in materials and methods of construction.</i></p> <p><i>I have therefore taken the policies which are attached at the end of this document and extracted sections which I think will be of interest the town council and where I believe comment is due.</i></p> <p><i>I believe that the planning committee needs to be aware of these points extracted. My comments in italics</i></p>

	<i>There is no mention as per National Policy as to the preference for new developments being developed on brownfield sites as far as I can see.</i>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1721
Rep Status	Processed
Consultee ID	1333480
Consultee Full Name	Mr K Ledger
Consultee Company / Organisation	Ledger Farms Ltd
Agent Full Name	John Peall
Agent Company / Organisation	EnergyArk Developments Limited
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes

<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Yes</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>the Plan has not considered the potential of the settlements in the Dover-Deal corridor to provide distributed sustainable development. (DDC Note - Text extracted from Attachment)</p> <p>We are making submissions concerning land between Dover and Deal. We have made direct representations on the Coldblow site in Walmer (DEA009), and will be supported by another party, Esquire Developments Limited, who have options on other sites for early delivery. Over the past 3 years the progress of the draft Local Plan has seen some notable changes. You have sought submissions at this stage which portray the widest possible perspective. We believe that our proposals will help give security to the local plan and deliver a more sustainable settlement infrastructure.</p> <p>All of the land proposed can be rapidly delivered to the plan. Moving from Guston towards Deal along the Dover to Deal Corridor of land.</p> <p>1. Guston. Not in plan but available. We made a representation for 100+ hectares. We consider that this is the obvious “elephant in the room” in respect of the Dover Plan. There has been no effective consideration of our submission for this strategic site although the site fits plan policy criteria well. There are implications for: The housing target. The Lower Thames Crossing and the A2/M2. The HS1 route and the Railtrack Canterbury Link. The efficacy of the Fastrack System and the regions transport plan. The structural development of Dover Town and the UK’s face to the EU and Kent’s overall development. The change of policy whereby villages now should take forward part of the housing burden. Various options exist from one or more smaller sites of 10, through to fields adjacent to the Fastrack system that could accommodate 100 houses or more, right up to a mixed development of 1000+ houses that would see a new heart to Dover set about a new land transport node as we proposed to the current portfolio holder for planning and development.</p> <p>We have national house builders interested in the land and are surprised that officers from Colas have approached our client in respect of the land. Immediate opportunities which we can easily fulfil are the fields to the east of Dover Road and those that abut the A2 and Dover Road.</p> <p>2. Land at East Langdon. Not in plan but available. We are advised that the site promoted to the North West of The Street has significant challenges. We proposed a site to South East of The Street. Our site remains available and could provide benefits for the village and the school. We have a developer engaged and our client has signed an option agreement. Esquire Developments Limited made an appropriate representation.</p> <p>3. STM03 Land of Station Road St Margaret’s at Cliffe. In plan and available for early delivery. We have a developer engaged and our client has signed an option agreement. Esquire Developments Limited have made an appropriate representation.</p> <p>4. Land to the West of the A258 Ringwould. Not in plan but available. We received feedback from DDC suggesting that this was not appropriate for development. Lately the thrust of the draft plan changed, opening the door for developments to make the villages more sustainable. An alternative site with access challenges from Dover Road is being progressed in this parish. Esquire Developments Limited have been informed that it is too late to consider Ringwould for a medium scale development although the original proposals were made some 3 years ago.</p> <p>5. Small parcel of land to the North East of Church Lane Ringwould. Not in plan but available. We submitted a HELAA. DDC suggested that it was inappropriate. With the iterations the plan has been through the site now looks appealing. We have many developers interested many of which are local.</p> <p>6. Southwall Road. We believe a limited mixed development with a commercial leaning would be appropriate at this site and have interest from local, regional and national players.</p> <p>In respect of 1, 5, and 6 these are our representations In respect of 2,3,4 Esquire Developments Limited will respond to the consultation.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>inclusion of land at Guston and Ringwould in housing allocations</p>

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	Peall (Ledger Farms) Em Att1.pdf Peall (Ledger Farms) Em Att2 - Rep Form_Redacted.pdf
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1891
Rep Status	Processed
Consultee ID	1333840
Consultee Full Name	Jon Alldis
Consultee Company / Organisation	Barrat David Wilson Homes
Agent Full Name	Emily Harris
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Full Representation attached to SDLP1883. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1883.) Draft Strategic Policy 3: Planning for Housing Growth - COMMENT Strategic Policy 3 sets out the Council's current housing supply position and shows that in order to meet the Local Housing Need for the District, the Council will need to allocate housing sites in the Local Plan to deliver 3,316 homes over the Plan period. This number has been reduced since the Regulation 18 draft which made allocation of 5,288 homes. Draft Strategic Policy 3 confirms that in total the provision is made for at least 11,924 additional homes across the Plan Period (2020 – 2040) – the baseline growth. Dover Council makes provision of a buffer between needs and supply of approximately 8% which is not considered to be sufficiently large enough to ensure that needs are met over the plan period, especially given that around half of the homes will come from urban expansions. BDW agrees with the representations submitted by the Housing Building Federation (HBF) which states that a buffer of around 20% would be more appropriate, including the allocation of smaller sites which will deliver earlier in the plan period. This would also provide an

additional buffer in overall supply should there be delays in the delivery of the larger sites in Dover. The council should actively be seeking to boost housing in accordance with NPPF paragraph 60. NPPF paragraph 69 explains the important role that small and medium sized site can make in meeting the housing need and that they are often brought forward quickly. Thus, to ensure that sufficient housing can come forward within the early years of the Plan Period, further small and medium scale sites should be allocated. This will alleviate the risk of the larger allocations under-delivering within the Plan Period which is historically documented in the District. NPPF Paragraph 11 sets out that a Local Plan should apply a presumption in favour of sustainable development and this means that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses. This is unless the protection of areas or assets restrict development or there would be adverse impacts that demonstrably outweigh the benefits of the development. It is considered that Regulation 19 Local Plan is not ambitious enough in the planning for the baseline of housing growth, especially given that the housing target is less than that which was provided for under Regulation 18. Paragraph 3.45 of (page 31) of the Regulation 19 Document states that housing delivery in Deal and Sandwich is constrained by a number of factors including: flood risk, wildfire sites, heritage and highways. As such it is claimed that the potential growth of these settlements are considered to be limited. BDW considered the Land North of Sandwich Road to be a logical option for additional development, outside of Sandwich and the listed constraints, whilst still in close proximity.

Paragraph 3.47 also states that a key part of the Council's growth strategy is to promote the sustainable development of rural areas, to support the vitality of rural communities in line with national policy. At the same time national policy advises that a balance must be achieved between allowing new housing and the need to protect the character and heritage of the settlements themselves, as well as the surrounding countryside. Within SP3 there are several allocated sites that are not confined by the listed constraints and are capable of delivering more housing across the District. This should include the Land North of Sandwich Road, where BDW has a firm commitment to delivering a high quality proposal of circa 110 dwellings.

Recommendation: DDC seek to meet their higher housing growth target, taking into account small and medium sized sites that are unconstrained and able to meet the overarching vision for the district.

The housing requirement of 10,998 over the plan period 2022 to 2040 is consistent with the minimum number of homes the Council should plan for using the standard method. However, what is not clear from the Council's evidence is whether this level of growth will be sufficient to meet the growth aspirations of the Council. The current housing strategy seeks to distribute housing across the District but with the majority in and around Dover Town. A secondary focus will be in Deal, Sandwich and Aylesham. The housing strategy is reliant on the delivery of major allocations which have historically been slow to deliver new homes. This is acknowledged by DDC at paragraph 6.7 where it is stated: "the proportion of housing development in Dover Town has been significantly less than the 70% envisaged in the Core Strategy. There does not currently appear to be any evidence to demonstrate that the delivery of the major allocations will improve. Paragraph 060 (Ref: 61-060-20190315) of the Planning Practice Guidance explains that:

"Should issues arise which would adversely affect the delivery of the adopted strategy then the authority should consider alternative strategies, through a plan review, if these issues are unlikely to be resolved." There is clear evidence that there are issues with the delivery the major allocations. At paragraph 6.8 DDC states that there are issues with the existing housing growth strategy. DDC appears to be dismissing alternative strategies including the allocation of small/medium scale site alongside the major allocation as part of the preparation of this new Local Plan. Alternative strategies should be considered otherwise the Local Plan will fall short of the tests of soundness.

Recommendation: DDC reconsider their reliance on major allocations and alternative strategies are considered.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 3 - Housing Growth
Rep ID	SDLP1911
Rep Status	Processed
Consultee ID	1333859
Consultee Full Name	Andrew Street
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We refer to the above mentioned document that is currently available for public consultation. We act on behalf of the owner of the property [redacted] in relation to this matter.</p> <p>We wish to provide the following comments on the Councils proposed housing strategy:</p> <p>Policy DP3 Housing Supply and Growth</p> <p>We consider the policy is Unsound for the following reasons</p> <p>We are concerned that the Council will continue to rely heavily upon large strategic sites to deliver its housing land supply needs. Whilst we have no issue the housing land supply figures, as they are based upon the Government standard methodology calculations, we would advocate it necessary and prudent to provide an additional contingency buffer. We note that the majority of homes are anticipated to come forward in the Whitfield Urban Expansion area.</p> <p>The additional buffer supply or contingency should be brought forward by allocating smaller sites that do not require a large upfront investment in infrastructure costs to facilitate delivery. These smaller sites can also be brought forward by small medium sized (SME) developers in the short term and will deliver earlier in the current plan period. Although this may be considered by some to be an over supply above the current housing land supply targets, it is necessary to factor in delays in the delivery of larger sites in the Council's area by the volume or national house builders; especially in the current economic climate.</p> <p>It is also an important consideration that Government advocates smaller sites for SME developers in the National Planning Policy Framework (2021) document (paragraph 68). The identification of these smaller sites in the local plan document as opposed to identifying a projected windfall figure allowance provides more certainty for SME developers in pursuing sites for planning permission.</p>

	<p>Our client has a site that would be suitable for inclusion as a site allocation in the village of Staple. The site itself currently forms part of an extended garden area of Warren House and is well screened from the surrounding rural area by mature trees and landscaping. This site is by definition previously developed land (PDL) as defined in the latest version of the NPPF (2021)</p> <p>Attached is a red line plan of the site and we consider the site is of sufficient size to accommodate a small residential development for between five- six dwellings (see plan 1 attached). Photographs attached for reference.</p> <p>At present, Staple has a very restricted tightly drawn settlement boundary surrounding the village as shown on the attached plans. There is already a small site within the settlement confines identified in the plan document as suitable for development. Therefore, the village is considered a suitable area by the Council for new housing development and is a sustainable location.</p> <p>We therefore ask for the settlement boundary to be expanded to include a residential site allocation as shown on the attached plan (reference plan 2).</p> <p>We trust these comments will be taken into consideration.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>We therefore ask for the settlement boundary to be expanded to include a residential site allocation as shown on the attached plan (reference plan 2).</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Not Applicable</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>Street Att1_Redacted.pdf Street Att2.pdf</p>

Strategic Policy 4 - Residential Windfall Development

Local Plan Consultation Point	Strategic Policy 4 - Residential Windfall Development
Rep ID	SDLP17
Rep Status	Processed
Consultee ID	1259309
Consultee Full Name	Mr Peter Jull
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP4 1.
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	It is questioned whether the wording of this policy is adequate to achieve the intended purpose or whether it opens a door to aggressive developers to submit applications for sites that have been rejected by this local plan. In relation to Dover or Deal, commensurate with the scale of the existing settlement could be argued to include developments of 100 houses or more.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Addition of the word Minor at the start of part 1 if that would be recognised as having the same meaning that differentiates between minor and major in other planning terminology or the additional of a maximum number of dwellings that would be considered in any one application.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	The hear and potentially counter any argument as to the intended scope of the policy or possible interpretation of the wording at an appeal.

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 4 - Residential Windfall Development
Rep ID	SDLP455
Rep Status	Processed
Consultee ID	1266351
Consultee Full Name	Dr Sharon Danby
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP4 Residential windfall development
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The proposed LDP as stands in light of the government announcement of 5/12/22 is not positively prepared or justified. Pressure to build large developments outside local centres is now lifted and DDC can look again at the reasonable alternatives including allowing only windfall developments in these rural locations, particularly where there are heritage and landscape conservation considerations eg Kingsdown should not be designated as a local centre as it is bordered by the AONB, heritage coast and Ripple F3 (LCA 2020) and has a large conservation area. Instead it should only be carefully developed through windfall.</p> <p>3.72 I agree that there should not be erosion of countryside between settlements. Unfortunately this has happened at Walmer, which due to the Station Road developments is now edging closer to Ringwoud and Deal.</p> <p>SP4 c - i agree strongly that the beauty of the heritage coast and AONB must be preserved, proposals like SAP34 - Woodhill Farm Kingsdown and SAP15 Rays Bottom, Walmer are contrary to this.</p> <p>h - SAP34 would have a large impact on adjoining residents of Glen Rd and the whole of Kingsdown village as it would impact on the poor but characterful roads.</p> <p>i <i>Where development would result in the loss of active employment, open space, sport or community facilities within the settlement that such development is consistent with the requirements of policies EN2, PM5 and PM6 of this Plan;</i> It is not justified to include Kingsdown as a village centre as this will result in loss of unique heritage and charm which will cause a decline in tourism, which employs locals and allows the small number of businesses in the village to thrive.</p>

	<p>j- traffic movements through villages have already been increased through the larger developments allowed in the current LDP. The proposed LDP must therefore take into account the already strained infrastructure particularly the A258 which has seen a number of fatalities. The proposed LDP is not consistent with NPPF 21 as the unsustainable development figures of nearly 11,000 houses will result in excessive car movements in rural communities with reduced bus services.</p> <p>I agree with 3.74 - the AONB will need careful protection. Buffers should be carefully maintained between the built environments of villages and these landscape assets.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Reduce rural developments to careful windfall, maintaining buffers between AONB and other landscape and biodiversity assets. Also stop developments that may lead to coalescence between settlements, particularly when these settlements have character, heritage and landscape assets and are important to tourism.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>Strategic Policy 4 - Residential Windfall Development</p>
<p>Rep ID</p>	<p>SDLP405</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331010</p>
<p>Consultee Full Name</p>	<p>Mr Kevin Holyer</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>Strategic Policy 4, paragraph 3.73 and Residential Windfall Development paragraph 2 -Chillenden</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified Effective</p>

	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>REPRESENTATION TO REVIEW SITE TC4S067</p> <p>THE GLEBE PLOT, STATION ROAD (OFF SHORT STREET)</p> <p>CHILLENDEN, CT3 1PR AND INCLUDE IN THE LOCAL PLAN</p> <p>Representation</p> <p>I am making a representation against the Dover District Council (DDC) Local Plan, which is currently subject to Regulation 19 Local Plan Consultation. I believe it is unsound and that The Glebe Plot Station Road (off Short Street) Chillenden (TC4S067) has been wrongly omitted from the Local Plan. I believe the site TC4S067 has been omitted from the Local Plan when it should have been included as an allocation, this is because I believe the HELAA assessment carried out by DDC is incorrect. I would ask that during your examination process you consider my representation, confirm the failings of the HELAA assessment and add site TC4S067 to the Dover District Council Local Plan.</p> <p>I also want to confirm that should this be included under the Examination process that I would like to attend the examination process and, if it is felt necessary, to support this representation.</p> <p>Background to Representation</p> <p>The Glebe Plot, Station Road (off Short Street) Chillenden (TC4S067) submission was made to DDC, following its Call for Sites in 2021. The submission was sent to the DDC Local Plans team and receipt acknowledged on 15th March 2021.</p> <p>When the Regulation 19 Local Plan Consultation was released in October 2022, by DDC, the Glebe Plot (TC4S067) was referenced by inclusion on the list of eliminated sites. The reason for the elimination is set out in the Evidence Base as having been eliminated at the Stage 1 Assessment, which is the initial desktop study, the reason stated is that the site is “isolated in the Countryside”. This meant that there was no further consideration of the site and its suitability, availability and achievability to bring forward much needed housing in a sustainable and sympathetic location for the local community.</p> <p>My representation is that the Stage 1 assessment is wrong, and that The Glebe Plot (TC4S067) is clearly within the boundaries and confines of Chillenden Village and represents an opportunity for the development of an infill site for the village.</p> <p>To support this view, in addition to the absolute fact that The Glebe Plot is within the village and is not “isolated in the Countryside” I present the evidence of DDCs own information. Four sites were submitted for consideration from Chillenden village. These are set out on the Settlement maps for Goodnestone and Chillenden sites which were included at Stage 1 Assessment. This map is shown below.</p> <p>This shows clearly that The Glebe Plot (TC4S067) sits between two sites that were not eliminated at stage 1, if these plots were not eliminated for being “isolated in the countryside” it cannot be correct that The Glebe Plot was eliminated for that reason, and it should have been carried forward for further assessment.</p> <p>This first stage assessment also considered the following criteria and sites could have been eliminated if they were:</p> <ul style="list-style-type: none"> • Too small • Covered by National designations <p>and/or</p> <ul style="list-style-type: none"> • Contrary to policy. <p>None of these criteria were identified as the reason for the elimination of The Glebe Plot, and I can confirm that the plot could not be eliminated for these reasons because:</p> <ul style="list-style-type: none"> • The site area extends to 0.38 hectares (3,800 metres squared). As part of the targeted call for sites 2021, the evidence base states that Housing sites would be considered between 0.25 and 1 hectare in size and therefore, The Glebe Plot, TC4S067 meets these criteria. • The Glebe Plot TC4S067 is not covered by any National designations. • Following discussions and e mail correspondence with DDC Local Plans team in November 2022, I understand that the reason The Glebe Plot TC4S067 was rejected is that it was considered that the site was “Isolated in the countryside”. This is the reason given and why the Glebe Plot, TC4S067 was included in the HELAA document Appendix 2a (Initial assessment housing sites eliminated on page 3. Please see the link below.

<https://www.doverdistrictlocalplan.co.uk/uploads/pdfs/appendix-2a-tc4s-initial-assessment-housing-sites-eliminated.pdf>

In preparing to make this representation, on 21st November 2022, I asked the DDC Local Plan team to confirm the definition they had used of "Isolated in the Countryside". On 1st December 2022, DDC Local Plans team responded stating that the term "Isolated in the countryside" is explained in Paragraph 3.73 of the Local Plan (Page 39) and is also set out within National Guidance - See NPPF National Planning Policy Framework - 5. Delivering a sufficient supply of homes - Guidance - GOV.UK (www.gov.uk) Paragraphs 78 onwards. I have also researched numerous legal cases around the interpretation of the term 'isolated' in the NPPF.

I have read the explanation on Strategic Policy 4 (SP4) on page 39 Paragraph 3.73. The Local Plan states "National Policy is clear that new isolated dwellings in the countryside, outside of settlement boundaries are only permissible in exceptional circumstances"

The Local plan identifies in SP4 2, Chillenden "as a settlement suitable for minor residential development or infilling of a scale that is commensurate with that of the existing settlement and that "residential development or infilling will be permitted within the settlement boundaries, as shown on the Policies Map of the settlements" and which includes the settlement of Chillenden subject to criteria a) to k) being met (reference SP4 page 39 of the Local Plan).

With the above in mind, I would request that the Planning Inspector reviews the conclusion reached by the Stage 1 assessment that the Glebe Plot TC4S067 is "Isolated in the Countryside" for the following reasons:

- As can be seen from the map, The Glebe Plot TC4067 site is quite clearly within the well-defined settlement confines and boundary of the settlement of Chillenden.
- The TC4S067 site meets NPPF and SP4 policy subject to criteria 2a)-k) being met.
- The Glebe Plot Site TC4S067 is just 50m from the GOO006 site, (Land adjacent to short street, Chillenden) which has been included in the Consultation Local plan Regulation 19 submission on page 211.
- From further research, I understand that the definition of "isolated in the countryside" is a dwelling that is physically separate or remote from a settlement (Court of appeal judgement Lord Justice Lindblom). The Glebe Plot TC4S067 is neither physically separate nor remote from the settlement of Chillenden.

In summary, I believe it to be absolutely clear that The Glebe Plot site (TC4S067) should not have been eliminated from consideration for inclusion in the DDC HELAA at stage 1 desk top assessment, because it is not "isolated and in the countryside". Further to this, I consider that the site would not have been excluded at the Site, Suitability, Availability and Achievability assessments as it meets the same standards as the site, GOO006, that has been included in the Local Plan on page 212, but with the added advantage of not being a site which is subject to flooding.

In summary The Glebe Plot TC4S067 site is:

- Highly accessible to Chillenden Village, being centrally located.
- Not affected by Flood Risk
- Suitably accessed from an existing access point off Station Road with the ability to improve the access further.
- Visually contained by surrounding topography and existing mature hedgerow and trees and will be seen against the backdrop of the existing neighbouring dwellings.
- Not affected by any recognised landscape designations.
- Adjacent to a sole Heritage asset, with significant screening between them and the ability to further mitigate the impacts.
- Not subject to any ecological constraint.

We have engaged fully with Goodnestone Parish Council (GPC) regarding the proposal to include, The Glebe Plot site, as part of the HELAA process and we are sympathetic to the comments made in the GPC letter dated 11th March 2021 as part of their response to the District Plan consultation. Due to its unique location in the middle of the settlement of Chillenden, The Glebe Plot site will not impact adversely on the surrounding landscape. It does not suffer from surface water flooding. The site is well screened by mature trees, hedgerows and bushes and a preliminary study has been undertaken by a heritage expert, to ensure that any heritage concerns of the nearby Grade 2 listed building can be mitigated. Importantly, The Glebe Plot site benefits from its own access off Station Road with no other shared properties or driveways.

In addition to the documents submitted on 15th March 2021 as part of the targeted call for sites 2021, I would request that the details of the site's suitability, achievability and availability appended to this representation to be considered (Appendix 1).

In conclusion, my representation is that the Glebe Plot was wrongly excluded at the first stage assessment, because it is not "isolated in the Countryside" as it is within the confines and boundary of the village of Chillenden, and it should have been considered suitable for inclusion in the Local Plan, as at least equal to the site that has been included (GOO006), if not better given the lack of impact of flooding, and should be added to Dover District Council Local Plan.

	Thank you for your attention to this and I look forward to receiving confirmation that you have accepted my formal representation and will consider the matters during your Examination process.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	I believe the Dover District Plan is unsound and that The Glebe Plot Station Road (off Short Street) Chillenden (TC4S067) has been wrongly omitted from the Local Plan. I believe the site TC4S067 has been omitted from the Local Plan when it should have been included as an allocation, this is because I believe the HELAA assessment carried out by DDC is incorrect. I would ask that during your examination process you consider my representation, confirm the failings of the HELAA assessment and add site TC4S067 to the Dover District Council Local Plan.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I also want to confirm that should my representation be included under the Examination process that I would like to attend the examination process and, if it is felt necessary, to support this representation.
Include files	Picture1.png The Glebe V3.docx SDLP0405 Holyer Att6.pdf SDLP0405 Holyer Att3.pdf SDLP0405 Holyer Att4.pdf SDLP0405 Holyer Att5.pdf
Local Plan Consultation Point	Strategic Policy 4 - Residential Windfall Development
Rep ID	SDLP252
Rep Status	Processed
Consultee ID	1331383
Consultee Full Name	Mrs Katie Miller
Consultee Company / Organisation	Kent Downs AONB Unit
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP4
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	

4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	No objection, support proposed inclusion of criterion (c), which is in compliance with the NPPF paragraph 176.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 4 - Residential Windfall Development
Rep ID	SDLP751
Rep Status	Processed
Consultee ID	1259612
Consultee Full Name	Mr Chris Shaw
Consultee Company / Organisation	Langdon Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP4 - Residential Windfall Development, Paragraph 1
2 - Do you consider this part of the Plan sound?	No

<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Justified Effective</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Yes</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Yes</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>Langdon Parish remains concerned about the categorisation of East Langdon as a 'Large Village'– see comments below this table. It is unclear as to whether the settlement confines are to be amended to incorporate the proposed site allocation at East Langdon (Policy SAP46 - Land adjacent Langdon Court Bungalow, The Street, East Langdon (LAN003)). The Parish Council would like to see clarity on this, as extending the boundary would potentially open up additional countryside to windfall development. As an aside, the Policies map describes these as the 'settlement confines' as opposed to the 'settlement boundaries'</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Settlement hierarchy- East Langdon as a 'larger village': The Parish Council remains concerned about the categorisation of East Langdon as a 'larger village' The criteria for this category states that larger villages have a good range of services and facilities, which serve their own residents and those of nearby hamlets. East Langdon village has no retail facilities. There is a Post Office operated from the village hall two mornings per week. One bus serves the village 5 times a day, although there is no evening service. The main facility is the primary school, however it is unclear as to the viability of the school. The KCC Schools Plan states that there is likely to be a surplus of spaces in the coming years: "<u>District commentary</u>: We forecast a significant surplus of Year R and Year R-6 places over the Plan period. This surplus is the result of the falling birth rate, with some planning groups having around one quarter increase of Year R surplus in the coming years. As schools are primarily funded on the number of pupils on roll, low Year R numbers will impact on future budgets with some schools choosing to reduce their published admissions numbers." "<u>Dover East Planning Group</u>: Surplus places are forecast throughout the Plan period. However, in the longer term places will be required to support the planned development of Connaught Barracks. Ideally this will be via the expansion of Guston Church of England Primary School. We are continuing to work with interested parties to secure the additional land that will be required to enable the expansion to happen." The supporting text for the policy says that to help sustain and strengthen the role of these larger villages, additional housing over the lifetime of this Plan is considered appropriate. Criteria (a) of the policy itself states that any development is to be of "a scale that is appropriate to the size of the settlement and the range of services and community facilities that serve it, taking account of the cumulative impact of any allocated sites and committed development". This is further emphasised in Policy SP2 (Planning for Healthy and Inclusive Communities) which includes the following text: "Ensuring that new development is well served by services and facilities (for example education, health care, community, cultural facilities, play, youth, recreation, sports, faith and emergency facilities) and that a mix of uses are provided in new development that support daily life." East Langdon currently comprises some 87 dwelling, 69 being concentrated central to the village in the vicinity of The Street, a narrow through-route to other hamlets of the parish. The proposed land allocation SAP46 at East Langdon is for 40 dwellings adjacent to the current north-eastern settlement boundary on BMV quality agricultural land. This location would be accessed via the network of narrow country lanes which lead from the A258 – A256 – A2 district highways into East Langdon Road and The Street. Although SAP46 has been identified as the most suitable allocation site in East Langdon, increasing the village core from 69 to 109 dwellings (58%) would have a profound impact on the local infrastructure, road network and access to services. It is considered that there is a discrepancy between the allocation of 40 additional dwellings to the village (with no requirement for mixed development to include space for other services/ retail/ economic use etc.) in the context of Policy SP2 and clause (a) of Policy SP4 particularly in the context of lack of certainty over the school, which is the primary service in the village, and the rural nature of the road network. The Parish Council consider that either the categorisation of East Langdon as a larger village should be reconsidered, or the number of dwellings in the proposed site allocation should be reconsidered to ensure that it is sustainable in the context of the lack of local services.</p>

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Langdon Parish Council wishes the opportunity to explain the specific issues with East Langdon being categorised as a "Large Village" and the consequential issues it raises if a development was proposed which would increase the dwellings by nearly 60% on the infrastructure, road safety and infrastructure services.
Include files	
Local Plan Consultation Point	Strategic Policy 4 - Residential Windfall Development
Rep ID	SDLP958
Rep Status	Processed
Consultee ID	1266351
Consultee Full Name	Dr Sharon Danby
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3 Housing growth
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Due to the governments announcement 5/12/22 the plan is not positively prepared as the development needs must be reassessed. This means it is no longer justified as there now is the room without central government pressure to find reasonable alternatives. It is also not effective as the pressure put on local communities and existing infrastructure is unreasonable and means that it is not deliverable. The plan is also not consistent with NPPF 2021 as the many landscape and heritage assets in Dover District are being compromised by the level of unsustainable overdevelopment which the current plan has allowed.</p> <p>The Housing Growth statement that the aim is to , "provide a greater choice of high-quality housing to meet the needs of Dover districts's growing population and changing demographic and address affordability issues", does not seem internally consistent with the details provided in the plan which underestimates the evidence showing a large part of district population growth is due to aging. The details thus render SP 3 and SP 5 less effective and less sound.</p> <p>Under the current LDP developers have shied away from the badly needed regeneration of Dover and concentrated on building maximum profit, minimum affordability developments of large homes around the more desirable town of Deal and out in Whitfield. The supposed regeneration</p>

of Dover has resulted in another generic shopping centre and a more depressed high street and has not lifted the rest of Dover. The promenade area is uplifted but there seems to be little connectivity to the rest of Dover.

The government department (DLUHC) decision that Dover needs 611 new dwellings a year and a minimum of 10,998 new homes between now and 2040 we find very incompatible with legally binding Net Zero Strategy, Climate Emergency Declaration 2019 and Climate Change Act 2008, and unsound. We should be transforming existing housing stock into zero carbon homes as is happening in East Sussex, led by Lewes DC. Combining these numbers with 3.51 and the statement '76.7% of the new homes are on greenfield sites, while 23.3% are on brownfield sites' is unsound and unacceptable to the public.

We feel that our communities are being harvested by developers and our worries are not being heard or needs met in terms of infrastructure. Thanks to certain national newspaper Sunday supplements, Deal is desired as a 2nd home location by the wealthy from London and elsewhere. Holiday homes which spend most of the year empty in Deal, Dover and coastal villages of Kingsdown and St Margarets are stopping locals from buying affordable homes in their own area from existing housing stock.

It must also be pointed out that at least one of the sites included in the 23.3% of brownfield sites is actually a site intended by SEEDA as local nature reserve having rewilded on unstable slag (only rendered stable by tree-planting, a site which DDC forgot to make a local nature reserve in 2004, and it has become a biodiversity hotspot well known to genuine ecologists nationally; Betteshanger Park.

Central government in London, according to Housing Today is imposing a disproportionate amount of housing growth on Kent and the SE. There is a grievous lack of democratic accountability across Kent. So the chances of protecting Kent, of achieving a Growth Strategy that creates climate-friendly jobs and suitably sized, suitably-priced zero-carbon homes for the next generation of local families, are not good. The space available for infrastructure, functions well for compact coastal towns of the size that Deal / Walmer and Sandwich were 5 years ago.

The level of greenfield overdevelopment which has been disastrous under the current weak LDP is putting Deal infrastructure under strain now, so in-fill should make up the majority of the allocations for Deal and that the housing growth specified for District Centre of Deal and around its boundaries needs to be stopped or radically reduced. Either or both of SAP 15 / SAP 34 would destroy the only road access alternative for diverted traffic. (See detailed comments under SAP 15/ SAP 34 below). Housing Growth that threatens gridlock, blocking off a conurbation of 30,000 from access by emergency vehicles, commuters, school buses is not sustainable housing growth and is very unsound.

3.29 I note and welcome a degree of shift from the Reg 18 draft, in that more sites have been selected with a view to using 'existing infrastructure, facilities and services, with a greater professed purpose to ensure development contributes to the sustainability of local communities and services'.

I note with appreciation both the increase in the number of sites in Dover town SAP 6 – SAP 13, and the SAP 26 Former Snowdown Colliery, Aylesham near a rail station for example. It should be possible to state a determination to 'make best use of brownfield – non-rewilded – land) without giving developers the opt-out qualification 'wherever possible'.

On Five Year Housing Land Supply. 3.39 Having stated the Council had 6.03 years land supply plus a 5% buffer; it is not sound, effective or legally compliant to then state 'the provision of additional sites within the first 5 years of plan period is needed to ensure resilience and promote flexibility;'. Instead of ensuring resilience, it will create exactly the

destructive suburbanisation of a rural district that many, many of the resident electorate are most worried about.

3.46 It is the conspicuous lack of a secondary school in Aylesham that prevents Aylesham becoming the small garden town planners aspire to. The provision of a secondary school by 2028 should be a condition of SAP 23. There seems to be a complete lack of planning in the statement that now

3.48 Many, many of the current residents of ex mining village Elvington were / are dependent on buses that have recently (2022) been cut, (following KCC cut to bus subsidies) to get to work in Canterbury, Folkestone, Sandwich, Thanet or Dover, or to get to secondary school, or to get to doctors, or to shop. These people had environmentally sustainable public transport service that has been cut. KCC is saying it is looking at potential bankruptcy in 2023, so promises of new services and facilities are met with some disbelief. The selection of this site is ONLY sound with cast-iron conditions to provide all of the services we mention below, including new drainage infrastructure. Council housing in Elvington has been subject to flooding from the sewage system, long overdue for replacement. As in Dover deprived wards, there are unhealthy EPC EFG homes in Elvington that need to be transformed into zero carbon home to lift residents out of fuel and therefore food poverty.

3.68 Windfall. Unless existing settlement boundaries are respected, there is suburban ribbon development creep from field to field to field. To render the plan sound it should contain a statement 'Previously existing settlement boundaries will be respected, until such time as town and parish councils may have agreed changes with Dover District Council, in accordance with the principles of Localism Act 2011.' In the current economic climate, it seems very naïve to hope that 'new housing in

villages can help them retain existing services such as public transport, retail (many pubs are going under because lack of staff and sky high energy bills) and schools'. Indeed we have lost a large proportion of our bus services in the district.

<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Push back to central government and demand a reduction in the housing allocation of 10,998 new homes. Now possible after announcements 5/12/22 from Prime Minister.</p> <p>Regenerate Dover as a priority, retrofitting existing housing stock to provide well insulated renewable energy powered homes. Windfall development only should be allowed in Deal, Sandwich and surrounding villages. Create a self sufficient sustainable garden village at Aylesham with secondary school and green infrastructure and homes far beyond future homes standard.</p> <p>Provide better facilities and transport links for Whitfield to ensure that homeowners are not car dependent.</p> <p>Lobby central government for changes to the rules for ownership of second homes. Priority should be given to locals.</p> <p>Make the wording in the plan stronger in favour of brownfield sites eg 3.32 <i>sufficient amount and variety of land</i> should also state that brownfield must be used before greenfield as per stated in NPPF 21.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>Strategic Policy 4 - Residential Windfall Development</p>
<p>Rep ID</p>	<p>SDLP722</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1261008</p>
<p>Consultee Full Name</p>	<p>Dr John Garcia-Rodriguez</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>Strategic Policy 4</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified Effective Consistent with National Policy</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Not Applicable</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>No</p>

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>Para 3.72 rightly mentions avoiding merging of settlements. This though is what is happening with Aylesham and Snowdown and Aylesham and Adisham (failure to cooperate with Canterbury City Council seems to be likely on this issue).</p> <p>Much of the Aylesham development is on large farmers' fields. These must be outside settlement boundaries but para 3.73 suggests that should not happen unless there are exceptional circumstances.</p> <p>The green box text suggests that development will not be permitted if settlements coalesce or the gaps between them are v much reduced.</p> <p>From the green text box:</p> <p><i>Subject to all of the following criteria being met:</i></p> <ol style="list-style-type: none"> 1 <i>It is of a scale that is appropriate to the size of the settlement and the range of services and community facilities that serve it, taking account of the cumulative impact of any allocated sites and committed development;</i> 2 <i>It is compatible with the layout, density, fabric and appearance of the existing settlement and individually or cumulatively, would not result in the coalescence or merging of two (or more) separate settlements, or the significant erosion of a gap between settlements, so as to result in the loss of individual settlement identity or character;</i> <p>These criteria seem to be ignored for developments around Aylesham but also for the site at Nonington NON006r where the Sustainability Appraisal states, para 7.548, that 35 new homes is a large development considering the small size of the surrounding settlement.</p> <p>The document seems to equate Aylesham with Sandwich as Rural Service Centres - but they are hugely different in facilities and amenity. Aylesham is relatively unattractive and is a poorer person's housing option due to its lack of facilities and isolation.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>There are huge inconsistencies and contradictions between policies and the resultant plans for development sites.</p> <p>The plan need to drop the huge expansion of Aylesham, collaborate properly with Canterbury City Council and focus on where there are facilities - created over many many years and impossible to have in Aylesham without huge investment as a mini "new town".</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>Strategic Policy 4 - Residential Windfall Development</p>
<p>Rep ID</p>	<p>SDLP796</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331099</p>
<p>Consultee Full Name</p>	<p>Rosie Cavalier</p>
<p>Consultee Company / Organisation</p>	<p>Esquire Developments</p>
<p>Agent Full Name</p>	

Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3, SP4
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p><u>SP4 relevant text in bold below</u></p> <p>1.0 INTRODUCTION</p> <p>1 i) About the Kent SME Developers Network</p> <p>These representations have been prepared by the Kent SME Developer Network (the Network) a consortium of Small and Medium (SME) Developers who are located in or operate within Kent and Medway. The Group is currently chaired by Paul Henry, Managing Director of Esquire Developments, an SME Housebuilder based in Longfield near Dartford, Kent.</p> <p>The Network was formed in November 2019 and presently comprises approximately 30 participants including SME Housebuilders and Developers (of varying size and scale) and Registered Providers. In addition, the Network includes representatives of Local Planning Authorities including Medway Council, Swale Borough Council, Tonbridge and Malling Borough Council, Tunbridge Wells Borough Council and Maidstone Borough Council. It is the intention that the Network grows over time to cover all of Kent including additional SME Developers and Local Planning Authorities. The Network has recently engaged with Dover District Council.</p> <p>The Network was set up to provide a platform for SMEs to discuss relevant planning and delivery issues associated with bringing forward smaller developments and to positively and proactively engage with Local Planning Authorities at the plan making and decision taking stages.</p> <p>The Government has recognised the need to support existing SMEs and encourage more into the market in order to diversify the housing market from the volume housebuilders and generate choice and improve quality of homes being built. The Government has described SMEs as being of 'National Importance'. Appendix 1 sets out the narrative behind the support and role for SME Housebuilders.</p> <p>The Network meets on a quarterly basis to discuss and explore relevant SME related issues, including working through planning related matters. Notable attendees at past meetings including Steve Quartermain (prior to his retirement as Chief Planner at the then MHCLG) and Homes England.</p> <p>In addition to the meetings acting as a discussion platform, the SME Network is also designed to act as a support and mentoring network, where land opportunities can be shared, or knowledge/experiences drawn from in-house teams in order to help each other and strengthen the SMEs. The Network can also act as a collective voice in the preparation of Local Plans or other consultations - such as this.</p> <p>The Network comprises the following:</p> <p><u>SME Housebuilders and Developers</u></p> <p>Esquire Developments</p> <p>Fernham Homes</p> <p>Wealden Homes</p> <p>Fernfield Homes</p> <p>Meridian Construction</p> <p>Aile Homes</p>

King and Johnstone
Clarkmores
Clarendon Homes
Gillcrest Group
A&E Property Ltd
Country House Homes
Classicus Estates
Woodcroft Developments
Provectus Developments
Penenden Heath Developments
Grandera Homes
Windmill Construction
Jarvis Homes
Aspire Designer Homes
Kentish Projects
Woolbro Homes
Cooper and Cole
Hillstone Homes
RJC New Homes
Wedgewood Homes
TG Designer Homes
Endeavour Construction Limited
Unique Land
Registered Providers
Hyde Housing
MHS
Local Planning Authorities
Medway Council
Maidstone Borough Council
Swale Borough Council
Tunbridge Wells Borough Council
Tonbridge and Malling Borough Council
Dover District Council
Folkestone District Council
Canterbury City Council
Agents
Tetlow King Planning
David Hicken Associates
Barton Willmore now Stantec

The Network welcomes ongoing engagement with Dover District Council and any other interested party.

For clarity, the representation contained in this response relate to the Members of the Network that are SME Housebuilders and Developers and not the Registered Providers, LPAs or Agents.

1 ii) Content of Representations

These representations have been prepared by the Network which seek to address strategic matters. Any site-specific matters will be addressed by individual SMEs within their own representations.

The representations are structured to respond to each relevant question posed within the document.

In summary the headline points are as follows:

We support the council identifying the need to meet the small sites requirements and support SME developers.

However, we are not convinced that the requirements of Paragraph 69 have been met in respect of 10% of allocations being on 1ha or less:

We support the principle of a Policy such as SP4, however we consider that amendments to the policy wording and the defined policies map are required in order to ensure it is 'effective' and therefore 'sound'.

We encourage the Council to continue to work with the Network, including the consideration of a small sites policy to help support SME developers within the plan period.

RESPONSE

Requirement of Paragraph 69

Paragraph 69 of the NPPF requires Local Planning Authorities to identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare. This is a clear requirement and therefore 1,099 dwellings need to be allocated on sites of this nature.

Central Government recognises the problem of bringing SMEs into the market and has sought to 'level the playing field' in the context of supporting small and medium sized sites at the plan making stage. Crucially, the NPPF 2019 confirms in paragraph 68 that:

Small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:

- 1 a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;
- 2 b) use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward;
- 3 c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and
- 4 d) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.

The NPPF provides for a clear direction to LPAs, that it must identify land to accommodate at least 10% of their housing requirement that are 1ha or less.

Paragraph 3.52 of the Reg 19 plan sets out that 11.4% of the housing requirement are on small sites. These sites are listed out in Appendix 3 of the Housing Topic Paper September 2022 and the table shows that the total of 1,249 dwellings are considered to be identified for delivery on small sites.

The Local Plan states (para. 3.52) that these small sites have been identified through the Local Plan and the brownfield register. Of the 1,249 dwellings, a total of 516 dwellings are allocated under 'small sites' within the Regulation 19 plan.

The remaining dwellings (733 dwellings) are to be found in the Brownfield Register. The Register is available on the Dover District Council website and was last updated in February 2021- nearly 2 years ago. Shown at Appendix 02 of this statement is the list of sites that make up the 11.4% as suggested by the council which fulfils this requirement, alongside comments taken from the Brownfield Register. A number of the sites listed in the Brownfield Register are noted to be 'complete' or 'built out'. This equates to a total of 313 units.

We consider a site that has been noted as complete or built out can no longer be counted as a site that will contribute towards meeting the housing need. Accordingly, this element should be removed from the total supply which would reduce the figure to 936 dwellings or 8.8% of the total requirement of 10,998 dwellings.

Further to this figure, there are a number of sites that are listed as 'under construction' (209 in total). It is not clear when these comments have been added to the Brownfield Register, but for a number of the sites listed, it is clear from sold house price data that a number of these dwellings have now been completed.

We consider it important, therefore for Dover District Council acknowledge that there could be as many as 522 dwellings on the Brownfield Register that are no longer available and that the Brownfield Register should be re-assessed.

We expect that following this review, the number would fall from 1,249 dwellings to 727 dwellings or 6.6% of the required total.

The SHLAA is a critical piece of work in this regard and it is crucial that sites of this scale are identified and that they are being promoted by SME developers (or capable of being delivered by an SME developer). It is not simply a numbers game but a qualitative exercise to ensure that a sufficient number of these small sites are identified to support the intent of paragraph 69 – which is to support SME developers.

Small sites have a significant advantage as they can deliver quickly. Accordingly, in allocating smaller sites (of 1ha), or indeed supporting SME developers in bringing forward larger 'small sites' (there are a number of SME Developers capable of delivering sites in excess of 1ha and up to 100 dwellings or more per site), it will help deliver housing in the short term and firstly seek to rectify the existing housing land supply issue and deliver in early years of the plan period whilst the larger, longer term sites move through the planning and delivery process.

It is critical to have a good blend of sites and small site and SME developers are key to the success of delivery. SMEs also seek to deliver good design and set a good standard in the Borough.

Support for SME's/Small Sites

We support the principle of Policy SP4- Residential Windfall Development which seeks to deliver small scale windfall development in certain locations. This allows SME's to come forward with development in sustainable locations.

However, we consider the wording of the policy is too restrictive and will not result in an effective policy. This is in part because the wording is too restrictive when referencing land that is within our immortally adjacent to settlement boundaries and that the settlement boundaries themselves are tightly drawn around these areas. The Regulation 19 Policy Map settlement boundaries do not include all existing built form and the proposed new allocations are also excluded from within the boundaries.

In order for this policy to be effective and to meet the windfall requirement (1,050 dwellings) we consider amendments are required to the wording of the policy and that the settlement boundaries as shown on the Policies Map should be modified to include the existing built form and the built form proposed in the Local Plan.

The wording of Policy SP4 should be amended as follows:

SP4 - Residential Windfall Development

1 Residential development or infilling of a scale that is commensurate with that of the existing settlement will be permitted within, or immediately adjoining or close to the existing built up confines of the settlement boundaries, as shown on the Policies Map, of the following settlements:

Ash, Alkham, Aylesham, Capel-le-Ferne, Deal, Dover, East Langdon, Eastry, Elvington, Eythorne, Guston, Goodnestone, Kingsdown, Lydden, Northbourne, Preston, Ripple, Sandwich, Shepherdswell, St Margarets at Cliffe, Wingham, and Worth.

1 Minor residential development or infilling or adjoining or close to the existing built up confines of the settlement boundaries of a scale that is commensurate with that of the existing settlement will be permitted within the settlement boundaries, as shown on the Policies Map, of the following settlements:

Ashley, Barnsole, Betteshanger, Chillenden, Coldred, Denton, East Studdal, Finglesham, Great Mongeham, Martin, Martin Mill, Nonington, Ringwould, Staple, East Stourmouth, Sutton, Tilmanstone, West Hougham, Wingham Green, Woodnesborough and Wootton.

Subject to all of the following criteria being met:

- 1 a) It is of a scale that is appropriate to the size of the settlement and the range of services and**

community facilities that serve it, taking account of the cumulative impact of any allocated sites and committed development;

1 b) It is compatible with the layout, density, fabric and appearance of the existing settlement and individually or cumulatively, would not result in the coalescence or merging of two (or more) separate settlements, or the significant erosion of a gap between settlements, so as to result in the loss of individual settlement identity or character;

1 c) In the case of settlements in, adjoining or surrounded by, the Kent Downs AONB or Heritage Coasts, that the proposal complies in the first instance with the primary requirement of conserving and enhancing landscape and scenic beauty, and, where this is demonstrated, that the scale and extent of development is limited, sensitively located and designed to avoid or minimise adverse impacts on these designated landscapes;

1 d) It would conserve and enhance landscape character and biodiversity and not result in an unacceptable intrusion into the open countryside or the loss of, important green spaces within the confines that contribute positively to the existing character of that settlement;

1 e) It would preserve or enhance any heritage assets within its setting;

2 f) It would not result in the significant loss of best and most versatile agricultural land currently used for agriculture;

1 g) Where the site adjoins open countryside, an appropriately designed landscape buffer is included;

2 h) It would not have an adverse impact on the living conditions of existing adjoining residents;

3 i) Where development would result in the loss of active employment, open space, sport or

community facilities within the settlement that such development is consistent with the requirements of policies EN2, PM5 and PM6 of this Plan;

1 j) Traffic movements generated from the development do not result in severe impacts to the highway network that cannot be mitigated. This should be considered through transport assessments carried out in accordance with Policy TI2 which must take account of the cumulative impact of sites allocated for development. Proposals must not prejudice the ability of sites allocated for development to come forward due to limited highway capacity; and

1 k) It would be in accordance with all other relevant policies in the Plan.

2 New dwellings (both isolated and non-isolated) elsewhere in the countryside outside of settlement

boundaries will only be permitted in exceptional circumstances under one or more of the criteria

1 to v), and subject to meeting criteria a) to k) above:

2 i) there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside;

1 ii) the development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets;

iii) the development would re-use redundant or disused buildings and enhance its immediate setting;

1 iv) the development would involve the subdivision of an existing residential building; or

2 v) the design is of exceptional quality, in that it: - is truly outstanding, reflecting the highest standards in architecture, and would help to raise standards of design more generally in rural

areas; and – would significantly enhance its immediate setting, and be sensitive to the defining characteristics of the local area

In order to help meet housing needs as well as support SMEs and Self and Custom Builders, we consider the Council could still include a small sites policy or a policy which recognises the role of rural communities and supports windfall developments.

The Network is championing a small sites policy, which is presently being endorsed by a number of LPAs including Swale and Medway Council.

Any future plan should provide for a policy framework to allow SMEs to deliver throughout the lifetime of the plan, particularly in rural areas.

As part of the Network's objective, it has sought to introduce a policy into emerging Local Plans that seeks to support small and medium sized developments that builds on the 1ha site requirement but expands this into a policy framework that can allow SMEs to successfully operate within the policy framework of a Local Plan where there are limited opportunities through the allocations in which the Council has made (i.e. on larger sites).

In this respect, there is often a large windfall figure required to be met, or LPAs find themselves in a position where the presumption in favour of sustainable development is applicable. The SME policy set out below is a policy in which the Network considers would provide the opportunity for SME sites to come forward, whilst offering the LPA an enhanced development coming forward that is typically delivered by an SME – i.e. in respect of design quality or for instance carbon efficiencies.

Whilst the ideal scenario would be for the same policy to be adopted by each Council (and therefore apply a level of consistency in understanding and application of the policy), we also recognise that each LPA has a specific set of circumstances that may require the policy wording to be tweaked. This maybe the case in DDC and the Network would welcome further discussions as to how such a policy could be introduced into the Plan.

The suggested wording of the policy is as follows, but can be tailored to suite each LPA.

Policy [insert Policy Number] Small Sites

In order to recognise the value of SMEs and small scale sites, the Council will support development of unallocated or windfall small scale housing (C3) and approve applications providing the harm does not demonstrably outweigh the benefits; and where:

- 1 The site does not exceed 60 dwellings (net) and is of an appropriate scale to its location;

- 1 The site is being brought forward by a recognised SME Developer and is not part of a larger site;

III. The proposed development delivers;

- 1 A bespoke design approach;
- 2 A high quality design that is locally distinctive;
- 3 Is sympathetic to the character of its location;
- 4 All dwellings meet National Design Standards and endeavor to deliver a

range of Carbon reduction build techniques;

- 1 The proposed development preserves residential amenity, designated heritage assets and core environmental assets and increase net biodiversity.

- 1 A flexible approach will be encouraged to the delivery of Affordable Housing assessed on a site by site basis. Where on site provision is demonstrated through evidence to be unviable or unattractive (less than 70% Open Market Value) to recognised Registered Providers, the Council

will permit alternative levels of Affordable Housing or alternative forms of tenure, including First Homes, payment in-lieu of on site provision or another form of recognised Affordable Product as defined in the NPPF.

It is recognised that SMEs can deliver quickly and applicants are encouraged to explore if a reduced implementation period is appropriate.

A Small Sites policy will allow for SMEs to operate within the Plan Led system and will allow both Small and Medium sites to come forward (i.e. sites above 1ha and up to 60 dwellings). Such a policy will allow an SME to come forward with a planning application that meets locally defined specific criteria, such as high-quality design, low carbon footprint, reduced time limits for implementation etc and a flexible approach to the delivery of Affordable Housing. On the other side of the coin, the Council will receive higher quality developments being submitted that are in character with more rural fringe locations (remembering the SME site typology), but that those Rural Fringe locations can be supported with an appropriate amount of growth that will assist in preventing, slowing or reversing their cycle of decline.

Such a policy would provide for additional weight to be afforded to an SME application, and thus allow greater weight to be applied to the application in the overall planning balance. This would reduce risk to an SME and increase certainty at the planning stages, as the SME can tailor their scheme to meet the specific criteria. The LPA also recognises that it would result in a development that meets Building Better Building Beautiful objectives and potentially addressing Climate Change issues.

Crucially, the policy is designed to deliver up to 60 dwellings (and thus meet the M of SME as much as the S) but is worded in a way that seeks to ensure the development coming forward in any given location is consistent and respectful to the area that it is in i.e. a scheme of 60 dwellings may not be appropriate for a small village, but 20 maybe, and therefore a policy that refers up to a figure of 60 dwellings is deemed acceptable ? i.e. the policy is fully flexible.

In addition, the 60 dwelling threshold is very much seen as the scale of developments where larger SME's start to compete with Volume housebuilders on sites. A volume housebuilder will tend not to drop below 60 dwellings and thus the Policy is desgned to really assist SME delivery and support the delivery of bespoke high-quality development, but also directly respond to certain SME challenges, such as how to deliver small numbers of Affordable Housing on any given site.

The Network recognises that other Kent LPAs are seeking to introduce a Small Sites Policy and a key aim for the policy is that there is a level of consistency in the wording across a number of LPAs, in order that the interpretation and understanding of the policy is also consistent on a cross boundary level – again seeking to reduce the risk at the planning stages to an SME.

In addition to the Policy itself, we also consider that an SME protocol should be prepared which provides guidance and clarity for SMEs at the pre-application and post-submission stages. The protocol would recognise the need to engage with SMEs and understand that a flexible approach is needed to certain issues (such as site typology/affordable housing provision).

The protocol could include a standard PPA timeframe and fixed cost to ensure that sufficient officer time is allocated to an SME application. Whilst SME applications tend to be on the smaller scale (when compared to larger volume housebuilder submissions), those applications are critical to the SME themselves, and accordingly the Network often discusses the frustration at the lack of engagement from LPAs on their applications – often perceived by SMEs in the Network as being at the bottom of the pile.

This position is especially so at the pre-application stage, where often paid pre-application advice is sought, but either never received or delayed, in some cases up to 9 months. Whilst this is a matter than may extend beyond Dover District Council, this is a 'real life' significant issue as a pre-application response is so important to an SME to determine the extent of risk that a site may carry.

The importance of a planning consent is vital to the success of an SME, no matter how small (or large) that scheme is, and greater engagement is always encouraged. This works both ways and greater engagement can improve the submission material of an SME and thus also reducing risk.

A further burden on SME's, and a point that the above policy is seeking to assist with is delivery of Affordable Housing. This is a wider matter than DDC, but it is well recognised that Registered Providers are rarely interested in sites unless the number of affordable homes being offered equates to at least 20 affordable dwellings. For DDC, this means that any site that falls under a 67-dwelling threshold will likely struggle to gain interest in a registered provider (at 30% AH requirement). The policy seeks a flexible approach to how Affordable Housing can be delivered by an SME in instances where it is the RP that is not interested, not that the SME does not wish to provide affordable homes.

	Please see attached representations with appendices in full
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	See above and attached representations in full
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	Kent SME Reps to Dover Reg 19 Nov 22 final with appendices.pdf
Local Plan Consultation Point	Strategic Policy 4 - Residential Windfall Development
Rep ID	SDLP603
Rep Status	Processed
Consultee ID	1331790
Consultee Full Name	Julie Davies
Consultee Company / Organisation	CPRE Kent
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP4
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>The Council has set out that the previous unintended consequences of the pattern of windfall development has meant that Deal has had to assimilate unplanned development.</p> <p>In realising the disbenefits of this type of development on implementing a sustainable spatial strategy, it is curious that the Council places such reliance on windfalls going forward.</p> <p>Windfall delivery is estimated to be 1,050 across the Plan period – this amounts to a ‘strategic’ development in its own right. Not so much a strategy, as leaving the delivery of a significant number of homes to chance – with development, quite possibly, being unsustainably located.</p> <p>Local Plan supply comprises the urban expansion at Whitfield (2,200), allocations (3,392) and windfalls (1,050); or put another way 33% of housing need will be provided for at Whitfield, 51% will be allocations across the District and 16% will be windfalls.</p> <p>CPRE Kent is sceptical about the soundness of a strategy that allows nearly one-fifth of the required housing provision to be left to chance. In the event developments at Whitfield and Aylesham aren’t built out at the anticipated rate, then even greater reliance will be placed on windfalls – as has occurred in the recent past where historically high windfalls have been experienced in response to allocated sites being slow to come forward.</p> <p>If a ‘spectacular and sustainable environment’ is a vision of the plan, then acceptance of windfall sites should be tied to active travel connections. CPRE queries what the test is for ‘commensurate scale’ will be when all development sites are required by the NPPF to make efficient use of land.</p> <p>CPRE as an organisation strongly believes that where new land is given over to development, it should be used as efficiently as possible - as appropriate for that site’s location. The higher the density, the more benefits accrue, and the more land is saved.</p> <p>High density building does not equate to high rise apartment blocks. CPRE London published a report in 2019 on this issue called “Double the density, halve the land needed”https://www.cprelondon.org.uk/wp-content/uploads/sites/10/2020/02/DoubleTheDensityHalveTheLandNeeded_1.pdf. This sets out both the benefits of higher density design along with providing examples of higher density developments being achieved by a variety of means. This includes a mixed-use residential development at Springhead Park, Ebbsfleet, Kent where 160dph is being achieved.</p> <p>Further research undertaken by CPRE and Place Alliance (A housing design audit for England, 2020) https://placealliance.org.uk/research/national-housing-audit/ concludes that housing schemes performed more poorly with distance from the urban core and with reduced density. The additional constraints imposed by stronger pre-existing urban context, were considered to encourage a more sensitive design response.</p> <p>Building at low density and on green fields is not being done well in terms of design quality. The most successful schemes (as audited in the study of 142 developments) were those at 56dph – which is almost double the national average of 31dph. Moreover, the National Design Code (July 2021) states that density is an essential component of an effective design code.</p> <p>While CPRE welcomes the detail set out in criteria (a) and (b), but it is concerned for the reasons set out above the densities will be suppressed, resulting in larger homes on larger plots which will not address the need for more affordable homes across the District.</p> <p>In respect of the reference in criteria (b) to the protection of gaps between settlements this is also welcomed – but would appear to contradict the stance taken with the strategic allocation at the two villages of Eythorne and Elvington. If gaps are to be protected, they should be protected across the board in the interests of visual distinctness, social cohesion and in the interests of health and wellbeing.</p> <p>Criteria (f) is also welcomed. However, it’s not clear what constitutes a “significant loss of best and most versatile agricultural land”. CPRE queries whether this is consistent with stance on allocated greenfield sites, which account for 76.7% of all allocated site and presumably will result in a greater loss of best and most versatile agricultural land.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	CPRE Kent would wish to participate at the examination hearings to explore these issues further.
Include files	
Local Plan Consultation Point	Strategic Policy 4 - Residential Windfall Development
Rep ID	SDLP663
Rep Status	Processed
Consultee ID	1331795
Consultee Full Name	Mrs Talina Wells
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP4 residential windfall developments
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Item SP4- Residential Windfall Development - sections C&D. Could you add 'Would not diminish public amenity views in the Conservation Area/ AONB'? The threshold for infill windfall developments ought to be higher in CA's
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	Item SP4- Residential Windfall Development - sections C&D. Could you add 'Would not diminish public amenity views in the Conservation Area/ AONB'? The threshold for infill windfall developments ought to be higher in CA's

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 4 - Residential Windfall Development
Rep ID	SDLP893
Rep Status	Processed
Consultee ID	1331943
Consultee Full Name	Ms Alexa Childs
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP4
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>SP4 Residential Windfall Development p.37: 3.71 Separation of Settlements : <i>Unplanned erosion of Countryside between confines of settlements . . . therefore has the potential to have a serious adverse impact on the overall landscape character . . . and on the individual identity of villages through the loss of important elements of their setting or more seriously through coalescence. Around Deal particularly at risk.</i> There is a contradiction between this Strategic Policy 4 statement which is very sound and the inclusion of SAP 34 / 35 and 15 in the Local plan. Any development of any of these sites would compromise the 'individual identity' of Kingsdown village and lead to 'coalescence and loss of identity'.</p> <p>It is unsound and ineffective to a damaging extent, to list Kingsdown as being a 'Local Centre ; a village providing services for a local rural area and a secondary focus for development in the rural area'Any development at SAP 34 would do the opposite of 'reinforcing the role of the village'; it would in fact choke off the existing parish economy, reducing its attractiveness to tourists, a key location on the Deal Welcomes Walkers</p>

	initiative. Any development at SAP34 would endanger life given the unique highways situation of the village, the district-wide need for traffic to flow through village on narrow lanes with single lane passing whenever the A258 is blocked.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The loss of defined boundary to the village will destroy the individual identity of our village. Coalescence is damaging many local areas and does not bring benefits to existing residents or new alike. It will erode the rural aspect of our village. The geography and road system simply cannot cope with expansion in this way. We will be come gridlocked 24 hours a day. Ringwould rd is a vital access rd to the village and Kingsdown already suffers in both winter and summer from traffic congestion. The reduction in air quality and additional light pollution from all the new housing are also of concern in addition to the devastating impact on our wildlife.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 4 - Residential Windfall Development
Rep ID	SDLP922
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP4
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails	Any impact of windfall development on County Council infrastructure and services would need to be mitigated and KCC will request contributions as applications for windfall development are prepared and submitted

to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 4 - Residential Windfall Development
Rep ID	SDLP1275
Rep Status	Processed
Consultee ID	1271353
Consultee Full Name	Church Commissioners
Consultee Company / Organisation	
Agent Full Name	Mr Andrew Watson
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP4
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>(DDC Note - Text Extracted from Document sent from Savills on Behalf of the Church Commissioners. Representation has been split across relevant areas of the Local Plan. Full attachment and introduction to Policy comments can be found under reference SDLP1265 for Shepherdswell Site and SDLP1266 for Eastry Site.)</p> <p>Policy SP4 – Residential Windfall Development – COMMENTS Policy SP4 states that residential development or infilling of a scale that is commensurate with that of the existing settlement will be permitted within or immediately adjoining the settlement boundaries, as shown on the Policies Map, of the following settlements: Ash, Alkham, Aylesham, Capel-le-Ferne, Deal, Dover, East Langdon, Eastry, Elvington, Eythorne, Guston, Goodnestone, Kingsdown, Lydden, Northbourne, Preston, Ripple, Sandwich, Shepherdswell, St Margarets at Cliffe, Wingham, and Worth. Whilst our Client supports this approach to allowing suitable windfall development adjoining settlements including Shepherdswell and Eastry, it is noted that Policy SP4 only allows for minor residential development within the settlement boundaries of the following settlements: Ashley, Barnsole, Betteshanger, Chillenden, Coldred, Denton, East Studdal, Finglesham, Great Mongeham, Martin, Martin Mill, Nonington, Ringwould, Staple, East Stourmouth, Sutton, Tilmanstone, West Hougham, Wingham Green, Woodnesborough and Wootton. We also note that the justification for the approach outlines that 45% of new housing completions in the previous 10 years have been as a result of windfall development. As a result of this, limiting the amount and location of development in specific settlements means that the plan is not justified or positively prepared. If the draft plan were amended to allow for greater flexibility in all locations, it would serve to provide a degree of mitigation against a situation whereby site allocations do not deliver as expected. Furthermore, considerations such as scale, amount and design of development would still be controlled by criterion a-k of the policy, which our Client feels are generally appropriate with the exception to the below. In addition to the above, our Client considers that Policy SP4 is not fully justified and should be amended to omit reference to the 'cumulative impact of any allocated sites and committed development'. It is our view that each development should be assessed on their own merits, especially having regard to the fact that allocated sites and committed development do not always actually result in built development as anticipated, as aforementioned. As such, criteria a should be amended to read as follows: "It is of a scale that is appropriate to the size of the settlement and the range of services and community facilities that serve it. taking account of the cumulative impact of any allocated sites and committed development." Recommendation: DDC should provide greater flexibility for windfall development in all locations and each site should be judged on its own merits.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>Strategic Policy 4 - Residential Windfall Development</p>
<p>Rep ID</p>	<p>SDLP1248</p>
<p>Rep Status</p>	<p>Processed</p>

Consultee ID	1331875
Consultee Full Name	Alice Beeken
Consultee Company / Organisation	Kent Planning Consultancy
Agent Full Name	Alice Beeken
Agent Company / Organisation	Kent Planning Consultancy
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP4
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Text has been extracted from PFD document sent by Kent Planning Consultancy. Images that accompany this text can be seen within the Full Document Attached to on SDLP1240 Text has also been extracted and split across relevant places within the Local Plan .)</p> <p>SP4 - Residential Windfall Development</p> <p>Kent Planning Consultancy broadly support the provision of policy SP4 'Residential Windfall Development' with regards to windfall development, but consider that the policy should also include a broader provision for brownfield, or previously developed land where this may not fall inside existing settlement boundaries.</p> <p>Dover District, particularly around Deal and its hinterlands, have a number of small, brownfield sites, often associated with historic mining activity, that should not be excluded from the opportunity to re-development on the basis of their location within the countryside.</p> <p>There will, on occasion, be sites suitable for redevelopment that may not always have substantial remnants of development, such as the one subject to this submission, but where their redevelopment would represent a benefit to the wider sense of place, and, where they are of little other value to the countryside (in that they are not agricultural land), and offer little to a sense of place, or even a detraction.</p> <p>Given such examples, we recommend that policy be amended to be sufficiently flexible to allow for the delivery of historically developed sites outside of development boundaries,</p>

where this would not otherwise conflict with the aims of the preservation of the countryside. We believe our site represents a perfect example of this.

To aid, we consider that the most appropriate amendment should be to SP4 3iii) to read:

*iii) the development would re-use redundant, disused buildings, **previously developed land, or land subject to historic development** and enhance its immediate setting;*

7.0 CONCLUSION

This submission has been prepared and made by Kent Planning Consultancy with a view to highlighting and promoting the development potential for a residential development at **'Land at The Street/Broad Street, Finglesham, Kent, CT14 0LZ'**

The site is considered to be in a sustainable location, offers the opportunity to re-utilise an existing area of brownfield land, and crucially, offers the potential benefit of enhancing and strengthening the village entrance to Finglesham.

The site is broadly in accordance with the requirements of emerging policy SP4, identifying clear that the site follows the broad plans and parameters for growth the Council has identified.

With an estimated capacity, with good quality design, to provide **8-10 units**, Kent Planning Consultancy recommend that the site provides a good opportunity for the Council to re-enforce its proposed housing supply with a small, sustainable site allocation.

Kent Planning Consultancy thus request that the Council consider this late submission for the Local Plan as a potential opportunity to provide a small, sustainable, site within the Local Plan.

Further, KPC believe that, in light of sites such as that subject to this submission, policy SP4 should be amended to include a greater flexibility, particularly with regards to land subject to a historic use, and previously developed land, where this is outside of the defined settlement boundaries but would not undermine the general aims of protecting the countryside.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 4 - Residential Windfall Development
Rep ID	SDLP1300
Rep Status	Processed
Consultee ID	1331928
Consultee Full Name	Matthew Porter
Consultee Company / Organisation	Fernham Homes Ltd
Agent Full Name	Matt Porter
Agent Company / Organisation	DHA Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy SAP15 - Land at Rays Bottom between Liverpool Road and Hawksdown, Walmer (WAL002) Policy SP3 - Housing Growth Policy SP4 - Windfall Development Policy SP11 - Infrastructure and Developer Contributions Policy SP12 - Strategic Transport Infrastructure
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We consider that the plan is sound, but object to elements of Policy SAP15 - Land at Rays Bottom between Liverpool Road and Hawksdown, Walmer (WAL002) and Policy SP3 - Housing Growth. These objections are set out in the consultation response submitted on behalf of Fernham Homes Limited (ref DHA/30359).</p> <p>1 Introduction</p> <p>1.1 Purpose of this Representation</p> <p>1.1.1 This representation has been prepared by DHA Planning on behalf of Fernham Homes Limited in response to the Dover District Council 'DDC' Local Plan (Regulation 19) consultation which runs until 9th December 2022.</p> <p>1.1.2 We understand that DDC is in the process of preparing a new Local Plan to set out a strategy for development for the period to 2040 and that the Council are presently seeking comments on the pre-submission Plan prior to its submission for examination in early 2023.</p> <p>1.1.3 Our client is promoting 'Land at Rays Bottom, Walmer, Deal' (hereafter referred to as 'Land at Rays Bottom' or 'the site') for the residential allocation of the site as part of the new Dover District Local Plan preparation process. The site is allocated for residential development in the Regulation 19 Pre-submission Plan for the provision of 75 dwellings under policy reference 'SAP15'.</p> <p>1.1.4 It is highlighted that as part of the Regulation 18 Local Plan, the Site was allocated under the 'Site Allocations Policy 1 Non-Strategic Housing Allocations' for approximately 100 dwellings (reference WAL 002).</p> <p>1.1.5 The purpose of the representation is to support the allocation of Land at Rays Bottom as a suitable and deliverable location for residential development and provide comment on the consistency of the allocation with the proposed strategy, draft policies and our client's position in respect of the 'soundness' of the Plan but to object to the indicative capacity set out in the policy.</p>

1.1.6 In this regard, we remain wholly supportive of the principle of the residential allocation of Land at Rays Bottom and agree that the Site represents a logical and sustainable location to direct growth in Deal consistent with the growth strategy of the Plan as a whole.

1.1.7 Accordingly, we say that the allocation of Land at Rays Bottom is necessary in order for the Council in meeting the growing need for new homes in the district and help to ensure the DDC can have confidence in consistently meeting its market and affordable housing targets in full throughout the life of the new Dover District Plan.

1.1.8 It is submitted that the SAP15 policy wording should be amended to reflect the capability of the Site to accommodate approximately 80 dwellings, deliverable early in the Plan period.

1.1.9 Based on the current national and local planning context, we consider the Site to be a highly suitable edge-of-settlement location to allocate land for housing to help meet the need for new homes in the district and its effective use should be appropriately maximised in accordance with national policy objectives.

1.1.10 Further details regarding the Site and commentary on the consistency of the allocation with the proposed strategy, draft policies and our client's position in respect of the 'soundness' of the Plan are set out in the following sections of this document.

1.2 About Fernham Homes

1.2.1 Fernham Homes Ltd are a local award winning small and medium sized (SME) housebuilder, established in 1997 and has a strong track record of delivering high quality residential and mixed use developments in Kent over the last 25 years. This has been acknowledged through the receipt of nationally recognised awards, including the gold Evening Standard Awards best family home 2022 and 2019 bronze WhatHouse Best Small Housebuilder.

1.2.2 SME housebuilders are recognised in the National Planning Policy Framework ('NPPF') at paragraph 69 as making an important contribution to meeting the housing requirements of an area, and being able to build out relatively quickly. Similarly, this has also been recognised by the Planning Inspectorate. This is particularly the case with Fernham Homes, which is privately owned with access to significant resources. This provides significantly more flexibility than national and other regional housebuilders, and allows Fernham Homes to deliver housing rapidly and to a high quality, beautiful and sustainable standard (para 126 of the NPPF).

1.2.3 Fernham Homes has embarked on a sustained period of growth, with an adopted and robust business plan to deliver around 300 houses per year in five years time.

1.2.4 A key element of Fernham Homes' operations is to take a careful approach to site selection: a huge amount of due diligence is undertaken as part of this, and therefore Fernham Homes only invests in those sites which meet the NPPF requirements of being available, suitable, and deliverable. As set out below land at Rays Bottom, Walmer ('SAP15') is firmly considered to be such a site.

1.2.5 Similarly, a key feature of Fernham Homes' approach is to work positively and proactively with local planning authorities (LPAs), both during the preparation of local plans and at planning application stage. Fernham Homes are fully committed to engaging with DDC in the preparation of its Local Plan, and firmly subscribe to the national policy approach set out in paragraphs 15 and 16 c) of the NPPF that "the planning system should be genuinely plan-led" and should be shaped by early, proportionate and effective engagement between LPAs and others, including businesses and developers. Accordingly, Fernham Homes would welcome the opportunity to discuss the matters contained in this representation, including the availability, suitability, deliverability and capacity of land Rays Bottom, Walmer ('SAP15') directly with DDC members and officers, ahead of the submission of the Local Plan for examination.

1.3 Representation Structure

1.3.1 The representation structure is outlined below for ease of reference:

Chapter 2 (Consultation Background) – Sets out the context of the Dover District new Local Plan preparation, relevant national planning requirements and a summary of our current position.

Please refer to paragraph 52 of Appeal Decisions: APP/M2270/W/21/3283924 & APP/M2270/W/21/3288645

Chapter 3 (Legal Tests of Soundness) - Assessing whether the plan is sound, having regard to the tests of soundness outlined by paragraph 35 of the NPPF.

Chapter 4 (Duty to Co-operate) - Assessing whether the plan is sound, having regard to the duty to cooperate outlined by paragraph 24 of the NPPF.

Chapter 5 (Housing Need) - Consideration of market and affordable housing need and assessment of proposed housing allocations and supply sources.

Chapter 6 (Assessment of Suitability) - Re-introduces our client's Site and provides a summary of planning constraints and opportunities, including the quantum of development that could be accommodated, why the Site is suitable for development and why the principle of the draft allocation for residential development is both justified and consistent with the DDC's strategy for growth in the district.

Chapter 7 (Conclusion) - Summarises the key points raised throughout the representation and re-affirms our client's support for the principle of the Site's allocation and the principle of proposed strategy ahead of the submission of the Plan for examination, and the objections in terms of capacity.

2 DDC – Draft for Submission Local Plan (Regulation 19)

2.1 Consultation Background

2.1.1 DDC are required to prepare a new Local Plan, as the current suite of development plan documents were adopted in 2002, 2010 and 2015. The Core Strategy (CS) (adopted 2010) in particular has a time horizon up to 2026. The plans, and the policies contained within, pre-date current national policy, practice guidance and local evidence and consequently require updating.

2.1.2 The new Local Plan will set out the vision, strategic objectives and overarching development strategy for the growth of the District over the period to 2040. It provides the planning policy framework to guide the future development of the area, addressing needs and opportunities for housing, the economy, community facilities and infrastructure, as well as the basis for conserving and enhancing the natural and historic environments, mitigating and adapting to climate change, and achieving well designed places.

2.1.3 For the avoidance of doubt, the new Local Plan, on adoption, will replace the CS 2010 and the Land Allocations Plan 2015, as well as saved policies from the 2002 Local Plan.

2.1.4 DDC's Regulation 19 Local Plan outlines the key issues that need to be addressed between now and 2040. In particular, the Plan sets out the following key planning issues for the District:

- Ensuring that new development in the District contributes to the mitigation of, and adaptation to, climate change.
- Supporting DDC to deliver its intention to be a carbon neutral district by 2050.
- Managing flood risk and coastal change.
- Ensuring that a sufficient amount and variety of land is identified to deliver a continuous supply of housing across the Plan period and that DDC maintains a five-year housing land supply.
- Delivering growth in a way that focuses development in the least sensitive areas of the District in order to conserve and enhance the District's rich natural and historic environments.
- Supporting sustainable development in rural areas to enhance the vitality of rural communities.
- Working with partners to facilitate the delivery of the Whitfield Urban Expansion. Ensuring a range of housing tenures, types and sizes are provided across the District to meet the needs of the local community and provide choice and flexibility in the housing market.
- Promoting economic growth, tourism, and investment in the District's Town Centres in line with DDC's Economic Growth Strategy.
- To address the impact of the COVID-19 pandemic.
- Delivering strategic transport improvements, including upgrades to the Duke of York and Whitfield roundabouts to support the scale of housing and economic growth identified in the Plan.
- Promoting sustainable transport initiatives to encourage a modal shift to more sustainable forms of transport like walking and cycling.
- Ensuring that infrastructure is delivered, in the right place, at the right time, to meet the needs of the District and support the levels of development identified in the Local Plan.
- Supporting the delivery of attractive, high-quality, design led developments and the creation of healthy, inclusive and safe communities, that are well served by good quality services and facilities to support people's lives.
- Conserving and enhancing the District's rich and diverse natural landscape, including the five international sites within the district, the Kent Downs Area of Outstanding Natural Beauty (AONB), five Sites of Special Scientific Interest (SSSIs), two National Nature Reserves (NNRs), two stretches of Heritage Coasts and two Marine Conservation Zones.
- Delivering a net gain in biodiversity in the District over the plan period.

- To promote the conservation, restoration and where appropriate the enhancement of the District's heritage assets, in order to protect their significance and to ensure that they can be best appreciated and enjoyed by current and future generations.

2.1.5 The new Local Plan will be examined by an Inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is 'sound'.

2.1.6 This submission will comment on each of the above, highlighting where we believe any areas of concern lie or where modifications may be required.

2.2 DDC's Local Development Scheme

2.2.1 The District Council has a duty to review the policies contained within the development plan every five years. The 2014/2015 Authority Monitoring Report signalled the need to review key parts of DDC's adopted CS evidence base.

2.2.2 DDC's Local Development Scheme (LDS) first outlined the delivery timetable for the Local Plan Review (LPR) in the March 2017 publication. Since then, the LDS has been updated on an annual basis. The most recent September 2022 LDS summarises that following the preparation of the principal evidence base

documents, the Local Plan Review Regulation 18 consultation took place for 8 weeks in January 2021. The Regulation 19 consultation was scheduled for 7 weeks during Q4 of 2022 and is the subject of this representation.

2.2.3 Moving forward, submission of the Plan is anticipated in Q1-2 2023 with the Examination in Public in Q3-4 2023. The new Local Plan is currently scheduled for adoption in 2024.

2.2.4 As planned, DDC are now undertaking the Regulation 19 Draft Local Plan Consultation, for which this submission is made

3 Legal Test of Soundness

3.1 Legislation and Guidance

3.1.1 The new Local Plan will be examined by an Inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is 'sound'. It is a statutory requirement that every development plan document must be submitted for independent examination to assess when it is "sound", as well as whether other statutory requirements have been satisfied (s.20(5) of the 2004 Act). By s.19 of the 2004 Act, in preparing a development plan document a local planning authority must have regard to several matters including national policies and advice contained in guidance issued by the Secretary of State. Such guidance currently exists in the form of the NPPF and is summarised below. This states that Plans must be:

(a) Positively Prepared: based on a strategy which seeks to meet objectively assessed development and infrastructure requirements

3.1.2 This means that the Local Plan should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. The NPPF set out principles through which the Government expects sustainable development can be achieved.

(b) Justified: an appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence

3.1.3 This sets out the requirement that the Local Plan should be based on a robust and credible evidence base involving:

I. Research/fact finding: the choices made in the plan are backed up by facts.

II. Evidence of participation of the local community and others having a stake in the area.

3.1.4 The Local Plan should demonstrate an appropriate strategy, taking into account reasonable alternatives and based on proportionate evidence. These alternatives should be realistic and subject to sustainability appraisal. The Plan should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

(c) Effective: deliverable over its period based on effective joint working on cross-boundary strategic priorities

3.1.5 This makes clear that the Local Plan should be deliverable, requiring evidence of:

- Sound infrastructure delivery planning;
- Having no regulatory or national planning barriers to delivery;
- Delivery partners who are signed up to it; and
- Coherence with the strategies of neighbouring authorities, including neighbouring marine planning authorities.
- The new Local Plan should be flexible and able to be monitored.

3.1.6 The Local Plan should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen. The plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important

that policies are flexible, the Local Plan should make clear that major changes may require a formal review including public consultation. Any measures which DDC has included to make sure that targets are met should be clearly linked to an Annual Monitoring Report.

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national policy.

3.1.7 This submission comments on each of the above in further detailing, highlighting areas of support and where modifications are required as appropriate.

3.2 Legal Compliance

3.2.1 In terms of legal compliance, the main requirements for the early stages of Local Plan consultation are in relation to:

- planning for community engagement;
- the sustainability appraisal (including consultation with the statutory environment consultation bodies);
- identifying significant cross boundary and inter-authority issues; and
- ensuring that the plan rests on a credible evidence base, including meeting the Act's requirement for keeping matters affecting the development of the area under review.

3.2.2 In addition to the above, the NPPF states² that: "Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:

a) All plans should promote a sustainable pattern of development that seeks to: meet the development needs of the area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effect.

b) Strategic policies should as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

(i) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or

Paragraph 11, National Planning Policy Framework 2021

(ii) Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

3.2.3 In addition, to the above, the NPPF states³ that Plans should:

a) be prepared with the objective of contributing to the achievement of sustainable development;

b) be prepared positively, in a way that is aspirational but deliverable;

c) be shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;

d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

e) be accessible through the use of digital tools to assist public involvement and policy presentation; and

f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

3.2.4 It is important to note that the NPPF⁴ requires strategic policies to set out an overall strategy for the pattern, scale, and design quality of places, and make sufficient provision for:

a) housing (including affordable housing), employment, retail, leisure and other commercial development;

b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

c) community facilities (such as health, education and cultural infrastructure); and;

d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

3.2.5 It is clear from the above, that any local plan should set out a comprehensive and cohesive approach to future development.

Paragraph 16, NPPF 2021

Paragraph 20, NPPF 2021

4 Duty to Co-Operate

4.1 Legal and NPPF Requirements

4.1.1 Section 33A of the Planning and Compulsory Purchase Act 2004 sets out a statutory 'Duty to Cooperate' (DtC) – i.e. a legal obligation - to all bodies as prescribed by Regulation 4 of the Town and Country Planning (Local Planning) England Regulations 2012 (the Regulations).

4.1.2 The duty requires DDC to cooperate with other persons to 'maximise the effectiveness' with which named activities are undertaken. Those activities include the preparation of development plan documents (such as this local plan) and activities that support that activity 'so far as relating to a strategic matter'.

4.1.3 A strategic matter is defined by S33A(4) in summary as: (a) 'sustainable development or use of land that has or would have a significant impact on at least two planning areas' (a planning area in this case is the area of a borough or district council); and (b) 'sustainable development or use of land in a two tier area' (as this is) 'if the development or use (i) is a county matter, or (ii) has or would have a significant impact on a county matter'. County matters broadly relate to minerals and waste and associated developments as defined by Paragraph 1 of schedule 1 to the Town and Country Planning Act 1990 (as amended).

4.1.4 Section 33A (7) requires DDC (and persons subject to the DtC) to have regard to any guidance issued by the Secretary of State about how the duty is to be complied with. In that regard Paragraph ID 9-004-29140306 of the Government's Planning Practice Guidance (PPG) confirms amongst other things that the DtC is not a duty to agree (albeit that local planning authorities should make every effort to secure the necessary cooperation on strategic cross border matters before they submit local plans for examination).

4.1.5 The NPPF establishes that effective and on-going joint working is an integral part of the plan making process that will, amongst other things, determine whether development needs that cannot be met wholly within a plan can be met elsewhere. The NPPF goes on to state at paragraph 27 that in order to demonstrate effective and on-going joint working strategic policy making authorities should: "... prepare and maintain one or more statements of common ground documenting the cross-boundary matters being addressed".

4.1.6 In addition to the District's own housing pressures, part of the DtC involves considering whether neighbouring authorities' unmet housing need can be accommodated. It is worth highlighting that recent amendments to the London Plan have identified that the City's housing need has become increasingly more difficult to deliver and therefore areas outside London will be faced with having to absorb more of London's housing need. Consequently, DDC has a duty to explore whether it can accommodate some of this overspill of London's unmet need.

4.2 Assessment of DDC's discharging of the Duty to Co-operate

4.2.1 It is recognised that work to discharge the DtC remains ongoing by DDC and will continue prior to submission as part of the preparation of the Local Plan evidence base.

4.2.2 Notwithstanding the above, at this stage it is understood that DDC have engaged with the members of the East Kent Regeneration Board including neighbouring East Kent planning authorities, Kent County Council (KCC) and its subsidiary departments:

- Folkestone and Hythe District Council
- Canterbury City Council
- Thanet District Council
- KCC
 - KCC Highways & Transportation
 - KCC Minerals & Waste
 - KCC Heritage Conservation
 - KCC Flood & Water Management
 - KCC Natural Environment & Coast
 - KCC Infrastructure including Education

4.2.3 In February 2016, DDC adopted a Memorandum of Understanding (MOU) in respect of the DtC between the East Kent Regeneration Board members. A review of the MOU took place and was agreed in January 2021.

4.2.4 The East Kent MOU sets out the framework in which the authorities will work together on strategic issues and will actively engage. It forms the overarching framework and context within which Statements of Common Ground (SoCG) will be agreed between individual authorities.

4.2.5 Further engagement is also confirmed to have taken place between the following prescribed bodies and other relevant bodies:

- Environment Agency
- National Highways
- Historic England
- Natural England
- Network Rail
- NHS Kent and Medway Clinical Commissioning Group (CCG) – now known as Integrated Care Board (ICB) since July 2022
- Kent Downs AONB Unit
- Other infrastructure providers

4.2.6 Whilst work remains ongoing, at this stage it is understood that SoCGs have been agreed and signed between the following parties:

DDC and Folkestone & Hythe District Council

DDC and Canterbury City Council

DDC and Thanet District Council

DDC and Kent County Council

DDC and National Highways

4.2.7 As part of the DtC Evidence Base documents, DDC prepared a detailed DtC Statement (dated September 2022) which sets out a summary of the engagement that has taken place, firstly by organisation, and then by issue. Whilst the statement focuses on strategic issues and duty to co-operate bodies it also includes information relating to engagement on non-strategic issues and co-operation with other bodies that are not prescribed by the regulations. In addition, Appendices 1, 3 and 4 identify the main meetings and other correspondence that has taken place throughout the plan making process.

4.3 Summary

4.3.1 On account of the above and the documents published within the DDC's Local Plan Evidence Base, we are satisfied that DDC as the strategic policy making authority has demonstrated effective and on-going joint working with neighbouring authorities, the county council, prescribed bodies and other relevant bodies. Further, we agree that DDC has prepared and maintained SoCG documenting the cross-boundary matters being addressed in accordance with the Framework and the DtC may be discharged by the Planning Inspector under Section 20(5) (c) of the Planning and Compulsory Purchase Act 2004.

4.3.2 Without prejudice to the above, should ongoing work by DDC result in significant changes in circumstances such that the signed SoCGs may be amended or withdrawn, our client reserves the right to alter their consultation response accordingly and be present at the examination of the Plan to discuss further.

5 Housing Need

5.1 Context

5.1.1 Paragraph 11 of the NPPF is explicit in its requirement for strategic policy-making authorities to promote a sustainable pattern of development that seeks to meet the need in full.

5.1.2 Paragraph 20 of the Framework is equally clear that strategic policies should set out an overall strategy for the pattern, scale and design quality of places. Policies should make sufficient provision for the development that is required as well as associated infrastructure, community facilities and should set out a strategy for the conservation and enhancement of the natural, built and historic environment.

5.1.3 Given this national planning context, the emerging Local Plan should provide a comprehensive and cohesive approach to future development in Dover district, capable of making sufficient provision for the identified needs, whilst balancing the conservation and enhancement of the natural, built and historic environment.

5.1.4 National guidance states that strategic policy-making authorities will need to calculate their local housing need figure at the start of the plan-making process. This number should be kept under review and revised where appropriate.

5.1.5 In calculating the local housing need, paragraph 61 of the NPPF states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance - unless exceptional circumstances justify an alternative approach.

5.1.6 Further, in addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

5.2 DDC's Housing Need

5.2.1 The Standard Method for assessing housing need, issued alongside the Ministerial Statement on 16 December 2020, sets an indicative housing need figure for Dover District of 596 dwellings per annum. However, the affordability ratio which factors into the local housing need assessment is updated annually. For Dover District the latest housing need calculation is 611 dwellings per annum (dpa), equating to a total housing need of 10,998 dwellings for the Plan period to 2040. We understand that the Regulation 19 Local Plan seeks to meet this need in full and in addition to the minimum figures, DDC have set an appropriate contingency buffer of 926 dwellings of the Plan period, equating to 8.4% of the total Plan period figure.

5.2.2 For context, the current adopted CS requirement is 700 dwellings per annum. This followed the adoption of a high-growth strategy in 2010 of 14,000 homes to 2026 based around the recommendations of the Dover Regeneration Strategy and above the minimum 10,100 requirement across the same period, as set out in the emerging (at the time) Regional Spatial Strategy.

5.2.3 For the avoidance of doubt, accounting for the Committed Supply Total of 5,282 dwellings, the new Local Plan will be required to allocate sufficient land to accommodate a minimum of 6,642 new homes over the remaining plan period to 2040. It is understood that this will be derived from the following sources:

- Whitfield Urban Expansion Allocation: 2,200 dwellings
- Local Plan Allocations (excluding Whitfield): 3,392 dwellings
- Windfall Allowance (70 a year from year 4): 1,050 dwellings

5.2.4 On this basis, it is evident that a substantial quantum of Plan-led housing delivery will be required in order to meet the new Local Plan's housing target. Due to the nature and dwindling supply of available urban land in Dover town and the remaining higher order settlements of Deal and Sandwich, the restrictive effect of the coast, the Kent Downs AONB, environmental constraints and the limited capacity of the district's remaining mid- and lower order settlements to accommodate significant levels of growth, meeting Dover's housing needs inevitably will require the release of significant greenfield land.

5.2.5 In our view, sustainable and accessible sites logically located adjacent to existing higher-order urban areas, including Deal, represent the most sustainable and reliable sources of growth for the Plan Period, to deliver the significant number of new homes that are required and are most capable of making meaningful contributions to the associated public infrastructure, affordable housing and mix of new homes that is urgently needed in the District.

6 Site Specific Assessment

6.1 Overview

6.1.1 The previous chapters of this representation (Chapter 3-5) outline our client's position relating to the soundness of the Plan in which our client is confirmed to be supportive of the Local Plan as a sound strategy for the growth of the district to 2040.

6.1.2 Paragraph 4.146 of the Local Plan states that the urban area of Deal encompasses the built-up areas of the parishes of Walmer and Sholden. Deal is identified in the Settlement Hierarchy and Confines Topic Paper (2022) as a 'District Centre', where there is a secondary focus for development. This position is reinforced by draft policy SP3 which states that development in Deal will be at a more limited scale than Dover Town, compatible with the more limited range of job opportunities, shops, services, and other facilities available in these locations.

6.1.3 As introduced in the preceding sections, Fernham Homes Limited are supporting the residential allocation of the Site 'Land at Rays Bottom, Walmer' and. The Site is allocated for residential development in the Regulation 19 Pre-submission Plan with an indicative capacity of 75 dwellings under policy reference 'SAP15' (WAL002).

6.1.4 Appendix 1a of the Housing and Economic Land Availability Assessment (HELAA) 2022 provides the following summary:

- No heritage concerns other than archaeology.
- Site will need to reflect character of surrounding area – low density, generous landscaping, well designed.
- Potential site for executive homes.
- Risk of surface water flooding.

- Transport Assessment required.

6.1.5 The Site was considered 'Green' in the red/amber/green (RAG) rating in terms of suitability, availability and achievability, with an anticipated timescale for delivery in the medium term (2027-2031). The information contained in the summary could be addressed as part of any future planning application.

6.1.6 We agree that the Site represents a logical and sustainable location to direct the growth required within Deal and consider that the land promoted at Rays Bottom, Walmer must remain included as a future housing allocation within the Dover District emerging Local Plan. The allocation is considered to be wholly consistent with the objectives of the Plan and forms part of a sound growth strategy for the district to 2040.

6.1.7 We are firmly of the view that the allocation of Land at Rays Bottom is a necessary component of the balanced growth strategy put forward within the Pre-submission

DDC Settlement hierarchy (2022): <https://www.doverdistrictlocalplan.co.uk/uploads/pdfs/settlement-hierarchy-and-confines-topic-paper-aug-2022.pdf>

Dover District Local Plan, comprising an appropriate mix of small, medium and strategic-scale sites deliverable across the Plan period. The allocation of well-located, reliable, greenfield sites such as our client's at Land at Rays Bottom is necessary in order for DDC to meet the growing need for new homes in the district and ensure that DDC can have confidence in consistently meeting its market and affordable housing targets in full throughout the life of the new Dover District Plan.

6.1.8 Notwithstanding our client's support of the draft allocation within the Regulation

19 Plan in principle, we suggest that the policy text be re-visited prior to submission, to allow a higher dwelling per hectare guide to ensure the Site is developed to its full potential. It is submitted that the SAP15 policy wording should be amended to more accurately reflect the capability of the Site to accommodate approximately 80 dwellings deliverable early in the Plan period. Further commentary on this point is provided below in section 6.3.

6.2 Site and Surroundings

6.2.1 The Site is situated to the south of Walmer, Deal between Liverpool Road to the east and Hawksdown to the west immediately adjacent to existing residential development.

6.2.2 The Site comprises an undeveloped regular parcel of land in arable use totalling approximately 4.43 hectares, forming part of a larger arable unit to the south. The Site is bound primarily by hedgerow vegetation to the east along Liverpool Road with dense woodland and mid-storey vegetation to the north. The west boundary comprises a mix of hedgerows and trees set along the perimeter abutting residential development on Hawksdown.

Figure 6.1: Approximate Site Location (courtesy of Google Earth)

6.2.3 The wider surroundings are characterised by its edge-of-settlement location with low density existing residential development along Hawksdown to the north and west and undeveloped agricultural land to the east and south. The landscape assessment which informed the HELAA recognises that the site is:

"...relatively discrete, having housing on two sides and being located on the side of a dry valley. The sensitivity of the site is moderate as views in are limited and the flow of housing down the slope would not detract. The impact of development on the wider landscape would be minimal and this could be reduced further by providing additional buffer of landscaping along the southern boundary".

6.2.4 The Site enjoys access to a number of day-to-day facilities and services which are within a reasonable walk distance, including primary and secondary schools, local shops, healthcare, employment, and public transport links within Walmer and Deal including Walmer mainline station and frequent buses along Dover Road between Dover, Deal, Sandwich and Canterbury.

6.2.5 In terms of overarching planning constraints, the site is not subject to any overarching landscape or ecological designations and is not itself subject to any heritage constraints.

6.2.6 To the north east of the site – with intervening land - is the grade II Registered Park and Garden of Walmer Castle which is a scheduled monument, and nearby to the east is an undesignated historic First World War Aerodrome and Second World War radar station within an area of Archaeological Potential.

6.2.7 There is a low risk of a surface water flow path through the non-wooded area of the site, and along the western boundary – both of which can be easily accommodated in a residential layout.

6.3 Development Capacity

6.3.1 As set out above, the proposed allocation is for 75 dwellings, reduced from 100 dwellings at the Regulation 18 stage. The reasoning set out in the "selection of Site Allocations" (September 2022) supporting document for the reduction in capacity is "To enable a scheme to come

forward which reflects the character of the surrounding area, and enable sufficient landscaping to be provided". Excluding the wooded area to the north of the site, the provision of 75 dwellings would equate to a density of 21 dwellings per hectare, with 100 dwellings equating to 28 dwellings per hectare. For the reasons set out subsequently, we consider that sites located in sustainable locations such as Land at Rays Bottom, adjacent to Deal, should take opportunities to maximise the potential for housing – whilst respecting the context and character of the area. For this reason we consider that the appropriate capacity is a little greater at approximately 80 dwellings, as part of a high-quality, landscape-led residential scheme capable of delivery within the early phase of the Plan period.

6.3.2 At this early stage, detailed proposals have not yet been advanced, however it is anticipated that any future development of the site – at 80 dwellings - will be of appropriate density, reflecting local patterns of development and sensitively designed to respect the existing character of the area, the topography of the site and to allow transition to the rural landscape and respond to its coastal location.

6.3.3 Particular care will be taken with regard to the low-risk surface flow route, impact on nearby heritage assets and ecologically sensitive sites with a particular emphasis on opportunities for biodiversity habitat creation and enhancement. Fernham Homes have a strong track record of delivering high quality housing whilst respecting such characteristics and constraints.

6.3.4 In terms of access, primary vehicular, pedestrian and cycle access to the site shall be provided from Liverpool Road. Road widening and traffic management should be provided to Liverpool Road along the frontage of the site and where possible up to the junction with Gram's Road; along with an extension to the 30mph speed limit zone. Appendix 1 indicates how this can be achieved, with the provision of a footway and suitable carriage width which meets relevant highways requirements. Alternatively, the footway could not be provided, and instead a wider carriage way could be provided. Appendix 1 also clearly shows how the required visibility splays can be achieved on land either within the site, or within the public highway.

6.4 Draft Policy Allocation 'Land at Rays Bottom between Liverpool Road and Hawksdown, Walmer' (SAP15)

6.4.1 As introduced in the preceding sections, our client's Site at Land at Rays Bottom is allocated for residential development within the Dover Pre-submission (Regulation 19) Local Plan. For ease of reference, the draft policy wording is as follows:

"SAP15 - Land at Rays Bottom between Liverpool Road and Hawksdown, Walmer (WAL002)

The site, Land at Rays Bottom between Liverpool Road and Hawksdown, as shown on the policies map is allocated for an indicative capacity of 75 dwellings.

Development proposals for the site shall include the following:

- a) Development should be low density and sensitively designed to respect the existing character of the area, the topography of the site and to allow transition to the rural landscape;
- b) A sensitive landscaping scheme and appropriate landscape buffer to the south, determined by a Landscape Visual Impact Assessment is required to mitigate the impact of development on the wider countryside and to provide opportunities for biodiversity habitat creation and enhancement responding to the nearby BOA and local wildlife site;
- c) The existing wooded area to the north of the site and the tree and shrub line along the western boundary, shall be maintained and enhanced as areas for biodiversity habitat creation.
- d) Primary vehicular, pedestrian and cycle access to the site shall be provided from Liverpool Road. Road widening and traffic management should be provided to Liverpool Road along the frontage of the site and where possible up to the junction with Gram's Road; along with an extension to the 30mph speed limit zone;
- e) The Transport Assessment that is required to be carried out in accordance with Policy TI2, must consider and identify mitigation (potential widening/traffic management measures/junction improvements) for the surrounding local road network, taking into account the cumulative impact of this and other sites allocated in this Plan, including (but not limited to) Liverpool Road and Gram's Road up to and including the Gram's Road/Dover Road junction.
- f) A site-specific Flood Risk Assessment must be carried out in accordance with Policy CC5. This shall also inform the application of the Sequential Approach to the layout of the site by locating the most vulnerable elements in the lowest risk areas;
- g) In accordance with Policy SP13, a wintering bird survey must be undertaken in advance of a planning application on the site. If the bird survey identifies that the development will exceed the threshold of significance, mitigation will be required. A suitable scheme of mitigation will need to be submitted with the planning application for the site;
- h) An Archaeological Assessment for the site must be carried out in accordance with Policy HE3 Archaeology, the results of which should inform the layout and design of the development which is necessary to avoid harm to any archaeological assets identified through the assessment;
- i) A Heritage Assessment carried out in accordance with Policy HE1 is required to identify any necessary measures to avoid or minimise harm to the nearby heritage assets; and

j) The occupation of the development should be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider. Development should provide a connection to the sewerage system at the nearest point of adequate capacity and ensure future access to the existing sewerage infrastructure for maintenance and upsizing purposes.”

6.4.2 To be clear, our client remains wholly supportive of the principle of the allocation of the Site for residential development. Fernham Homes has a strong track record of swift delivery, and commits to being able to deliver the Site within the early phase of the Plan period. We agree that it represents a logical and sustainable location to direct growth consistent with the growth strategy of the Plan as a whole, however we submit that more effective use of our client’s Site can be made – and therefore object to the capacity identified.

6.4.3 Accordingly, we say that the allocation of Land at Rays Bottom is necessary in order for DDC deliver proportionate and high-quality sustainable growth within Deal, meet the growing need for new homes in the district and ensure that DDC can have greater confidence in meeting its market and affordable housing targets in full.

6.4.4 It is submitted that the SAP15 policy wording is sound and appropriately reflects the capability of the site to deliver a sensitive, landscape-led residential development but the wording should be amended to reflect the capability of the Site to accommodate approximately 80 dwellings, deliverable with the early phase of the forthcoming Plan period.

6.4.5

6.5 Strategic Justification for Development

Spatial Strategy

6.5.1 The proposed Housing Distribution for the district across the Plan period is established within Policy SP3 ‘Housing Growth’ which sets out that the distribution of housing growth in the district is primarily based on the settlement hierarchy and influenced by site availability, environmental constraints and factors of delivery.

6.5.2 Rightly, a key aim of the growth strategy is to focus development in the least sensitive areas of the district in order to conserve and enhance the Dover’s rich natural and historical environment.

6.5.3 A retained theme from the adopted Plan, is that DDC’s settlement strategy continues to focus on the development and regeneration of Dover Town and Whitfield (3381 dwellings). Approximately half of the district’s planned housing is in this location, the majority of which again is to come forward as part of the strategic urban expansion of Whitfield ‘SAP1’ (2200 minimum dwellings).

6.5.4 Development will then be focused in the District Centre of Deal (223 dwellings), and the Rural Service Centres of Sandwich (227 dwellings) and Aylesham (649 dwellings). Following the settlement hierarchy rigidly would distribute housing in the preceding order, however the Plan recognises that housing delivery in Deal and Sandwich continues to be constrained by a number of factors including flood risk, ecological designations, heritage and highways. Further, Deal has experienced generally high levels of windfall development across the previous Plan period and accordingly there is now a dwindling supply of available, suitable sites in both settlements. On account of this context, DDC have sought to direct the majority of the remaining higher order settlement growth (outside of Dover & Whitfield) to Aylesham, through the strategic expansion to the town.

6.5.5 Outside of the four principal district settlements, the Rural Settlement Hierarchy (August 2022) identified that the majority of lower-order settlements in the district emerge as having a low level of facilities within the hierarchy and six settlements having none of the key indicators of sustainable services. Plainly, these settlements offer very limited opportunities for growth and it is evident that the forthcoming Plan will remain reliant on the settlements of Dover (including Whitfield), Deal, Sandwich and Aylesham to deliver the housing growth that is required.

6.5.6 Given this context, it is clear that where available and suitable opportunities for residential development do exist within the district’s higher order settlements, including our client’s Site at Land at Rays Bottom, Walmer which can provide a policy compliant level of much-needed affordable housing, it is imperative that the effective use of these sites are appropriately maximised in accordance with national policy objectives.

6.5.7 Notwithstanding our client’s in principle support or the proposed strategy, we are concerned that highly sustainable, edge-of-settlement sites, particularly in higher tier settlements such as Deal have not been fully maximised to reflect their accessible location and capability to accommodate a greater quantum of development. On this basis, we are concerned that the strategic objectives underlying draft policy SP3 ‘Housing Growth’ may not be fully realised, to the detriment of market and affordable housing delivery and the wider policies seeking to conserve and enhance the district’s natural and historic environment.

6.5.8 Consequently, our clients object to policy SP3 as drafted, on the basis that there is a clear need to maximise the delivery of housing at sites around Deal (whilst ensuring that sensitive characteristics are reflected), and this has not been

undertaken – for example at Rays Bottom, Liverpool Road. It is our view that the site has sufficient capacity to deliver approximately 5 additional units over the draft allocation, that will otherwise be required to be delivered elsewhere in the district, in potentially less accessible and more sensitive locations.

6.5.9

Greenfield Development and Consistency with Housing Trajectory

6.5.10 Due to the nature and dwindling supply of available urban land in Dover town and the remaining higher order settlements of Deal and Sandwich, the restrictive effect of the coast, the Kent Downs Area of Outstanding Natural Beauty, environmental constraints and the limited capacity of the district's remaining mid- and lower order settlements to accommodate significant levels of growth, greenfield development will inevitably be required if DDC is to meet its housing and development commitments in full moving forward.

6.5.11 In our view, sustainable and accessible unconstrained sites logically located adjacent to existing urban areas, including Deal, represent the most sustainable and reliable sources of growth for the Plan period, to support the role and timescales of strategic urban extensions and to deliver the significant number of new homes that are required within the forthcoming Plan period.

6.5.12 Within Deal itself, meaningful housing growth is inherently constrained on three sides due to the restrictive effect of the coast to the east and Flood Zone 2/3 land and ecologically sensitive sites including SSSIs to the north and west. Alongside overarching objectives to minimise the incursion of widespread development into the rural countryside, the scope for significant Plan-led development in Deal is becoming increasingly limited. Accordingly, we firmly agree that sites to the south of Deal, including that of our clients in Walmer, represent the least sensitive and most logical locations for future Plan-led growth, making effective use of the availability of sites in close proximity to the Urban Area and key infrastructure including Walmer train station.

6.5.13 In terms of housing delivery in Deal, the development of Land at Rays Bottom (75 dwellings) is anticipated to deliver completions with Years 9-11 of the Plan period, although as detailed above our clients have a strong track record of swift delivery, and consider that it could be delivered ahead of this. When combined with extant permissions within Deal and nearby allocations at Land off Cross Road, Deal (SAP14) and Deal Small Housing Sites (SAP16) totalling 100 dwellings and 48 dwellings respectively, our client's site will assist in delivering a steady supply of new homes within Deal across the majority of the early and middle phases of the Plan period and contribute to providing genuine choice in the market.

6.5.14 Moreover, in our experience, greenfield edge-of-settlement sites are typically most capable of making meaningful contributions to the associated public infrastructure, affordable housing and mix of new homes that are urgently needed in the district.

6.5.15 The Sustainability Appraisal Scoping Report (2018) sets out that over the course of the adopted Plan period, the key sustainability issues facing Dover District in relation to housing are as follows:

Population growth, household growth and demographic change will place additional demand on key services and facilities such as housing, health, education and social care. The Local Plan offers a new opportunity to manage these pressures, encouraging mixed communities;

There is a need for affordable housing across the District. At present, the mean price of dwellings is higher than the national average. The Local Plan will help to expedite its delivery; and,

There is the need for a mix of housing types that cater for the needs of a range of people, including the growing number of single person and elderly households. Without an up-to date Local Plan, the required housing is less likely to be delivered.

6.5.16 It is evident that the new Dover Local Plan must allocate a mix of reliable sites capable of steadily delivering not only the quantum of housing that is required, but also the associated public infrastructure, affordable housing and a mix of unit types and tenures suitable for a wide range of future occupants.

6.5.17 The Housing Topic Paper (September 2022) provides further context and summarises under Chapter 7 'Historical Housing Delivery' that Dover has historically placed significant reliance on windfall development over the current adopted Plan period, with windfall sites accounting for 44% of all completed dwellings over the preceding 10-year period.

Figure 1: DDC Brownfield / Greenfield Completions 2010/11 to 2020/21
(source: Housing Topic Paper September 2022)

6.5.18 Moreover, it is highlighted that at the beginning of the 10 year period, the majority of new dwellings were being built on brownfield land. However, from the monitoring year 2013-14 onward development on greenfield land began to play a much greater part in the location for new development as show in figure 1 above. This trend of increased housing development on greenfield land is a result of the allocations within the CS and Land Allocation DPD being built out and is associated with an approximate doubling of completions in the district. From 2013-14 onwards the average number of completed dwellings per annum has doubled to that of the early years of the CS, as the strong

delivery rates of greenfield sites formed the predominant source of housing. This is despite an overall declining trend of brownfield completions towards the latter half of the Plan period. This is not an uncommon trend whereby in the majority of local planning authorities areas, opportunities for available and suitable sites in urban centres typically dwindle throughout the Plan period.

6.5.19 In light of the above context, it is clear that the adopted Dover Local Plan suffered from an initial under delivery of Plan-led housing growth in which windfall development sources were largely required to take up the slack in the early phases of the Plan period, as major allocated sites failed to deliver at the rates initially expected.

6.5.20 It is equally apparent that initial slow completions rates were quickly renewed once greenfield allocations commenced development, feeding into strong completions in the latter half of the Plan period. In our experience, greenfield sites are typically associated with stronger delivery rates and provide a reliable source of housing growth. The allocation of an appropriate mix of sites and scales is required in order to ensure steady and sustained Plan-led housing delivery across the Plan period and to avoid a reliance on windfall development to address the shortfall.

6.5.21 Consequently, given all of the above, it is imperative that the new Local Plan allocates a sufficient variety and scales of site capable of both ensuring steady and sustained housing completions and capable of making necessary contributions to public infrastructure and services, affordable housing and mix of unit types to address the key issue raised in the Sustainability Appraisal.

6.5.22 In our view, edge-of-settlement greenfield sites such as our client's Site Land at Rays Bottom, Walmer represents the most reliable and sustainable source of housing delivery for the Plan period. Such sites are typically less constrained by wider factors and less affected by unforeseen delays such as land contamination. Moreover, greenfield sites typically are more capable of delivering the policy compliant affordable housing, unit mix and developer contributions that are urgently needed.

6.5.23 It is understood that the Plan is predicated on the delivery of strategic scale development at Whitfield comprising the development of circa 2,200 new homes. Consequently, in order to avoid a repetition of the previous Plan, DDC have sought to ensure that a pool of reliable greenfield allocation, including that of our client's are included within the Plan, capable of delivering the early and middle phase growth that is required within the housing trajectory prior to the commencement of stronger delivery from major allocations later in the Plan period.

6.5.24 We note that within the Housing Trajectory 'Appendix D', DDC have included allocated units from Years 4 onwards, with extant permissions (accounting for 5% non-implementation) demonstrated to be solely capable of delivering the growth required in Years 1-3. Notwithstanding our client's considerations that it can deliver at Land at Rays Bottom early in the plan period, we support this pragmatic approach and suggest this represents a sound basis on which to set the district's housing trajectory. We note also the inclusion of an appropriate windfall allowance and the included contingency buffer to further ensure reasonably flexibility in the housing supply.

6.5.25 On account of all of the above, we submit that the allocation of Land at Rays Bottom, Walmer forms part of a sound strategy for growth in the district for the forthcoming Plan period. The Site is capable of delivery within the early phase of the Plan period. The Site represents a reliable source of housing growth in a highly sustainable and accessible location adjacent to the existing settlement boundary of Deal and Walmer mainline station, consistent with DDC's preferred settlement strategy. Proposals remain at an early stage, however the Site is unconstrained and is considered capable of providing a high-quality landscape-led residential development including a mix of unit types and tenures, a meaningful contribution to the supply of affordable housing and contributions to public services and infrastructure, benefiting both existing residents and future occupiers. However, we object on the submission that the Site is capable of making a greater contribution to the district's housing need and suggest an amended wording of the policy to allocate the Site for approximately 80 dwellings.

Policy SP4 'Windfall Development'

6.5.26 Separately, we note the provisions of policy SP4 windfall development. Proposals at Rays Bottom, Walmer would likely be acceptable in principle under this policy and we support the inclusion within the Plan for appropriate, proportionate windfall development.

6.5.27 Our client is fully committed to the delivery of the Site which is available and anticipated for delivery in the early phase of the Plan period. Notwithstanding the provisions of SP4, it is reiterated that our client fully supports the allocation of the Site under SAP15 as the most appropriate mechanism for delivery of the Site and the opportunity for genuinely Plan-led development in Deal, the provision of associated benefits to public services and infrastructure, contribution to affordable housing supply and the delivering of a mix of house types and tenures.

Infrastructure Delivery

6.5.28 Paragraph 11 of the Framework is clear that all plans should promote a sustainable pattern of development. This includes aligning growth and infrastructure. Paragraph 20 goes on to confirm that strategic polices will be expected to make sufficient provision for associated development infrastructure.

6.5.29 In this regard, draft policies SP11 'Infrastructure and Developer Contributions' and SP12 'Strategic Transport Infrastructure' of the emerging Plan form the key strategic policies for infrastructure delivery. We agree that where development would create a need, or would have an impact, or would exacerbate an existing deficiency in infrastructure provision, appropriate developer contributions may be sought.

6.5.30 It is however emphasised that in all developments, infrastructure requirements must be demonstrated to be necessary through assessment during determination of the application on a case-by-case basis. Where new development is proposed, it does not automatically follow that major infrastructure contributions are always required or contribution to strategic infrastructure proposals are appropriate. For instance, it is our client's view that any infrastructure requirements must be demonstrated through a robust and transparent assessment at application stage, taking into account the submission of detailed supporting evidence, for example following consideration of the Transport Assessment in the case of highway infrastructure contributions.

Alignment with Sustainability Appraisal Findings

6.5.31 As part of the preparation of the Local Plan, the Council has identified and appraised a range of growth and spatial options through the Sustainability Appraisal (SA) which provides an assessment of how different options perform in environmental, social and economic terms, to help inform which option should be taken forward and combined with wider evidence documents, have been used to determine the growth and spatial strategy set out in the Plan.

6.5.32 Five potential distributions of growth were identified during preparation of the draft Regulation 18 Local Plan:

- Spatial Option A: Distributing growth to the District's suitable and potentially suitable housing and employment site options (as needed to deliver the scale of growth required).
- Spatial Option B: Distributing growth proportionately amongst the District's existing settlements based on their population.
- Spatial Option C: Distributing growth proportionately amongst the District's existing settlements based on the District's defined settlement hierarchy.
- Spatial Option D: Distributing growth in the same way as the adopted Local Plan, focussing most growth in and around Dover town.
- Spatial Option E: Distributing growth more equally across the District's settlements: Dover, Deal, Sandwich and Aylesham, as well as the rural villages.

6.5.33 The conclusion of the SA was that Spatial Options C (settlement hierarchy) and D (adopted Core Strategy with Dover focus) generally perform the most strongly against the SA objectives, particularly when delivering the baseline growth scenario. However, given the environmental constraints that exist around Deal and Sandwich, very few suitable and potentially suitable sites have been identified in these towns. Given this, the Council's preferred option for the distribution of housing and economic growth comprises a combination of options A (HELAA sites), C (settlement hierarchy) and D (Dover focus). The distribution of housing and economic growth in the District is therefore primarily based on the settlement hierarchy, and influenced by site availability, environmental constraints and factors of delivery.

6.5.34 On account of the above, our client agrees that the proposed growth strategy, and by extension, policy SP3 in principle represents a sound and evidence-led strategy for growth. However, given the clear acknowledgement of the dwindling supply of available sites in the higher order settlements of Deal and Sandwich, which has necessitated a minor deviation from the strongest performing spatial options, we submit that where sites are available and suitable for development in Deal and Sandwich, these must be fully maximised, reflecting their accessible location and their ability to reduce the need to develop into less accessible and more sensitive sites elsewhere in the district to accommodate the growth that is required.

Site Specific Sustainability Appraisal

6.5.35 Land at Rays Bottom between Liverpool Road and Hawksdown is included under HELAA reference 'WAL002' within the SA Site Assessment (Appendix F). The site generally performs strongly, with particular positives identified with regards to SA Objectives related to housing and the economy.

6.5.36 We contest the assessment of 'minor negative' in regard to sustainable transport. To the contrary, the site is well-located adjacent to the settlement boundary of Deal with access to a range of high-quality day-to-day services and access to Walmer train station for convenient access to larger settlements. In what is otherwise a largely rural district, we strongly disagree with the suggestion that an edge-of-settlement site represents a less than preferable location in respect of sustainable travel and day-to-day access to amenities.

6.5.37 We also note negatives associated with the development of a greenfield site, including loss of agricultural land, however this would be true of the majority of greenfield sites and it is abundantly clear that Dover's housing need cannot be met solely on brownfield sites. We note also minor negatives / uncertain associated with biodiversity, the historic environment and landscape, however it is not clear whether these take into account the potential for high-quality design, biodiversity enhancement and landscape mitigation. Irrespective, these are not considered to

outweigh the clear and tangible sustainability benefits associated with edge-of-settlement development, the site's consistency with the preferred spatial options and the wider benefits associated with reducing the need to develop into lesser accessible, more sensitive sites to otherwise deliver the housing growth that is required.

Summary

6.5.38 Taking all of the above into consideration, our client is wholly supportive of the inclusion of land promoted at Rays Bottom, Walmer as a future housing allocation within the Dover District emerging Local Plan. The allocation is considered wholly consistent with the objectives of the Plan and forms part of a sound growth strategy for the district to 2040.

6.6 Deliverability

6.6.1 Prior to the current appeal proposal, the Site has had no recent planning history of a residential nature or a history of unimplemented permissions. There are not considered to be any impediments to the Site being allocated for development commencing within the early (or mid) phase of the Plan period.

6.6.2 Fernham Homes – a local SME with a strong history and track record of delivery, together with an adopted and robust business plan for growth – is promoting the site, and are poised to commence work on its residential development promptly after the adoption of the Local Plan.

6.6.3 Combined with the delivery of extant permissions, an appropriate number and scale of wider allocations within Deal (including SAP 14 and SAP 16) and elsewhere across the district, this would ensure the steady delivery of housing both in Deal and in Dover district across the majority of the Plan period and support the role and timescales of strategic housing delivery at Whitfield towards the latter half of the Plan period.

6.6.4 For the reasons set out in this representation, the Site is considered suitable for the residential development of approximately 80 dwellings. The Site is adjacent to the overarching urban area of Deal, one of the four higher order settlements in the district and DDC's preferred locations for Plan-led growth within the district. Development at land at Rays Bottom would form a natural and logical development south of Walmer, Deal with excellent accessibility to day-to-day services and amenities via active travel modes within Deal itself and convenient access to public transport infrastructure including Walmer train station for onward travel to key neighbouring settlements including Dover, Ramsgate, Canterbury and Ashford.

6.6.5 Finally, in respect of suitability there are no physical limitations or problems such as access, infrastructure, flood risk, hazardous risks, pollution or contamination.

6.6.6 On behalf of the landowner, we submit that there are no known financial restrictions that would impact upon the viability of a future housing scheme or that would prohibit development coming forward within the mid-stages of the Plan period. To the contrary, we consider there to be an opportunity to deliver a high-quality, sustainably located residential development scheme consistent with DDC's proposed growth strategy comprising an appropriate mix of market and affordable housing and capable of contributing to a range of community facilities, public infrastructure and services locally.

6.6.7 At the time of writing, proposals at Rays Bottom, Walmer remain at an early stage, however our clients are firmly committed to progressing the delivery of the Site on adoption of the Plan. The project team therefore does not anticipate any absolute constraints to the commencement of delivery on-site early in the plan period (potentially 2025-26) and completion by 2028/9).

6.6.8 The Site is in single ownership and there are no complicated legal agreements or covenants that would prohibit the ability to bring forward the Site in line with DDC's housing trajectory within the mid-phase of the Plan period. The Site is therefore considered available and achievable for the purposes of the tests of deliverability.

7 Conclusion

7.1 Summary

7.1.1 This representation has been prepared by DHA Planning on behalf of Fernham Homes Limited in response to the DDC Local Plan (Regulation 19) consultation which runs until 9th December 2022.

7.1.2 Our client is promoting 'Land at Rays Bottom, Walmer, Deal' for the residential allocation of the Site as part of the new Dover District Local Plan preparation process. The Site is allocated for residential development in the Regulation 19 Pre-submission Plan within an indicative capacity of 75 dwellings under policy reference 'SAP15'.

7.1.3 Taking the above representation contents into consideration, we remain wholly supportive of the principle of the allocation of Land at Rays Bottom and agree that the Site represents a logical and sustainable location to direct necessary growth within Deal.

7.1.4 Accordingly, we consider that the land promoted at Rays Bottom, Walmer must remain included as a future housing allocation within the Dover District emerging Local Plan. The allocation is considered to be wholly consistent with the objectives of the Plan and forms part of a sound growth strategy for the district to 2040. However, it is imperative that the effective use of these higher-order settlement sites are appropriately

	<p>maximised in accordance with draft policy SP3 of the emerging Plan, and wider policies seeking to otherwise conserve and enhance the district's natural and historic environment and national planning policy objectives. We are concerned that this has not been fully undertaken and object solely on this basis.</p> <p>7.1.5 Consequently, our clients object to policy SP3 as drafted, on the basis that there is a clear need to maximise the delivery of housing at sites around Deal, and this has not been undertaken – for example at Land at Rays Bottom, where it is considered that the site has sufficient capacity to deliver approximately 5 additional units over the draft allocation, that will otherwise be required to be delivered elsewhere in the district, in potentially less accessible and more sensitive locations.</p> <p>7.1.6 Outside of the point regarding capacity, it is submitted that the SAP15 policy wording is sound and appropriately reflects the capability of the site to deliver a sensitive, landscape-led residential development with an indicative capacity of 80 dwellings, deliverable with the early phase of the forthcoming Plan period. Without prejudice to our client's support in principle of the proposed allocation, we would urge the Council to re-visit the allocation policy text and allow a higher dwelling capacity.</p> <p>7.1.7 Accordingly, we say that the allocation of Land at Rays Bottom forms part of a balanced growth strategy comprising an appropriate mix of small, medium and strategic-scale sites deliverable across the Plan period. The allocation of well-located, reliable, greenfield sites such as our client's at Land at Rays Bottom is necessary in order for DDC to meet the growing need for new homes in the district and ensure that DDC can have confidence in consistently meeting its market and affordable housing targets in full throughout the life of the new Dover District Plan.</p> <p>7.1.8 In addition to being a highly sustainable and logical edge-of-settlement allocation, the Site is deliverable in a single land ownership with no viability issues, legal or third-party constraints present. Our client is fully committed to the delivery of land at Rays Bottom Farm and there are no impediments to the Site being capable of delivery within the mid-phase of the Plan period.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>For the reasons set out in the consultation response submitted on behalf of Fernham Homes Limited (ref DHA/30359), the capacity of Land at Rays Bottom between Liverpool Road and Hawksdown, Walmer (WAL002) and Policy SP3 - Housing Growth should be increased to approximately 80 dwellings.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>Please refer to the consultation response submitted on behalf of Fernham Homes Limited (ref DHA/30359).</p>
<p>Include files</p>	<p>30359 DDC Rep_Walmer FINAL 09 12 22.pdf</p>
<p>Local Plan Consultation Point</p>	<p>Strategic Policy 4 - Residential Windfall Development</p>
<p>Rep ID</p>	<p>SDLP1342</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1333125</p>
<p>Consultee Full Name</p>	<p>Amy Beaney</p>
<p>Consultee Company / Organisation</p>	

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP4
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I have concerns on the sp4 in the local plan. We have recently purchased the pub, The Crown Inn at Finglesham tho when we purchased this property we never thought we would like to develop the land, however unfortunately since August when we took over this property we have seen a huge increase energy bills, traffic to the holiday lodges dwindle to a small amount of rent to the point they are not paying for their selfs at the moment. If this local plan is put in place it would stop us from using the whole piece of land to gain the return needed to help keep the pub open. What we would consider if business doesn't pick up is to maybe take down the holiday lodges all the outbuildings and wedding barn. We would then develop this land we believe we could build 10 Homes on this site. In doing this we would then have the resources to change the pub for the better In doing this we believe that we could make the pub a huge success and keeping it a village asset with the advantage of not having no financial strains to all the other buildings. This was never our intention when buying this venture we are fully committed to keeping this as a village asset, however we have huge worries going forward in the present climate. Could you please consider moving the confines so all of the property in within the boundaries, or consider struggling businesses in sp4 of the local plan.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	I worried that there could be no consideration for arguments against this part of the policy
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 4 - Residential Windfall Development
Rep ID	SDLP1313
Rep Status	Processed

Consultee ID	1331922
Consultee Full Name	Matthew Porter
Consultee Company / Organisation	Fernham Homes Ltd & Walker Residential Ltd
Agent Full Name	Matt Porter
Agent Company / Organisation	DHA Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy SAP22 - Land at Archers Low Farm, St Georges Road Sandwich (SAN023) Policy SP3 - Housing Growth Policy SP4 - Windfall Development Policy SP11 - Infrastructure and Developer Contributions Policy SP12 - Strategic Transport Infrastructure
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We consider that the plan is sound, but object to elements of Policy SAP22 - Land at Archers Low Farm, St Georges Road Sandwich (SAN023) and Policy SP3 - Housing Growth. These objections are set out in the consultation response submitted on behalf of Fernham Homes Limited and Walker Residential Limited (ref DHA/30245).</p> <p>1 Introduction</p> <p>1.1 Purpose of this Representation</p> <p>1.1.1 This representation has been prepared by DHA Planning on behalf of Fernham Homes Limited and Walker Residential Limited in response to the Dover District Council 'DDC' Local Plan (Regulation 19) consultation which runs until 9th December 2022.</p> <p>1.1.2 We understand that DDC is in the process of preparing a new Local Plan to set out a strategy for development for the period to 2040 and that the Council are presently seeking comments on the pre-submission Plan prior to its submission for examination in early 2023.</p> <p>1.1.3 Our client controls 'Land at Archers Low Farm, Sandown Road, St Georges Road, Sandwich' (hereafter referred to as 'Land at Archers Low' or 'the Site') and is promoting the residential allocation of the Site as part of the new Dover District Local Plan preparation process. The Site is allocated for residential development in the Regulation 19 Pre-submission Plan for the provision of 35 dwellings under policy reference 'SAP22'.</p> <p>1.1.4 It is highlighted that as part of the Regulation 18 Local Plan, the Site was allocated under the 'Site Allocations Policy 1 Non-Strategic Housing Allocations' for approximately 40 dwellings (reference SAN023).</p> <p>1.1.5 The purpose of the representation is to support the allocation of 'Land at Archers Low' for a greater quantum of development and provide comment on the consistency of the allocation with the proposed strategy, draft policies and our client's position in respect of the 'soundness' of the Plan, but to object to the indicative capacity set out in the policy.</p> <p>1.1.6 In this regard, we remain wholly supportive of the principle of the residential allocation of the Site and agree that it represents a logical and sustainable location to direct growth consistent with the growth strategy of the Plan as a whole, however we submit that more effective use of our client's Site can be made – and object (solely) to this element of the policy.</p> <p>1.1.7 Accordingly, we say that Land at Archers Low can further assist the Council in meeting the growing need for new homes in the district and help to ensure the Council can have greater confidence in meeting its market and affordable housing targets in full.</p> <p>1.1.8 Based on the current national and local planning context, we consider the Site to be a highly suitable edge-of-settlement location to allocate land for housing to help meet the need for new homes in the district and its effective use should be appropriately maximised in accordance with national policy objectives.</p>

1.1.9 Further details regarding the Site and commentary on the consistency of the allocation with the proposed strategy, draft policies and our client's position in respect of the 'soundness' of the Plan are set out in the following sections of this document.

1.2 About Fernham Homes

1.2.1 Fernham Homes Limited are a local award winning small and medium sized (SME) housebuilder, established in 1997 and has a strong track record of delivering high quality residential and mixed use developments in Kent over the last 25 years. This has been acknowledged through the receipt of nationally recognised awards, including the gold Evening Standard Awards best family home 2022 and 2019 bronze WhatHouse Best Small Housebuilder.

1.2.2 SME housebuilders are recognised in the National Planning Policy Framework ('NPPF') at paragraph 69 as making an important contribution to meeting the housing requirements of an area, and being able to build out relatively quickly. Similarly, this has also been recognised by the Planning Inspectorate. This is particularly the case with Fernham Homes, which is privately owned with access to significant resources. This provides significantly more flexibility than national and other regional housebuilders, and allows Fernham Homes to deliver housing rapidly and to a high quality, beautiful and sustainable standard (para 126 of the NPPF).

1.2.3 Fernham Homes Limited has embarked on a sustained period of growth, with an adopted and robust business plan to deliver around 300 houses per year in five years time.

1.2.4 A key element of Fernham Homes' operations is to take a very careful approach to site selection: a huge amount of due diligence is undertaken as part of this, and therefore Fernham Homes Limited only invests in those sites which meet the NPPF requirements of being available, suitable, and deliverable. As set out below land at Archers Low Farm, Sandwich ('SAP22') is firmly considered to be such a site.

1.2.5 Similarly, a key feature of Fernham Homes' approach is to work positively and proactively with local planning authorities (LPAs), both during the preparation of local plans and at planning application stage. Fernham Homes Limited are fully committed to engaging with Dover District Council in the preparation of its Local Plan, and firmly subscribe to the national policy approach set out in paragraphs 15 and 16 c) of the NPPF that "the planning system should be genuinely plan-led" and should be shaped by early, proportionate and effective engagement between LPAs and others, including businesses and developers. Accordingly, Fernham Homes Limited would welcome the opportunity to discuss the matters contained in this representation, including the availability, suitability, deliverability and capacity of land at Archers Low Farm, Sandwich ('SAP22') directly with Dover District Council members and officers, ahead of the submission of the Local Plan for examination.

1.3 Representation Structure

1.3.1 The representation structure is outlined below for ease of reference:

Chapter 2 (Consultation Background) – Sets out the context of the Dover District new Local Plan preparation, relevant national planning requirements and a summary of our current position.

Please refer to paragraph 52 of appeal decisions: APP/M2270/W/21/3283924 and APP/M2270/W/21/3288645

Chapter 3 (Legal Tests of Soundness) - Assessing whether the plan is sound, having regard to the tests of soundness outlined by paragraph 35 of the NPPF.

Chapter 4 (Duty to Co-operate) - Assessing whether the plan is sound, having regard to the duty to cooperate outlined by paragraph 24 of the NPPF.

Chapter 5 (Housing Need) - Consideration of market and affordable housing need and assessment of proposed housing allocations and supply sources.

Chapter 6 (Assessment of Suitability) - Re-introduces our client's Site and provides a summary of planning constraints and opportunities, including the quantum of development that could be accommodated, why the Site is suitable for development and why the principle of the draft allocation for residential development is both justified and consistent with the Council's strategy for growth in the district. It also sets out why we consider there is scope for a higher number of dwellings at the site. This consideration amounts to an objection to one element of the strategy – namely that those sites around the most sustainable settlements should be maximised.

Chapter 7 (Conclusion) - Summarises the key points raised throughout the representation and re-affirms our client's support for the principle of the Site's allocation and the principle of the proposed strategy ahead of the submission of the Plan for examination, and the objections in terms of capacity.

2 Dover District Council – Draft for Submission Local Plan (Regulation 19)

2.1 Consultation Background

2.1.1 DDC are required to prepare a new Local Plan, as the current suite of development plan documents were adopted in 2002, 2010 and 2015. The Core Strategy (CS) (adopted 2010) in particular has a time horizon up to 2026 and requires updating.

2.1.2 The new Local Plan will set out the vision, strategic objectives and overarching development strategy for the growth of the District over the period to 2040. It provides the planning policy framework to guide the future development of the area, addressing needs and opportunities for housing, the economy, community facilities and infrastructure, as well as the basis for conserving and enhancing the natural and historic environments, mitigating and adapting to climate change, and achieving well designed places.

2.1.3 For the avoidance of doubt, the new Local Plan, on adoption, will replace the CS 2010 and the Land Allocations Plan 2015, as well as saved policies from the 2002 Local Plan.

2.1.4 DDC's Regulation 19 Local Plan outlines the key issues that need to be addressed between now and 2040. In particular, the Plan sets out the following key planning issues for the District:

- Ensuring that new development in the District contributes to the mitigation of, and adaptation to, climate change.
- Supporting the Council to deliver its intention to be a carbon neutral district by 2050.
- Managing flood risk and coastal change.
- Ensuring that a sufficient amount and variety of land is identified to deliver a continuous supply of housing across the Plan period and that the Council maintains a five-year housing land supply.
- Delivering growth in a way that focuses development in the least sensitive areas of the District in order to conserve and enhance the District's rich natural and historic environments.
- Supporting sustainable development in rural areas to enhance the vitality of rural communities.
- Working with partners to facilitate the delivery of the Whitfield Urban Expansion.
- Ensuring a range of housing tenures, types and sizes are provided across the District to meet the needs of the local community and provide choice and flexibility in the housing market.
- Promoting economic growth, tourism, and investment in the District's Town Centres in line with the Council's Economic Growth Strategy.
- To address the impact of the COVID-19 pandemic.
- Delivering strategic transport improvements, including upgrades to the Duke of York and Whitfield roundabouts to support the scale of housing and economic growth identified in the Plan.
- Promoting sustainable transport initiatives to encourage a modal shift to more sustainable forms of transport like walking and cycling.
- Ensuring that infrastructure is delivered, in the right place, at the right time, to meet the needs of the District and support the levels of development identified in the Local Plan.
- Supporting the delivery of attractive, high-quality, design led developments and the creation of healthy, inclusive and safe communities, that are well served by good quality services and facilities to support people's lives.
- Conserving and enhancing the District's rich and diverse natural landscape, including the five international sites within the district, the Kent Downs Area of Outstanding Natural Beauty (AONB), five Sites of Special Scientific Interest (SSSIs), two National Nature Reserves (NNRs), two stretches of Heritage Coasts and two Marine Conservation Zones.
- Delivering a net gain in biodiversity in the District over the plan period.
- To promote the conservation, restoration and where appropriate the enhancement of the District's heritage assets, in order to protect their significance and to ensure that they can be best appreciated and enjoyed by current and future generations.

2.1.5 The new Local Plan will be examined by an Inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is 'sound'. This submission will comment on each of the above, highlighting where we believe any areas of concern lie or where modifications may be required.

2.2 DDC's Local Development Scheme

2.2.1 The District Council has a duty to review the policies contained within the development plan every five years. The 2014/2015 Authority Monitoring Report signalled the need to review key parts of the Council's adopted CS evidence base.

2.2.2 The Council's Local Development Scheme (LDS) first outlined the delivery timetable for the Local Plan Review (LPR) in the March 2017 publication. Since then, the LDS has been updated on an annual basis. The most recent September 2022 LDS summarises that following the preparation of the principal evidence base documents, the Local Plan Review Regulation 18 consultation took place for 8 weeks in January 2021. The Regulation 19 consultation was scheduled for 7 weeks during Q4 of 2022 and is the subject of this representation.

2.2.3 Moving forward, submission of the Plan is anticipated in Q1-2 2023 with the Examination in Public in Q3-4 2023. The new Local Plan is currently scheduled for adoption in 2024.

2.2.4 As planned, DDC are now undertaking the Regulation 19 Draft Local Plan Consultation, for which this submission is made

3 Legal Test of Soundness

3.1 Legislation and Guidance

3.1.1 The new Local Plan will be examined by an Inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is 'sound'. It is a statutory requirement that every development plan document must be submitted for independent examination to assess when it is "sound", as well as whether other statutory requirements have been satisfied (s.20(5) of the 2004 Act). By s.19 of the 2004 Act, in preparing a development plan document a local planning authority must have regard to several matters including national policies and advice contained in guidance issued by the Secretary of State. Such guidance currently exists in the form of the NPPF and is summarised below. This states that Plans must be:

(a) Positively Prepared: based on a strategy which seeks to meet objectively assessed development and infrastructure requirements

3.1.2 This means that the Local Plan should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. The NPPF set out principles through which the Government expects sustainable development can be achieved.

(b) Justified: an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence

3.1.3 This sets out the requirement that the Local Plan should be based on a robust and credible evidence base involving:

I. Research/fact finding: the choices made in the plan are backed up by facts.

II. Evidence of participation of the local community and others having a stake in the area.

3.1.4 The Local Plan should demonstrate an appropriate strategy, taking into account reasonable alternatives and based on proportionate evidence. These alternatives should be realistic and subject to sustainability appraisal. The Plan should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

(c) Effective: deliverable over its period based on effective joint working on cross-boundary strategic priorities

3.1.5 This makes clear that the Local Plan should be deliverable, requiring evidence of:

- Sound infrastructure delivery planning;
- Having no regulatory or national planning barriers to delivery;
- Delivery partners who are signed up to it; and
- Coherence with the strategies of neighbouring authorities, including neighbouring marine planning authorities.
- The new Local Plan should be flexible and able to be monitored.

3.1.6 The Local Plan should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen. The plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the Local Plan should make clear that major changes may require a formal review including public consultation. Any measures which the Council has included to make sure that targets are met should be clearly linked to an Annual Monitoring Report.

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national policy.

3.1.7 This submission comments on each of the above in further detailing, highlighting areas of support and where modifications are required as appropriate.

3.2 Legal Compliance

3.2.1 In terms of legal compliance, the main requirements for the early stages of Local Plan consultation are in relation to:

- planning for community engagement;
- the sustainability appraisal (including consultation with the statutory environment consultation bodies);
- identifying significant cross boundary and inter-authority issues; and
- ensuring that the plan rests on a credible evidence base, including meeting the Act's requirement for keeping matters affecting the development of the area under review.

3.2.2 In addition to the above, the NPPF states² that: "Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:

a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;

b) Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

(i) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or

Paragraph 11, NPPF 2021

(ii) Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”

3.2.3 In addition, to the above, the NPPF states³ that Plans should:

a) be prepared with the objective of contributing to the achievement of sustainable development;

b) be prepared positively, in a way that is aspirational but deliverable;

c) be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;

d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

e) be accessible through the use of digital tools to assist public involvement and policy presentation; and

f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

3.2.4 It is important to note that the NPPF⁴ requires strategic policies to set out an overall strategy for the pattern, scale, and design quality of places, and make sufficient provision for:

a) housing (including affordable housing), employment, retail, leisure and other commercial development;

b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

c) community facilities (such as health, education and cultural infrastructure); and;

d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

3.2.5 It is clear from the above, that any local plan should set out a comprehensive and cohesive approach to future development.

Paragraph 16, NPPF 2021

Paragraph 20, NPPF 2021

4 Duty to Co-Operate

4.1 Legal and NPPF Requirements

4.1.1 Section 33A of the Planning and Compulsory Purchase Act 2004 sets out a statutory ‘Duty to Cooperate’ (DtC) – i.e. a legal obligation - to all bodies as prescribed by Regulation 4 of the Town and Country Planning (Local Planning) England Regulations 2012 (the Regulations).

4.1.2 The duty requires DDC to cooperate with other persons to ‘maximise the effectiveness’ with which named activities are undertaken. Those activities include the preparation of development plan documents (such as this Local Plan document) and activities that support that activity ‘so far as relating to a strategic matter’.

4.1.3 A strategic matter is defined by S33A(4) in summary as: (a) ‘sustainable development or use of land that has or would have a significant impact on at least two planning areas’ (a planning area in this case is the area of a borough or district council); and (b) ‘sustainable development

or use of land in a two tier area' (as this is) 'if the development or use (i) is a county matter, or (ii) has or would have a significant impact on a county matter'. County matters broadly relate to minerals and waste and associated developments as defined by Paragraph 1 of schedule 1 to the Town and Country Planning Act 1990 (as amended).

4.1.4 Section 33A (7) requires DDC (and persons subject to the DtC) to have regard to any guidance issued by the Secretary of State about how the duty is to be complied with. In that regard Paragraph ID 9-004-29140306 of the Government's Planning Practice Guidance (PPG) confirms amongst other things that the DtC is not a duty to agree (albeit that local planning authorities should make every effort to secure the necessary cooperation on strategic cross border matters before they submit local plans for examination).

4.1.5 The NPPF establishes that effective and on-going joint working is an integral part of the plan making process that will, amongst other things, determine whether development needs that cannot be met wholly within a plan can be met elsewhere. The NPPF goes on to state at paragraph 27 that in order to demonstrate effective and on-going joint working strategic policy making authorities should: "... prepare and maintain one or more statements of common ground documenting the cross-boundary matters being addressed".

4.1.6 In addition to the District's own housing pressures, part of the DtC involves considering whether neighbouring authorities' unmet housing need can be accommodated. It is worth highlighting that recent amendments to the London Plan have identified that the City's housing need has become increasingly more difficult to deliver and therefore areas outside London will be faced with having to absorb more of London's housing need. Consequently, DDC has a duty to explore whether it can accommodate some of this overspill of London's unmet need.

4.2 Assessment of DDC's discharging of the Duty to Co-operate

4.2.1 It is recognised that work to discharge the DtC remains ongoing by DDC and will continue prior to submission as part of the preparation of the Local Plan evidence base.

4.2.2 Notwithstanding the above, at this stage it is understood that DDC have engaged with the members of the East Kent Regeneration Board including neighbouring East Kent planning authorities, Kent County Council (KCC) and its subsidiary departments:

- Folkestone and Hythe District Council
- Canterbury City Council
- Thanet District Council
- KCC
 - KCC Highways & Transportation
 - KCC Minerals & Waste
 - KCC Heritage Conservation
 - KCC Flood & Water Management
 - KCC Natural Environment & Coast
 - KCC Infrastructure including Education

4.2.3 In February 2016, the Council adopted a Memorandum of Understanding (MOU) in respect of the DtC between the East Kent Regeneration Board members. A review of the MOU took place and was agreed in January 2021.

4.2.4 The East Kent MOU sets out the framework in which the authorities will work together on strategic issues and will actively engage. It forms the overarching framework and context within which Statements of Common Ground (SoCG) will be agreed between individual authorities.

4.2.5 Further engagement is also confirmed to have taken place between the following prescribed bodies and other relevant bodies:

- Environment Agency
- National Highways
- Historic England
- Natural England
- Network Rail
- NHS Kent and Medway Clinical Commissioning Group (CCG) – now known as Integrated Care Board (ICB) since July 2022
- Kent Downs AONB Unit
- Other infrastructure providers

4.2.6 Whilst work remains ongoing, at this stage it is understood that SoCGs have been agreed and signed between the following parties:
DDC and Folkestone & Hythe District Council

DDC and Canterbury City Council

DDC and Thanet District Council

DDC and Kent County Council

Dover District Council and National Highways

4.2.7 As part of the DtC Evidence Base documents, DDC prepared a detailed DtC Statement (dated September 2022) which sets out a summary of the engagement that has taken place, firstly by organisation, and then by issue. Whilst the statement focuses on strategic issues and duty to co-operate bodies it also includes information relating to engagement on non-strategic issues and co-operation with other bodies that are not prescribed by the regulations. In addition, Appendices 1, 3 and 4 identify the main meetings and other correspondence that has taken place throughout the plan making process.

4.3 Summary

4.3.1 On account of the above and the documents published within the Council's Local Plan Evidence Base, we are satisfied that the Council as the strategic policy making authority has demonstrated effective and on-going joint working with neighbouring authorities, the county council, prescribed bodies and other relevant bodies. Further, we agree that DDC has prepared and maintained SoCG documenting the cross-boundary matters being addressed in accordance with the Framework and the DtC may be discharged by the Planning Inspector under Section 20(5) (c) of the Planning and Compulsory Purchase Act 2004.

4.3.2 Without prejudice to the above, should ongoing work by the Council result in significant changes in circumstances such that the signed SoCGs may be amended or withdrawn, our client reserves the right to alter their consultation response accordingly and be present at the examination of the Plan to discuss further.

5 Housing Need

5.1 Context

5.1.1 Paragraph 11 of the NPPF is explicit in its requirement for strategic policy-making authorities to promote a sustainable pattern of development that seeks to meet the need in full.

5.1.2 Paragraph 20 of the Framework is equally clear that strategic policies should set out an overall strategy for the pattern, scale and design quality of places. Policies should make sufficient provision for the development that is required as well as associated infrastructure, community facilities and should set out a strategy for the conservation and enhancement of the natural, built and historic environment.

5.1.3 Given this national planning context, the emerging Local Plan should provide a comprehensive and cohesive approach to future development in Dover district, capable of making sufficient provision for the identified needs, whilst balancing the conservation and enhancement of the natural, built and historic environment.

5.1.4 National guidance states that strategic policy-making authorities will need to calculate their local housing need figure at the start of the plan-making process. This number should be kept under review and revised where appropriate.

5.1.5 In calculating the local housing need, paragraph 61 of the NPPF states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance - unless exceptional circumstances justify an alternative approach.

5.1.6 Further, in addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

5.2 DDC's Housing Need

5.2.1 The Standard Method for assessing housing need, issued alongside the Ministerial Statement on 16 December 2020, sets an indicative housing need figure for Dover District of 596 dwellings per annum. However, the affordability ratio which factors into the local housing need assessment is updated annually. For Dover District the latest housing need calculation is 611 dwellings per annum (dpa), equating to a total housing need of 10,998 dwellings for the Plan period to 2040. We understand that the Regulation 19 Local Plan seeks to meet this need in full and in addition to the minimum figures, DDC have set an appropriate contingency buffer of 926 dwellings of the Plan period, equating to 8.4% of the total Plan period figure.

5.2.2 For context, the current adopted CS requirement is 700 dwellings per annum. This followed the adoption of a high-growth strategy in 2010 of 14,000 homes to 2026 based around the recommendations of the Dover Regeneration Strategy and above the minimum 10,100 requirement across the same period, as set out in the emerging (at the time) Regional Spatial Strategy.

5.2.3 For the avoidance of doubt, accounting for the Committed Supply Total of 5,282 dwellings, the new Local Plan will be required to allocate sufficient land to accommodate a minimum of 6,642 new homes over the remaining plan period to 2040. It is understood that this will be derived from the following sources:

- Whitfield Urban Expansion Allocation: 2,200 dwellings
- Local Plan Allocations (excluding Whitfield): 3,392 dwellings
- Windfall Allowance (70 a year from year 4): 1,050 dwellings

5.2.4 On this basis, it is evident that a substantial quantum of Plan-led housing delivery will be required in order to meet the new Local Plan's housing target. Due to the nature and dwindling supply of available urban land in Dover town and the remaining higher order settlements of Deal and Sandwich, the restrictive effect of the coast, the Kent Downs AONB, environmental constraints and the limited capacity of the district's remaining mid- and lower order settlements to accommodate significant levels of growth, meeting Dover's housing needs inevitably will require the release of significant greenfield land.

5.2.5 In our view, sustainable and accessible sites logically located adjacent to existing urban areas, including Sandwich, represent the most sustainable and reliable sources of growth for the Plan period, consistent with the overarching strategic objectives of draft policy SP3 within the emerging Plan. Such sites are best placed to deliver the significant number of new homes that are required and are most capable of making meaningful contributions to the associated public infrastructure, affordable housing and mix of new homes that is urgently needed in the District as well as further balancing the role of strategic-scale development at Whitfield within the emerging Plan's proposed growth pattern.

6 Site Specific Assessment

6.1 Overview

6.1.1 The previous chapters of this representation (Chapter 3-5) outline our client's position relating to the soundness of the Plan in which our client is confirmed to be supportive in principle of the Local Plan as a sound strategy for the growth of the district to 2040. It is clear that Sandwich must continue to form a principal location for focusing sustainable housing delivery in Dover district and will assist in ensuring an appropriate balance of sites are identified, capable of supporting the strategic role of Whitfield within the forthcoming Plan Period.

6.1.2 As introduced in the preceding sections, Fernham Homes Limited and Walker Residential Limited control 'Land at Archers Low, Sandwich' and are continuing to promote the residential allocation of the Site. The Site is allocated for residential development in the Regulation 19 Pre-submission Plan for the provision of 35 dwellings under policy reference 'SAP22'.

6.1.3 As aforementioned, the Site was allocated in the Regulation 18 Local Plan for approximately 40 dwellings under the 'Site Allocations Policy 1 Non-Strategic Housing Allocations' (reference SAN023).

6.1.4 Notwithstanding our client's support of the draft allocation within the Regulation 19 Plan in principle, we suggest that the policy text be re-visited prior to submission, to allow a higher dwelling per hectare guide to ensure the Site is developed to its full potential. It is submitted that the SAP22 policy wording should be amended to more accurately reflect the capability of the Site to accommodate approximately 40 - 45 dwellings (broadly in line with the previous site allocation in the Regulation 18 Local Plan), deliverable early in the Plan period.

6.1.5 Fernham Homes Limited and Walker Residential Limited are fully committed to the delivery of the Site within the next five years, and subject to a grant of planning permission in Spring 2023 – please see below – anticipate starting developing on site in 2023. Indeed, for the avoidance of doubt it is confirmed that Fernham Homes Limited and Walker Residential Limited have previously submitted a planning application ('ref: 22/00274') for the residential development of the Site for 44no. dwellings with associated access, parking, open space, landscaping, drainage, and infrastructure. (Amended plans and details).

6.1.6 Following a positive recommendation to grant planning permission by Officers at the DDC Planning Committee, the application was refused following consideration at Planning Committee on 31st March 2022. The application is now the subject of an appeal with a date confirmed for a two day hearing on the 17th - 18th January 2023. The site layout is shown in Figure 6.2.

6.1.7 For the avoidance of doubt, our client's support of the proposed allocation, subject to their objection to the capacity and considerations that it can accommodate an increased capacity of approximately 40 – 45 dwellings, is made without prejudice to the ongoing appeal. Should the appeal be allowed, this would realise the delivery of the residential allocation in accordance with the policy requirement (albeit more dwellings), which is consistent in its key elements with the submitted appeal scheme.

6.2 Site and Surroundings

6.2.1 The Site is situated to the southeast of St. George's Road and southwest of Sandown Road, on the southern edge of Sandwich.

6.2.2 The Site is a predominately undeveloped parcel of land totalling approximately

2.37 hectares, with tall and dense hedge and tree planting around the perimeter of the Site and an existing agricultural access point off St Georges Road to the north-west of the Site

6.2.3 The Site comprises a level enclosed field mainly formed of uniform improved grassland bounded on all sides by trees mixed in age, species, condition and character. There are also semi-derelict agricultural buildings in the southwest corner.

Figure 6.1: Site Location Plan (Drawing no. 29923A/01)

6.2.4 The Site comprises a level enclosed field mainly formed of grassland bounded on all sides by trees mixed in age, species, condition and character. There are also semi derelict agricultural buildings in the southwest corner.

6.2.5 The Site is bounded by existing residential development along St Georges Road to the north and west, undeveloped land to the east and south, Sandown Road to the north-east and a small area of residential development fronting Sandown Road further to the east of the Site.

6.2.6 The Site enjoys access to a number of local facilities and services which are within a reasonable walking distance, including schools, local shops, healthcare, employment, and public transport links. The Sir Roger Manwood Secondary School, Sandwich railway station and the historic town centre (including convenience stores) are all located within 800m of the Site. Sandwich Junior School and the local supermarket are located just over 800m from the Site. Larger shops and supermarkets are available in the local area, including Westwood Cross 8 miles to the north and Deal, 6 miles to the south. In terms of planning constraints, a Tree Preservation Order (TPO) protects trees on the northwest boundary of the Site and the belt of trees bounding the northeast and southeast.

6.3 Development Capacity

6.3.1 For the purposes of this representation, Land at Archers Low Farm, Sandwich is submitted with capacity for approximately 40 – 45 dwellings (broadly in line with the previous site allocation in the Regulation 18 Local Plan), as part of a high- quality, landscape-led residential scheme capable of delivery early in the Plan period.

6.3.2 Significant work has already been advanced by the project team as part of the submitted planning application and the subsequent appeal in which the proposed development has been informed following a thorough analysis of the Site opportunities, constraints and surroundings. The key design principles have been to create an attractive, permeable and legible layout set with a strong landscape framework, utilising existing landscape features, to accommodate a mixture of high-quality and attractive homes, of a scale and design that reflect its setting and surroundings.

6.3.3 In summary the vision for the Site is to create a high quality residential development which includes:

- Circa 40 – 45 no. residential dwellings, comprising 30% Affordable Housing and a mixture of 2, 3 and 4 bedroom properties.

- A series of open spaces that perform multiple functions including informal space, a local area of play (LAP), ecological mitigation areas and incorporation of native and wildflower meadow planting.

- Retention of trees on the northern and southern boundaries and the provision of new woodland planting. This will include proactive management of the retained and proposed woodland belts to encourage structural and species diversity and improve the overall health and longevity of these assets. The provision of significant biodiversity net gain is envisaged, and has been demonstrated can be delivered through the application and appeal.

- Low key principle vehicular access point onto Sandown Road through landscaped entrance with trees and vegetation maintained, introduction of wildflower planting.

- Footpath connectivity onto St Georges Road.

- Tree lined connecting avenue creating strong legibility and navigation throughout the layout.

Figure 6.2: Proposed Site Plan as amended in December 2021 (Produced by Clague Architects – Drawing no. 29923A/11)

6.3.4 For context, at the time of determination of application ref: '22/00274', full planning permission was sought for the erection of 44 dwellings, together with associated access to Sandown Road, a pedestrian crossing point on St Georges Road, parking, open space, landscaping, drainage, and infrastructure works.

6.3.5 It is highlighted that draft policy PM1 seeks to provide a density typically between 30-50 net dwellings per hectare (dph). In this respect, it is highlighted that at 45 dwellings, the Site would provide a density of approximately 22.5 dph. Whilst it is acknowledged that lower density development may be more appropriate in edge of settlement locations, this demonstrates that even at a capacity 45 dwellings, the density is relatively low. Furthermore, as part of the previous application 22/00274, DDC confirmed at paragraph 2.23 of the Committee Report that subject to a detailed assessment of visual impacts, a proposed scheme of 44 dwellings on the Site is considered appropriate.

6.3.6 The above proposed Site plan submitted during the determination of the application demonstrates the capability of the Site to comfortably accommodate circa 40 – 45 residential units, together with significant boundary and internal landscaping elements.

Draft Allocation in the Regulation 18 Local Plan:

6.3.7 As aforementioned, the Site was proposed to be allocated for a capacity of approximately 40 dwellings in the Regulation 18 Local Plan under the 'Site Allocations Policy 1 Non-Strategic Housing Allocations' (reference SAN023).

6.3.8 The Site was considered as part of DDC's Housing and Economic Land Availability Assessment (HELAA) (December 2020) for the development of approximately 40 dwellings. The summary of suitability as provided by DDC is summarised as follows:

- The Site is in an Area of Archaeological potential and a Heritage Assessment will be required.
- The Site clips Flood Zone 2 and 4, along the boundary and an FRA would need to be undertaken.
- The Site was removed from the LALP (Local Allocations Local Plan) by the Inspector on landscape grounds, however, with the provision of an enhanced landscape buffer to the east, south and west of the site to provide year-round screening, it is considered that the impact on the landscape can be mitigated. The housing number on the site has also been reduced to address landscape concerns.
- Access to this site would be possible via Sandown Road, however vehicle access onto St Georges Road is likely to be challenging due to limited footway width and subsequent sightline requirements, so would need to be restricted to emergency/pedestrian access only.
- The provision of 40 dwellings is unlikely to create a severe impact on the surrounding highway network, however St Georges Road and Sandown Road (including Knightrider Street and the route to the High Street/Quay) are subject to constrained geometry due to on street parking, as such, a review on-street parking controls may be required to manage any increase in traffic-flow.
- There is a general concern over the potential cumulative impact of development in and around Sandwich and on routes within the town, which should be considered as part of future traffic modelling exercises.
- A Transport Assessment is required.
- Further information should be provided to demonstrate that access is achievable. However, cumulative impact on the highways network needs to be assessed.

6.3.9 At the time, owing to the matters set out above the Site was considered 'Amber' in the reg/amber/green (RAG) rating. However the clients have since demonstrated within the planning application and subsequent appeal submission that the proposed development for 44 dwellings would address the queries above.

6.4 Draft Policy Allocation 'Land at Archers Low Farm, Sandwich Road, Sandwich' (SAP22)

6.4.1 As introduced in the preceding sections, our client's Site at Archers Low is allocated for residential development within the Dover Pre-submission (Regulation 19) Local Plan. For ease of reference, the draft policy wording is as follows:
"SAP22 – Land at Archers Low Farm, St Georges Road, Sandwich (SAN023)

The Site, Land at Archers Low Farm, St Georges Road, Sandwich, as shown on the policies map is allocated for an indicative capacity of 35 dwellings.

Development proposals for the Site shall include the following:

- a) Development should be laid out to protect the residential amenity of the existing residential properties to the north-east and designed to take account of the character of the Sandwich Walled Town Conservation Area;
- b) The existing trees on the boundaries of the site should be retained and enhanced to mitigate the impact of development on the landscape and provide opportunities for biodiversity habitat creation and enhancement;
- c) Trees which need to be removed to enable an access to be provided to the site, shall be kept to the minimum needed to provide necessary visibility, and will be required to be replaced on-site;
- d) The layout of the scheme should provide a sufficient buffer between the existing mature trees on the site and residential properties, to ensure appropriate residential amenity for future residents and the protection of existing trees once the site is developed;
- e) A site-specific Flood Risk Assessment must be carried out in accordance with Policy CC5, including a comprehensive investigation into surface water flood risk. This shall also inform the application of the Sequential Approach to the layout of the site by locating the most vulnerable elements in the lowest risk areas;

- f) Primary vehicular, pedestrian and cycle access to the site shall be provided from Sandown Road;
- g) In accordance with Policy SP13 a wintering bird survey must be undertaken in advance of a planning application on the site. If the bird survey identifies that the development will exceed the threshold of significance, mitigation will be required. A suitable scheme of mitigation will need to be submitted with the planning application for the site;
- h) Environment assessment study required to address any potential impact on the Sandwich Bay SPA and Ramsar;
- i) A Heritage Assessment, to include appropriate archaeological investigations must be carried out in accordance with Policy HE1 and Policy HE3, the results of which should inform the layout and design of the development which is necessary to avoid harm to any heritage assets identified through the assessment; and
- j) The occupation of the development should be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider. Development should provide a connection to the sewerage system at the nearest point of adequate capacity.”

6.4.2 To be clear, our client remains wholly supportive of the allocation of the Site for residential development and is committed to delivering the Site early in the Plan period (start on site in 2023). We agree that it represents a logical and sustainable location to direct growth consistent with the growth strategy of the Plan as a whole, however we submit that more effective use of our client’s Site can be made – and therefore object to the capacity identified.

6.4.3 Accordingly, we say that Land at Archers Low can further assist the Council in meeting the growing need for new homes in the district and help to ensure the Council can have greater confidence in meeting its market and affordable housing targets in full.

6.4.4 It is submitted that the SAP22 policy wording should be amended to reflect the capability of the Site to accommodate approximately 40 – 45 dwellings (broadly in line with the previous site allocation in the Regulation 18 Local Plan), deliverable early in the Plan period.

6.5 Strategic Justification for Development

Spatial Strategy

6.5.1 The proposed Housing Distribution for the district across the Plan period is established within Policy SP3 ‘Housing Growth’ which sets out that the distribution of housing growth in the district is primarily based on the settlement hierarchy and influenced by site availability, environmental constraints and factors of delivery.

6.5.2 Rightly, a key aim of the growth strategy is to focus development in the least sensitive areas of the district in order to conserve and enhance the Dover’s rich natural and historical environment.

6.5.3 A retained theme from the adopted Plan, is that the Council’s settlement strategy continues to focus on the development and regeneration of Dover Town and Whitfield (3381 dwellings). Approximately half of the district’s planned housing is in this location, the majority of which again is to come forward as part of the strategic urban expansion of Whitfield ‘SAP1’ (2200 minimum dwellings).

6.5.4 Development will then be focused in the District Centre of Deal (223 dwellings), and the Rural Service Centres of Sandwich (227 dwellings) and Aylesham (649 dwellings). Following the settlement hierarchy rigidly would distribute housing in the preceding order, however the Plan recognises that housing delivery in Deal and Sandwich continues to be constrained by a number of factors including flood risk, ecological designations, heritage and highways. Further, Deal has experienced generally high levels of windfall development across the previous Plan period and accordingly there is now a dwindling supply of available, suitable sites in both settlements. On account of this context, the Council have sought to direct the majority of the remaining higher order settlement growth (outside of Dover & Whitfield) to Aylesham, through the strategic expansion to the town.

6.5.5 Outside of the four principal district settlements, the Rural Settlement Hierarchy (August 2022) identified that the majority of lower-order settlements in the district emerge as having a low level of facilities within the hierarchy and six settlements having none of the key indicators of sustainable services. Plainly, these settlements offer very limited opportunities for growth and it is evident that the forthcoming Plan will be reliant on the settlements of Dover (including Whitfield), Deal, Sandwich and Aylesham to deliver the housing growth that is required.

6.5.6 We further note the findings of the Strategic Housing Market Assessment (2017) which identified that Sandwich and the north is the most expensive part of district with median property prices for all sizes of homes significant in excess of prices in Deal and Dover town and the south. It is suggested that issues of unaffordability are most likely to effect entry-level properties and result in existing residents being forced to seek more affordable properties elsewhere in Dover district or neighbouring authority areas.

6.5.7 Given this context, it is clear that where available and suitable opportunities for residential development do exist within the district’s higher order settlements, including our client’s Site at Land at Archers Low which can provide a policy compliant level of affordable housing, it is

imperative that the effective use of these sites are appropriately maximised in accordance with draft policy SP3 of the emerging Plan and national policy objectives.

6.5.8 Notwithstanding our client's in principle support of the proposed strategy, we are concerned that highly sustainable, edge-of-settlement sites, particularly in higher tier settlements such as Sandwich have not been fully maximised to reflect their accessible location and capability to accommodate a greater quantum of development. On this basis, we are concerned that the strategic objectives underlying draft policy SP3 'Housing Growth' may not be fully realised, to the detriment of market and affordable housing delivery and the wider policies seeking to conserve and enhance the district's natural and historic environment.

6.5.9 Consequently, our clients object to policy SP3 as drafted, on the basis that there is a clear need to maximise the delivery of housing at sites around Sandwich, and this has not been undertaken – for example at Land at Archers Low, where it has previously been demonstrated that the site has sufficient capacity to deliver approximately 5-10 additional units over the draft allocation, that will otherwise be required to be delivered elsewhere in the district, in potentially less accessible and more sensitive locations.

Greenfield Development and Consistency with Housing Trajectory

6.5.10 Due to the nature and dwindling supply of available urban land in Dover town and the remaining higher order settlements of Deal and Sandwich, the restrictive effect of the coast, the Kent Downs Area of Outstanding Natural Beauty, environmental constraints and the limited capacity of the district's remaining mid- and lower order settlements to accommodate significant levels of growth, release will be required if the Council is to meet its housing and development commitments moving forward.

6.5.11 In our view, sustainable and accessible sites logically located adjacent to existing urban areas, including Sandwich, represent the most sustainable and reliable sources of growth for the Plan period, to support the role and timescales of strategic urban extensions and to deliver the significant number of new homes that are required within the forthcoming Plan period.

6.5.12 Moreover, greenfield edge-of-settlement sites are, in our experience, typically most capable of making meaningful contributions to the associated public infrastructure, affordable housing and mix of new homes that is urgently needed in the district.

6.5.13 The Sustainability Appraisal Scoping Report (2018) sets out that over the course of the adopted Plan period, the key sustainability issues facing Dover District in relation to housing are as follows:

Population growth, household growth and demographic change will place additional demand on key services and facilities such as housing, health, education and social care. The Local Plan offers a new opportunity to manage these pressures, encouraging mixed communities;

There is a need for affordable housing across the District. At present, the mean price of dwellings is higher than the national average. The Local Plan will help to expedite its delivery; and,

There is the need for a mix of housing types that cater for the needs of a range of people, including the growing number of single person and elderly households. Without an up-to date Local Plan, the required housing is less likely to be delivered.

6.5.14 It is evident that the new Dover Local Plan must allocate a mix of reliable sites capable of steadily delivering not only the quantum of housing that is required, but also the associated public infrastructure, affordable housing and a mix of unit types and tenures suitable for a wide range of future occupants.

6.5.15 The Housing Topic Paper (September 2022) provides further context and summarises under Chapter 7 'Historical Housing Delivery' that Dover has historically placed significant reliance on windfall development over the current adopted Plan period, with windfall sites accounting for 44% of all completed dwellings over the preceding 10-year period.

6.5.16 Moreover, it is highlighted that at the beginning of the 10 year period, the majority of new dwellings were being built on brownfield land. However, from the monitoring year 2013-14 onward development on greenfield land began to play a much greater part in the location for new development as show in figure 1 below. This trend of increased housing development on greenfield land is a result of the allocations within the CS and Land Allocation DPD being built out and is associated with an approximate doubling of completions in the district. From 2013-14 onwards the average number of completed dwellings per annum has doubled to that of the early years of the CS, as the strong delivery rates of greenfield sites form the predominant source of housing. This is despite an overall declining trend of brownfield completions towards the latter half of the Plan period. This is generally not an uncommon trend in the majority of local planning authorities areas, where opportunities for available and suitable sites in urban centres dwindle throughout the Plan period.

Figure 1: DDC Brownfield / Greenfield Completions 2010/11 to 2020/21 (source: Housing Topic Paper September 2022)

6.5.17 In light of the above context, it is clear that the adopted Dover Local Plan suffered from an initial under delivery of Plan-led housing growth in which windfall development sources were largely required to take up the slack in the early phases of the Plan period, as major allocated sites failed to deliver at the rates initially expected.

6.5.18 It is equally apparent that initial slow completion rates were quickly addressed once greenfield allocations commenced development, feeding into strong completions in the latter half of the Plan period. In our experience, greenfield sites are typically associated with stronger delivery rates and provide a reliable source of housing growth. The allocation of an appropriate mix of sites and scales is required in order to ensure steady and sustained Plan-led housing delivery across the Plan period and to avoid a reliance on windfall development to address the shortfall.

6.5.19 Consequently, given all of the above, it is imperative that the new Local Plan allocates a sufficient variety and scales of site capable of both ensuring steady and sustained housing completions and capable of making necessary contributions to public infrastructure and services, affordable housing and mix of unit types to address the key issues raised in the Sustainability Appraisal.

6.5.20 In our view, edge-of-settlement greenfield sites such as our client's Site Land at Archers Low represents the most reliable and sustainable source of housing delivery for the Plan period. Such sites are typically less constrained by wider factors and less affected by unforeseen delays such as land contamination. Moreover, greenfield sites typically are more capable of delivering the policy compliant affordable housing, unit mix and developer contributions that are urgently needed and in the case of our client's Site, have already been demonstrated within the present planning application and appeal submission.

6.5.21 It is understood that the Plan is predicated on the delivery of strategic scale development at Whitfield comprising the development of circa 2,200 new homes. Consequently, in order to avoid a repetition of the previous Plan, the Council have sought to ensure that a pool of reliable greenfield allocation, including that of our client's are included within the Plan, capable of delivering the early growth that is required within the housing trajectory prior to the commencement of major allocations later in the Plan period.

6.5.22 We note that within the Housing Trajectory 'Appendix D', the Council have included allocated units from Years 4 onwards, with extant permissions (accounting for 5% non-implementation) demonstrated to be solely capable of delivering the growth required in Years 1-3. Notwithstanding our client's commitment to commencement on site in 2023 and the initial delivery of units at Land at Archers Low in 2024 (subject to successful appeal), we support this pragmatic approach and suggest this represents a sound basis on which to set the district's housing trajectory. We note also the inclusion of an appropriate windfall allowance and the included contingency buffer to further ensure reasonable flexibility in the housing supply.

6.5.23 On account of all of the above, we submit that the allocation of Land at Archers Low forms part of a sound strategy for growth in the district for the forthcoming Plan period. Land at Archers Low is capable of delivery early in the Plan period, representing a reliable source of housing growth in a highly sustainable and accessible location adjacent to the existing settlement boundary of Sandwich, consistent with the Council's preferred settlement strategy. However, we object on the submission that the Site is capable of making a greater contribution to the district's housing need and suggest an amended wording of the policy to allocate the Site for approximately 40-45 dwellings. Nonetheless, the Site is unconstrained and capable of providing a high-quality residential development including a mix of unit types and tenures, a meaningful contribution to the supply of affordable housing and contributions to public services and infrastructure, benefiting both existing residents and future occupiers.

Policy SP4 'Windfall Development'

6.5.24 Separately, we note the provisions of policy SP4 windfall development. Proposals at Land at Archers Low would likely be acceptable in principle under this provision and we support the policy inclusion for appropriate, proportionate windfall development.

6.5.25 Our client is fully committed to the delivery of the Site which is available and suitable for delivery early in the Plan period and is presently pursuing an appeal on the Site for a greater quantum of units than the allocation in the Regulation 19 Plan. There is consequently little to be gained from potentially delaying delivery of the Site by withdrawing the allocation. Notwithstanding the provisions of SP4, it is reiterated that our client fully supports the allocation of the Site under SAP22 for residential development as the most appropriate mechanism for delivery of the Site and the opportunity for genuinely Plan-led development in Sandwich and the provision of associated benefits to public services and infrastructure, contribution to affordable housing supply and the delivering of a mix of house types and tenures.

Infrastructure Delivery

6.5.26 Paragraph 11 of the Framework is clear that all plans should promote a sustainable pattern of development. This includes aligning growth and infrastructure. Paragraph 20 goes on to confirm that strategic policies will be expected to make sufficient provision for associated development infrastructure.

6.5.27 In this regard, draft policies SP11 'Infrastructure and Developer Contributions' and SP12 'Strategic Transport Infrastructure' of the emerging Plan form the key strategic policies for infrastructure delivery. We agree that where development would create a need, or would have an impact, or would exacerbate an existing deficiency in infrastructure provision, appropriate developer contributions may be sought.

6.5.28 It is however emphasised that in all developments, infrastructure requirements must be demonstrated to be necessary through assessment during determination of the application on a case-by-case basis. Where new development is proposed, it does not automatically follow that major infrastructure contributions are always required or contribution to strategic infrastructure proposals are appropriate. For instance, it is our client's view that any infrastructure requirements must be demonstrated through a robust and transparent assessment at application stage, taking into account the submission of detailed supporting evidence, for example following consideration of the Transport Assessment in the case of highway infrastructure contributions.

Alignment with Sustainability Appraisal Findings

6.5.29 As part of the preparation of the Local Plan, the Council has identified and appraised a range of growth and spatial options through the Sustainability Appraisal (SA) which provides an assessment of how different options perform in environmental, social and economic terms, to help inform which option should be taken forward and combined with wider evidence documents, have been used to determine the growth and spatial strategy set out in the Plan.

6.5.30 Five potential distributions of growth were identified during preparation of the draft Regulation 18 Local Plan:

- Spatial Option A: Distributing growth to the District's suitable and potentially suitable housing and employment site options (as needed to deliver the scale of growth required).
- Spatial Option B: Distributing growth proportionately amongst the District's existing settlements based on their population.
- Spatial Option C: Distributing growth proportionately amongst the District's existing settlements based on the District's defined settlement hierarchy.
- Spatial Option D: Distributing growth in the same way as the adopted Local Plan, focussing most growth in and around Dover town.
- Spatial Option E: Distributing growth more equally across the District's settlements: Dover, Deal, Sandwich and Aylesham, as well as the rural villages.

6.5.31 The conclusion of the SA was that Spatial Options C (settlement hierarchy) and D (adopted Core Strategy with Dover focus) generally perform the most strongly against the SA objectives, particularly when delivering the baseline growth scenario. However, given the environmental constraints that exist around Deal and Sandwich, very few suitable and potentially suitable sites have been identified in these towns. Given this, the Council's preferred option for the distribution of housing and economic growth comprises a combination of options A (HELAA sites), C (settlement hierarchy) and D (Dover focus). The distribution of housing and economic growth in the District is therefore primarily based on the settlement hierarchy, and influenced by site availability, environmental constraints and factors of delivery.

6.5.32 On account of the above, our client agrees that the proposed growth strategy, and by extension, policy SP3 in principle represents a sound and evidence-led strategy for growth. However, given the clear acknowledgement of the dwindling supply of available sites in the higher order settlements of Deal and Sandwich, which has necessitated a minor deviation from the strongest performing spatial options, we submit that where sites are available and suitable for development in Deal and Sandwich, these must be fully maximised, reflecting their accessible location and their ability to reduce the need to develop into less accessible and more sensitive sites elsewhere in the district to accommodate the growth that is required.

Site Specific Sustainability Appraisal

6.5.33 Land at Archers Low Farm, St George's Road, Sandwich is included under HELAA reference 'SAN23' within the SA Site Assessment (Appendix F). The site performs strongly, with particular positives identified with regards to SA Objectives related to housing, accessibility, the economy, sustainable transport and climate change mitigation, in large parts due to the edge-of-settlement location and proximity of the site to key services in Sandwich.

6.5.34 We note negatives associated with the development of a greenfield site, including loss of agricultural land, however this would be true of the majority of greenfield sites and it is abundantly clear that Dover's housing need cannot be met solely on brownfield sites. We note also minor negatives / uncertain associated with biodiversity, the historic environment and landscape, however it is not clear whether these take into account the high-quality design, biodiversity enhancement and landscape mitigation proposed under the application/appeal. Irrespective, these are not considered to outweigh the clear and tangible sustainability benefits associated with edge-of-settlement development and the site's consistency with the preferred spatial options.

Summary

6.5.35 Taking all of the above into consideration, our client is wholly supportive of the inclusion of land promoted at Archers Low, as a future housing allocation within the Dover District emerging Local Plan. The allocation is considered wholly consistent with the objectives of the Plan

and forms part of a sound evidence-led growth strategy consistent with the recommendations of the Sustainability Appraisal for the district to 2040, subject to the sole objection in relation to capacity.

6.6 Deliverability

6.6.1 Prior to the current appeal proposal, the Site has had no planning history of a residential nature or a history of unimplemented permissions. There are not considered to be any impediments to the Site being allocated for development commencing within the first five years of the Plan period. Combined with an appropriate number and scale of wider allocations in Sandwich and elsewhere across the district, this would ensure steady delivery of housing in Dover district across the majority of the Plan period and support the role and timescales of strategic housing delivery at Whitfield towards the latter half of the Plan period.

6.6.2 Fernham Homes Limited – a local SME with a strong history and track record of delivery, together with an adopted and robust business plan for growth – has control over the site, and are poised to commence work on its residential development very promptly after the receipt of planning permission, potentially (subject to the successful outcome of the current appeal) in 2023. Delivery of housing is expected from 2024.

6.6.3 For the reasons set out in this representation, the Site is considered suitable for the residential development of approximately 40 – 45 dwellings. The Site is adjacent to the urban area of Sandwich, one of the four higher order settlements in the district and the Council's preferred locations for Plan-led growth within the district. Development at Land at Archers Low would form a natural and logical development east of Sandwich with excellent accessibility to day-to-day services and amenities via active travel modes within Sandwich itself and convenient access to public transport infrastructure (including Sandwich train station) for onward travel to key neighbouring settlements including Dover, Ramsgate, Canterbury and Ashford.

6.6.4 Finally, in respect of suitability, there are no physical limitations or problems such as access, infrastructure, flood risk, hazardous risks, pollution or contamination.

6.6.5 On behalf of the landowner, we submit that there are no known financial restrictions that would impact upon the viability of a future housing scheme or that would prohibit development coming forward within the early stages of the Plan period. To the contrary, we consider there to be an opportunity to deliver a high-quality, sustainably located residential development scheme consistent with the Council's proposed growth strategy comprising an appropriate mix of market and affordable housing and capable of contributing to a range of community facilities, public infrastructure and services locally.

6.6.6 Given the advanced nature of the proposals by virtue of the submitted planning application, in terms of specific timescales, should the ongoing appeal be allowed, we understand that Fernham Homes Limited and Walker Residential Limited are capable of commencing work on-site in early 2023, with delivery in 2024 and completion of the Site anticipated in 2025.

6.6.7 The Site is in single ownership and there are no complicated legal agreements or covenants that would prohibit the ability to bring forward the Site early in the Plan period. The Site is therefore considered available and achievable for the purposes of the tests of deliverability.

7 Conclusion

7.1 Summary

7.1.1 This representation has been prepared by DHA Planning on behalf of Fernham Homes Limited and Walker Residential Limited, in response to the Dover District Council Local Plan (Regulation 19) consultation which runs until 9th December 2022.

7.1.2 Our client controls 'Land at Archers Low Farm, Sandown Road, St Georges Road, Sandwich' and is promoting the residential allocation of the Site as part of the new Dover District Local Plan preparation process. The Site is allocated for residential development in the Regulation 19 Pre-submission Plan for the provision of 35 dwellings under policy reference 'SAP22'.

7.1.3 Taking all of the above into consideration, we consider that the Site promoted at Land at Archers Low should remain included as a future housing allocation within the Dover District emerging Local Plan. The allocation is considered, in principle, wholly consistent with the objectives of the Plan and forms part of a sound growth strategy for the district to 2040. However, it is imperative that the effective use of these higher-order settlement sites are appropriately maximised in accordance with draft policy SP3 of the emerging Plan, and wider policies seeking to otherwise conserve and enhance the district's natural and historic environment and national planning policy objectives. We are concerned that this has not been fully undertaken and object solely on this basis.

7.1.4 Consequently, our clients object to policy SP3 as drafted, on the basis that there is a clear need to maximise the delivery of housing at sites around Sandwich, and this has not been undertaken – for example at Land at Archers Low, where it has previously been demonstrated that the site has sufficient capacity to deliver approximately 5-10 additional units over the draft allocation, that will otherwise be required to be delivered elsewhere in the district, in potentially less accessible and more sensitive locations.

7.1.5 Without prejudice to our client's support in principle of the proposed allocation at Land at Archers Low, we would urge the Council to re-visit the allocation policy text and allow a higher dwelling per hectare guide to ensure the Site is developed to its full potential and the objectives of

	<p>draft policy SP3 are most effectively realised. It is submitted that the SAP22 policy wording should be amended to more accurately reflect the capability of the Site to accommodate approximately 40 – 45 dwellings (broadly in line with the previous site allocation in the Regulation 18 Local Plan), deliverable early in the Plan period.</p> <p>7.1.6 In addition to being a highly sustainable and logical edge-of-settlement allocation, the Site is deliverable in a single land ownership with no viability issues, legal or third-party constraints present. Our client is fully committed to the delivery of Land at Archers Low and there are no impediments to the Site being capable of delivery within the initial 0-5 years of the Plan period.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>For the reasons set out in the consultation response submitted on behalf of Fernham Homes Limited and Walker Residential Limited (ref DHA/30245), the capacity of Land at Archers Low Farm, St Georges Road Sandwich (SAN023) should be increased to 40 - 45 dwellings.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>Please refer to the consultation response submitted on behalf of Fernham Homes Limited and Walker Residential Limited (ref DHA/30245).</p>
<p>Include files</p>	<p>30245 DDC Rep_Archers Low Farm FINAL 09 12 22.pdf</p>
<p>Local Plan Consultation Point</p>	<p>Strategic Policy 4 - Residential Windfall Development</p>
<p>Rep ID</p>	<p>SDLP1208</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1332924</p>
<p>Consultee Full Name</p>	<p>Amy Aldridge</p>
<p>Consultee Company / Organisation</p>	<p>Gladman Developments Ltd</p>
<p>Agent Full Name</p>	<p>Amy Aldridge</p>
<p>Agent Company / Organisation</p>	<p>Gladman Developments Ltd</p>
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SP4</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>Yes</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	

4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Policy SP4 sets out that residential development or infilling of a scale that is commensurate with that of the existing settlement will be permitted within or immediately adjacent to the settlement boundaries. The Council will support development in these locations, subject to the nine criteria being satisfied. Gladman support the proposed policy as worded with regard to development immediately adjoining the settlement boundaries of the larger settlements in the District. This approach represents positive plan making and adopts a constructive approach to sustainable growth and responds positively to the objective of the NPPF. Gladman are aware of other Local Plans where this approach has been supported through Examination.</p> <p>(DDC Note - Text Extracted from Document sent from Gladman Developments Ltd. Full attachment can be found under the introduction comment reference SDLP1192)</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 4 - Residential Windfall Development
Rep ID	SDLP1290
Rep Status	Processed
Consultee ID	1331942
Consultee Full Name	Matt Porter
Consultee Company / Organisation	Persimmon Homes South East
Agent Full Name	Matt Porter
Agent Company / Organisation	DHA Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy SAP16 - Deal Small Housing Sites Policy SP3 - Housing Growth Policy SP4 - Windfall Development

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>*SP4 comments, omission rep is SDLP1291 and SP3 comments are on SDLP886*</p> <p>Our client supports DDC's new Local Plan in principle, however our client objects to a component of the Plan, such that the Plan should be considered 'unsound'. It is put forward that a minor modification to the growth strategy is required in order for the Plan to be found 'sound'. These objections are set out in the consultation response submitted on behalf of Persimmon Homes South East (ref DHA/30289)</p> <p>1 Introduction</p> <p>1.1 Context</p> <p>1.1.1 This representation has been prepared by DHA Planning on behalf of Persimmon Homes South East in response to the Dover District Council 'DDC' Local Plan (Regulation 19) consultation which runs until 9th December 2022.</p> <p>1.1.2 We understand that DDC is in the process of preparing a new Local Plan to set out a strategy for development for the period to 2040 and that the Council are presently seeking comments on the pre-submission Plan prior to its submission for examination in early 2023.</p> <p>1.1.3 The new Local Plan will set out the vision, strategic objectives and overarching development strategy for the growth of the District over the period to 2040. It provides the planning policy framework to guide the future development of the area, addressing needs and opportunities for housing, the economy, community facilities and infrastructure, as well as the basis for conserving and enhancing the natural and historic environments, mitigating and adapting to climate change, and achieving well designed places.</p> <p>1.1.4 The new Local Plan will be examined by an Inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is 'sound'. This submission will comment with reference to the above, highlighting where we believe any areas of concern lie or where modifications may be required.</p> <p>1.2 Purpose of this Representation</p> <p>1.2.1 Our client controls 'Land Golf Road, Deal' (hereafter referred to as 'Land at Golf Road' or 'the Site') and is promoting the residential allocation of the Site as part of the new Dover District Local Plan preparation process. The Site was submitted as an available, suitable and deliverable location for residential development with capacity for approximately 60 dwellings as part of the new Local Plan preparation, however the Site has not been taken forward within the Regulation 19 Pre- submission Plan.</p> <p>1.2.2 The purpose of this representation is to support DDC's new Local Plan in principle, however our client objects to a component of the Plan, such that the Plan should be considered 'unsound'. It is put forward that a minor modification to the growth strategy is required in order for the Plan to be found 'sound', in which the quantum of Plan-led housing delivery within Deal should be increased to accurately reflect its second tier settlement status. Our client considers that given historic strategic under delivery in the district and wider uncertainties in the planning system, the Council should sensibly demonstrate an oversupply of reliable, deliverable sites early in the Plan period to ensure sufficient flexibility in housing delivery, should extant permissions or larger allocated sites not come forward or deliver as anticipated.</p> <p>1.2.3 To be clear, Persimmon Homes South East support the premise of DDC's growth strategy, which includes further Plan-led development within Deal in line with its higher-order settlement status. However, we are concerned that DDC have planned at a significantly reduced level of growth in Deal, citing a dwindling supply of available land within and around the settlement. Consequently, the Plan fails to appropriately maximise the sustainable credentials of Deal and has resulted in a marginal supply of available, deliverable small and medium sites, insufficient to provide the flexibility in housing delivery that is required in accordance with national planning policy.</p> <p>1.2.4 The Plan is predicated on the delivery of a major urban extension at Whitfield, Dover comprising a new community and a minimum of 2,200 homes within the Plan period. It is anticipated that Whitfield will deliver a significant quantum of new homes primarily towards the latter half of the forthcoming Plan period. Consequently, DDC must demonstrate a sufficient supply of reliable small and medium sizes sites capable of delivery early in the Plan period to ensure consistent housing delivery in accordance with national planning policy and Plan-making guidance.</p>

1.2.5 This representation provides comment on the consistency of our client's proposed allocation site with the proposed strategy, draft policies and sets out our client's position in respect of the 'soundness' of the Plan. To reiterate, whilst our client is supportive of DDC's new Local Plan in principle, Persimmon Homes South East object to a component of the Plan, such that the Plan is considered 'unsound'. Our client is concerned that the growth strategy as drafted fails to fully maximise available sites within the higher order settlement of Deal and by extension, our client objects to the exclusion of Land at Golf Road within the Regulation 19 Local Plan.

1.2.6 Our client is also concerned that given the recent constraints to housing delivery associated with nutrient neutrality in East Kent, the historic under delivery previously experienced at Whitfield and the wider uncertainty within the planning system more generally, the growth strategy as drafted may not include sufficient small and medium sites to demonstrate the necessary flexibility should allocated sites not come forward or deliver as anticipated.

1.2.7 In this regard, our client remains wholly supportive of the premise of further residential development within Deal and agree that it represents a logical and sustainable location to direct growth consistent with the growth strategy of the Plan as a whole. However, it is submitted that Deal is capable of making a far greater contribution to the delivery of new homes within the forthcoming Plan period than drafted. In line with its higher-order status within the settlement hierarchy and excellent access to day-to-day services and amenities, it is put forward that Deal is wholly capable of delivery significantly greater than the 223 dwellings allocated.

1.2.8 For the reasons set out within this representation, we say that available and suitable sites do exist, including that of our client's Land at Golf Road, Deal capable of delivering logically located, highly sustainable new homes in accessible location early in the Plan period, sufficient to provide greater flexibility and assurance of steady and sustained housing delivery across the Plan period, balance the scale of delivery from strategic urban extensions and further assist in reducing the need to develop into more rural, typically less accessible and more sensitive locations within the district to otherwise deliver the growth that is required.

1.2.9 The inclusion of Golf Road, Deal would provide a medium sized site for the Council that could come forward quickly, complying with the Framework's requirement to provide a mix of sites and include specific sites for years 1-5 of the Plan period. Accordingly, we say that Land at Golf Road, Deal can further assist the Council in meeting the growing need for new homes in the district and is necessary to ensure the Council can have greater confidence in meeting its market and affordable housing targets in full as well as delivering wider public benefits to the local community within Deal.

1.2.10 Based on the current national and local planning context, we consider the Site to be a highly suitable edge-of-settlement location to allocate land for housing to help meet the need for new homes in the district. Its effective use should therefore be appropriately maximised in accordance with national policy objectives.

1.2.11 Further details regarding the Site and commentary on the consistency of the Site with the proposed strategy, draft policies and our client's position in respect of the 'soundness' of the Plan are set out in the following sections of this document.

1.3 About Persimmon Homes

1.3.1 Building over 13,500 beautifully-designed new homes a year in more than 350 prime locations nationwide, Persimmon is proud to be one of the UK's most successful housebuilders, committed to the highest standards of design, construction and service. As a reflection of their commitment to delivering excellence always and delivering great customer care, the Home Builder's Federation (HBF) have awarded Persimmon 5 stars. Persimmon have a track record of delivery, and have been building new homes for over 50 years. Local Authorities up and down the country rely on national-scale housebuilders to deliver significant quantities of new homes each year, to meet the ever growing demand for new housing. Persimmon Homes remains committed to building new houses in the Dover District area and has over the last few years been developing two sites in the district, one in Aylesham which is a joint venture with Barratt Homes and one in Deal.

1.3.2 Persimmon's approach is to work positively and proactively with local planning authorities (LPAs), both during the preparation of local plans and at planning application stage. Persimmon Homes South East are fully committed to engaging with Dover District Council in the preparation of its Local Plan, and firmly subscribe to the national policy approach set out in paragraphs 15 and 16 c) of the NPPF that "the planning system should be genuinely plan-led" and should be shaped by early, proportionate and effective engagement between LPAs and others, including businesses and developers. Accordingly, Persimmon Homes South East would welcome the opportunity to discuss the matters contained in this representation, including the availability, suitability, deliverability and capacity of Land at Golf Road, Deal directly with Dover District Council members and officers, ahead of the submission of the Local Plan for examination.

1.4 Representation Structure

1.4.1 The representation structure is outlined below for ease of reference:

Chapter 2 (Housing Need) - Consideration of market and affordable housing need and assessment of proposed housing allocations and supply sources.

Chapter 3 (Assessment of Suitability) - Re-introduces our client's Site and provides a summary of planning constraints and opportunities, including the quantum of development that could be accommodated, why the Site is suitable for development and why the principle of the draft allocation for residential development is both justified and consistent with the Council's strategy for growth in the district. It also sets out why we consider there is scope for a higher number of dwellings at the site. This consideration amounts to an objection to one element of the strategy – namely that those sites around the most sustainable settlements should be maximised.

Chapter 4 (Conclusion) - Summarises the key points raised throughout the representation and re-affirms our client's support for the Site's allocation and proposed strategy ahead of the submission of the Plan for examination.

2 Housing Need

2.1 Context

2.1.1 Paragraph 11 of the NPPF is explicit in its requirement for strategic policy-making authorities to promote a sustainable pattern of development that seeks to meet the need in full.

2.1.2 Paragraph 20 of the Framework is equally clear that strategic policies should set out an overall strategy for the pattern, scale and design quality of places. Policies should make sufficient provision for the development that is required as well as associated infrastructure, community facilities and should set out a strategy for the conservation and enhancement of the natural, built and historic environment.

2.1.3 Given this national planning context, the emerging Local Plan should provide a comprehensive and cohesive approach to future development in Dover district, capable of making sufficient provision for the identified needs, whilst balancing the conservation and enhancement of the natural, built and historic environment.

2.1.4 National guidance states that strategic policy-making authorities will need to calculate their local housing need figure at the start of the plan-making process. This number should be kept under review and revised where appropriate.

2.1.5 In calculating the local housing need, paragraph 61 of the NPPF states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance - unless exceptional circumstances justify an alternative approach.

2.1.6 Paragraph 68 is clear in its requirement that strategic policy-making authorities should have a clear understanding of the land available in their area and should ensure that planning policies identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

- a) specific, deliverable sites for years one to five of the plan period
- b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.

2.1.7 In this vein, paragraph 69 of the Framework goes on to stress that small and medium sized sites (such as that of our client's land at Golf Road) can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly.

2.1.8 Further, in addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

2.2 DDC's Housing Need

2.2.1 The Standard Method for assessing housing need, issued alongside the Ministerial Statement on 16 December 2020, sets an indicative housing need figure for Dover

District of 596 dwellings per annum. However, the affordability ratio which factors into the local housing need assessment is updated annually. For Dover District the latest housing need calculation is 611 dwellings per annum (dpa), equating to a total minimum housing need of 10,998 dwellings for the Plan period to 2040. We understand that the Regulation 19 Local Plan seeks to meet this need in full and in addition to the minimum figures, DDC have a set a contingency buffer of 926 dwellings for the Plan period, equating to 8.4% of the total Plan period figure.

2.2.2 For context, the current adopted CS requirement is 700 dwellings per annum. This followed the adoption of a high-growth strategy in 2010 of 14,000 homes to 2026 based around the recommendations of the Dover Regeneration Strategy and above the minimum 10,100 requirement across the same period, as set out in the emerging (at the time) Regional Spatial Strategy.

2.2.3 For the avoidance of doubt, accounting for the Committed Supply Total of 5,282 dwellings, the new Local Plan will be required to allocate sufficient land to accommodate a minimum of 6,642 new homes over the remaining plan period to 2040. It is understood that this will be derived from the following sources:

- Whitfield Urban Expansion Allocation: 2,200 dwellings
- Local Plan Allocations (excluding Whitfield): 3,392 dwellings

- Windfall Allowance (70 a year from year 4): 1,050 dwellings

2.2.4 On this basis, it is evident that a substantial quantum of Plan-led housing delivery will be required in order to meet the new Local Plan's housing target. Due to the nature and dwindling supply of available urban land in Dover town and the remaining higher order settlements of Deal and Sandwich, the restrictive effect of the coast, the Kent Downs AONB, environmental constraints and the limited capacity of the district's remaining mid- and lower order settlements to accommodate significant levels of growth, meeting Dover's housing needs inevitably will require the release of significant greenfield land.

2.2.5 In our view, sustainable and accessible sites logically located adjacent to existing urban areas, including Deal, represent the most sustainable and reliable sources of growth for the Plan period, consistent with the overarching strategic objectives of draft policy SP3 within the emerging Plan.

2.2.6 Such sites are best placed to deliver the significant number of new homes that are required and are most capable of making meaningful contributions to the associated public infrastructure, affordable housing and mix of new homes that is urgently needed in the District as well as further balancing the role of strategic- scale development at Whitfield within the emerging Plan's proposed growth pattern in the event that Whitfield or indeed any of the major allocations upon which DDC seek to rely to not come forward or do not deliver as anticipated.

2.2.7 On this basis, we set out below why our client's site Land at Golf Road, Deal is suitable to be included within the submission Dover Local Plan and is necessary for inclusion in order for DDC to demonstrate sufficient supply and flexibility within the early phase of the housing trajectory as required by national planning policy, such that the Plan may be considered 'sound'.

3 Site Specific Assessment

3.1 Overview

3.1.1 The previous chapters of this representation outline our client's position relating to the soundness of the Plan in which our client is confirmed to be supportive in principle of the Local Plan as a strategy for the growth of the district to 2040, however our client objects to a component of the Plan, such that the Plan should be considered 'unsound'. It is put forward that a minor modification to the growth strategy is required in order for the Plan to be found 'sound', in which the quantum of Plan-led housing delivery within Deal should be increased to accurately reflect its second tier settlement status.

3.1.2 Paragraph 4.146 of the Local Plan states that the urban area of Deal encompasses the built-up areas of the parishes of Walmer and Sholden. Deal is identified in the Settlement Hierarchy and Confines Topic Paper (2022) as a 'District Centre', where there is a secondary focus for development.

3.1.3 It is clear that Deal must continue to form a principal location for focusing sustainable housing delivery in Dover district and will assist in ensuring an appropriate balance of sites are identified, capable of supporting the strategic role of Whitfield within the forthcoming Plan Period and minimising the need for housing growth in typically less accessible and more sensitive rural settlement with limited development capacity.

3.1.4 As introduced in the preceding sections, our client controls 'Land Golf Road, Deal' and is promoting the residential allocation of the Site as part of the new Dover District Local Plan preparation process. The Site was submitted for residential development with capacity for approximately 60 units as part of the new Local Plan preparation, however the Site has not been taken forward within the Regulation 19 Pre-submission Plan.

3.1.5 Land at Golf Road represents an excellent opportunity for the delivery of approximately 60 high-quality new homes in a logical, highly accessible location in north Deal with capability to deliver a policy compliant quantum of much- needed affordable housing, a mix of house types, sizes and tenures and ability to make a significant contribution to wider public infrastructure through developer contributions. The land itself is of no particular ecological value and is in private ownership, offering limited public benefit. The Site is capable of delivering strong biodiversity net gain, attractive internal and boundary landscaping, open space, play facilities and a development pattern which facilitates pedestrian permeability and encourages active travel in north Deal.

3.1.6 Given the dwindling supply of available sites within the District and the growing housing need, it is imperative that the sustainable credentials of these higher- order settlement sites are appropriately maximised to deliver the housing that is required in accordance with the underlying objectives of draft policy SP3, and wider policies seeking to otherwise conserve and enhance the district's natural and historic environment and national planning policy objectives. We are concerned that this has not been fully undertaken and our client objects solely on the basis that the growth strategy component of the Plan as drafted is 'unsound'.

3.1.7 Consequently, our clients object to policy SP3 as drafted. On the basis that there is a clear need to maximise the delivery of housing sites within Deal, our clients consider the Plan 'unsound'. Our site, Land at Golf Road, Deal, has been excluded from the Plan primarily on flood risk grounds, without further consideration or detailed evidence; without acknowledging the presence of high-quality 1 in 200 year flood defences and without any regard to the prevalence of recent residential developments permitted nearby (having passed the Sequential and Exception test with Environment Agency support on flood risk). Additionally, we submit that the Site is capable of providing a residential development which would be safe for its lifetime, owing to the high-quality flood defences and on site mitigation measures.

3.1.8 The consequent omission of potentially circa 60 units, in our view fails to make effective use of Dover's second tier settlement and will otherwise require further new homes to be delivered elsewhere in the district, in potentially less accessible and more sensitive locations.

3.1.9 Without prejudice to our client's support to the premise of the growth strategy, which primarily directs growth at higher order settlements, we would urge the Council to re-visit its growth strategy and proposed allocations to allow a greater quantum of development within Deal, by including suitable sites such as Land at Golf Road to fully reflect its excellent sustainability credentials and provide a pragmatic oversupply of reliable, deliverable small and medium sites capable of delivery early in the Plan period.

3.1.10 We submit that Deal is wholly capable of delivering significantly greater than the 223 dwellings allocated. We say that available and suitable sites do exist, including that of our client's Land at Golf Road, Deal which is being promoted by a national housebuilder fully committed to the Site and with an excellent track record of delivery.

3.1.11 It is put forward that Deal is capable of delivering further logically located, highly sustainable new homes in accessible locations early in the Plan period. An additional supply would; provide greater assurance of steady and sustained housing delivery across the Plan period, balance the scale of delivery from strategic urban extensions and, further assist in reducing the need to develop into more rural, less accessible and sensitive locations within the district to otherwise deliver the growth that is required.

3.1.12 We agree that Deal represents a logical and sustainable location to direct the growth required within the district and consider that the land promoted at Golf Road, Deal should be included as a future housing allocation within the Dover District emerging Local Plan. The Site is considered to be wholly consistent with the objectives of the Plan and would form part of a sound growth strategy for the district to 2040 whilst delivering policy compliant affordable homes, a mix of house types and tenures and wider ecological, landscape and public benefits.

3.1.13 Our client is firmly of the view that the allocation of additional housing sites is necessary to ensure that balanced growth strategy put forward within the Pre- submission Dover District Local Plan is 'sound', comprising an appropriate balance of small, medium and strategic-scale sites deliverable across the Plan period. The allocation of well-located, reliable, greenfield sites such as our client's at Land at Golf Road is necessary for DDC to meet the growing housing need. The Site is being promoted by Persimmon, a firmly committed national housebuilder with an excellent track record for delivery, and the inclusion of the Site would ensure that DDC can have confidence in consistently meeting its market and affordable housing targets in full throughout the life of the new Dover District Plan in the event that identified sources of housing do not come forward or fail to deliver as anticipated.

3.2 Site and Surroundings

3.2.1 The Site is situated to the west of Golf Road, north of West Lea and west of the Fairway on the north-western edge of Deal.

Figure 3.1: Approximate Site Location (courtesy of Google Earth)

3.2.2 The Site comprises an undeveloped regular parcel of land in agricultural use totalling approximately 1.9 hectares. The site is bound by residential development on three sides which detached the site from the wider open countryside to the west. The Site is consequently characterised by its edge-of-settlement location with typical suburban residential development the predominant development pattern in the area.

3.2.3 In terms of overarching planning constraints, the site is not subject to any overarching landscape or ecological designations and is not itself subject to any heritage constraints. The site is located within defended Flood Zone 3, albeit this covers the majority of this part of north Deal which is subject to coastal flood defences.

3.2.4 In terms of accessibility, the Site enjoys excellent access to a number of day-to-day facilities and services which are within a reasonable walk distance, including primary and secondary schools, local shops, healthcare, employment, and public transport links within Deal and Walmer including Deal mainline station and frequent buses along Dover Road between Dover, Deal, Sandwich and Canterbury.

Consideration of Flood Risk

3.2.5 The site is located entirely within Flood Zone 3a as defined by the Environment Agency Flood Risk mapping.

3.2.6 Owing to its strategic nature, Deal is subject to significant coastal defences. These defences provide protection from coastal erosion as much as they do flooding, and are actively maintained, as part of a 'hold the line' policy in this Shoreline Management Plan area (SMP).

3.2.7 As part of the Deal Coastal Flood Defence Scheme (completed in 2013), a recurved concrete sea wall was constructed from Sandown Castle to Deal Castle. Beach nourishment provides an additional level of protection to this frontage.

3.2.8 The NPPF requires the actual risk of flooding to a development to be appraised. The actual risk considers the likelihood of flooding under extreme conditions (e.g. the design flood event), whilst considering the influence of any defence infrastructure, or drainage systems, which may provide a level of protection to the site. Given the presence of high-quality defences at Deal, it is evident that the actual risk of flooding under the design event is reduced, leaving only the residual risk, which falls outside of the scope of the NPPF and relates to extreme circumstances in the event the defences, or drainage system were to fail (i.e. due to a breach or a blockage), or if an event greater than the design flood event was to occur and overtop the defences.

3.2.9 The Strategic Flood Risk Assessment (2019) prepared by Herringtons Consulting is included within the DDC Local Plan Evidence Base and has identified that the coastal towns of Deal and Dover are protected from sea flooding under an extreme storm event with a 1 in 200 year return period (0.5% AEP) and the construction of the defence infrastructure has significantly reduced the actual risk of flooding at these coastal locations. The risk of coastal flooding to these two towns is therefore limited to a residual risk event only, which would require a catastrophic failure of the new defence infrastructure (e.g. a failure in the seawall).

3.2.10 On account of the above, we do not consider it appropriate for the Plan-led growth of north Deal to be automatically excluded on account of flood risk. DDC acknowledge that following high-levels of windfall development within the previous (adopted) Plan period, there are limited available and suitable sites for development within Deal and consequently have sought to reduce the level of Plan-led growth within the forthcoming Plan period, with a greater reliance on strategic development at Whitfield and alternative third tier settlements in response. Our client's disagree with this approach and object to the proposed growth strategy as an unsound basis on which to reliably deliver the growth that is required in the district.

3.2.11 Our client's site, Land at Golf Road, Deal is evidence that suitable small and medium sites are available in Deal and are being promoted for delivery early in the Plan period. It is accepted that sites such as that of our client's will be subject to Flood Risk Assessment and be required to pass both the Sequential and Exception tests.

3.2.12 Taking each test in turn, the Sequential Test is a risk-based test which aims to steer development to areas at the lowest risk of flooding. DDC already acknowledge that there is a dwindling supply of available sites in Deal. Moreover, we emphasise that two small sites within Deal have been allocated for residential development under policy SAP16 'Deal Small Housing Sites' (Ethelbert Road Garages (5 units) and 104 Northwall Road, Deal (8 units)). Both sites as shown in figure 3.2 below are in close proximity to our client's site. Both sites are in Flood Zone 3a and protected by the Deal coastal defences. Land at 104 Northwall Road is plainly highly comparable to our client's site and there appears no sound justification for the exclusion of Land at Golf Road on this basis. For the purposes of the Sequential Test, the allocation of sites within Flood Zone 3a is clear acknowledgment that sequentially preferable sites do not exist in Deal and some development within the defended flood zone is required in order to deliver the growth that is required.

Figure 3.2: Extract of Reg 19 Policies Map showing our client's site (red line) and proposed residential allocations (green shading). Flood Zone 3 shown in blue.

3.2.13 In addition to the Sequential Test, the Exception Test must also be passed which requires proposals to demonstrate

- a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and
- b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

3.2.14 In this regard, the provision of the housing that is required, in addition to wider biodiversity, accessibility, open space and public infrastructure benefits is considered sufficient to outweigh the flood risk. With respect to (b), exact details would be provided as part of a detailed planning application, however in combination with the existing flood defences, it is anticipated that any future development could be subject to land raising and all living and sleeping accommodation is proposed above the ground floor level, above the predicted design flood level. Further early flood warning systems, evacuation plans and a raised area of safe refuge could be included to ensure the development would be safe for its lifetime.

3.2.15 Further to the above, we note the following planning applications for residential development have also been permitted recently in north Deal, within Flood Zone

3a and without Environment Agency objection having passed both the Sequential and Exception tests without issue. Examples of granted planning applications within Flood Zone 3a include:

- 21/01233 – 17 Godwyn Road, Deal (1no. dwelling)
- 20/00341 – 269 Sandown Road, Deal (1no. dwelling)
- 20/00787 – Land adjacent 56 Golf Road, Deal (1no. dwelling)
- 19/00425 – Land rear of 92 & 94 Northwall Road, Deal (1no. dwelling)
- 15/00176 – Site at 90 Golf Road, Deal (2no. dwellings)
- 14/01211 – Land off Ark Lane, Deal (14no. dwellings)
- 14/00852 - 22 Harold Road, Deal (1no. dwelling)
- 13/00522 – Bede and Dunstan Houses, College Road, Deal (16no. dwellings)

3.3 Development Capacity

3.3.1 At this early stage, significant design work has not yet progressed. However, for the purposes of this representation, Land at Golf Road, Deal is submitted with capacity for approximately 60 residential dwellings (subject to detailed design and flood risk assessment) deliverable early in the Plan period.

3.3.2 The scale and nature of the Site is considered highly conducive to the delivery of a high-quality, landscape-led scheme capable of making a significant contribution to the delivery of market and affordable housing in a logically contained location that would assimilate with the existing pattern of development.

3.3.3 Land at Golf Road represents an excellent opportunity for the delivery of approximately 60 high-quality new homes in a logical, highly accessible location in north Deal with capability to deliver a policy compliant quantum of much-needed affordable housing, a mix of house types, sizes and tenures and ability to make significant developer contributions to support existing and future public infrastructure.

3.3.4 The land itself is of no particular ecological value and is in private ownership, offering limited public benefit. To the contrary, the Site is capable of delivering strong biodiversity net gain, attractive internal and boundary landscaping, opening up public access to open space, play facilities and a development pattern that facilitates pedestrian permeability and encourages active travel in north Deal.

3.3.5 Detailed proposals have not yet been advanced, however it is anticipated that any future development of the site will be of an appropriate density, reflecting the local character of development and responding to local needs for housing. Any future development will be sensitively designed to respect the existing character and materiality of the area, the topography of the site and to allow a positive transition to the rural landscape and respond to its coastal location.

3.3.6 It is acknowledged that the site is located within Flood Zone 3a, however this is true of the majority of north Deal which is nonetheless protected by coastal flood defences. Subject to detailed flood risk assessment and site layout design, for the reasons set out above, flood risk is not considered to represent an absolute constraint preventing the future development of the site.

3.3.7 Exact flood risk design details would be provided as part of a detailed planning application, however in combination with the existing flood defences, it is anticipated that any future development could be subject to land level raising and all living and sleeping accommodation is proposed above the ground floor level, above the predicted design flood level. Further early flood warning systems, evacuation plans and a raised area of safe refuge could be included to ensure the development would be safe for its lifetime.

3.3.8 Particular care will also be taken with regard to opportunities for biodiversity habitat creation and enhancement, publicly accessible open space and high-quality play space to serve the local community.

3.3.9 In terms of access, opportunities for safe, direct and convenient primary vehicular, pedestrian and cycle access are achievable onto the adopted highway. The Site will be capable of facilitating a permeable pattern of development in northwest Deal, providing convenient access for future and existing residents to a range of day-to-day facilities including grocery stores, medical facilities and Deal train station.

3.3.10 To be clear, our client agrees that Deal represents a logical and sustainable location to direct growth consistent with the growth strategy of the Plan as a whole, however we submit that more effective use of available land within Deal can be made – and therefore object to policy SP3 'housing growth strategy' and the exclusion of Land at Golf Road on this basis.

3.3.11 Accordingly, we say that Land at Golf Road is not subject to any absolute development constraints and can further assist the Council in meeting the growing need for new homes in the district and help to ensure the Council can have greater confidence in meeting its market and affordable housing targets in full.

3.4 Strategic Justification for Development

Spatial Strategy

3.4.1 The proposed Housing Distribution for the district across the Plan period is established within Policy SP3 'Housing Growth' which sets out that the distribution of housing growth in the district is primarily based on the settlement hierarchy and influenced by site availability, environmental constraints and factors of delivery.

3.4.2 Rightly, a key aim of the growth strategy is to focus development in the least sensitive areas of the district in order to conserve and enhance the Dover's rich natural and historical environment.

3.4.3 A retained theme from the adopted Plan, is that DDC's settlement strategy continues to focus on the development and regeneration of Dover Town and Whitfield (3381 dwellings). Approximately half of the district's planned housing is in this location, the majority of which again is to come forward as part of the strategic urban expansion of Whitfield 'SAP1' (2200 minimum dwellings).

3.4.4 Development will then be focused in the District Centre of Deal (223 dwellings), and the Rural Service Centres of Sandwich (227 dwellings) and Aylesham (649 dwellings). Following the settlement hierarchy rigidly would distribute housing in the preceding order, however the Plan

recognises that housing delivery in Deal and Sandwich continues to be constrained by a number of factors including flood risk, ecological designations, heritage and highways. Further, Deal has experienced generally high levels of windfall development across the previous Plan period and accordingly there is now a dwindling supply of available, suitable sites in both settlements. On account of this context, DDC have sought to direct the majority of the remaining higher order settlement growth (outside of Dover & Whitfield) to Aylesham, through the strategic expansion to the town.

3.4.5 Outside of the four principal district settlements, the Rural Settlement Hierarchy (August 2022) identified that the majority of lower-order settlements in the district emerge as having a low level of facilities within the hierarchy and six settlements having none of the key indicators of sustainable services. Plainly, these settlements offer very limited opportunities for growth and it is evident that the forthcoming Plan will be reliant on the settlements of Dover (including Whitfield), Deal, Sandwich and Aylesham to deliver the housing growth that is required.

3.4.6 Given this context, it is clear that where available and suitable opportunities for residential development do exist within the district's higher order settlements, such as our client's site Land at Golf Road, which can provide a policy compliant level of affordable housing, it is imperative that the effective use of these sites are secured and appropriately maximised consistent with draft policy SP3 of the emerging Plan and national policy objectives.

3.4.7 Notwithstanding our client's in support of the premise of the proposed strategy, we are concerned that highly sustainable, edge-of-settlement sites, particularly in higher tier settlements such as Deal have been omitted to reflect their accessible location and capability to accommodate a significant quantum of high-quality development. On this basis, our client is concerned that the strategic objectives underlying draft policy SP3 'Housing Growth' may not be fully realised, to the detriment of market and affordable housing delivery and the wider policies seeking to conserve and enhance the district's natural and historic environment.

3.4.8 Consequently, our client objects to policy SP3 which is considered 'unsound' as drafted, on the basis that there is a clear need to maximise the delivery of housing at sites around Deal, and this has not been undertaken – for example at Land at Golf Road, where the Site has the site has been omitted despite clear justification for the suitability of development in Flood Zone 3a and indeed site allocations being included for residential development in the immediate vicinity. The Site has sufficient capacity to deliver approximately 60 additional units over the draft allocations for Deal, which will otherwise be required to be delivered elsewhere in the district, in potentially less accessible and more sensitive locations.

Greenfield Development and Consistency with Housing Trajectory

3.4.9 Due to the nature and dwindling supply of available urban land in Dover town and the remaining higher order settlements of Deal and Sandwich, the restrictive effect of the coast, the Kent Downs Area of Outstanding Natural Beauty, environmental constraints and the limited capacity of the district's remaining mid- and lower order settlements to accommodate significant levels of growth, release will be required if DDC is to meet its housing and development commitments moving forward.

3.4.10 In our view, sustainable and accessible sites logically located adjacent to existing urban areas, including Deal, represent the most sustainable and reliable sources of growth for the Plan period, to support the role and timescales of strategic urban extensions and to deliver the significant number of new homes that are required within the forthcoming Plan period.

3.4.11 In terms of housing delivery within Deal, just 223 new dwellings are proposed to be delivered, the fourth most number of dwellings despite Deal's secondary status within the settlement hierarchy. We understand this reflects the previously high levels of growth seen within the previous (adopted) Plan period and the reduced supply of sites now available in the town. However, our client's site is testament to the continuing availability of sites and in our view, delivery within the previous Plan period does not preclude further development within the following Plan period, particularly where a settlement has proven to provide a reliable and sustainable source of much-needed new housing in a highly accessible location.

3.4.12 Moreover, greenfield edge-of-settlement sites are, in our experience, typically most capable of making meaningful contributions to the associated public infrastructure, affordable housing and mix of new homes that is urgently needed in the district.

3.4.13 The Sustainability Appraisal Scoping Report (2018) sets out that over the course of the adopted Plan period, the key sustainability issues facing Dover District in relation to housing are as follows:

Population growth, household growth and demographic change will place additional demand on key services and facilities such as housing, health, education and social care. The Local Plan offers a new opportunity to manage these pressures, encouraging mixed communities;

There is a need for affordable housing across the District. At present, the mean price of dwellings is higher than the national average. The Local Plan will help to expedite its delivery; and,

There is the need for a mix of housing types that cater for the needs of a range of people, including the growing number of single person and elderly households. Without an up-to date Local Plan, the required housing is less likely to be delivered.

3.4.14 It is evident that the new Dover Local Plan must allocate a mix of reliable sites capable of steadily delivering not only the quantum of housing that is required, but also the associated public infrastructure, affordable housing and a mix of unit types and tenures suitable for a wide range of future occupants.

3.4.15 The Housing Topic Paper (September 2022) provides further context and summarises under Chapter 7 'Historical Housing Delivery' that Dover has historically placed significant reliance on windfall development over the current adopted Plan period, with windfall sites accounting for 44% of all completed dwellings over the preceding 10-year period.

3.4.16 Moreover, it is highlighted that at the beginning of the 10 year period, the majority of new dwellings were being built on brownfield land. However, from the monitoring year 2013-14 onward development on greenfield land began to play a much greater part in the location for new development as show in figure 1 below. This trend of increased housing development on greenfield land is a result of the allocations within the CS and Land Allocation DPD being built out and is associated with an approximate doubling of completions in the district. From 2013-14 onwards the average number of completed dwellings per annum has doubled to that of the early years of the CS, as the strong delivery rates of greenfield sites form the predominant source of housing. This is despite an overall declining trend of brownfield completions towards the latter half of the Plan period. This is generally not an uncommon trend in the majority of local planning authority areas, where opportunities for available and suitable sites in urban centres dwindle throughout the Plan period.

Figure 1: DDC Brownfield / Greenfield Completions 2010/11 to 2020/21 (source: Housing Topic Paper September 2022)

3.4.17 In light of the above context, it is clear that the adopted Dover Local Plan suffered from an initial under delivery of Plan-led housing growth in which windfall development sources were largely required to take up the slack in the early phases of the Plan period, as major allocated sites failed to deliver at the rates initially expected.

3.4.18 It is equally apparent that initial slow completion rates were quickly addressed once greenfield allocations commenced development, feeding into strong completions in the latter half of the Plan period. In our experience, greenfield sites are typically associated with stronger delivery rates and provide a reliable source of housing growth. The allocation of an appropriate mix of sites and scales is required in order to ensure steady and sustained Plan-led housing delivery across the Plan period and to avoid a reliance on windfall development to address the shortfall.

3.4.19 Consequently, given all of the above, it is imperative that the new Local Plan allocates a sufficient variety and scales of site capable of both ensuring steady and sustained housing completions and capable of making necessary contributions to public infrastructure and services, affordable housing and mix of unit types to address the key issues raised in the Sustainability Appraisal.

3.4.20 In our view, edge-of-settlement greenfield sites such as our client's Site, Land at Golf Road, represents one of the most reliable and sustainable source of housing delivery for the Plan period. Such sites are typically less constrained by wider factors and less affected by unforeseen delays such as land contamination. Moreover, greenfield sites typically are more capable of delivering the policy compliant affordable housing, unit mix and developer contributions that are urgently needed.

3.4.21 It is understood that the Plan is predicated on the delivery of strategic scale development at Whitfield comprising the development of circa 2,200 new homes. Consequently, in order to avoid a repetition of the previous Plan, the Council have sought to ensure that a pool of reliable greenfield allocation, including sites not dissimilar to that of our client are included within the Plan, capable of delivering the early growth that is required within the housing trajectory prior to the commencement of major allocations later in the Plan period.

3.4.22 We note that within the Housing Trajectory 'Appendix D', the Council have included allocated units from Years 4 onwards, with extant permissions (accounting for 5% non-implementation) demonstrated to be solely capable of delivering the growth required in Years 1-3. Notwithstanding our client's commitment to the Site, we support this pragmatic approach and suggest this represents a sound basis on which to set the district's housing trajectory. We note also the inclusion of an appropriate windfall allowance and the included contingency buffer to further ensure reasonably flexibility in the housing supply.

3.4.23 On account of all of the above, we submit that Land at Golf Road, Deal is required as a minor modification to form part of a sound strategy for growth in the district for the forthcoming Plan period. Land at Golf Road is capable of delivery early in the Plan period, representing a reliable source of housing growth in a highly sustainable and accessible location adjacent to the existing settlement boundary of Deal, consistent with the Council's preferred settlement strategy.

3.4.24 Our client objects to the omission of the Site and objects to policy SP3 as drafted, on the basis that there is a clear need to maximise the delivery of housing at sites within Deal, and this has not been undertaken – for example at Land at Golf Road, Deal.

3.4.25 Without prejudice to our client's support in for the premise of the proposed growth strategy which primarily directs growth at higher order settlements, we would urge the Council to re-visit its growth strategy and proposed allocations through a minor modification to allow a greater quantum of development within Deal to fully reflect its excellent sustainability credentials.

Policy SP4 'Windfall Development'

3.4.26 Separately, we note the provisions of policy SP4 windfall development. Proposals at Land at Golf Road would likely be acceptable in principle under this provision and we support the policy inclusion for appropriate, proportionate windfall development.

3.4.27 Our client is fully committed to the delivery of the Site which is available and suitable for delivery early in the Plan period. Notwithstanding the provisions of SP4, it is reiterated that our client fully supports the promotion of the Site for allocation as the most appropriate mechanism for delivery of the Site. The inclusion of Land at Golf Road would provide the opportunity for genuinely Plan-led development in Deal and the provision of associated benefits to public services and infrastructure, contribution to affordable housing supply and the delivering of a mix of house types and tenures.

Alignment with Sustainability Appraisal Findings

3.4.28 As part of the preparation of the Local Plan, the Council has identified and appraised a range of growth and spatial options through the Sustainability Appraisal (SA) which provides an assessment of how different options perform in environmental, social and economic terms, to help inform which option should be taken forward and combined with wider evidence documents, have been used to determine the growth and spatial strategy set out in the Plan.

3.4.29 Five potential distributions of growth were identified during preparation of the draft Regulation 18 Local Plan:

- Spatial Option A: Distributing growth to the District's suitable and potentially suitable housing and employment site options (as needed to deliver the scale of growth required).
- Spatial Option B: Distributing growth proportionately amongst the District's existing settlements based on their population.
- Spatial Option C: Distributing growth proportionately amongst the District's existing settlements based on the District's defined settlement hierarchy.
- Spatial Option D: Distributing growth in the same way as the adopted Local Plan, focussing most growth in and around Dover town.
- Spatial Option E: Distributing growth more equally across the District's settlements: Dover, Deal, Sandwich and Aylesham, as well as the rural villages.

3.4.30 The conclusion of the SA was that Spatial Options C (settlement hierarchy) and D (adopted Core Strategy with Dover focus) generally perform the most strongly against the SA objectives, particularly when delivering the baseline growth scenario. However, given the environmental constraints that exist around Deal and Sandwich, very few suitable and potentially suitable sites have been identified in these towns. Given this, the Council's preferred option for the distribution of housing and economic growth comprises a combination of options A (HELAA sites), C (settlement hierarchy) and D (Dover focus). The distribution of housing and economic growth in the District is therefore primarily based on the settlement hierarchy, and influenced by site availability, environmental constraints and factors of delivery.

3.4.31 On account of the above, our client agrees that the proposed growth strategy, and by extension, policy SP3 in principle represents a sound and evidence-led strategy for growth. However, given the clear acknowledgement of the dwindling supply of available sites in the higher order settlements of Deal and Sandwich, which has necessitated a minor deviation from the strongest performing spatial options, we submit that where sites are available and suitable for development in Deal and Sandwich, these must be fully maximised, reflecting their accessible location and their ability to reduce the need to develop into less accessible and more sensitive sites elsewhere in the district to accommodate the growth that is required.

3.5 Site Specific Justification for Allocation

3.5.1 Land at Golf Road is considered highly conducive to the delivery of a high-quality, landscape-led scheme capable of making a significant contribution to the delivery of market and affordable housing in a logically contained location that would assimilate with existing patterns of development and is demonstrated to be acceptable in terms of flood risk.

3.5.2 Land at Golf Road represents an excellent opportunity for the delivery of approximately 60 high-quality new homes in a logical, highly accessible location in north Deal with capability to deliver a policy compliant quantum of much-needed affordable housing, a mix of house types, sizes and tenures and ability to make significant developer contributions to support existing and future public infrastructure.

3.5.3 The land itself is of no particular ecological value and is in private ownership, offering limited public benefit. To the contrary, the Site is capable of delivering strong biodiversity net gain, attractive internal and boundary landscaping, opening up public access to open space, play facilities and a development pattern that facilitates pedestrian permeability and encourages active travel in north Deal.

3.5.4 In terms of flood risk, it is apparent that no sequentially preferable sites are available and the allocation of sites in this location is justified. We note that two other sites in north Deal have been allocated under policy SAP16 'Deal Small Housing Sites'. However, neither of these sites meet the threshold of 'major development' and are highly unlikely to deliver affordable housing or meaningful developer contributions and are not of a scale conducive to delivering a genuine mix of house types, tenures and sizes. Moreover, neither site is anticipated to deliver any further public benefit beyond housing, with no capacity for open space, play space and limited scope of significant biodiversity or landscape enhancement. To the contrary, our client's site is capable of delivering significant benefits in all of the above areas and can assist in achieving the government's objectives of creating mixed and balanced communities as set out within the Framework and is the only site capable of delivering direct benefits to existing and future residents of north Deal.

Site Specific Sustainability Appraisal

3.5.5 Land at Golf Road, Deal was removed from consideration following the 2022 HELAA assessment (ref: DEA004) which defined the site 'unsuitable' primarily due to flood risk. The Site consequently was not considered against the SA objectives, however for the purposes of this representation, we consider the Site in the context of the SA objectives below.

3.5.6 We consider that the Site would generally perform strongly, with particular positives associated with SA Objectives related to housing, accessibility, the economy, sustainable transport and climate change mitigation, in large parts due to the edge-of-settlement location and proximity of the site to key services in Deal.

3.5.7 We accept likely disbenefits associated with the development of a greenfield site, including loss of agricultural land, however this would be true of the majority of greenfield sites and it is abundantly clear that Dover's housing need cannot be met solely on brownfield sites. We suggest that potential minor negatives / uncertainty associated with biodiversity and landscape, however these could be overcome via high-quality design, biodiversity enhancement and landscape mitigation proposed under a future planning application. Irrespective, these would not be considered to outweigh the clear and tangible sustainability benefits associated with edge-of-settlement development and the site's consistency with the preferred spatial options.

Summary

3.5.8 Taking all of the above into consideration, our client is supportive of the premise of the growth strategy, however objects to the quantum of allocations within Deal, which in our view fails to fully maximise the sustainability credentials of the settlement and the capacity for growth, such that the Plan is unsound as drafted and requires minor modification to the growth strategy component. Land at Golf Road is considered wholly consistent with the objectives of the Plan and would form part of a sound evidence-led growth strategy consistent with the recommendations of the Sustainability Appraisal for the district to 2040, sufficient to ensure the Plan is found sound.

3.6 Deliverability

3.6.1 There are not considered to be any impediments to the Site being allocated for development commencing within the first five years of the Plan period. Combined with an appropriate number and scale of wider allocations in Deal and elsewhere across the district, this would ensure steady delivery of housing in Dover district across the majority of the Plan period and support the role and timescales of strategic housing delivery at Whitfield towards the latter half of the Plan period.

3.6.2 Persimmon Homes South East – a national housebuilder with a strong history and track record of delivery, together with an adopted and robust business plan for growth – has control over the site, and are committed to delivery of the site for residential development early in the Plan period.

3.6.3 For the reasons set out in this representation, the Site is considered suitable for the residential development of approximately 60 dwellings. The Site is adjacent and well contained by the urban area of Deal, one of the four higher order settlements in the district and the Council's preferred locations for Plan-led growth within the district. Development at Land at Golf Road would form a natural and logical development in Deal with excellent accessibility to day-to-day services and amenities via active travel modes within Deal itself and convenient access to public transport infrastructure (including Deal train station) for onward travel to key neighbouring settlements including Dover, Ramsgate, Canterbury and Ashford.

3.6.4 Finally, in respect of suitability, there are no physical limitations or problems such as access, infrastructure, hazardous risks, pollution, flood risk or contamination that would prevent development coming forward. It is acknowledged that the site is located within Flood Zone 3a, however this is true of the majority of north Deal which is protected by coastal flood defences. For the reasons set out within this representation, flood risk is not considered to represent an absolute constraint preventing the future development of the site, subject to detailed flood risk assessment and site layout design.

3.6.5 On behalf of our client, we submit that there are no known financial restrictions that would impact upon the viability of a future housing scheme or that would prohibit development coming forward within the early stages of the Plan period. To the contrary, we consider there to be an opportunity to deliver a high-quality, sustainably located residential development scheme consistent with the Council's proposed growth strategy comprising an appropriate mix of market and affordable housing and capable of contributing to a range of community facilities, public infrastructure and services locally.

3.6.6 At the time of writing, proposals at Land at Golf Road, Deal remain at an early stage, however our clients are firmly committed to progressing work on a future planning application in the short term and have a strong record of steady and sustained housing delivery once permission is secured.

3.6.7 The Site is in single ownership and there are no complicated legal agreements or covenants that would prohibit the ability to bring forward the Site early in the Plan period. The Site is therefore considered available and achievable for the purposes of the tests of deliverability.

4 Conclusion

4.1 Summary

4.1.1 This representation has been prepared by DHA Planning on behalf of Persimmon Homes South East in response to the Dover District Council Local Plan (Regulation 19) consultation which runs until 9th December 2022.

4.1.2 Our client controls 'Land Golf Road, Deal' and is promoting the residential allocation of the Site as part of the new Dover District Local Plan preparation process. The Site was submitted for residential development with capacity for approximately 60 units as part of the new Local Plan preparation, however the Site has not been taken forward within the Regulation 19 Pre-submission Plan.

4.1.3 Taking all of the above into consideration, we consider that the Site promoted at Land at Golf Road should have been included as a future housing allocation within the Dover District emerging Local Plan. The Site is considered, in principle, wholly consistent with the objectives of the Plan and would form part of a sound growth strategy for the district to 2040.

4.1.4 Our client is supportive of DDC's new Local Plan in principle, however our client objects to a component of the Plan, such that the Plan should be considered 'unsound'. It is put forward that a minor modification to the growth strategy is required in order for the Plan to be found 'sound', in which the quantum of Plan-led housing delivery within Deal should be increased to accurately reflect its second tier settlement status. Our client considers that given historic strategic under delivery in the district and wider uncertainties in the planning system, the Council should sensibly demonstrate an oversupply of reliable, deliverable sites early in the Plan period to ensure sufficient flexibility in housing delivery, should extant permissions or larger allocated sites not come forward or deliver as anticipated.

4.1.5 To be clear, Persimmon Homes South East support the premise of DDC's growth strategy, which includes further Plan-led development within Deal in line with its higher-order settlement status. However, we are concerned that DDC have planned at a significantly reduced level of growth in Deal, citing a dwindling supply of available land within and around the settlement. Consequently, the Plan fails to appropriately maximise the sustainable credentials of Deal and has resulted in a marginal supply of available, deliverable small and medium sites, insufficient to provide the flexibility in housing delivery that is required in accordance with national planning policy.

4.1.6 Given the dwindling supply of available sites within the District and the growing housing need, it is imperative that the sustainable credentials of these higher-order settlement sites are appropriately maximised to deliver the housing that is required in accordance with draft policy SP3 of the emerging Plan, and wider policies seeking to otherwise conserve and enhance the district's natural and historic environment and national planning policy objectives. We are concerned that this has not been fully undertaken and object solely on this basis.

4.1.7 Consequently, our clients object to the growth strategy component as drafted, on the basis that there is a clear need to maximise the delivery of housing at sites within Deal, and this has not been undertaken – for example at Land at Golf Road, Deal, where it the Site has been excluded primarily on flood risk ground without further consideration of detailed evidence or the capability of suitable mitigation to be put in place. The consequent omission of potentially circa 60 units, will otherwise be required to be delivered elsewhere in the district, in potentially less accessible and more sensitive locations.

4.1.8 Without prejudice to our client's support in principle of the proposed growth strategy which primarily directs growth at higher order settlements, we would urge the Council to re-visit its growth strategy and proposed allocations to allow a greater quantum of development within Deal to fully reflect its excellent sustainability credentials.

4.1.9 We submit that Deal is wholly capable of delivery significantly greater than the 223 dwellings allocated. We say that available and suitable sites exist, including that of our client's at Land at Golf Road, Deal capable of delivering logically located, highly sustainable new homes in accessible location early in the Plan period, sufficient to provide greater assurance of steady and sustained housing delivery across the Plan period, balance the scale of delivery from strategic urban extensions and further assist in reducing the need to develop into more rural, typically less accessible and more sensitive locations within the district to otherwise deliver the growth that is required.

	<p>4.1.10 Accordingly, we submit that the inclusion of Golf Road, Deal would provide a medium sized site for the Council that could come forward quickly, complying with the Framework's requirement to provide a mix of sites and include specific sites for years 1-5 of the Plan period. Accordingly, we say that Land at Golf Road, Deal can further assist the Council in meeting the growing need for new homes in the district and is necessary to ensure the Council can have greater confidence in meeting its market and affordable housing targets in full as well as delivering wider public benefits to the local community within Deal.</p> <p>4.1.11 In addition to being a highly sustainable and logical edge-of-settlement allocation, the Site is deliverable in a single land ownership with no viability issues, legal or third-party constraints present. Our client is fully committed to the delivery of Land at Golf Road and there are no impediments to the Site being capable of delivery within the initial 0-5 years of the Plan period.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>For the reasons set out in the consultation response submitted on behalf of Persimmon Homes South East, it is put forward that a minor modification to the growth strategy is required in order for the Plan to be found 'sound'. These suggest modifications are set out in the consultation response submitted on behalf of Persimmon Homes South East (ref DHA/30289).</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>Please refer to the consultation response submitted on behalf of Persimmon Homes South East (ref DHA/30289).</p>
<p>Include files</p>	<p>DHA_30289 DDC Reg 19 Representation - Golf Road Deal - Final.pdf</p>
<p>Local Plan Consultation Point</p>	<p>Strategic Policy 4 - Residential Windfall Development</p>
<p>Rep ID</p>	<p>SDLP1861</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1271717</p>
<p>Consultee Full Name</p>	<p>Quinn Estates</p>
<p>Consultee Company / Organisation</p>	<p>Quinn Estates Ltd</p>
<p>Agent Full Name</p>	<p>James Waterhouse</p>
<p>Agent Company / Organisation</p>	<p>Iceni projects</p>
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SP4</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified</p>

	Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Full Representation attached to SDLP1860. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1860.)</p> <p>Quinn Estates supports Policy SP4 and the principle of commensurate scale development within or adjoining settlement boundaries at larger settlements. In this regard, it is evident from the table below that the development needs of Deal and strong sustainability benefits of locating development at the settlement have not been reflected in the identified commitments in the Plan:</p> <p>(DDC Note - See table 1 in attachment)</p> <p>Quinn Estates would also question the approach to minor residential development at smaller specified settlements. In this regard, the approach is not considered to be justified or effective, as there will still be local housing need at these settlements, and the settlement boundaries do not necessarily create any opportunities for windfall development within the settlement boundaries at these settlements. Accordingly, to make the policy sound, it is suggested that the policy be amended to allow for exceptional cases where local housing need cannot be delivered within settlement boundaries, through the insertion of the following text into Policy SP4 2:</p> <p>“Minor residential development or infilling of a scale that is commensurate with that of the existing settlement will usually only be permitted within the settlement boundaries, or exceptionally on land adjoining settlement boundaries, as shown on the Policies Map, of the following settlements:”</p> <p>With respect to those settlements in the District that are not specifically listed in Policy SP4, Quinn Estates raises concern that these settlements having the same categorisation as open countryside. Some of these settlements will have local housing need and the policy should only be considered sound if it enables this need to be met at or around these settlements.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Quinn Estates is a developer with significant land interests in the District, who has an important role in delivering the Plan strategy
Include files	
Local Plan Consultation Point	Strategic Policy 4 - Residential Windfall Development
Rep ID	SDLP1469
Rep Status	Processed

Consultee ID	1333277
Consultee Full Name	Mr George Jenkins
Consultee Company / Organisation	
Agent Full Name	Grace Martin
Agent Company / Organisation	Hume Planning Consultancy Ltd
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP4
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Representation submitted by Hume Planning. Full Representation attached to SDLP1460. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1460.)</p> <p>Whilst we welcome DDC's commitment to meeting its housing need, with Strategic Policy SP3 seeking to provide at least 10,998 net additional homes over the Plan period, it is considered smaller size additional sites, if suitable and available, should be additionally included within the Plan (especially where high scoring in the HELAA such as this site).</p> <p>This is because a large proportion of the plan's growth is again being directed towards Dover, with further units at Whitfield (over 2,000 dwellings), and also Aylesham. With large strategic sites delivery rates can easily slow down during the plan period and under-deliver. This has been evidenced by the track record of slow delivery rates at earlier phases of planned development at Whitfield upon which previous approved development plans were very heavily reliant; a factor that explains the very high contribution of windfall opportunities to housing land supply over the last 15 years. Whilst it is acknowledged that there is a planned buffer within the emerging Local Plan, it is considered appropriate not to use this as a limit, and allocate other suitable sites in sustainable locations such as Preston where available.</p> <p>Whilst it is acknowledged that emerging SP4 'Residential Windfall Development' allows for residential development or infilling of a scale that is commensurate with that of the existing settlement will be permitted within or immediately adjoining the settlement boundaries of Preston, subject to all of the listed criteria being met, it is considered preferable, in order to allow more certainty for small housebuilders (for the site-specific reasons outlined below and the positive HEELA scoring compared with other land opportunities), that the site is individually allocated. We believe will provide more certainty and accelerate housing delivery.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s)	

you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 4 - Residential Windfall Development
Rep ID	SDLP1416
Rep Status	Processed
Consultee ID	1333243
Consultee Full Name	Mr and Mrs Tobin
Consultee Company / Organisation	
Agent Full Name	Mr Reece Lemon
Agent Company / Organisation	Lee Evans Partnership
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP4
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Representation submitted by Lee Evans On behalf of Mr and Mrs Tobin. Full Representation attached to SDLP1411. This document has been split across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1411.) POLICY SP4 – Residential Windfall Development 3.20 This policy sets out a series of criteria under which windfall development (i.e. non-allocated

development) may come forward. In respect of development in the Smaller Villages such as Woodnesborough it is noted that “minor residential development or infilling of a scale that is commensurate with that of the existing settlement will be permitted within the settlement boundaries, as shown on the Policies Map”.

3.21 It is understood that SP4 retains the overall focus for residential development at settlements atop the settlement hierarchy, and this is again supported in principle. However, it must also be recognised that the settlement boundaries have been tightly drawn per the policies map. Taking the example of Woodnesborough, the boundary as proposed is elongated in a ribbon manner and in parts- is separated into clusters. It excludes all land between component parts of the village in its current configuration (Figure 2).

3.22 As drafted, the Plan would preclude most development supporting housing delivery of any note at Woodnesborough. The case is made at Section 4 of this response that the evidence base underpinning the Plan is flawed in its omission of Land off The Street, Woodnesborough given its sustainability credentials including its central location within the village. It is therefore considered that the tight boundary drawn is also flawed in its limitation of sustainable development opportunities over the plan period up to 2040.

Smaller settlements may present opportunities for short-term delivery in a manner which otherwise meets the above criteria, albeit just adjacent to settlement boundaries. This is true of Land off The Street, Woodnesborough.

3.24 It is suggested that either the settlement boundary is amended to provide sufficient opportunity for sustainable development (as windfall or additional allocations) to come forward; or that an amendment to SP4 be made to capture further delivery opportunities.

3.25 Amendment to ensure that development at commensurate scales adjacent to or close to the settlement boundaries can come forward over the plan period would assist in the delivery of its overall Vision and Objectives. It is emphasised that the Ashford Borough Local Plan 2030 (adopted in 2019) benefits from similar provisions, with its own Policy HOU5 – ‘Residential Windfall Development in the Countryside’ noting that: “Proposals for residential development adjoining or close to the existing built up confines of the following settlements will be acceptable...”, followed by similar detailed criteria. There is thus precedent for a similar approach here, that has been accepted as a sound basis for plan-making in recent years elsewhere in Kent.

3.26 Amendment may simply refer to [amendments to Regulation 19 policy wording in bold text]:

2. Minor residential development or infilling of a scale that is commensurate with that of the existing settlement will be permitted within and adjoining or close to the settlement boundaries, as shown on the Policies Map, of the following settlements: Ashley, Barnsole, Betteshanger, Chillenden, Coldred, Denton, East Studdal, Finglesham, Great Mongeham, Martin, Martin Mill, Nonington, Ringwould, Staple, East Stourmouth, Sutton, Tilmanstone, West Hougham, Wingham Green, Woodnesborough and Wootton.

3.27 SP4 otherwise contains detailed criteria-based policies which all windfall development must meet – it is considered that these criteria would sufficiently protect against inappropriate development in its own right.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 4 - Residential Windfall Development
Rep ID	SDLP1464
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP4
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note <i>The text below is an extract from the original representation which is attached to SDLP1438.</i></p> <p>Windfall. Unless existing settlement boundaries are respected, there is suburban ribbon development creep from field to field to field. To render the plan sound it should contain a statement 'Previously existing settlement boundaries will be respected, until such time as town and parish councils may have agreed changes with Dover District Council, in accordance with the principles of Localism Act 2011.' In Nov 2022, it seems very naïve to hope that 'new housing in villages can help them retain existing services such as public transport, retail (many pubs are going under because lack of staff and sky high energy bills) and schools (again oversubscribed local schools fear they will go bankruptcy with sky-high energy bills).</p> <p>SP4 Residential Windfall Development</p> <p>As stated below on SP5, the policy of Dover Urban Area nil provision of affordable housing is both unsound and non-legally compliant. Moreover, the reality is that during the life of the last Local Plan, Deal experienced 30% more housing development than was planned. So this policy would only be sound if it were amended as follows: 'In the case of planning applications on developments of over 8 dwellings on windfall development</p>

	sites, within 3 miles of the outer boundaries of Deal / Walmer, permission will only be given if the developer applicant has previously undertaken a development of a similar scale within Dover Urban area which provides a minimum of 30% affordable housing'. (See our comments on DM - H1 below. (Comments on SP9 refer.)
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 4 - Residential Windfall Development
Rep ID	SDLP1876
Rep Status	Processed
Consultee ID	1272184
Consultee Full Name	Tony and Valerie Armitage
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP4
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	3.68 Windfall, unless existing settlements either present boundaries are respected there is suburban ribbon development creep from field to field. Plans should state previously existing settlement boundaries will be respected until Town and Parish councils agree changed with DDC in accordance with localism act 2011. New housing in Kingsdown will result in traffic jams – not public transport, retail and schools (schools have no money with sky high energy bills etc.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 4 - Residential Windfall Development
Rep ID	SDLP1640
Rep Status	Processed
Consultee ID	1333394
Consultee Full Name	Shelley Miller (Clerk)
Consultee Company / Organisation	Tilmanstone Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP4
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Tilmanstone Village is not mentioned by name anywhere in the documents probably because there are no identified sites within the village confines. The part of our Parish that adjoins Whitfield is still in the plan but as part of the Whitfield expansion. Tilmanstone Village is included ,but not by name, when 'other' settlements are referred to especially when it comes to the drainage element of the infrastructure document and it is a stated aim that settlements dependent on cesspool drainage should be especially considered for improvement. Small, infill development within the confines of 'other' settlements will still be considered under the current NPPF. <i>(DDC note - this is an extract from full representation SDLP1639)</i>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 4 - Residential Windfall Development
Rep ID	SDLP1733
Rep Status	Processed
Consultee ID	1271717
Consultee Full Name	Quinn Estates
Consultee Company / Organisation	Quinn Estates Ltd
Agent Full Name	Nicholas Pellegram
Agent Company / Organisation	Iceni projects
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP4
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified

	Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Full Representation attached to SDLP1731. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1731.) Given the positioning of the site on the settlement boundary of Dover, the site would therefore be in accordance with Draft Policy SP4 'Residential Windfall Development' of the Local Plan, which further supports the case for the allocation of this site.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 4 - Residential Windfall Development
Rep ID	SDLP1743
Rep Status	Processed
Consultee ID	1333572
Consultee Full Name	Martin Sturge
Consultee Company / Organisation	
Agent Full Name	Andrew Ransome
Agent Company / Organisation	ADP Architecture

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP4 / HELAA
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The Local Plan in respect to the Policies Map, where it considers the village of Preston, is not sound as it is not based on sound evidence. The following comments are made in relation to the land to the rear of Meadow Cottage, The Street, Preston, which was incorrectly assessed within the HELAA Housing Site Assessment. The HELAA Housing Site Assessment that has informed the local plan has failed to draw upon the extensive evidence that was gathered in support for an approved planning application for 5 no. dwellings on that land at Meadow Cottage. The conclusions drawn in the HELAA Housing Site Assessment are not made objectively and run contrary to conclusions from the detailed technical assessments that supported the planning application. Consequently, the settlement boundary for Preston has not accurately been drawn and needs to be reconsidered. The planning application mentioned above [LPA Ref: 20/00544] sought the demolition of Meadow Cottage and the erection of 5 no. detached dwellings, new a vehicle access, associated car parking and landscaping on land to the rear of this existing property. Planning permission was granted on 27th September 2022. The decision notice, proposed layout and site location plan are appended to this representation. The HELAA Housing Site Assessment inaccurately concluded that this site should not be allocated for development or included in the settlement boundary due to: landscape impact; the need to demolish Meadow Cottage to gain access; tree coverage; and impact on the conservation area. Each of these issues were considered by the Council in detail during planning application ref: 20/00544. In approving this application, the Council [see delegated report, which is appended to this representation] concluded that:</p> <ul style="list-style-type: none"> • The demolition of the existing dwelling and arrangement of 5 no dwellings in a courtyard form would be an acceptable development that reflects the building arrangements prevalent in rural areas. • The proposed landscaped landscape strategy for the site allowed for the development to create a rural transition between the village and surrounding countryside. • The Landscape Visual Impact Assessment found that the proposed mitigation strategy would ensure that the landscape impact would be low to neutral. • The proposed design, form and appearance would be would not cause harm to the character and appearance of the street scene, the Conservation Area or the setting of listed buildings in the vicinity of the site. • The tree survey found that a number of trees on site were with Category C or U trees and should be removed irrespective of the development. <p>These planning application conclusions confirm that the HELAA Housing Site Assessment supporting the local plan is not a robust evidence document and does not include an appropriately and objective assessment of the sites.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>To make the Dover Local Plan sound, it is necessary for the defined settlement boundary for Preston to be enlarged to include the approved boundary under planning application 20/00544. The wider site actually extends beyond the approved planning application boundary and the conclusions drawn during the planning application could equally be applied to a development across the wider site, that is, development could be acceptable if:</p> <ul style="list-style-type: none"> • The development takes on a rural form and pattern of development; and • An appropriate landscaping strategy is applied that allows the site to transition from village to countryside. <p>It is therefore also requested that the village boundary be extended to include the land marked in blue on the approved site location plan, but in any event, as a minimum, the land marked in red on the same plan.</p> <p>It is also requested that the HELAA Housing Site Assessment evidence base documented to confirm that the development of land to the rear of Meadow Cottage, The Street, Preston be updated to confirm that it is a suitable site for residential development.</p>

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	Ransome ADP Planning 1203 Att1_Redacted.pdf
Local Plan Consultation Point	Strategic Policy 4 - Residential Windfall Development
Rep ID	SDLP1882
Rep Status	Processed
Consultee ID	1333838
Consultee Full Name	mrs rosemary anne Holmes
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP4 para 3.68
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	3.68 windfall. Unless existing settlements and their present boundaries are respected there is suburban ribbon development creep from field to field. Plan should state previously existing settlement boundaries will be respected until town and parish councils agree changes with DDC in accordance with Localism Act 2011. New housing in Kingsdown will result in traffic jams – not with public transport, retail and schools (schools have no money until sky high energy bills etc)
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	SP3 Housing Growth statement – 'provide a greater choice of high quality housing to meet the needs of Dover Districts growing population and changing demographic and address affordability issues'. Not consistent with details in plan which underestimate the evidence showing a large part of district growth population growth is due to ageing. The details thus render SP3 and SP5 less effective – not sound judgement. Social housing and not more 4/5 bedroom houses should have been planned for. SP6. Economic growth – quality not quantity please.

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 4 - Residential Windfall Development
Rep ID	SDLP1892
Rep Status	Processed
Consultee ID	1333840
Consultee Full Name	Jon Alldis
Consultee Company / Organisation	Barrat David Wilson Homes
Agent Full Name	Emily Harris
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP4
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Full Representation attached to SDLP1883. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1883.)</p> <p>Draft Strategic Policy 4: Residential Windfall Development - COMMENT Given the poor delivery at major allocations over the adopted Plan period, DDC has recognised at paragraph 6.8 that there have been higher levels of windfall development in the district. Further to this, paragraph 6.84 notes that windfall allowance accounted for 45% of housing delivery across the district in the adopted Plan period. From year 4, the Housing Trajectory makes allowance for 70 windfall sites a year.</p> <p>As there is currently no evidence for the delivery of larger strategic allocations, it is likely that this windfall allowance will be larger and account for a large percentage of housing delivery in the District. It is likely that windfall development will come forward in the early stages of the Plan</p>

	<p>period resulting in housing growth that is not genuinely plan-led in accordance with NPPF paragraph 15. DDC should allocate further sites that are deliverable within the first five years of the Plan period to ensure that the number of windfall sites does not conflict with the objectives of the Local Plan. By allocating further deliverable sites in the early stages of the Plan period, the over-reliance of delivery at large strategic sites is less. This will alleviate the risk of windfall development leading development in the area and risking the delivery of the overarching objectives. BDW consider that the Land North of Sandwich Road can deliver a high quality housing development efficiently within the early stages of the Plan period. Further consideration for sites such as the Land North of Sandwich Road should be given to ensure a plan-led approach is delivered. Recommendation: DDC consider the housing delivery within the early years of the Plan period and seek to allocate quickly deliverable sites to ensure a plan-led approach is adopted.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	

Strategic Policy 5 - Affordable Housing

Local Plan Consultation Point	Strategic Policy 5 - Affordable Housing
Rep ID	SDLP80
Rep Status	Processed
Consultee ID	1330746
Consultee Full Name	Mr Jac Lewis
Consultee Company / Organisation	Town and Country Housing
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	3.80, 3.82, 3.85, SP5.2
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	N/A
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>In relation to policy 3.80 the evidence to discount Dover Centre from any and all obligations to provide affordable housing seems weak. The area is a large one, and developments can be assessed individually for viability and the timespan of this local plan means that developments to have no contribution to affordable housing is both unjustified. This policy will only create an imbalance of house pricing in the area, one deeper than if the 30% was beholden too. Shared ownership and Intermediate Rent are other forms of affordable housing that would not impact viability. By not providing affordable housing there is an inherent discrimination between who is able to live in Dover Centre. Those not able to live in the centre how had previously done so will be pushed away from their jobs, childrens schools etc. There is also a shorter term consideration - the impact of the cost of living crisis which will likely push more towards needing affordable housing. If there is no provision for affordable housing in the centre the issues I raised above about being forced out will affect these people.</p> <p>In regards to policy 3.82 the need for affordable housing continues to grow and therefore the possibility of all-affordable housing schemes become more and more important. With the grant funding that can be tapped into with all-affordable developments they can be both financially viable for the developer and provide the type of social development that only all-affordable schemes can.</p> <p>Policy 3.85 - Stress if the local connection/key worker/income cap requirements will or will not be implemented rather than it being discussed as possibility. A feature like that needs to be concrete. It also needs to be drafted without affecting mortgageability of interemediate (SO or rent) for Registered providers and prospective purchasers.</p> <p>Policy SP5.2 - Stress the necessity of social rented housing over affordable rented, SR can gain higher grant funding and therefore can be both ceompetitive to the developer and more affordable to those moving into the units.</p>

	<p>To summarise:</p> <ul style="list-style-type: none"> • S106 levels to be maintained at policy (national policy) levels. • Tenure split should again follow. • Affordable Home Ownership Shared Ownership to have option to convert to Intermediate Rent to Homebuy • SP5 to stipulate Social rent not Affordable Rent • First Homes should not be introduced at the expense of rented housing. • First Homes technically are not as affordable as SO in our opinion. • Management/Estate charges should be apportioned on a floor area and not on a unit basis. • 100% affordable projects should be prioritised and supported through the local plan. • Large sites should be broken into smaller parcels to allow SME's and RP's to develop – thereby allowing a competitive position against housebuilders and to increase the rate of construction.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	N/A
Include files	
Local Plan Consultation Point	Strategic Policy 5 - Affordable Housing
Rep ID	SDLP457
Rep Status	Processed
Consultee ID	1266351
Consultee Full Name	Dr Sharon Danby
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP5 Affordable Housing
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>3.79 Provision of affordable housing. It is both unsound and not legally compliant to assess Dover urban area as not viable to require affordable housing including the minimum requirement in the NPPF 2021 for 10% affordable homeownership. until after the Thanet Local Plan adopted 2020 includes a requirement for 30% affordable housing / homeownership throughout the district, with no urban exclusions, in accordance with the previous version of NPPF. (Cross reference DM policy H1 / SP 9). We note that https://www.labcwarranty.co.uk/media/2694/land-development-report.pdf shows that return on investment for developers in Kent in 2021 was running at 29.34% . The vast majority of the public in Dover district (whether they are among the 35% of the electorate who are engaged enough in local elections to vote, or not), are keen for Dover urban area to get the warm, healthy, affordable homes that it is crying out for. 3.81 Pleased to see 30% requirement affordable for the rest of the district referred to here, but it will not become sound or effective unless it becomes a real requirement and not just 'a starting point'. 3.83 and 3.84 should be strengthened to become sound. Alas 3.86, about helping people move out of the private rented sector seems unsound and wildly over optimistic in the current climate. And it is the transformation of council housing into zero carbon homes, and an increase in social rented, zero carbon homes at scale, homes that will be publicly owned in perpetuity and cannot be lost to private landlords through right to buy, that will address Dover's most urgent needs.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Developers to provide at least 30% affordable housing needed in Dover Town, this is where it is most needed.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>Strategic Policy 5 - Affordable Housing</p>
<p>Rep ID</p>	<p>SDLP253</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331383</p>
<p>Consultee Full Name</p>	<p>Mrs Katie Miller</p>
<p>Consultee Company / Organisation</p>	<p>Kent Downs AONB Unit</p>
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP5
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Support the requirement for affordable housing on schemes of 6 units or more within Designated Rural Areas (which includes AONBs), which is in compliance with the NPPF paragraph 64. The provision of well designed, sustainable and affordable housing, particularly for workers employed in the land-based economy is an identified aim of the AONB Management Plan and its provision is supported in Principle VC3 which seeks the provision of suitably located affordable housing that is of a high-quality design and of an appropriate scale.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 5 - Affordable Housing
Rep ID	SDLP789
Rep Status	Processed
Consultee ID	1259612
Consultee Full Name	Mr Chris Shaw
Consultee Company / Organisation	Langdon Parish Council
Agent Full Name	

Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP5 - Affordable Housing Clause 2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The policy could usefully provide for the ability for neighbourhood planning areas to amend the affordability mix subject to any Local Housing Needs Assessment at the neighbourhood level.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 5 - Affordable Housing
Rep ID	SDLP559
Rep Status	Processed
Consultee ID	1267584
Consultee Full Name	Jason Ransley
Consultee Company / Organisation	Dover Harbour Board
Agent Full Name	John

	Bowles
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Strategic Policy SP5 - Affordable Housing
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Dover Harbour Board supports the exception of the Dover Urban Area from the requirement under Strategic Policy SP5 - Affordable Housing to provide affordable housing on schemes of 10 dwellings or more.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	N/A
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	N/A
Include files	
Local Plan Consultation Point	Strategic Policy 5 - Affordable Housing
Rep ID	SDLP949
Rep Status	Processed
Consultee ID	1268017
Consultee Full Name	Ms Penelope James

Consultee Company / Organisation	Dover and Deal Liberal Democrats
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	H1
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	n/a
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	n/a
Include files	
Local Plan Consultation Point	Strategic Policy 5 - Affordable Housing
Rep ID	SDLP1057
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah

	Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>3.79 Provision of affordable housing. We believe it is both unsound and not legally compliant for DDC dept of Planning to say 'for Dover urban area it is not viable to require affordable housing including the minimum requirement in the NPPF 2021 for 10% affordable homeownership. (See our recommendation on SP4 above on how to incentivise developers to provide affordable housing needed in Dover Town). We note some mitigation in 3.91 since the Reg 18 consultation, but it is still completely unsound. We very much regret that DDC Local Plan was delayed until after the NPPF was changed in this respect in 2021. We note that the Thanet Local Plan adopted 2020 included a requirement for 30% affordable housing / homeownership throughout the district, with no urban exclusions, in accordance with the previous version of NPPF. (Cross reference DM policy H1 / SP 9). We note that https://www.labcwarranty.co.uk/media/2694/land-development-report.pdf shows that return on investment for developers in Kent in 2021 was running at 29.34% . The vast majority of the public in Dover district (whether they are among the 35% of the electorate who are engaged enough in local elections to vote, or not), are keen for Dover urban area to get the warm, healthy, affordable homes that it is crying out for.</p> <p>3.81 We are relieved to see 30% requirement affordable for the rest of the district referred to here, but it will not become sound or effective unless it becomes a real requirement and not just 'a starting point'.</p> <p>3.83 and 3.84 should be strengthened to become sound.</p> <p>Alas 3.86, about helping people move out of the private rented sector seems unsound and wildly over optimistic in Nov 2022. And it is the transformation of council housing into zero carbon homes, and an increase in social rented, zero carbon homes at scale, homes that will be publicly owned in perpetuity and cannot be lost to private landlords through right to buy, that will address Dover's most urgent needs.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	As stated below on SP5, the policy of Dover Urban Area nil provision of affordable housing is both unsound and non-legally compliant. Moreover the reality is that during the life of the last Local Plan, Deal experienced 30% more housing development than was planned. So this policy would only be sound if it were amended as follows <i>In the case of planning applications on developments of over 8 dwellings on windfall development sites, within 3 miles of the outer boundaries of Deal / Walmer, permission will only be given if the developer applicant has previously undertaken a development of a similar scale within Dover Urban area which provides a minimum of 30% affordable housing.</i> (See our comments on DM - H1 below. (Comments on SP9 refer.)

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	Strategic Policy 5 - Affordable Housing
Rep ID	SDLP604
Rep Status	Processed
Consultee ID	1331790
Consultee Full Name	Julie Davies
Consultee Company / Organisation	CPRE Kent
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP5
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	CPRE welcomes 30% requirement for affordable housing and recognises that such a requirement for affordable homes within the Dover Urban Area, in terms of plan making, would render such developments unviable and therefore housing schemes in this area undeliverable. CPRE would encourage the Council to work in partnership with Homes England to progress the delivery of affordable homes where they are most needed; and to ensure that any forthcoming commuted affordable housing payments be directed towards Dover, ahead of Deal and Sandwich.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	CPRE Kent would wish to participate at the examination hearings to explore these issues further.
Include files	
Local Plan Consultation Point	Strategic Policy 5 - Affordable Housing
Rep ID	SDLP1063
Rep Status	Processed
Consultee ID	1331808
Consultee Full Name	Mr Robert Hogben
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	1 Introduction
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The plan is unsound as it does not comply with the legally binding commitment made by DDC when they declared a climate emergency in 2020 and prepared their climate change strategy. The plan will not do enough to meet the target of the district being net zero by 2050. DDC should be much more ambitious about the green credentials of new housing. If new homes generated their own power, were insulated to the highest standards, and collected rain water, it would greatly help stretched local services and go a long way towards making the housing stock fit for the coming decades.</p> <p>The regulation 19 stage of the consultation is not fit for purpose as it is overly complicated and very difficult to use. The process has left many members of the public including me and my wife feeling overwhelmed and confused as to how to make a representation. For those who are working full time this has been a task for which they do not have enough time. As a result those who may have wanted to make a submission have not been able to. The format of the submission form is also difficult to navigate. Without prior experience of planning law it is difficult to say whether a part of the plan is legal or not. As to the duty to cooperate it is impossible to know. The unsound plan needs updating after the government announcement on 5/12/22 that mandatory housing targets are not to be imposed. The figure of nearly 11,000 is unsustainable and should now be reviewed, particularly with respect to allocated land around Station Rd Walmer and proposed developments around villages.</p>

	<p>The character and landscape value of the district is being rapidly eroded under the current plan and this must not continue as it is contrary to NPPF 21. It is not sustainable to build on agricultural land which is in short supply as we are only 50% self sufficient in producing food in the UK. The CPRE has found that almost 14,500 hectares of farmland has been permanently lost to development since 2010. The contribution from the districts agricultural land is of vital importance. Much of the agricultural land is also vital for flood protection, and field margins are important for wildlife and biodiversity, forming corridors between habitats for vertebrates and nesting and roosting sites for birds. Dover District also has a wealth of character landscapes, AONB, heritage coast, nature reserves, internationally rare chalk grassland and rewilded areas such as Betteshanger Park. Overdevelopment under the last weak plan has meant that these areas are under pressure and being denuded as their boundaries are eroded and wildlife corridors between sites are cut off. The new plan does not do enough to protect these areas, wildlife and biodiversity. Developments should not be allowed to remove ancient woodlands and trees and biodiverse rich habitats even if it is argued that this is for the greater good. This is not sustainable as all nature is interconnected and if it fails then we all fail. The UK is one of the worst countries in the world for biodiversity loss, we have lost half of our biodiversity since the 1970's.</p> <p>Development has been at such a pace that infrastructure cannot keep up. Buses have been cut recently, cycle and pedestrian routes have not been upgraded sufficiently to connect some developments to main bus and train routes without car dependence. Aylesham has not had a secondary school which would mean children could walk to school. Many rural communities are entirely car dependent due to lack of buses and the roads not being safe to use their bikes. Not enough emphasis is put on renovating existing housing stock to provide greener, insulated, fuel efficient homes. Each new build generates around 56 tonnes of embedded carbon. The NPPF states that we should prioritise brownfield sites over greenfield but although there are many opportunities to develop brownfield sites in Dover, this has not been prioritised. Many developments have been for larger houses in villages and there is not enough provision for affordable housing.</p> <p>The wording of the local plan is not definitive, it leaves too many loop holes and vague preferences which enable large developers to argue and get what they want, to maximise profits, not what the people of the Dover area need.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Better mapping and understanding of the Dover District, taking into account internationally rare areas of chalk grassland, woodland and trees wherever they occur.</p> <p>Large buffers around the AONB to protect its character from the built environment. Stronger protection for the AONB and the Ripple LCA F3.</p> <p>Tighter protections on our remaining biodiversity.</p> <p>Tighter definitions in the local plan so that developers have no room to argue what has been specified in the local plan.</p> <p>Hire several biodiversity officers to monitor closely and prevent loss of ancient woodland, chalk grassland, veteran trees, protected wildlife and rich habitats and to actively go out into the community, looking for ways to improve biodiversity by such things as accessing grants for hedge planting and the creation of ponds where ever possible in our district.</p> <p>Employ experts to liaise with farmers in our area to encourage the most environmentally friendly farming and land management practices which will encourage maximum biodiversity in the countryside and maximum sequestration of carbon in soils and biomass.</p> <p>Stop the use of agricultural land for development.</p> <p>Renovate and insulate rather than build new houses, brownfield not greenfield.</p> <p>Turn attention away from destroying village communities with unsustainable housing estates outside their village boundaries.</p> <p>Do not give developers the get out clause of financial mitigation for destruction of wildlife and habitat. No development should further deplete our critically low levels of biodiversity.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>Strategic Policy 5 - Affordable Housing</p>

Rep ID	SDLP782
Rep Status	Processed
Consultee ID	1331880
Consultee Full Name	Natasha Styles
Consultee Company / Organisation	McCarthy Stone
Agent Full Name	Natasha Styles
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP5
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy Positively prepared
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Policy SP5 Affordable Housing</p> <p>Policy SP5 was previously policy DM 12 in the regulation 18 consultation. We responded to the previous consultation recommending amendments to the policy but this appears to have been disregarded and therefore it is still felt that this policy is not justified, effective or consistent with national policy and therefore unsound.</p> <p>The Local Plan Whole Viability Study which must underpin the proposed affordable housing states at paragraph 10.83 to 10.85</p> <p><i>'In the case of Sheltered housing, the appraisals produce a residual value that is over the BLV at 30% Affordable Housing on greenfield sites, but only 5% on brownfield sites.</i></p> <p><i>In the case of Extracare housing, the Residual Value does not exceed the BLV, even without Affordable Housing</i></p> <p><i>Care should be taken when considering additional policy requirements in this sector'</i></p> <p>Whilst we would take issue with some of the viability inputs (and respectfully reserves the rights to do so if the Policy is not amended as per recommendation), it is noteworthy that the preferred location for older persons housing is in proximity to established local facilities and services – ie brownfield locations, and the Study determines that schemes will only be viable with a 5% affordable housing provision.</p> <p>The study then goes on to somewhat casually dismiss this finding with its reference at 10.86:</p> <p><i>When considering the above, it is important to note that paragraph 10-007-20180724 of the updated PPG specifically anticipates that the viability of specialist older people's housing will be considered at the development management stage. It is therefore not necessary to develop a specific Affordable Housing policy for Sheltered and Extracare Housing'.</i></p> <p>The approach is a complete misinterpretation of the PPG on viability, which also states at Paragraph: 002 Reference ID: 10-002-20190509 that <i>'The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan'</i> and that <i>'Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing</i></p>

and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage'.

Para 10.86 and 12.90 of the viability study in effect provides the consultant, who undertook the viability study's, interpretation of paragraph 10-007-20180724 of PPG. It should also be noted that the paragraph referenced has been superseded and this is now Paragraph: 007 Reference ID: 10-007-20190509. This now states 'It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage' and 'Such circumstances could include, for example where development is proposed on unallocated sites of a wholly different type to those used in viability assessment that informed the plan; where further information on infrastructure or site costs is required; where particular types of development are proposed which may significantly vary from standard models of development for sale (for example build to rent or housing for older people); or where a recession or similar significant economic changes have occurred since the plan was brought into force'.

Therefore, as the affordable housing requirement for older people's housing has been tested through the viability study supporting the submission Local Plan and the typology found to be largely unviable, requiring such sites to deliver affordable housing or requiring a viability study through the application stage is contrary to PPG. Any affordable housing requirement creates an unrealistic over aspirational policy requirement that will undermine deliverability of a form of development with a clear need.

The council has not translated the evidence from the Viability Study through to policy SP5 and therefore the policy is not justified, effective or consistent with national policy. The policy as written, will not deliver sites for older peoples housing in line with need without further viability assessment and is therefore not justified or effective. As older people's housing has been included within the viability assessment to inform the Local Plan and been found to not be viable the affordable housing requirement should be removed from older person's housing to ensure the Local Plan is in accordance with national policy. In addition, if any affordable housing requirement was required of older persons housing schemes this would no doubt result in protracted discussion at the decision making stage which would be contrary to the PPG and hinder the delivery of the Local Plan objectives. The policy and supporting paragraphs should therefore be amended to make it clear that older person's housing is exempt from all types of affordable housing in line with the viability study to ensure the plan is sound, deliverable, justified and consistent with national policy.

For these reasons, Policy SP5 is considered to be **unsound**.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

That Policy SP5 be amended to make clear that it does not apply to older persons housing developments, possibly by use of the following reference:

"Development proposals for older persons housing or other specialist housing are exempt from delivering affordable housing".

This would make the plan justified, effective and in line with national policy.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Local Plan Consultation Point

Strategic Policy 5 - Affordable Housing

Rep ID

SDLP1296

Rep Status

Processed

Consultee ID	1271717
Consultee Full Name	Quinn Estates
Consultee Company / Organisation	Quinn Estates Ltd
Agent Full Name	Lydia Frimley
Agent Company / Organisation	Iceni Projects
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP5 (RE: Land to the North of Discovery Drive, Preston)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Text relating to Strategic Policy Extracted from SDLP1294. For Full representation including attachments please see original representation.) Affordable Housing Dover District has an increasingly growing population and changing demographic, making it a key priority of the Government to deliver more homes, including more affordable homes. To enforce this policy SP5 (affordable housing) of the draft Local Plan explains that for this site, at least 30% of the housing provided should be affordable housing. A scheme that optimises the capacity of the site will also optimise the number of affordable homes that can be delivered at this site, helping to ensure that sufficient affordable housing is delivered at Preston. Raising the development capacity of the site to at least 75 home will increase the affordable housing delivery to a minimum of 23 affordable homes.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 5 - Affordable Housing
Rep ID	SDLP923
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Sp5
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The aspiration for delivery of 30% affordable housing outside the Dover Urban Area is noted, however, it is essential that the viability of individual sites identified as being liable for significant highway infrastructure provision is clarified to sufficient detail to manage stakeholder expectations at the earliest possible juncture, which will potentially speed up future development planning decisions. Such an approach will also assist KCC in making informed infrastructure planning/funding decisions at the earliest possible juncture.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 5 - Affordable Housing
Rep ID	SDLP1594
Rep Status	Processed
Consultee ID	1252100
Consultee Full Name	Mrs Amandajayne Hollobon-Baxter
Consultee Company / Organisation	Sandwich Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP5
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	This policy should be amended to state that where sites are owned by public bodies (in any part of the district) the proportion of affordable housing should be set at 50%. Sandwich Town Council would like to encourage developers to include more social housing within their proposed applications for Sandwich.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	This policy should be amended to state that where sites are owned by public bodies (in any part of the district) the proportion of affordable housing should be set at 50%. Sandwich Town Council would like to encourage developers to include more social housing within their proposed applications for Sandwich

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 5 - Affordable Housing
Rep ID	SDLP1269
Rep Status	Processed
Consultee ID	1271353
Consultee Full Name	Church Commissioners
Consultee Company / Organisation	
Agent Full Name	Mr Andrew Watson
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP5
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Text Extracted from Document sent from Savills on Behalf of the Church Commissioners. Representation has been split across relevant areas of the Local Plan. Full attachment and introduction to Policy comments can be found under reference SDLP1265 for Shepherdswell Site and SDLP1266 for Eastry Site.) Draft Policy SP5 (Affordable Housing) proposes a minimum requirement of 30% affordable housing on developments of: "10 dwellings or more (and on sites of 0.5 hectares or more), and in Designated Rural Areas, on schemes of 6 dwellings or more". This policy is in accordance with paragraph 65 of the NPPF which requires a minimum of 10% affordable housing on major schemes. Whilst Draft Policy SP5 appears to meet the affordable housing need of the district set out in most recent SHMA (2019), the last few years of Authority Monitoring Reports demonstrate a significant under-delivery of affordable housing. In addition, the viability study indicates that the strategic sites will find it challenging to deliver 30% affordable housing. Therefore, it is recommended that DDC allocate additional sites to meet the affordable housing need in the district. This representation highlights the capacity to deliver additional dwellings at the Land at Botolph Street Farm in a sympathetic manner, demonstrating that there is scope to increase housing provision across the site and improve its contribution to the requisite growth in the district. There is also the potential for longer-term development at the site in Eastry if additional land is sought by DDC to help distribute the

	<p>risk of large-scale strategic developments across the Local Plan period. These sites lie within the medium value area set out within the Local Plan's supporting Viability Assessment (2020) whereby, it is a viable option to deliver affordable housing. As such, the development of these site would support the delivery of affordable housing in the area.</p> <p>Recommendation: DDC should provide a larger buffer than 8% on the required housing need due to the over-reliance on the Whitfield Urban Expansion and to ensure that the affordable housing needs of the district are met. Therefore, DDC should allocate more smaller sites to reliably meet this housing need since these sites can be delivered earlier in the Plan Period.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 5 - Affordable Housing
Rep ID	SDLP1538
Rep Status	Processed
Consultee ID	1271535
Consultee Full Name	Jean Swan
Consultee Company / Organisation	Adisham Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP5
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Within the requirements of the NPPF we welcome the district councils target of providing affordable housing @20% above the national proposal of 10% outside of urban areas
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 5 - Affordable Housing
Rep ID	SDLP1350
Rep Status	Processed
Consultee ID	1333128
Consultee Full Name	David Powell
Consultee Company / Organisation	
Agent Full Name	Klaire Lander
Agent Company / Organisation	Lander Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP5
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	

4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Lander Planning sent a PDF document which has been split across the relevant sections of the Plan. See Original Attachment on SDLP1346)</p> <p>Providing sufficient affordable housing is important and the policy is supported. However, the policy should make it clear what settlements constitute 'Designated Rural Areas' (threshold 6 units or more) in order to avoid ambiguity during any future planning applications. It is suggested to include an asterix at this point to those settlements listed at paragraph 3.91. This policy is supported subject to reviewed wording.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 5 - Affordable Housing
Rep ID	SDLP1474
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP5

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note <i>The text below is an extract from the original representation which is attached to SDLP1438.</i></p> <p>SP5 Affordable Housing</p> <p>3.79 Provision of affordable housing. We believe it is both unsound and possibly not legally compliant for DDC dept of Planning to say 'for Dover urban area it is not viable to require affordable housing including the minimum requirement in the NPPF 2021 for 10% affordable homeownership. (See our recommendation on SP4 above on how to incentivise developers to provide affordable housing needed in Dover Town). We note some mitigation in 3.91 since the Reg 18 consultation, but it is still completely unsound. We very much regret that DDC Local Plan was delayed until after the NPPF was changed in this respect in 2021. We note that the Thanet Local Plan adopted 2020 included a requirement for 30% affordable housing / homeownership throughout the district, with no urban exclusions, in accordance with the previous version of NPPF. (Cross reference DM policy H1 / SP 9). We note that https://www.labcwarranty.co.uk/media/2694/land-development-report.pdf shows that return on investment for developers in Kent in 2021 was running at 29.34% . The vast majority of the public in Dover district (whether they are among the 35% of the electorate who are engaged enough in local elections to vote, or not), are keen for Dover urban area to get the warm, healthy, affordable homes that it is crying out for.</p> <p>3.81 We are relieved to see 30% requirement affordable for the rest of the district referred to here, but it will not become sound or effective unless it becomes a real requirement and not just 'a starting point'.</p> <p>3.83 and 3.84 should be strengthened to become sound.</p> <p>Alas 3.86, about helping people move out of the private rented sector seems unsound and wildly over optimistic in Nov 2022. And it is the transformation of council housing into zero carbon homes, and an increase in social rented, zero carbon homes at scale, homes that will be publicly owned in perpetuity and cannot be lost to private landlords through right to buy, that will address Dover's most urgent needs.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	

Include files	
Local Plan Consultation Point	Strategic Policy 5 - Affordable Housing
Rep ID	SDLP1210
Rep Status	Processed
Consultee ID	1332924
Consultee Full Name	Amy Aldridge
Consultee Company / Organisation	Gladman Developments Ltd
Agent Full Name	Amy Aldridge
Agent Company / Organisation	Gladman Developments Ltd
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP5
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Policy SP5 determines that of schemes of 10 dwellings or more, or 6 or more in Designated Rural Areas, at least 30% of the total housing provided on site must be affordable. Dover Urban Area, as defined on the Policies Map is exempt from this policy and there will be no requirement for affordable housing to be provided on sites in this area. Gladman note that the proposed tenure split is now 55% affordable/social rent, 25% First Homes (30% discount rate) and 20% other affordable home ownership products. Gladman support that the Council have adjusted this to align with the most up to date evidence but consider that the policy itself must be worded so that this level of flexibility continues across the course of the plan period and the tenure splits can be adjusted according to changing circumstances. Gladman welcome the flexibility in terms of viability and consider that this will help ensure the continued delivery of both market and affordable homes across the plan period.</p> <p>(DDC Note - Text Extracted from Document sent from Gladman Developments Ltd. Full attachment can be found under the introduction comment reference SDLP1192)</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 5 - Affordable Housing
Rep ID	SDLP1405
Rep Status	Processed
Consultee ID	1333152
Consultee Full Name	Mr P & Mrs S Laflin & Rubix Estates Ltd
Consultee Company / Organisation	
Agent Full Name	Mr Reece Lemon
Agent Company / Organisation	Lee Evans Partnership
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP5
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Representation submitted by Lee Evans On behalf of Mr and Mrs Lafin and Rubix Estates. Full Representation attached to SDLP1387. This document has been split across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1387.) This policy sets out the LPA's position on affordable housing. It is derived from an extensive evidence base. The provisions of SP5 are generally supported. The Promoter and Landowners are supportive of delivering Affordable Housing for local people. It is welcomed that criterion (3) allows for flexibility in the provision of affordable housing.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 5 - Affordable Housing
Rep ID	SDLP1417
Rep Status	Processed
Consultee ID	1333243
Consultee Full Name	Mr and Mrs Tobin
Consultee Company / Organisation	
Agent Full Name	Mr Reece Lemon
Agent Company / Organisation	Lee Evans Partnership
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP5
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Representation submitted by Lee Evans On behalf of Mr and Mrs Tobin. Full Representation attached to SDLP1411. This document has been split across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1411.)</p> <p>This policy sets out the LPA's position on affordable housing. It is derived from the LPA's evidence base. The provisions of SP5 are generally supported, with due regard had to schemes of a 'minor' nature (i.e. less than 10 dwellings). It is welcomed that criterion (3) allows for flexibility in the provision of affordable housing in certain circumstances; it is noted that a core objective of the Plan is the delivery of housing and an onerous or overly stringent policy could otherwise run counter to aspirations to implement a given scheme, subject to</p>

	3.29 Notwithstanding the above, this policy appears positively prepared and justified in its approach to facilitating housing delivery to serve a wide range of identified need.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 5 - Affordable Housing
Rep ID	SDLP1436
Rep Status	Processed
Consultee ID	1333263
Consultee Full Name	Mark Behrendt
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails	Response by the Home Builders Federation to the consultation on the Dover District Local Plan.

to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

1. Thank you for consulting the Home Builders Federation (HBF) on the Dover District Local Plan that is being proposed for submission to the Secretary of State for examination. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

SP3 – Housing Growth

The policy is unsound as it not effective and is not sufficiently justified by the evidence base

Housing needs

2. The housing requirement of 10,998 over the plan period 2022 to 2040 is consistent with the minimum number of homes the Council should plan for using the standard method. However, what is not clear from the Council's evidence is whether this level of growth will be sufficient to meet the growth aspirations of the Council. Strategic Policy 6 sets out the Council's aspiration to deliver a minimum of 117,290 sqm of additional employment floorspace over the plan period but we could not find evidence to indicate that this number of homes will be sufficient to support the level of economic growth the Council is aspiring to deliver. The NPPF sets out at paragraph 82c that the potential barriers to investment in an area, such as a lack of housing, needs to be addressed in the plan and the Council need to be certain that the housing requirement set out in SP3 is supportive of its aspirations around economic growth.

Older people's housing needs

3. The HBF is concerned with the limited references to the needs to provide special accommodation for older people. It is noted that the mix of homes on allocated

sites will need to take account of the need for such accommodation but there appears to be no indication of whether this will be sufficient to meet the needs identified in the 2019 SHMA update. It also completely ignores the potential to allocate standalone sites to deliver homes for older people and there is no specific policy setting out the need for such accommodation and how the Council will support such development to come forward outside of the strategic allocations. The HBF would recommend that a policy setting out the Council's support for older people's accommodation is include in the plan. In order to be effective, we would suggest that this policy sets out the need for such accommodation and that there a presumption in favour of such development where needs are not being met.

Housing supply

4. Table 3.1 in the Local Plan states that overall housing supply to meet needs is 11,924, leaving a contingency buffer of 924 homes between housing needs and supply - around 8% of needs. Whilst the HBF welcomes the provision of a buffer between needs and supply we do not consider 8% to be sufficiently large to ensure that needs are met in full over the plan period, especially given that around half of the homes will come from the Whitfield Urban Expansion. In order to ensure the Council's needs are met in full the HBF recommends that a buffer of around 20% is necessary. The additional buffer should be brought forward through the allocation of smaller sites which will deliver earlier in the plan period and provide a buffer in overall supply should there be delays in the delivery of the larger strategic sites in Dover.

Meeting affordable housing needs

5. The most recent Strategic Housing Market Assessment undertaken by the Council is the 2019 update to the 2017 SHMA. This sets out hat there is a need for 3,387 new affordable homes between 2020 and 2040. No further assessments appear to have been undertaken since that period. However, the latest AMR indicates that 75 affordable homes were built in 2020/21 with permissions for a further 108 units which can be expected to come forward in 2021/22. As such if the SHMA update is used as the basis for affordable housing needs there remains a need for 3,204 homes over the plan period – around 30% of expected supply on sites that are likely to deliver affordable housing¹.

6. Whilst this would appear to show that on the basis of SP5 the need for affordable housing would be addressed we note that the delivery of affordable housing in the past has been well below what has been expected. The 2020/21 Authority Monitoring Report indicates on page 19 that delivery since 2010/11, the year the Core Strategy was adopted, has been at around 20% of housing completions. In addition, the viability study indicates that the strategic sites will find it challenging to deliver 30% affordable housing. This would suggest that in order to meet needs the Council will need to allocate additional sites.

1 Total supply of 11,924 less small site windfall allowance of 1,050

Conclusions on housing supply

7. To conclude on housing supply the HBF would recommend that further sites are allocated in this local plan. This would have the twin benefits of meeting the need for affordable housing in the district as well as providing an additional buffer between housing needs and supply.

SP5 – Affordable housing

The policy is unsound as it is not fully justified.

8. This policy requires residential development of 10 or more units to deliver 30% of the homes provided as affordable housing. The update notes on the viability study notes at paragraph 56 that this level of affordable housing requirement is deliverable in high and medium value areas alongside the other costs placed on development by the local plan. However, the study outlines that this level of provision will be challenging on the strategic sites and shows that it would not be viable in lower value areas and in the urban area of Dover. The Council recognises these concerns in part by removing the requirement to provide affordable housing in the urban area of Dover. However, no allowance is made with regard to the lower value areas or strategic sites.

9. Whilst the Council states that aside from the strategic allocation there is little planned development in the lower value area it is still necessary for the policy should reflect this evidence presented by the Council. Paragraph 58 of the NPPF recognises that decision makers should be able to assume that development that a policy compliant scheme is viable. This requires policies that place additional costs on development to reflect the evidence and in cases such as this set different requirements for different areas regardless of the development expectations in those areas. As such the HBF would recommend that the policy is amended to remove the requirement for affordable housing contributions in the lower value areas.

10. It is also notable in tables 10.17 and 10.18 of the Whole Plan Viability Study that the outside of greenfield sites at Deal extra care and sheltered housing for older people is not able to viably deliver affordable housing, Given that such development often comes forward on sustainable PDL sites close to services such development should be specifically excluded within SP5 from providing affordable housing contributions.

CC1 – Reducing Carbon Emissions

The policy is unsound as not consistent with national policy, justified or effective.

11. Through policy CC1 the Council indicate that they expect development to meet the Future Homes Standard (FHS) if this becomes a requirement that is delivered

through local plans. However, the expectation from Government is clear that FHS will be delivered through amendments to the Building Regulations and will not be an optional standard adopted as part of a local plan. The improvements to energy efficiency standards in new buildings and the transition to FHS has already started with the improvements to part L of the Building Regulations that came into force in June of 2022. These will see a circa 30% improvement in CO2 emissions prior to the introduction of FHS which will ensure that new homes are zero carbon ready from 2025. As such it is not necessary to refer to the Future Homes Standard and the Council should remove reference to the standard in policy which will be delivered as part of changes to part L of the Building Regulations.

12. The HBF is also concerned that the Council do not appear to have tested the Future Homes Standard within the update note on the viability assessment. The update note sets out at paragraph 23 that the initial improvements to the energy efficiency introduced in June of 2022 were included but no additional costings have been made with regard to the Future Homes Standard. The Government expects this to cost the house building industry an extra £100 million per year though this fails to recognise that there is likely to be additional electricity connection costs with the move away from gas and that the assumed reduction in the cost of air source heat pumps is unlikely². Given the significant increase in costs from these new standards will come into force in 2025, not long after the expected adoption of this local plan, these costs should have been considered through the viability assessment.

NE1 – Biodiversity Net Gain

Policy is not needed as this will be delivered through the Environment Act and support regulations.

13. Given that the requirement to provide a 10% Biodiversity Net Gain is set out in legislation and supporting regulations and guidance and will be in force when the plan is adopted, the HBF would question whether it is necessary to include a detailed policy on BNG. Including a detailed policy could lead to inconsistency between policy and legislation should this change either prior to the introduction of BNG at the end of 2023, or if there be changes to regulation and guidance in future. As council notes in para 11.6 the policy is intended to reflect the requirements of the Act and as and we would suggest that it would be more appropriate to refer in policy SP14 to the need to deliver a 10% BNG in line with relevant legislation and guidance.

Conclusion

14. At present we do not consider the plan to be sound, as measured against the tests of soundness set out in paragraph 35 of the NPPF, in the following key areas:

Economic growth has not been taken into account when considering the minimum number of homes to be planned for;

	<p>Greater flexibility required in the local plan to ensure needs are met in full; No specific policy with regard to the needs of older people Affordable housing policy does not reflect the full evidence on viability References to Future Homes Standard in policy CC1 unnecessary and unjustified No need to include detailed policy on BNG given that this is a requirement of legislation with associated regulations and guidance</p> <p>15. We hope these representations are of assistance in taking the plan forward to the next stage of plan preparation and examination. I would also like to express my interest in attending any relevant hearing sessions at the Examination in Public. Should you require any further clarification on the issues raised in this representation please contact me.</p> <p>2 Building Homes in a changing business environment: an assessment of new and forthcoming additional costs of housing delivery. (HBF, 2022) https://www.hbf.co.uk/documents/12117/HBF report - Building Homes in a Changing Business Environment.pdf</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>To conclude on housing supply the HBF would recommend that further sites are allocated in this local plan. This would have the twin benefits of meeting the need for affordable housing in the district as well as providing an additional buffer between housing needs and supply.</p> <p>It is also notable in tables 10.17 and 10.18 of the Whole Plan Viability Study that the outside of greenfield sites at Deal extra care and sheltered housing for older people is not able to viably deliver affordable housing, Given that such development often comes forward on sustainable PDL sites close to services such development should be specifically excluded within SP5 from providing affordable housing contributions.</p> <p>The HBF is also concerned that the Council do not appear to have tested the Future Homes Standard within the update note on the viability assessment.</p> <p>Given that the requirement to provide a 10% Biodiversity Net Gain is set out in legislation and supporting regulations and guidance and will be in force when the plan is adopted, the HBF would question whether it is necessary to include a detailed policy on BNG. Including a detailed policy could lead to inconsistency between policy and legislation should this change either prior to the introduction of BNG at the end of 2023, or if there be changes to regulation and guidance in future. As council notes in para 11.6 the policy is intended to reflect the requirements of the Act and as and we would suggest that it would be more appropriate to refer in policy SP14 to the need to deliver a 10% BNG in line with relevant legislation and guidance.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>I would also like to express my interest in attending any relevant hearing sessions at the Examination in Public.</p>
<p>Include files</p>	<p>SDLP1431 Behrendt.pdf SDLP1431 Behrendt Em1.pdf</p>
<p>Local Plan Consultation Point</p>	<p>Strategic Policy 5 - Affordable Housing</p>
<p>Rep ID</p>	<p>SDLP1631</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1333382</p>
<p>Consultee Full Name</p>	<p>Mr Colin and Linda Tearle</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	<p>Gurdev Moore</p>

Agent Company / Organisation	Rubix Estates
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP5
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Representation submitted by Rubix Estates. Full Representation attached to SDLP1624. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1624.)</p> <p>This policy sets out the Local Planning Authority's (LPA) position on affordable housing. It is derived from an extensive evidence base.</p> <p>3.27 The provisions of SP5 are generally supported, though refinement to the policy should be made to ensure that its application does not become a barrier to delivery. It is welcomed that criterion (3) allows for flexibility in the provision of affordable housing.</p> <p>3.29 This policy should introduce an additional criterion to maximise its application and implementation, with the underlying objective to encourage viable development delivery. This amendment should include for the following clarifications [amendments in bold text]:</p> <p>3 Should independently verified viability evidence establish that it is not possible to deliver the affordable housing as required by part 1 of this policy, and the viability position is agreed by the Council, the Council will consider, on a case by case basis, flexibility in the provision of affordable housing, including through the following options:</p> <ul style="list-style-type: none"> a Change in the tenure mix required; or b Reductions in the overall proportion of affordable housing; or c Provision of an off-site financial contribution in lieu of affordable housing provision on site, to secure equivalent provision of affordable housing off site, including 25% to secure First Homes; or d A combination of the above; or e Deferred contributions; or <p>if Any other suitable alternative as may be agreed with the Council, taking account of site specific circumstances.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 5 - Affordable Housing
Rep ID	SDLP1856
Rep Status	Processed
Consultee ID	1333802
Consultee Full Name	Churchill Retirement Living
Consultee Company / Organisation	Churchill Retirement Living
Agent Full Name	Ziyad Thomas
Agent Company / Organisation	Planning Issues
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP5
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes

6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

POLICY SP5: AFFORDABLE HOUSING

The Dover District Local Plan (Regulation 19) Consultation is one of an alarmingly limited number of emerging Local Plans that have set a differential affordable housing rates with a nil affordable housing rate in the Dover Urban Area. This is, of itself, highly commendable and suggests a greater focus on viability at the Plan making stage.

The affordable housing targets set out in Policy SP5: Affordable Housing are informed by the corresponding evidence base – namely the Dover Whole Plan Viability Study (WPVS) undertaken by HDH Planning & Development (2020). We note that the WPVS has assessed the viability of older persons' housing typologies, which is welcomed.

In reviewing the methodology for assessing specialist older persons' housing, we note that many of the inputs align with the methodology detailed in the Briefing Note on Viability Prepared for the Retirement Housing Group (hereafter referred to as the RHG Briefing Note) by Three Dragons, although a number do not.

The results of the viability modelling for older persons' housing typologies are provided in Table 10.17 and 10.18 of the WPVA. This concludes that:

10.83 In the case of Sheltered housing, the appraisals produce a residual value that is over the BLV at 30% Affordable Housing on greenfield sites, but only 5% on brownfield sites.

10.84 In the case of Extracare housing, the Residual Value does not exceed the BLV, even without Affordable Housing.

10.85 Care should be taken when considering additional policy requirements in this sector.

10.86 When considering the above, it is important to note that paragraph 10-007-20180724 of the updated PPG specifically anticipates that the viability of specialist older people's housing will be considered at the development management stage. It is therefore not necessary to develop a specific Affordable Housing policy for Sheltered and Extracare Housing

Churchill Retirement Living are strongly of the view that it would be more appropriate to set a nil affordable housing target for sheltered and extra care development, at the very least in urban areas. This approach accords with the guidance of the PPG which states that 'Different (affordable housing)

Page 2

requirements may be set for different types or location of site or types of development' (Paragraph: 001 Reference ID: 10-001-20190509).

The guidance in the NPPF and the PPG is that the role for viability assessment is primarily at the Plan making stage:

Where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. The weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case, including whether the plan and the viability evidence underpinning it is up to date, and any change in site circumstances since the plan was brought into force (paragraph 57.)

Council Members, Officers and the general public will assume that applications for sheltered or extra care housing will be able to support a policy compliant level of affordable housing. This would however be wholly at odds with the viability evidence underpinning the Local Plan.

The Dover Urban Area offers a nil affordable housing requirement based on viability, which as the principal town will be amongst the most suitable areas in the District for specialist older persons' housing. This is commendable.

Other large settlements such as Sandwich and Deal will however also be suitable locations for specialist older person's housing. In the urban areas outside of the Dover Urban Area, these forms of development will be subject to the 30% requirement, despite the evidence base clearly demonstrating that this is an unviable requirement.

The requirement for affordable housing contributions from specialist older persons' housing typologies is therefore speculative rather than based on the evidence presented. The Local Plan is therefore considered to be unsound on the grounds the affordable housing targets are not justified, positively prepared or effective.

We therefore respectfully request that a new subclause is added stating that:

a) Specialist older persons' housing will be subject to a nil affordable housing requirement on brownfield / urban sites and a 30% affordable housing requirement on greenfield sites.

To that end, we would like to draw the Council's attention to Paragraph 5.33 of Policy HP5: Provision of Affordable Housing in the emerging Fareham Borough Local Plan which advises that:

5.33 ... The Viability Study concludes that affordable housing is not viable for older persons and specialist housing. Therefore, Policy HP5 does not apply to specialist housing or older persons housing.

A nil affordable housing rate could facilitate a step-change in the delivery of older person's housing in the District, helping to meet the diverse housing needs of the elderly. The benefits of specialist older persons' housing extend beyond the delivery of planning obligations as these forms of development contribute to the regeneration of town centres and assist Council's by making savings on health and social care.

Thank you for the opportunity for comment.

<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	Viability & interpretation of the PPG is complex and would best communicated verbally.
<p>Include files</p>	Thomas Planning Issues (Churchill Retirement) 1157 Att2_Redacted.pdf

Strategic Policy 6 - Economic Growth

Local Plan Consultation Point	Strategic Policy 6 - Economic Growth
Rep ID	SDLP458
Rep Status	Processed
Consultee ID	1266351
Consultee Full Name	Dr Sharon Danby
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP 6 Economic growth
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>This section of the plan is not consistent with NPPF 21 - development must be sustainable - there is no mention of green economic growth.</p> <p>Quality of 'growth' is more important in crisis-ridden 2020 to 2040 than quantity of 'growth'. Because it is more sustainable as we look ahead to 2040 – 2060 and beyond.</p> <p>In the current economic climate energy prices, business rates, public sector cuts are making public and private sector employers (care homes, schools, health centres, hospitality, police (£30 million cut in Kent), buses, independent retail) fear for their survival.</p> <p>To be sound, effective and compliant with the realities of here and now, this is the direction DDC Local Plan should take. The local economy needs pump-priming, national fuel security needs to be enhanced, people need lifting out of fuel poverty. The local plan could do more than allocating sites and floor space.</p> <p>Transition to a greener economy, a means of making us more resilient economically, will be helped considerably by the ambitions of Port of Dover to decarbonize its estate by 2025 and to take seriously its scope 3 corporate responsibility in an inclusive manner to support local communities and economic players as they transition to a greener business too.</p> <p>There appears to be little mention of using the Local Plan to improve educational attainment by, for example, specific policies to</p> <ol style="list-style-type: none"> forge deeper links with FE institutions (eg Dover Technical College) given the skills gap relating to the Green Homes agenda, encourage higher education establishments to develop facilities in the district, and thereby to develop a knowledge-based economy beyond the former Pfizer's site. encourage the long-promised incubation hubs for the newly qualified in the district. This would contribute to raising the average level of earnings in the district and to combating the high levels of deprivation experienced in some wards. <p>A glaring omission relates to new economic opportunities created by climate-friendly recovery sectors. Three are essential in Dover District. With a 70% rural economy, which is severely challenged by increased costs of imports, and climate problems including water shortage. Diversification into agri-forestry could become popular among the farming community. It is recommended by Nature-Friendly Farming Network. Examples include</p>

	<p>a) protecting arable yields in cases of drought, by planted strips of suitable, native, drought-tolerant trees, (which counter soil erosion, while increasing carbon sequestration) and,</p> <p>b) bringing back to life existing but neglected, traditionally coppiced woodland, causing it to be harvested for small-scale biomass on a rotational basis. Similarly, short rotation forestry would create rural income and mitigate climate change.</p> <p>Another key to meeting climate targets is increasing the amount of land used for growing food for people rather than livestock. This would create new outdoor jobs as would replacing imported market-gardened food, with locally grown fruit, vegetables and pulses, this is a growth sector too, and is especially sustainable where zero / minimal pesticides are used, and Nature Friendly Farming practices are used. So rural areas, fields and woodland should be valued as locations of employment in themselves.</p> <p>The up-grading of all rented housing stock (both public and private sector) to zero homes standard, would mean, it doesn't need to be done again before the local and legally-binding national target of 2050, and is thus a pre-requisite for the Local Plan to become legally compliant, and this can be made to benefit the local economy. It will be necessary to ensure that publicly owned rented housing stock stays in public hands. To incentivise private landlords, DDC should set up a register of private landlords, and to qualify for registration, landlords should have to show that homes rented are EPC C in 2023, EPC B in 2024, and zero carbon in 2025. As this will push up the value of their property, landlords should not find it difficult to access cheap loans to carry out the retrofit, (DDC could plan an intermediary role or suggest sources of finance). Tenants will benefit in terms of heating costs saved and improved standards of health, which is also a saving to the public purse. The economy will benefit in terms of jobs created for local trades people.</p> <p>A third sector would include the fitting and maintenance of renewable energy installations, e.g. small-scale on-shore wind, small and medium scale solar (on domestic or non-residential roofs or to be combined with grazing land below, also on car parks), micro-tidal (tidal currents we are advised are very suitable locally), or 'green gas' as pioneered by Ecotricity in Hampshire (as the grass-cuttings from Dover's many golf courses and campsites are likely to be suitable). To maintain the returns on investment in these sectors within the regional economy, and stop them being off-shored, a priority should be given to schemes which are 51% or more community-owned.</p> <p>The Dept for Transport bought the site they wanted for Dover Inland Border Facility from a farmer in Guston for £22million, and in 2022 DfT publicly said the site would not be needed as Dover IBF. Could this become a combination of grazing under solar canopies? Near 2 schools and a sports centre, it is an unsuitable location for the HGV park that is needed at a site further outside the Dover urban area.</p> <p>Tourism and Tourist / Visitor Accommodation.</p> <p>It is very unsound, for DDC to fail to make AirB&B owners register with them, so that they can be charged business rate council tax. In terms of housing provision, AirB&B, both nationally, and in Kent's coastal towns especially, have a very negative effect of reducing the private rental market in 2022 and thus forcing up the average monthly rents for private tenants.</p> <p>The local plan would be more compliant with legality, if DDC regeneration took the greening of the economy more seriously and looked at smaller zero-carbon tourism /transport activity projects within Dover town; harbour trips with zero carbon, solar-powered boats. Better coach and toilet facilities are needed to boost tourism in Dover.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Public Works Loan Board or municipal loans could be used in Dover as in East Sussex, where they've invested in skilled jobs transforming existing homes into zero carbon homes across seven district councils. (The Lewes Model explained Green World).</p> <p>Businesses to be encouraged and helped to have more solar PV and Wind turbines.</p> <p>Solar canopies over the marshalling yards of Port of Dover, to generate energy that fridge trucks (whose engine-idling contaminates Dover) could plug into while waiting to board ferries.</p> <p>Rural economy growth through new farming initiatives (see above).</p> <p>Upgrade housing stock - so creating green jobs</p> <p>Improve facilities to promote tourism in Dover town.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 6 - Economic Growth
Rep ID	SDLP301
Rep Status	Processed
Consultee ID	1331112
Consultee Full Name	Miss Emma Waller
Consultee Company / Organisation	Kent Wildlife Trust
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP6 - Economic Growth
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Regarding SP6 - Economic Growth, we are concerned about the inclusion of Fort Burgoyne as a site allocation for economic growth. This is due to the importance of the site as a hibernation site for hundreds/thousands of bats, which are a protected species. The redevelopment of Fort Burgoyne could have a significant detrimental effect on Dover's local bat population, and therefore go against the Spectacular and Sustainable Environment Strategic Objective, which states <i>"to conserve and enhance the District's biodiversity [...] priority habitats and species"</i> . There are seven species of bat listed as UK BAP Priority Species.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 6 - Economic Growth
Rep ID	SDLP802
Rep Status	Processed
Consultee ID	1259612
Consultee Full Name	Mr Chris Shaw
Consultee Company / Organisation	Langdon Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Strategic Policy 6 - Economic Growth Clause 6
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Limited employment opportunities in the village could result in further out-commuting/pressure on roads. Could some sort of economic use be incorporated?
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	Could some sort of economic use be incorporated?

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 6 - Economic Growth
Rep ID	SDLP560
Rep Status	Processed
Consultee ID	1267584
Consultee Full Name	Jason Ransley
Consultee Company / Organisation	Dover Harbour Board
Agent Full Name	John Bowles
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Strategic Policy SP6 - Economic Growth
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Dover Harbour Board supports Strategic Policy SP6 - Economic Growth which supports the expansion of port facilities at Dover's Western Docks and (having regard to the Economic Growth Strategy 2021 and the Economic Development Needs Assessment 2021) the allocation of further sites including at Dover Waterfront which offer significant opportunity to regenerate brownfield sites in key locations in the District and deliver flexible employment use to support the achievement of a step change in the delivery of economic growth in the District. However, we consider that the development potential of this area is understated in the 'Estimated Employment Floorspace Supply' in Table 3.5 Employment Land Supply in the supporting text to Policy SP6.</p> <p>Dover Harbour Board considers that the estimated employment floorspace of 2,350 sqm shown in Table 3.5 significantly understates the development potential and deliverable floorspace of this area within the plan period. Dover Harbour Board's plans for the regeneration of the Waterfront include the replacement of a number of existing buildings, re-purposing of others and construction of new buildings particularly in the area around the Cut and the Marina Curve. As was identified in the Dover Waterfront Strategic Plan – March 2021, there is at least some 4,500 sqm of existing commercial space within the Waterfront which is to be replaced and, with the opportunities for new buildings on the</p>

	development platforms being created, we consider that an estimated floorspace figure of 10,000 sqm should be included in Table 3.5. We request that the Local Plan is amended to reflect the greater potential of this area to deliver the Council's economic growth aspirations.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Amend Table 3.5 Employment Land Supply to substitute the figure of 2,350 sqm with the figure 10,000 sqm in the 'Estimated Employment Floorspace Supply' column in respect of Dover Waterfront.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	N/A
Include files	SDLP0560 Dover Harbour Board - Att 2.pdf Waterfront Plan - Update 2022.pdf (1)
Local Plan Consultation Point	Strategic Policy 6 - Economic Growth
Rep ID	SDLP750
Rep Status	Processed
Consultee ID	1331585
Consultee Full Name	Terence Hopper
Consultee Company / Organisation	
Agent Full Name	Terence Hopper
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Strategic Policy SP6 Economic Growth
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>SP6 fails to consider the very small business or self-employed who will not easily fit in larger centralised employment zones. Fencing contractors, small builders, and landscape gardeners to name but a few. Many of who would be better placed within the communities they serve. This policies aims appear somewhat restrictive and exclusionary in that respect. Many of the smaller employment sites that would better suit these businesses seem to be being converted to housing, in an attempt to tidy up an area, SAN008, Woods Yard in Sandwich is a prime example of just such a site. Curiously, this site was marked positively for employment creation in the site assessment document. Despite the planned change to housing.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Reconsider the conversion of employment sites to housing allocation in an attempt to tidy up an area. This could easily be achieved with employment uses if the desire was there. Often this is a ploy used by landowners to achieve planning status for houses. Consider wider ranges of employment needs, other than those on an industrial estate.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>Strategic Policy 6 - Economic Growth</p>
<p>Rep ID</p>	<p>SDLP1058</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331762</p>
<p>Consultee Full Name</p>	<p>Ms Waite-Gleave Sarah Waite-Gleave</p>
<p>Consultee Company / Organisation</p>	<p>Dover and Deal Green Party</p>
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>

<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified Effective Consistent with National Policy</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>No</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>No</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>Quality of 'growth' is more important in crisis-ridden 2020 to 2040 than quantity of 'growth'. Because it is more sustainable as we look ahead to 2040 – 2060 and beyond. Quick fixes, gig economy and nail-bars do not a climate-friendly sustainable economy make. November 2022. Energy prices, business rates, public sector cuts are making public and private sector employers (care homes, schools, health centres, hospitality, police (£30 million cut in Kent), buses, independent retail) fear for their survival. The reality.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Public Works Loan Board or municipal loans could be used in Dover as in East Sussex, where they've invested in skilled jobs transforming existing homes into zero carbon homes across seven district councils. (The Lewes Model explained Green World) To be sound, effective and compliant with the realities of here and now, this is the direction DDC Local Plan should take. The local economy needs pump-priming, national fuel security needs to be enhanced, people need lifting out of fuel poverty. The local plan could do more than allocating sites and floor space.</p> <p>Transition to a greener economy, a means of making us more resilient economically, will be helped considerably by the ambitions of Port of Dover to decarbonize its estate by 2025 and to take seriously its scope 3 corporate responsibility in an inclusive manner to support local communities and economic players as they transition to a greener business too. Our team, which included 2 councillors elected to Dover Town council in 2019/2020, have put the following suggestions forward at DoverTC; Port of Dover to be approached regarding more solar PV on their buildings and the installation of wind turbines on the harbour walls like the ports of Boulogne and Liverpool, Eurotunnel to be approached about wind turbines on the Samphire Hoe breakwaters, Network rail to be approached about solar PV on Dover priory station buildings, similarly for Stagecoach and the planned new bus station at York street. We have since become aware of PoD's interest in hydro renewables too. We also recommend high solar canopies over the marshalling yards of Port of Dover, to generate energy that fridge trucks (whose engine-idling contaminates Dover) could plug into while waiting to board ferries.</p> <p>There appears to be little mention of using the Local Plan to improve educational attainment by, for example, specific policies to a) forge deeper links with FE institutions (such as the laudable, forward-looking Dover Technical College) given the skills gap relating to the Green Homes agenda, b) encourage higher education establishments to develop facilities in the district, and thereby to develop a <u>knowledge-based economy</u> beyond the former Pfizer's site. And c) encourage the long-promised incubation hubs for the newly qualified in the district, have fallen victim to central gov't's stop/start sound-byte culture, these a, b, c, should be a requirement. This would contribute to raising the average level of earnings in the district and to combating the high levels of deprivation experienced in some wards.</p> <p>A glaring omission relates to new economic opportunities created by climate-friendly recovery sectors. Three are essential in Dover District. With a 70% rural economy, which is severely challenged by increased costs of imports, and climate problems including water shortage, our agricultural advisor tells us that diversification into agri-forestry could become popular among the farming community. It is recommended by Nature-Friendly Farming Network and featured on BBC Countryfile 28/2/21. Examples include a) protecting arable yields in cases of drought, by planted strips of suitable, native, drought-tolerant trees, (which counter soil erosion, while increasing carbon sequestration) and, b) bringing back to life existing but neglected, traditionally coppiced woodland, causing it to be harvested for small-scale biomass on a rotational basis. Similarly, short rotation forestry would create rural income and mitigate climate change. Another key to meeting climate targets is increasing the amount of land used for growing food for people rather than livestock. This would create new outdoor jobs as would replacing imported market-gardened food, (on which red-tape has increased) with locally grown fruit, vegetables and pulses, this is a growth sector too, and is especially sustainable where zero / minimal pesticides are used, and Nature Friendly Farming practices are used. (See comments on opportunity to protect and expand Horticultural Belt LCT D in north of district in NE2 below) So rural areas, fields and woodland should be valued as locations of employment in themselves.</p> <p>The up-grading of all rented housing stock (both public and private sector) to zero homes standard, mentioned above, would mean, it doesn't need to be done again before the local and legally-binding national target of 2050, and is thus a pre-requisite for the Local Plan to become legally compliant, <u>and this can be made to benefit the local economy</u>. It will be necessary to ensure that publicly owned rented housing stock stays in public hands. To incentivise private landlords, DDC should set up a register of private landlords, and to qualify for registration, landlords</p>

should have to show that homes rented are EPC C in 2023, EPC B in 2024, and zero carbon in 2025. As this will push up the value of their property, landlords should not find it difficult to access cheap loans to carry out the retrofit, (DDC could plan an intermediary role or suggest sources of finance). Tenants will benefit in terms of heating costs saved and improved standards of health, which is also a saving to the public purse. **The economy will benefit in terms of jobs created for local trades people.**

A third sector would include the fitting and maintenance of renewable energy installations, e.g. small-scale on-shore wind, small and medium scale solar (on domestic or non-residential roofs or to be combined with grazing land below, also on car parks), micro-tidal (tidal currents we are advised are very suitable locally), or 'green gas' as pioneered by Ecotricity in Hampshire (as the grass-cuttings from Dover's many golf courses and campsites are likely to be suitable). To maintain the returns on investment in these sectors within the regional economy, and stop them being off-shored, a priority should be given to schemes which are 51% or more community-owned.

The Dept for Transport bought the site they wanted for Dover Inland Border Facility from a farmer in Guston for £22million, and in 2022 DfT publicly said the site would not be needed as Dover IBF. Could this become a combination of grazing under solar canopies? Near 2 schools and a sports centre, it is an unsuitable location for the HGV park that is needed at a site further outside the Dover urban area.

It is very unsound, for DDC to fail to make AirB&B owners register with them, so that they can be charged business rate council tax. In terms of housing provision, AirB&B, both nationally, and in Kent's coastal towns especially, have a very negative effect of reducing the private rental market in 2022 and thus forcing up the average monthly rents for private tenants, while we have a cost-of-living crisis, so homelessness, hidden and audited, increases. Green tourism, and 'safe' country lanes, are East Kent assets that would be very unsound to trash.

The local plan would be more compliant with legality, if DDC regeneration took the greening of the economy more seriously and looked at smaller zero-carbon tourism /transport activity projects within Dover town; harbour trips with zero carbon, solar-powered boats (like La Rochelle has had for 15 years), like electric hopper mini-buses (like the ones which have been coping with the 1 in 6 gradients of Aix-en-Provence for over 10 years).

Economic Growth in a coastal town aspiring to attract tourists would be unsound unless it included trebling the number of toilets installed. Tourists as well as residents have toilet needs. For a town with the iconic, historical importance of Dover NOT to have any coach park with lavatorial comfort facilities is a disgrace. The ratio of inhabitants to toilet blocks in Dover town is treble the ratio in other urban areas in the District, 1 : 10,000 or higher. The only coach park in Dover Town has, for 5 years, had 2 signs on Maison Dieu Road telling coach drivers and visiting car drivers that a toilet exists when in fact it doesn't. At this location in Maison Dieu car park, behind the police station, visitors get out, pay to park and find nothing, merely a sign to a 15 minute walk to Pencester Gardens, difficult when legs are crossed. The DDC website misleads the public on this issue. The lack of toilets is a public health problem which we have referred to Kent Director of Public health.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.

Include files

[v4 D&D Greens response 2022 Reg 19 new Local Plan .docx](#)

Local Plan Consultation Point

Strategic Policy 6 - Economic Growth

Rep ID

SDLP1053

Rep Status

Processed

Consultee ID

1331838

Consultee Full Name

Christian Pryce

Consultee Company / Organisation

Dover Harbour Board

Agent Full Name	Paul Carnell
Agent Company / Organisation	Strutt and Parker
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	TIF - Overnight Lorry Parking Facilities
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>These representations to the Regulation 19 stage local plan consultation are made by Dover Harbour Board. The Harbour Board is responsible for the administration, maintenance and improvement of the harbour at the Port of Dover, which itself is the busiest international roll-on roll-off ferry port in the UK.</p> <p>The Port of Dover is one of the UK's most important strategic economic assets. The Port of Dover is the UK's busiest international ferry port, handling more lorries than all other UK ports. Its operation is capable of facilitating 120 ferry movements and 110 miles of freight per day. £144bn worth of UK trade and 33% of all trade with the EU is handled by the Port of Dover.</p> <p>Further, Dover is the UK's second busiest cruise port. Over 200,000 cruise passengers visit the Port of Dover, a number The Harbour Board is actively looking to grow. Embarkations on day trips and excursions directly boost the local and regional economy, with an average passenger spend equivalent to £322 pre-embarkation, and £84 during a port visit. The benefits to the local Dover economy are significant; it is estimated that this generates circa £47m of direct passenger spending annually in the local economy. The Port of Dover indirectly supports over 5,000 jobs, many of them in the local area, many of which would be affected by any reduction in cruise calls.</p> <p>The Port of Dover therefore is a significant stakeholder in Dover District with a large influence on the local economy, both directly in terms of visitors, passenger throughput and employment, and indirectly by its impact on the highway network. The Harbour Board considers that the emerging Dover Local Plan needs to appropriately consider and account for the aspirations of The Harbour Board to improve operations more widely and plan for a low carbon future.</p> <p><u>Port Operations</u></p> <p>Port activity and operations can have a wide impact on the District and County. This is particularly the case in terms of highways given the volume of freight and passenger traffic experienced each year. This results in logistical challenges to ensure effective port operations which safeguard the economic benefits delivered by the Port, whilst also ensuring any adverse impacts on the locality are limited.</p> <p>In recent years the Port of Dover has experienced more periods of travel disruption (outside of The Harbour Board's control) than has previously been the case, resulting in national and international media coverage. This has had an adverse impact on the Port itself and Dover District. The Harbour Board is therefore committed to reducing wider impacts on both the highway network and the amenity of local residents from future disruptions to channel crossings.</p> <p>Draft Policy T14 – Overnight Lorry Parking Facilities</p> <p>Paragraph 109 of the National Planning Policy Framework (NPPF) notes that “<i>Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance.</i>”</p> <p>A lack of overnight parking in Dover District has been identified by Kent County Council and Draft Policy T14 seeks to address this issue through a criteria-based policy for a lorry park and associated facilities. The Harbour Board supports the principle of such provision to remove HGVs</p>

from the highway, but the provision of a truck stop alone deals with only part of the identified problem, especially at times of channel crossing disruption.

Dover District Council are aware of the Harbour Board's intention to deliver an Inland Terminal. This is considered a vital piece of Port infrastructure which will need to come online during the plan period (see below for further detail). Lorry parking facilities and the Inland Terminal are compatible and complementary land uses (as evidenced by the facilities provided at Sevington in Ashford) and The Harbour Board considers that there are significant benefits of co-joining these facilities.

Inland Terminal

Dover Harbour Board needs to deliver an Inland Terminal Facility. This is required to ease pressure on the Port of Dover by supplementing existing facilities or, in some cases, relocating them entirely to the inland site. There are a number of reasons why the Port needs this facility.

EU Entry/Exit System (EES)

The Council will be very aware of the Dover Traffic Assessment Project (TAP) and the associated Brexit Operations Across Kent, otherwise known as Operation Brock. These are measures put in place to deal with HGV traffic when Port operations have been disrupted, for example as a result of delays to channel crossings. The aim is to regulate the flow of HGVs into Dover along the A20 and M20 to ease congestion and allow residents and other users of the strategic road network to access Dover and go about their business.

The measures include left hand lane only use of the A20 by HGVs, queuing on the A20, contraflows on the M20, separation of traffic between Euro Tunnel and the Port, and the use of Manston Airport as a temporary lorry park.

TAP and Operation Brock are emergency measures to keep non-freight traffic moving and allow HGVs and their drivers to be safely located whilst the problems causing issues at the Port are dealt with, and until such time as crossings and travel return to normal. However, events in the past 12 months have demonstrated that significant disruption can still occur, particularly at times of prolonged delays. This results in an economic cost in terms of time lost by both freight business and other road users, and also a social cost given the number of lorry drivers held for long periods on motorway and trunk road verges with no welfare facilities.

The Harbour Board have been looking at more permanent solutions. However, the pending introduction of the EU Entry/Exit System (EES) is a further driver to pursue this goal. EES is a large-scale IT system that is being implemented as part of the European Union's 'Smart Borders Package', and is due to launch in May 2023. It will enable automatic monitoring of border crossings by 'third-country nationals' into and out of the EU. This includes UK nationals in addition to all members of non-EU states outside the Schengen Area.

The system will register a person's name, type of travel document, biometric data (fingerprints and captured facial images) and the date and place of entry and exit, and will fully replace the system of manually stamping passports. The Port of Dover has undertaken an assessment of the impacts of EES and has concluded it is very likely to have a profound effect on its operations if undertaken within the bounds of the Port itself. In a worst case scenario this would include excessive queues outside the Port for up to 365 days per year, necessitating the permanent operation of TAP and Operation Brock.

The provision of an appropriately located Inland Terminal facility would help to alleviate pressure on the Port and A20 given it would allow certain checks to be undertaken prior to entry to the main Port facility, speeding up operations whilst also removing large numbers of HGVs off the road and allowing drivers to rest and use welfare facilities.

Facilities/Welfare

An Inland Terminal facility would allow provision of significant improvements to HGV driver facilities in the District. This would enable the Port of Dover to contribute toward the wider government objective of improving conditions for HGV drivers and logistics workers more generally.

The Government's Road Freight Supply Chain Transport Committee¹ noted the difficulties the sector has had with recruitment and retention of staff, both of which contributed to the wider supply chain shocks experienced since the start of the pandemic. The committee heard evidence that one of the key reasons drivers do not stay in the sector is the lack of high-quality rest facilities, especially on key road freight routes.

Therefore improving the working conditions of HGV drivers is an important element of both retaining staff and encouraging others to choose transport logistics as a career.

This issue is also raised in the Department for Transport's publication "Future of Freight: a long-term plan" (June 2022)² which includes 'People and Skills' as one of its priority areas. One strategic goal is to ensure "*the freight and logistics sector will be seen as an industry of choice for a diverse group of talented and skilled people at all stages of their career and will have the people and skills that it needs to thrive*". Improving general working conditions through the provision of better facilities for drivers will be an important part of the wider strategy to improve the UK's freight and logistics sector.

Sustainability

The Inland Terminal would also be an important element of The Harbour Board plans to decarbonise Port of Dover activity and respond to wider changes in logistics such as the predicted increase in electric vehicles. This is explored more generally later in this representation, but the Inland Terminal would provide opportunities for on-site microgeneration of power and opportunities for electric vehicles to recharge where necessary before proceeding to the port.

Co-location of Inland Terminal and Overnight Lorry Park

An overnight lorry park and the Inland Terminal facility share a common set of site search criteria. They both require a large, level site which can be appropriately accessed from the Strategic Highway Network without causing disruption for other road users. They should also be located in close proximity to the Port, provide opportunities for landscaping to limit visual impact, be able to deliver biodiversity net gains and be located an appropriate distance from sensitive receptors such as residential properties.

There is a need to deliver the Inland Terminal and overnight Lorry Parking in Dover, but the very specific site criteria noted above reduces the amount of suitable sites in the District. The Local Plan should therefore seek to co-locate these facilities in order to increase the chances of delivery of both pieces of important infrastructure.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Recommended Policy

The Harbour Board proposes amendments to Policy TI4 so that it includes an area of search for the co-joined Inland Terminal and Lorry Park. The most appropriate location for an Inland Terminal would be to the east of the Roundhill Tunnels. This would ensure the facility is located wholly within Dover District and reduces the potential for conflict with Eurotunnel traffic and operations. It would also allow The Harbour Board to manage Port traffic more efficiently (through use of traffic cameras etc).

Land within the Kent Downs Area of Outstanding Natural Beauty (AONB) should not be excluded from the Area of Search. The NPPF provides a high degree of protection against inappropriate development in AONBs. Paragraph 177 notes applications for major development (such as an Inland Terminal/Lorry Park) should only be allowed in “*exceptional circumstances*” and where it can be demonstrated that “*the development is in the public interest*”.

The need for the Inland Terminal within the area of search suggested by The Harbour Board is significant and could meet these tests, which set a high bar for development proposals. This should be tested at Planning Application stage rather than excluded by Local Plan Policy.

The Harbour Board is therefore proposing an area of search along the A20 corridor, east of the Roundhill Tunnels.

An amended criteria-based policy should then be applied to potential development sites which come forward. The following amended Policy text is recommended:

TI4 – Inland Terminal and Overnight Lorry Parking Facilities

Inland Terminal Facilities to serve the Port of Dover to include overnight lorry parking facilities will be supported, subject to other policies in the Local Plan, within the following areas of search:

- *A20 corridor east of the Roundhill Tunnels*
- *A2/M2 Corridor*

Development will be subject to the following criteria:

- 1 *The site must be accessed from the Strategic Road Network (A20);*
- 2 *Applications must be supported by a Landscape and Visual Impact Assessment which informs the site layout, capacity and mitigation requirements;*
- 3 *A comprehensive landscape scheme should be provided to conserve and enhance the AONB and/or its setting;*
- 4 *Proposals for the mitigation of noise and air quality impacts from lorry movements and any associated commercial, welfare and support services will need to be provided as part of any application;*
- 5 *A lighting strategy must be submitted with any application and suitable mitigation will be required to deal with artificial lighting, to restrict the impact of the development on neighbouring residential properties or vulnerable uses;*
- 6 *Adequate space for access, sight lines, turning and manoeuvring must be provided in addition to the required parking spaces*

The inclusion of a Policy which seeks to deliver inland terminal facilities will ensure Dover District Council retains control over the provision and location of these facilities.

Summary

	<p>The NPPF sets out that the purpose of the planning system is to contribute to the achievement of sustainable development. Achieving sustainable development includes an economic objective – to help build a strong responsive competitive economy. Local planning policies and decisions are expected to help create the conditions in which businesses can invest, expand and adapt.</p> <p>The NPPF makes clear that planning policies and decisions should recognise and address the specific locational requirements of different sectors and that planning policies should also provide for large scale transport facilities, located in areas of need, taking into account any local shortages.</p> <p>The 'Future of Freight' document notes that <i>"In 2021, the Department for Transport made a Written Ministerial Statement with the Department for Levelling Up, Housing and Communities, which made clear that in preparing local plans and deciding planning applications, the specific locational requirements of different industrial sectors should be recognised and addressed by local planning authorities."</i></p> <p>The Inland Terminal will be needed by Dover Harbour Board during the life of the plan. It is a key piece of infrastructure required to support The Port of Dover and its continued substantial contribution to the local and national economy. There is a need to provide significantly improved driver welfare facilities as part of the wider government strategy to create attractive working conditions within the transport and logistics sector. Further, there is an identified local need for a facility to take HGVs off local roads.</p> <p>Delivery of a site that can provide a co-located facility would represent a positively prepared, justified and effective strategy consistent with national policy. The plan would be unsound without these proposed amendments to the policy.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	The Port of Dover is a significant stakeholder within Dover District. Matters relating to its effective operation have a direct impact on the wider district with implications to the national economy. Therefore it would benefit the Inspector to have Dover Harbour Board present at the examination in public.
Include files	
Local Plan Consultation Point	Strategic Policy 6 - Economic Growth
Rep ID	SDLP1268
Rep Status	Processed
Consultee ID	1271353
Consultee Full Name	Church Commissioners
Consultee Company / Organisation	
Agent Full Name	Mr Andrew Watson
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP6
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy

4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Text Extracted from Document sent from Savills on Behalf of the Church Commissioners. Representation has been split across relevant areas of the Local Plan. Full attachment and introduction to Policy comments can be found under reference SDLP1265 for Shepherdswell Site and SDLP1266 for Eastry Site.)</p> <p>Strategic Policy SP6 – Economic Growth - COMMENTS Draft Policy SP6 (Economic Growth) proposes: “a minimum of 117,290 sqm of new employment floorspace (31.1ha in land terms) over the Plan period”. Paragraph 82c of the NPPF states that: “[Planning policies should] seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment”.</p> <p>In accordance with the NPPF, DDC should provide evidence to demonstrate that 11,925 new homes are sufficient to support the level of economic growth proposed in the Local Plan.</p> <p>Recommendation: DDC should provide evidence of the number of new homes required to support the level of economic growth proposed in the Local Plan. This is needed to demonstrate that the housing growth set out in SP3 is supportive of the economic growth proposed in SP6.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
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Include files	
Local Plan Consultation Point	Strategic Policy 6 - Economic Growth
Rep ID	SDLP1311
Rep Status	Processed
Consultee ID	1252081
Consultee Full Name	Planning Department
Consultee Company / Organisation	Canterbury City Council
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP6
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	We observe that the Regulation 19 Dover District Local Plan proposes to meet the district's housing and employment needs within the district boundary. This is consistent with national policies and our agreed Statement of Common Ground and is welcomed by CCC.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 6 - Economic Growth
Rep ID	SDLP1614
Rep Status	Processed
Consultee ID	1252100
Consultee Full Name	Mrs Amandajayne Hollobon-Baxter
Consultee Company / Organisation	Sandwich Town Council
Agent Full Name	

Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP6
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Sandwich Industrial Estate: All sites are supported and if there is any opportunity to attain a favorable status for all three sites, not just Discovery Park, this should be sought.</p> <p>Discovery Park: All sites are supported and if there is any opportunity to attain a favorable status for all three sites, not just Discovery Park, this should be sought.</p> <p>Ramsgate Road: All sites are supported and if there is any opportunity to attain a favorable status for all three sites, not just Discovery Park, this should be sought.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 6 - Economic Growth
Rep ID	SDLP1338
Rep Status	Processed
Consultee ID	1331659
Consultee Full Name	Ben Young
Consultee Company / Organisation	The Land Trust

Agent Full Name	Ben Young
Agent Company / Organisation	Bloomfields Chartered Town Planners
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP5 - Fort Burgoyne, Dover
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC EDIT: Detailed representation attached to SDLP0447 with figures and maps. Representation reproduced in box 7 below (as originally done by the agent).
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>1. Introduction</p> <p>1.1. Following the publication of the Dover District Council Local Plan (Regulation 18 Draft) and the Targeted Call for Sites on the 20th of January 2021, the Land Trust submitted representations in relation to the development of their own appropriate strategy for the possible future use and regeneration of Fort Burgoyne, Fort Burgoyne Road, Guston, Dover, CT15 5LP. These representations are included as Appendix A of this Statement, however, can be summarised as follows:</p> <ul style="list-style-type: none"> · The site at Fort Burgoyne extends across an area of approximately 42 hectares and includes a recreation ground, a substantial area of chalk grassland and the main buildings and immediate surrounding grounds (including the Parade Ground). Fort Burgoyne is also a designated Schedule Monument, confirming that the site is of national importance. · Fort Burgoyne was built in the 1860s to protect Dover Castle and was used to defend the South Coast of England as one of the “Palmerston Forts” built to defend against invasion. The polygonal system on which the building is built was used to defend and watch from the highest strategic point in Dover. After the First World War, Fort Burgoyne was used a military depot/store for Connaught Barracks before it ceased to be used for military purposes in 2006. In 2014 the Land Trust, a national charity, acquired the site from Homes England and since then has been considering a variety of options for the future development of Fort Burgoyne. This includes the submission of two pre-application enquiries relating to the future use of the site to DDC in July 2019 (DDC Ref: PE/19/00127) and July 2020 (DDC Ref: PE/20/00234), which serve to demonstrate that the Land Trust has a clear commitment to bringing Fort Burgoyne back into use for public benefit at the earliest opportunity. · DDC’s adopted Core Strategy 2010, recognised the importance of Fort Burgoyne within the criterion vii of “Strategic Allocation” policy CP10 (Former Connaught Barracks Complex), which stated that alongside the allocation for around 500 dwellinghouses, <i>“the condition of Fort Burgoyne is stabilised, if possible new uses are accommodated, a public access strategy is agreed and a management arrangement is incorporated that secures a sustainable future for the Fort”</i>. The Dover District Local Plan Regulation 18 Draft appeared to “down-grade” of the Former Connaught Barracks site from a “Strategic Allocation” to a “Non-Strategic Housing Allocation”. The Regulation 18 draft no longer made any specific reference to Fort Burgoyne with no strategic policy objective to deliver the future of the Fort, a Scheduled Monument of national historic interest that is included on the Historic England at risk register. · The representation therefore sought to raise that the Draft Local Plan needed to provide clarification as to how the regeneration of the two separate elements (being the residential development of Connaught Barracks and the regeneration of Fort Burgoyne) will be delivered to allow for proposals for Fort Burgoyne to be brought forward under a set of key objectives, independent of the Connaught Barracks housing development. It was subsequently suggested within the representation that the Fort’s future is secured through other means within the new Local Plan, either through its own strategic policy in other sections of the plan (such as the Employment and the Local Economy section), or through the re-wording of Site GUS002 or through other Development Management policies.

· Finally, given that, in a “Strategic Futures” Report (included as part of **Appendix A**) prepared by WYG and commissioned by the Land Trust, it was identified that there is circa 3,000 square metres of floorspace within existing buildings at Fort Burgoyne that would be potentially suitable for a wide variety of uses. It was also suggested that in order to secure a long-term future use for Fort Burgoyne and secure its regeneration, it would be wholly appropriate for it to be allocated within Strategic Policy 9 for business and employment purposes, in order for more flexibility to be given to the types of uses that might be permissible at the site.

1.2. Dover District Council (DDC) has subsequently published the Regulation 19 Submission of the Dover District Council Local Plan which sets out the vision, strategic objectives and overarching development strategy for future growth in the district over the period to 2040. The Land Trust have therefore instructed Bloomfields Chartered Town Planners to prepare further representations in relation to the Regulation 19 submission and the regeneration and future use of the Scheduled Monument, Fort Burgoyne.

2. Regulation 19 Submission of the Dover District Council Local Plan

2.1. It is welcomed that the aforementioned representations have been taken into account within the Regulation 19 Submission of the Dover District Council Local Plan.

SAP5 - Fort Burgoyne, Dover

2.2. In particular, the Trust is pleased to see the inclusion of Fort Burgoyne for Mixed Employment Use in table 4.1 and a positive site-specific policy to support site regeneration at Fort Burgoyne within Chapter 4: Housing and Employment Site Allocations at Strategic Allocation Policy SAP5 which states the following:

Figure 1: SAP 5- Fort Burgoyne, Dover as of Regulation 19 Submission, DDC Local Plan

2.3. The Land Trust also notes the pre-amble to Policy SAP5 which, at 4.109, recognises that Fort Burgoyne has the potential to accommodate new uses, provided that they are compatible with its status as a scheduled monument. The Trust continues to explore suitable uses for the reuse of the Fort, as evidenced by the grant of planning permission 21/01000 on the 7th July 2022 for the change of use of 4no. casemates to Use Class E with associated ancillary works.

2.4. The Land Trust remains committed to attracting uses for the Fort that will fit in with the long-term sustainable vision for investment in its re-use, as required by the preamble to Policy SAP5. The uses being explored, as evidenced in the previous Regulation 18 representations, are all being considered with the aim of supporting local business growth and ensuring at the same time that any mixture of uses at the site are compatible in respect of access, servicing, general amenity and crucially with the aims of conserving the Scheduled Monument.

2.5. While the inclusion of this policy is largely supported, The Trust has a number of comments in respect of the criteria:

2.6. Criterion h sets out that a Surface Water Management strategy should be produced for the site. The Trust recognises the importance of surface water management; however, it is highlighted that the Fort already benefits from an existing surface water drainage system which was built in the 1860s as part of the construction of the site. This system has always discharged directly to the ditch of the Fort where it soaks into the ground.

2.7. Given the Scheduled Ancient Monument status of the site, establishing an alternative strategy for managing surface water may not be practical and could result in harm. As such it is suggested that this criterion should be removed.

2.8. Notwithstanding this, where relevant, any future planning applications for uses or development at the Fort can demonstrate if required how it would be compatible with the existing surface water drainage system and not require any alternative arrangements for its disposal.

2.9. In respect of criterion j which suggests that *“development within the boundary of Fort Burgoyne which would have a detrimental impact on the heritage significance, setting, views, biodiversity, character of coherence of the components and elements of the complex will not be permitted”*.

2.10. While the Trust acknowledges the need to avoid development which will have a detrimental impact on the range of criteria identified in this policy, any development within Fort Burgoyne would be restricted by the requirement for Scheduled Monument Consent approved by Historic England which is considered to negate the need for this criterion. Draft Local Plan policies in respect of landscape (NE2), ecological (SP13) and historic environment (HE1, SP15) further negate the need for this criterion.

2.11. It is therefore respectfully suggested that criteria h and j are removed from policy SAP 5.

Chapter 2 - Vision and Objectives

2.12. Chapter 2 sets out the overarching vision for Dover District, including that *“through careful stewardship of its world class landscapes, thriving natural environments and wealth of historic sites, Dover District will be a destination of choice for people of all ages to make their home, for businesses to invest in and for visitors to explore and experience.”*

2.13. It is appreciated that the vision highlights the *“Sensitive restoration of elements of its rich built heritage, will enhance the attractiveness of the town, while improved connections to its seafront will have been delivered by high quality design and investment in place making.”* Together with the strategic objective (echoed in Strategic Policy 15) to conserve and enhance heritage assets in the district *“in a manner appropriate to their significance, recognising their intrinsic value as a finite resource as well as their contribution to the character of the District and the positive role they can play in the regeneration of the District.”*

2.14. The Trust also welcomes the identification of Fort Burgoyne on the Local Plan key diagram (Figure 2 below) alongside other Regeneration Sites covered by policy SP6 as set out further over the page.

Figure 2: Figure 2.1, Local Plan Key Diagram

Chapter 3 - Strategic Policies

2.15. Chapter 3 sets out the districts strategic policies to achieve the aforementioned strategic objectives.

SP6 Economic Growth

2.16. Strategic Policy 6 seeks to grow and diversify the Dover District economy by providing additional employment floorspace through the regeneration of brownfield sites in key locations in the district, such as Fort Burgoyne, to deliver flexible employment uses, achieve a higher level of job growth, and help provide additional flexibility and choice to the market over the Plan period.

Figure 3:

SP6- Economic Growth, Dover as of Regulation 19 Submission, DDC Local Plan

2.17. The Trust welcomes the inclusion of Fort Burgoyne at criterion 2 of policy SP6 as site where regeneration for a mix of uses to secure their future will be supported by Dover District Council.

2.18. It is noted that paragraph 3.117 sets out that no floorspace allowance has been included for Fort Burgoyne (and other sites allocated under criterion 2) as they are *“brownfield sites allocated for regeneration, and the mix of development and floorspace requirements will need to be determined through the planning application process in accordance with the policies in the Local Plan.”*

2.19. Given the complexities of the site we support this position but anticipate that employment floorspace will amount to circa 3,000 sqm.

Chapter 11 - The Natural Environment

Policy NE1 Biodiversity Net Gain

2.20. The Trust agrees with the requirements of Natural Environment Policy 1 for development proposals to provide a minimum of 10% biodiversity net gain above the ecological baseline within the development boundary. And notes criterion (a) which states that where it can be demonstrated that ecologically meaningful biodiversity net gain cannot be achieved within the site boundary, the Council will consider off-site alternatives in line with the mitigation hierarchy approach.

2.21. Given that a large portion of the 42 hectares at Fort Burgoyne has the potential to provide for significant biodiversity offering, in responding to this consultation The Trust wishes to record interest in working with the Council in developing its Dover District Biodiversity Net Gain Strategy with a view to Coombe Hole providing opportunity for off-site net gain whilst maximising the value of this Local Wildlife Site.

Figure 4: NE1- Biodiversity Net Gain, Dover as of Regulation 19 Submission, DDC Local Plan

2.22. In a similar vein to the BNG potential at Fort Burgoyne, the Land Trust has extensive experience of working with developers to create and provide in perpetuity management of Suitable Alternative Natural Greenspace (SANG), areas of greenspace that are of a quality and type that are suitable to divert recreational activities associated with new residential development away from protected sites (such as Special Protection Areas or Special Areas of Conservation).

2.23. In noting the requirement of Draft Policy SAP1(l) (Whitfield Urban Expansion) which requires a need for SANG to mitigate potential impacts upon the Lydden and Temple Ewell SAC, the Trust wishes to express interest in discussions with the Council and/or the developers of this site with a potential view to assisting them with meeting the policy requirements.

	<p>3. Summary</p> <p>3.1. The overall objective of the Trust remains to seek to deliver a strong, sustainable future for the Fort, that secures its long-term status as a nationally and locally important historic site that will make a vital contribution to the district. The Land Trust supports the Regulation 19 Submission Version of the Dover District Local Plan and welcomes the inclusion of Fort Burgoyne as a strategic allocation site for regeneration subject to the comments set out in this representation.</p> <p>4. Appendices</p> <p>Appendix A- Representations on the Regulation 18 Draft Dover District Local Plan 2021 and Targeted Call for Sites</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 6 - Economic Growth
Rep ID	SDLP1877
Rep Status	Processed
Consultee ID	1272184
Consultee Full Name	Tony and Valerie Armitage
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP6
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SP6 economic growth – quality not quantity please.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 6 - Economic Growth
Rep ID	SDLP1476
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP6
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p><i>DDC Note The text below is an extract from the original representation which is attached to SDLP1438.</i></p> <p><i>SP6 Economic Growth.</i></p> <p>Quality of 'growth' is more important in crisis-ridden 2020 to 2040 than quantity of 'growth'. Because it is more sustainable as we look ahead to 2040 – 2060 and beyond. Quick fixes, gig economy and nail-bars do not a climate-friendly sustainable economy make.</p> <p>November 2022. Energy prices, business rates, public sector cuts are making public and private sector employers (care homes, schools, health centres, hospitality, police (£30 million cut in Kent), buses, independent retail) fear for their survival. The reality.</p> <p>Public Works Loan Board or municipal loans could be used in Dover as in East Sussex, where they've invested in skilled jobs transforming existing homes into zero carbon homes across seven district councils, as demonstrated in the 'Lewes Model'. To be sound, effective, and compliant with the realities of here and now, this is the direction DDC Local Plan should take. The local economy needs pump-priming, national fuel security needs to be enhanced, people need lifting out of fuel poverty. The local plan could do more than allocating sites and floor space.</p> <p>Transition to a greener economy, a means of making us more resilient economically, will be helped considerably by the ambitions of Port of Dover to decarbonize its estate by 2025 and to take seriously its scope 3 corporate responsibility in an inclusive manner to support local communities and economic players as they transition to a greener business too.</p> <p>Suggestions have been put to the Port of Dover regarding more solar PV on their buildings and the installation of wind turbines on the harbour walls like the ports of Boulogne and Liverpool, Eurotunnel to be approached about wind turbines on the Samphire Hoe breakwaters, Network rail to be approached about solar PV on Dover priory station buildings, similarly for Stagecoach and the planned new bus station at York street. We have since become aware of PoD's interest in hydro renewables too. We also recommend high solar canopies over the marshalling yards of Port of Dover, to generate energy that fridge trucks (whose engine-idling contaminates Dover) could plug into while waiting to board ferries.</p> <p>There appears to be little mention of using the Local Plan to improve educational attainment by, for example, specific policies to a) forge deeper links with FE institutions (such as the laudable, forward-looking Dover Technical College) given the skills gap relating to the Green Homes agenda, b) encourage higher education establishments to develop facilities in the district, and thereby to develop a knowledge-based economy beyond the former Pfizer's site. And c) encourage the long-promised incubation hubs for the newly qualified in the district, have fallen victim to central govt's stop/start sound byte culture, these a, b, c, should be a requirement. This would contribute to raising the average level of earnings in the district and to combating the high levels of deprivation experienced in some wards.</p> <p>A glaring omission relates to new economic opportunities created by climate-friendly recovery sectors. Three are essential in Dover District. With a 70% rural economy, which is severely challenged by increased costs of imports, and climate problems including water shortage, our agricultural advisor tells us that diversification into Agri forestry could become popular among the farming community. It is recommended by Nature-Friendly Farming Network and featured on BBC Countryfile 28/2/21. Examples include a) protecting arable yields in cases of drought, by planted strips of suitable, native, drought-tolerant trees, (which counter soil erosion, while increasing carbon sequestration) and, b) bringing back to life existing but neglected, traditionally coppiced woodland, causing it to be harvested for small-scale biomass on a rotational basis. Similarly, short rotation forestry would create rural income and mitigate climate change. Another key to meeting climate targets is increasing</p>

the amount of land used for growing food for people rather than livestock. This would create new outdoor jobs as would replacing imported market-gardened food, (on which red-tape has increased) with locally grown fruit, vegetables and pulses, this is a growth sector too, and is especially sustainable where zero / minimal pesticides are used, and Nature Friendly Farming practices are used. (See comments on opportunity to protect and expand Horticultural Belt LCT D in north of district in NE2 below) So rural areas, fields and woodland should be valued as locations of employment in themselves.

The up-grading of all rented housing stock (both public and private sector) to zero homes standard, mentioned above, would mean, it doesn't need to be done again before the local and legally binding national target of 2050, and is thus a pre-requisite for the Local Plan to become legally compliant, and this can be made to benefit the local economy. It will be necessary to ensure that publicly owned rented housing stock stays in public hands. To incentivise private landlords, DDC should set up a register of private landlords, and to qualify for registration, landlords should have to show that homes rented are EPC C in 2023, EPC B in 2024, and zero carbon in 2025. As this will push up the value of their property, landlords should not find it difficult to access cheap loans to carry out the retrofit, (DDC could plan an intermediary role or suggest sources of finance). Tenants will benefit in terms of heating costs saved and improved standards of health, which is also a saving to the public purse. The economy will benefit in terms of jobs created for local trades people.

A third sector would include the fitting and maintenance of renewable energy installations, e.g. small-scale on-shore wind, small and medium scale solar (on domestic or non-residential roofs or to be combined with grazing land below, also on car parks), micro-tidal (tidal currents we are advised are very suitable locally), or 'green gas' as pioneered by Ecotricity in Hampshire (as the grass-cuttings from Dover's many golf courses and campsites are likely to be suitable). To maintain the returns on investment in these sectors within the regional economy, and stop them being off-shored, a priority should be given to schemes which are 51% or more community-owned.

The Dept for Transport bought the site they wanted for Dover Inland Border Facility from a farmer in Guston for £22million, and in 2022 DfT publicly said the site would not be needed as Dover IBF. Could this become a combination of grazing under solar canopies? Near 2 schools and a sports centre, it is an unsuitable location for the HGV park that is needed at a site further outside the Dover urban area.

Tourism and Tourist / Visitor Accommodation.

It is very unsound for DDC to fail to make Airbnb owners register with them, so that they can be charged business rate council tax. In terms of housing provision, Airbnb, both nationally, and in Kent's coastal towns especially, have a very negative effect of reducing the private rental market in 2022 and thus forcing up the average monthly rents for private tenants, while we have a cost-of-living crisis, so homelessness, hidden and audited, increases. Green tourism, and 'safe' country lanes, are East Kent assets that would be very unsound to trash.

The local plan would be more compliant with legality, if DDC regeneration took the greening of the economy more seriously and looked at smaller zero-carbon tourism /transport activity projects within Dover town; harbour trips with zero carbon, solar powered boats (like La Rochelle has had for 15 years), like electric hopper mini-buses (like the ones which have been coping with the 1 in 6 gradients of Aix-en-Provence for over 10 years).

Economic Growth in a coastal town aspiring to attract tourists would be unsound unless it included trebling the number of toilets installed. Tourists as well as residents have toilet needs. For a town with the iconic, historical importance of Dover NOT to have any coach park with lavatorial comfort facilities is a disgrace. The ratio of inhabitants to toilet blocks in Dover town is treble the ratio in other urban areas in the District, 1 : 10,000 or higher. The only coach park in Dover Town has, for 5 years, had 2 signs on Maison Dieu Road telling coach drivers and visiting car drivers that a toilet exists when in fact it doesn't.

At this location in Maison Dieu car park, behind the police station, visitors get out, pay to park and find nothing, merely a sign to a 15-minute walk to Pencester Gardens, difficult when legs are crossed. The DDC website misleads the public on this issue. The lack of toilets is a public health problem which we have referred to Kent Director of Public health

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9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 6 - Economic Growth
Rep ID	SDLP1885
Rep Status	Processed
Consultee ID	1333838
Consultee Full Name	mrs rosemary anne Holmes
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP6
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3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SP6. Economic growth – quality not quantity please.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	SP6. Economic growth – quality not quantity please.

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 6 - Economic Growth
Rep ID	SDLP1934
Rep Status	Processed
Consultee ID	1271717
Consultee Full Name	Quinn Estates
Consultee Company / Organisation	Quinn Estates Ltd
Agent Full Name	Sarah Willson
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP6
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Iceni Projects, on behalf of Quinn Estates, welcomes the opportunity to submit representations to the Dover District Council Local Plan Regulation 19 Consultation in respect of land to the north-east of Southwall Road, Deal (the 'Site'). This representation should be considered alongside and with regard to the following appended documents which comprise:</p> <ul style="list-style-type: none"> • Appendix 1 – Site Location Plan <p>The vision for the Draft Local Plan reflects the growing importance of new challenges facing local communities in regard to climate and ecological emergency, and greater emphasis on the protection and enhancement of retail, leisure, cultural and commercial development across the district area, and promoting the health and social wellbeing of communities. The corresponding objectives strive for a more prosperous economy, as well as vibrant new communities. Quinn Estates considers that there is much to welcome in the new Plan, however, the company considers the opportunity to deliver an appropriate and badly needed quantum of growth at Deal has not been positively planned for, and that the Plan would be strengthened by promoting additional growth at Deal.</p>

Quinn Estates considers that the proposal at Southwall Road presents a suitable site for locating employment growth for Deal adjacent to an existing and successful employment site, which would be easily accessible by public transport and be commensurate with the size of the settlement. Given the unique characteristics of the site, it is considered that it would logically lend itself to development of approximately 130,000 sq. ft of employment uses compatible with those alongside. As such, the site would in particular suit smaller light industrial occupiers (Use Class E(g)) benefiting from the sustainable town centre location. This would provide logical and tempered expansion of the town's employment provision thereby helping address the district's needs, at a location where demand for such uses is proven.

Quinn Estates has a proven track record of providing purpose-built employment space for wide range of end users, from smaller artisanal start-ups to larger established operators; and it is considered that this site would provide opportunities for end users from across that range.

a. The site and surroundings

The Site comprises approximately 3.3 acres of land lying to the north-east of Southwall Road, Deal. The Site is bound to the south-east by Minters Industrial Estate and Deal Business Park on Court Marsh Road and to the south-west by residential properties. The Southwall Industrial Estate encloses the Site to the north-west, separated by an open field; and to the north-east, Hutchings Timber lies beyond a wooded field. The land adjoins the Deal settlement boundary along its southern edge and is located on the north-western edge of the town.

The Site does not contain any Public Right of Ways (PRoWs). Existing access to the Site is via a gate on Southwall Road. Deal train station is located approximately 0.6 miles walking/cycling distance to the east within Deal town centre.

The Site is neither within or near a designated Conservation Area, nor are there any listed buildings or other heritage assets nearby. The land is classified as Flood Zone 2/3. The Kent Habitat Survey 2012 identifies the entirety of the Site as Neutral grassland. There are no significant ecological designations affecting the Site or in the vicinity which would restrict development at this location.

The Site has an uncertain history with regard to assessment under previous Local Plan work. The HELAA 2020 Appendix 1 'Housing Long list' references the site; however, it does not state whether it was proposed for housing or employment as it does with other sites. Appendix 3b 'Housing Sites Highways Assessment' references the DEA049 code as the previous code for another site in Walmer. Appendix 3e 'Initial Assessment Housing Sites Eliminated' notes the site, however, states it is for employment and will be assessed separately. Appendix 3f 'Initial Assessment – Employment Sites Eliminated' has no reference to the site under the DEA049 code, the postcode, or any of the site addresses.

b. Objection to Tables 4.2 of the Draft Local Plan

Quinn Estates considers that the economic growth strategy for Dover, as detailed in Table 3.5 of the Regulation 19 Submission Version of the Draft Local Plan cannot be considered sound plan-making. In its current form, the Plan fails to positively plan for economic growth in Deal under Policies SP6 and E1. Quinn Estates considers that the Plan should proactively support employment growth in Deal through the allocation of additional sites.

Sustainable patterns of growth

Sustainability lies at the heart of good strategic planning and is a core tenet of the National Planning Policy Framework at Paragraph 8. When determining the spatial strategy for employment growth, the Council should direct employment land to the most sustainable locations, namely those which reduce the need for access via private vehicle and are near key population centres.

Deal is the second largest town within the District and is home to approximately 30,000 people. Deal is recognised in the Draft Local Plan as the second largest settlement in the District, benefitting from a vibrant town centre, which benefits from a good level of accessibility and an attractive environment. It's well used by residents and visitors and has a low vacancy rate, as a result of the diverse retail offer. In addition, the town is highly sustainable in regard to public transport accessibility, being served by mainline rail, the high-speed train service to London and numerous bus routes.

Quinn Estates posit that the amount of employment land allocated to Deal within the draft Local Plan is wholly inconsistent with relation to its position as the second most sustainable location in the District for future growth. No new employment land is allocated to the town. The Deal Business Park is offered policy protection through draft Policy E2. Employment allocations have instead been directed to Dover, Aylesham and Eastry, a principal town, rural service centre and local centre within the Settlement Hierarchy, respectively. Table 3.1 of 2021 EDNA update (copied below) succinctly summarises the spatial distribution of employment land across the district, and outlines the strange situation the District

faces, where rural areas and smaller settlements hold more employment space than the second largest settlement within the District.

[See attachment]

Evidently, successive Local Plans have failed to plan proactively for employment in Deal, resulting in the picture painted above. Similar to the spatial approach to housing within the Draft Local Plan, the Council's proposed strategy looks to further cement this position, skewing economic growth away from one of the most sustainable locations in the District to areas that are far less sustainable and would require employees to largely arrive by private vehicle to work. The justification for channelling so little growth to Deal is not considered to be justified by evidence, when all the evidence points to the settlement being such a logical and sustainable location to channel growth to. The principles of sustainability and sound plan making appear to have been absent in key decision taking over spatial choices at the heart of the spatial strategy presented in the Draft Plan.

Ensuring the delivery of employment land

For a plan to be considered effective, the objectives and identified requirements must be deliverable and achievable. It is considered that, in its current form, the plan fails to accord with this part of the soundness test, in part due to over reliance on the White Cliffs Business Park to provide the majority of the District's employment land requirement across the Plan period. Therefore, to ensure the balanced and steady delivery of employment floorspace, further Sites should be allocated to meet the needs of the District, and in particular, the previously identified need of Deal.

The EDNA 2017, and the 2022 update, both highlight how the District has not been able to deliver, to date, the level of growth identified in the 2010 Core Strategy and there is a great deal of 'catching up' to do over the next ten years if there is any prospect that the overall job growth target of 6,500 is to be reached.

Policy CP2 of the existing Core Strategy (2010) seeks to provide approximately 200,000 sqm of employment floorspace and 35,000 sqm of retail floorspace between 2006-2026. The Authority Monitoring Report 2020-21 scores progress against Policy CP2 as amber – where 'progress has been made towards meeting the target however further work is required'. Over the monitoring period (2020- 21), the following net-gains in employment floorspace are found:

[See attachment]

To address this difficulty with delivery of employment land, the Draft Local Plan proposed the White Cliffs Business Park to deliver the bulk of the employment floorspace requirement in the plan and is expected to deliver a total of 120,000 sqm across four phases. However, there is uncertainty regarding the availability of part of Phase 2 and Phase 3 of White Cliffs Business Park which was proposed to be used as an Inland Border Facility, subject to a Special Development Order which is in place. In addition, the Council's own EDNA 2017 assesses the issues with the site, stating that 'the site has struggled to come forward for new B class development over recent years, in part due to viability issues limiting interest by investors to promote B class uses within the site. Retail development has started to erode the longer-term employment potential of parts of the site.' Given the uncertain nature of this site, the Council should seek to broaden the employment base through additional allocations across the District where there is an identified need, in the most sustainable settlements i.e., Deal.

Addressing Flood Zone constraint

The site lies within Flood Zone 3, as shown on the Environment Agency's flood zone map and as such, has the potential to be at risk of flooding from the sea. In partnership with the Environment Agency, the Council completed the Deal Coastal Defence Scheme, which provides a 1 in 300-year (0.33%) standard of protection to this area from coastal flooding and only at risk in the extremely unlikely event that the flood defence infrastructure was to fail (i.e. a breach).

Notwithstanding the unlikelihood of a breach, the NPPF requires a site-specific FRA to be submitted for all development located within Flood Zone 3. The NPPF states that development in areas at risk of flooding should be avoided by directing it in the first instance away from areas of highest risk. Where development within areas at risk of flooding is proposed, Para 161 of the NPPF requires that the Sequential Test is applied and, if necessary, that the Exception Test is applied (Para 163-165).

The Council's Strategic-Flood-Risk-Assessment (2019) provides an up-to-date appraisal of the flood risk in Deal, prepared in conjunction with the Environment Agency, Lead Local Flood Authority, Internal Drainage Board and Southern Water. One of the aims of this report is to provide sufficient data and information to enable the Council to apply the Sequential Test to land use allocations and to identify whether the application of the Exception Test is likely to be necessary. It is significant to note that the Site proposes to develop employment floorspace, which is considered to be a less vulnerable use.

A live application (ref: 22/00916) on an adjacent site 64-66 Southwall Road) is currently seeking permission in principle for up to 7 dwellings, along with a replacement place of worship with a community hub and nursery. The application site also lies within Flood Zone 3 and therefore faces the same constraint as the Site subject to these representations. As of 24th November 2022, the Environment Agency have responded to consultation with no objection to the scheme following clarification of residual flood risk on site. This demonstrates that the designation of land as Flood Zone 3 should not be considered as an absolute constraint affecting the principle

of development in this location, and that suitable growth for Deal can be supported subject to the necessary technical work being undertaken through site specific FRA's, and the Sequential and Exception Tests in accordance with NPPF guidance.

c. Conclusion

Quinn Estates wishes to support Dover in bringing forward a successful, effective and sound Local Plan that can serve the District across the Plan period. However, Quinn Estates considers that the current approach to the spatial strategy in the Draft Local Plan requires amendment to address a significant soundness issue concerning the level of growth identified for Deal, the District's second largest settlement. It is considered that the Plan currently fails to positively plan for a commensurate level of housing and employment at the settlement, as expressed in Policy SP3 and that the available evidence does not support or justify this approach. Moreover, the evidence does support channelling a greater quantum of growth to Deal.

The Council has struggled with delivery of employment floorspace across the District within the last plan period, and there is a recognised need for additional employment in Deal within the evidence base for the Draft Local Plan. To combat the current over reliance on the White Cliffs Business Park, which is facing delivery issues, the Council should seek to explore additional avenues for employment growth, through identifying suitable sites in Deal, such as the Site subject to this representation.

We trust that the above amendments is acceptable to the Council and that these representations will be taken into account in consideration of the current consultation. We also confirm that Quinn Estates would welcome the opportunity to be involved in the forthcoming Examination-in-Public and contribute to the debate to ensure that the best strategy for the District is found.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Allocate land at Northwall Road for employment uses

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

[SDLP1934 Willson Att1 Site Location Plan.pdf](#)

Local Plan Consultation Point

Strategic Policy 6 - Economic Growth

Rep ID

SDLP1862

Rep Status

Processed

Consultee ID

1271717

Consultee Full Name

Quinn Estates

Consultee Company / Organisation

Quinn Estates Ltd

Agent Full Name

James
Waterhouse

Agent Company / Organisation

Iceni projects

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP6
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Full Representation attached to SDLP1860. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1860.) c. Policy SP6 – Economic Growth 4 The approach outlined in Policy EP6 is generally supported, but the failure to positively plan for any commercial development in and around Deal is objected to. If the Plan is not going to identify specific sites to deliver economic development in and around Deal, the supporting text in Para 3.119 (The Council recognises there is a need for further employment development in Deal and will support the delivery of new employment development in this location subject to the criteria in Policy E1) should be reflected within the policy itself, with the following additional text recommended for inclusion: “The Council recognises there is a need for further employment development in Deal and will support the delivery of new employment development in this location subject to the criteria in Policy E1. Such sites could comprise traditional windfall sites within existing settlements or extensions to settlements, either for commercial development or as part of a mixed-use development, in accordance with Policy SP4”
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Quinn Estates is a developer with significant land interests in the District, who has an important role in delivering the Plan strategy
Include files	

Strategic Policy 7 - Retail and Town Centres

Local Plan Consultation Point	Strategic Policy 7 - Retail and Town Centres
Rep ID	SDLP39
Rep Status	Processed
Consultee ID	1254085
Consultee Full Name	Mrs Sue Ward
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP7
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Since Covid, shopping habits have changed, with far more done online. Dover has a considerable amount of empty property designated for commercial use, judging by the many To Let signs.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	To allow or require long term vacant commercial property to be designated for residential use. This would reinvigorate the town centre and support the use of existing commercial property. It would also require fewer houses to be built on arable land.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 7 - Retail and Town Centres
Rep ID	SDLP792
Rep Status	Processed
Consultee ID	1259612
Consultee Full Name	Mr Chris Shaw
Consultee Company / Organisation	Langdon Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP 7 - Retail and Town Centres Paragraph 2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	It is sound
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	"Proposals which diversify the provision of facilities in district and local/village centres will be supported where they are of an appropriate scale in relation to the role of the centre": It would be helpful, particularly for village centres, to include wording relating to ensuring that such uses maintain the overall character of the village centre.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 7 - Retail and Town Centres
Rep ID	SDLP618
Rep Status	Processed
Consultee ID	1331372
Consultee Full Name	Laura Beech
Consultee Company / Organisation	Lidl Great Britain
Agent Full Name	Laura Beech
Agent Company / Organisation	Walsingham Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Strategic Policy 7 - Retail and Town Centres
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p><u>Introduction</u></p> <p>Walsingham Planning is submitting this representation on behalf of Lidl Great Britain, who has an existing store at Honeywood Parkway in Dover, and who also hopes to deliver additional investment in the District over the course of the new plan period.</p> <p><u>Context – The Need to Improve Convenience Retail Provision in Sandwich</u></p> <p>It is important to note from the outset that the existing, adopted Dover Land Allocations Local Plan identifies a clear need to improve convenience retail provision within the Deal / Sandwich trade area. Indeed, paragraph 3.237 of the Land Allocations Local Plan states that there is an identified quantitative need over the Plan period for around <u>2,400 sq.m gross</u> additional convenience goods floorspace within the area. Moreover, the adopted Plan explains that:</p> <p><i>“The Council considers that there is potential to increase the <u>quantity and quality</u> of convenience floorspace provision in Sandwich to help broaden the range and choice to the benefit of its local catchment population, whilst also helping to strengthen the role of Sandwich in the</i></p>

settlement hierarchy. New floorspace of an appropriate scale in a location that is well connected to the town centre would help to increase the 'claw back' and retention of shoppers and expenditure from the 2012 position" [our emphasis].

The adopted Local Plan goes on to explain that the tight historic grain of Sandwich town centre does not readily provide opportunities for larger retail provision. The adopted Local Plan could not identify any suitable or viable sites within or on the edge of Sandwich town centre to accommodate such a scheme, and so the Plan sets out a criteria-based policy, against which any future retail applications can be assessed. Policy LA19 relates directly to 'new convenience retail provision in Sandwich', and states that planning permission for new convenience provision in Sandwich will be permitted, provided that the scheme meets the six specified criteria.

We understand that Policy LA19 of the adopted Local Plan was framed by an evidence base that is now considered to be out-of-date. Notwithstanding this, it is clear that the current Local Plan identifies a very clear quantitative and qualitative need for additional food and grocery provision within the settlement of Sandwich, and this need remains unmet. Indeed, no new foodstores have been delivered within the town, and thus residents continue to have to travel further afield to undertake their main food shop.

The evidence base that informs the Regulation 19 Draft Local Plan includes an updated Dover Retail and Town Centre Needs Assessment (2021). The updated Needs Assessment shows that there is no District-wide capacity for new convenience goods floorspace in the period up to 2040, after taking into account commitments. However, when the specific towns are considered, the Study identifies that there remains some capacity for additional floorspace in Deal and Sandwich, equating to between 256 and 458 sq.m net convenience floorspace by 2040. It should be noted, however, that the 2021 Study is based on the very conservative assumptions that the retail market is in 'equilibrium' (i.e. that no stores are over-trading) and that market shares will remain constant over the study period.

Moreover, whilst the calculated quantitative need may have reduced based on the latest data assumptions, there has been no change in practice to the very real qualitative need that continues to exist for additional foodstore provision within Sandwich.

It is relevant to note that the evidence base (the 2021 Retail and Town Centre Needs Assessment) records that there were 104 retail and leisure units within Sandwich, as of 2021. Out of this total, 37% of the units comprised non-food retail stores, 23% of units provided leisure services, and 14% of units offered retail services. However, only 8% of the units (7 units in total) accommodated convenience retail shopping facilities. This is lower than the national average representation, and also represents a decline since 2015, when there were 10 food and grocery outlets within the centre.

Sandwich has limited representation from convenience retailers. Whilst the centre benefits from some independent food stores (bakers, butchers and greengrocers), there are limited 'main food' shopping opportunities. The only medium-sized foodstore is the Co-op at Moat Sole Road.

As a result, it is evident that many residents need to travel further afield – to Dover, Deal and out-of-centre destinations – to undertake their main food shopping. The household survey shopping results, reported in the Retail and Town Centre Needs Assessment, confirm that only 3% of convenience goods expenditure from the District is spent in Sandwich Town Centre, which is a very low level of expenditure retention. Within the more localised Sandwich study zone (Zone 6), less than a quarter of convenience goods expenditure is retained by local stores, which represents significant leakage of local expenditure to destinations located further afield.

Indeed, the market share analysis for main food shopping (Table 2, Appendix 2, Volume 4 of the 2021 Needs Assessment) shows that only 14% of main food expenditure within Zone 6 is retained within Sandwich. Instead, residents are travelling to Tesco Extra at White Cliffs Business Park (29%), Aldi at Cherry Tree Avenue, Dover (13%), Sainsbury's in Deal (11%), as well as destinations further afield (to Ramsgate, Margate and Canterbury) to undertake their weekly 'main food' shop. This is not a sustainable pattern of shopping, and the results highlight the clear deficiency in main food shopping provision within Sandwich that continues to exist.

We note that further growth is earmarked for Sandwich within the draft Local Plan. The identified disparity will continue to grow, as more residents move into the town, and the lack of local access to main food shopping opportunities becomes more apparent.

Strategic Policy 7 – Retail and Town Centres

The justification text for draft Strategic Policy 7 explains that: "*The District's town, local and village centres are a focus for activity and community life providing shopping, leisure, employment, culture as well as other services. This is particularly the case for Dover, Deal and Sandwich town centres*". Indeed, the draft Local Plan goes on to explain that Sandwich is a second-tier centre in the local retail hierarchy alongside Deal, and that it should provide a complementary role to Dover Town Centre.

Paragraph 3.130 of the draft Local Plan explains that Deal and Sandwich town centres offer a "wide range of shops to cater for everyday need", special interest and tourism.

The draft Local Plan then goes on to explain that there is no identified capacity for new convenience or comparison floorspace over the plan period to 2040, and thus no retail allocations are proposed. Draft Strategic Policy 7 – as currently worded - reflects this approach, and focuses

	<p>on: encouraging the reoccupation of existing vacant units; reducing town centre boundaries and consolidating primary shopping areas; and diversifying the uses within the existing town centre boundaries.</p> <p>It is our view that <u>draft Policy SP7 is not sound</u>, because it does not reflect positive planning and it is not consistent with national policy. As outlined above, it is our view that there is a <u>clearly identified need for additional main foodstore provision within Sandwich</u>. Even though the quantitative need is low (based on current calculations), the evidence base still shows a real qualitative need to enhance local provision, to ensure that Sandwich can adequately meet the ‘everyday needs’ of local residents. Sandwich is a second-tier centre, and yet it does not benefit from the same level of local provision as Deal.</p> <p>Moreover, the adopted Local Plan is clear that there is a requirement to improve the quantity and quality of convenience floorspace provision within the town, to strengthen the role of the town and clawback expenditure that currently leaks to destinations further afield. This identified deficiency has not been addressed, and thus it is not rational to remove this existing policy aspiration from the new draft Local Plan.</p> <p>Draft Policy SP7 represents a missed opportunity to identify and discuss the deficiencies in local retail provision within Sandwich and make provisions for future development (as reflected in adopted Local Plan Policy LA19).</p> <p>We note that paragraph 86 of the NPPF states that planning policies should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Moreover, paragraph 86 notes that planning policies should:</p> <ul style="list-style-type: none"> • “Allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. Meeting anticipated needs for retail, leisure, office and other main town centre uses over this period should not be compromised by limited site availability, so town centre boundaries should be kept under review where necessary; and • Where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre. If sufficient edge of centre sites cannot be identified, policies should explain how identified needs can be met in other accessible locations that are well connected to the town centre”. <p>The draft Local Plan does not reflect this positive and flexible approach to plan-making, and thus is inconsistent with national policy. The draft Local Plan does not seek to allocate any sites for retail development within Sandwich, despite the evidence of need identified, and it does not represent a positive approach to the growth and management of the key settlement of Sandwich over the plan period.</p> <p>In summary, by failing to make any provision for additional convenience floorspace, either as a retail allocation or criteria-based policy, it is our view that draft Policy SP7 is not sound, because it has not been positively prepared, it does not represent an appropriate and justified strategy, the policy will not be effective and it is not consistent with the approach to planning for town centres that is set out in the NPPF.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>It is our view that the retail and town centre strategy put forward in the draft Local Plan is flawed and unsound. The strategy places an over-reliance on the quantitative need figures derived from 2021 Retail and Town Centre Needs Assessment, and does not take into account evidence of qualitative need. In particular, it is of great concern that the draft Local Plan does not consider the clear need that exists for additional convenience provision within Sandwich, which is identified in the adopted Local Plan, and which remains unaddressed.</p> <p>Whilst the adopted Local Plan contains a positive and proactive policy to support new retail development within Sandwich (Policy LA19), this strategy has not been carried through to the draft Local Plan.</p> <p>In order to be sound, the new Local Plan (within Strategic Policy 7) should provide policy support to addressing the ongoing retail needs identified within Sandwich, as this currently represents an omission from the draft Local Plan.</p> <p>In the absence of an appropriate strategy to support new convenience provision within Sandwich, local residents will need to continue to travel to Deal, Dover and destinations further afield to undertake their food and grocery shopping. This is not a sustainable strategy.</p> <p>Strategic Policy 7 should identify the need to enhance convenience provision within the settlement of Sandwich, and should allocate a site for such use, or set out a criteria-based approach to considering future foodstore development proposals.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note</p>	<p>We would like to participate because we have recommended that modifications are required to Strategic Policy 7 (as well as other policies within the draft Local Plan).</p>

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Given the technical nature of the retail evidence base, it would be useful to participate directly in the oral examination in order to have the opportunity to discuss the proposed retail and town centre strategy for Sandwich in detail and answer questions directly.
Include files	Lidl Reps - Reg 19 Draft Dover Local Plan (Dec 2022).docx
Local Plan Consultation Point	Strategic Policy 7 - Retail and Town Centres
Rep ID	SDLP745
Rep Status	Processed
Consultee ID	1331585
Consultee Full Name	Terence Hopper
Consultee Company / Organisation	
Agent Full Name	Terence Hopper
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Strategic policy SP7 Retail and Town Centres
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The plan does not meet the aims of SP7 (4) in terms of ensuring housing development takes place on the outskirts of Sandwich. and so is failing in that respect. Consolidation of the centre in Sandwich will be difficult due DDC allowing many of the shops to be converted to housing
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Consider the sites SAN010 and SAN019 Do not restrict the provision of shops, services and other businesses to too narrow an area in the town. Given the town's scale, such a policy would be very restrictive to future trade within the town

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 7 - Retail and Town Centres
Rep ID	SDLP924
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP7
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	With reference to paragraph 4 referring residential provision in and on the edge of town centres across the main towns of Dover, Deal and Sandwich – additional households in these locations will require a proportionate increase in infrastructure provision, commensurate with the profile of occupants/residents.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 7 - Retail and Town Centres
Rep ID	SDLP1595
Rep Status	Processed
Consultee ID	1252100
Consultee Full Name	Mrs Amandajayne Hollobon-Baxter
Consultee Company / Organisation	Sandwich Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP7
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	This policy should be amended to include Bullet points 8 and 9 stating that, 8. The Council will support proposals to bring upper floors back into use within Primary Shopping Areas, including for residential and office use, unless the current use is for retail and the business is both viable and valued by the local community. 9. Changes of use to residential will not be permitted on the ground floor of any unit within the Primary Shopping Areas and this includes the prohibition on any loss of any square metres of retail space on ground floors
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	This policy should be amended to include Bullet points 8 and 9 stating that, 8. The Council will support proposals to bring upper floors back into use within Primary Shopping Areas, including for residential and office use, unless the current use is for retail and the business is both viable and valued by the local community. 9. Changes of use to residential will not be permitted on the ground floor of any unit within the Primary Shopping Areas and this includes the prohibition on any loss of any square metres of retail space on ground floors

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 7 - Retail and Town Centres
Rep ID	SDLP1172
Rep Status	Processed
Consultee ID	1271293
Consultee Full Name	Mr Alan Byrne
Consultee Company / Organisation	Historic England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP7
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	It is positive that the Council has a significant focus on town centres and is developing tailored strategies for each town centre. We welcome reference in each of these to the district's rich historic towns but do suggest the role heritage can play in the future could be enhanced. (DDC Note - This is an extract of the full Historic England representation which can be located at SDLP1169)
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance	

<p>with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Not Applicable</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	

Strategic Policy 8 - Dover Town Centre

Local Plan Consultation Point	Strategic Policy 8 - Dover Town Centre
Rep ID	SDLP41
Rep Status	Processed
Consultee ID	1254085
Consultee Full Name	Mrs Sue Ward
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	3.144
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	It is impossible to create a more vibrant town centre, when the major focus on building is at Whitfield. Many of the houses newly built at Whitfield have been bought by people keen to relocate from Dover town, because it is drab and unattractive. Dover Town should have priority, although I recognise that it is unattractive to developers, because they can make more money much easier by building on farm land.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Make Dover Town the priority and require development of all vacant, brownfield sites
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 8 - Dover Town Centre
Rep ID	SDLP459
Rep Status	Processed
Consultee ID	1266351
Consultee Full Name	Dr Sharon Danby
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP8 Dover Town
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The plan for Dover Town centre is ambitious and I hope it is successful. I would argue that to comply with the climate emergency declaration all regeneration should involve renewables and be carbon zero.</p> <p>Regeneration has focused on the seafront and St James and i presume is now moving back. High street shops could be renovated and have flats above for locals to rent or buy.</p> <p>The Sunday farmers' market should be tempted back all year round, so that there were more footfall further inland. There is an especial need to incentivise retail start-ups along London Road, Dover between the Charlton Centre and the Cadet centre. This area of one-way west-bound A256 is crying out for air pollution to be reduced eg living walls of vertical planting / urban hedges that are called for. The same applies to one-way, port-bound Barton Rd / Maison Dieu Rd A256. Many public buildings in mid Dover area, offer opportunities to enhance national and local energy security if they were to gain solar power installation that could be used by neighbouring carehomes, or doctors' surgeries (solar energy is most economical viable when exported to neighbouring premises using electricity during daylight hours all year round).</p> <p>Walking / cycling / driving along London Road could become a much more cheering experience if Living Walls referred to above, combined with murals.</p> <p>More toilet facilities are required.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	<p>More green infrastructure at the heart of continuing regeneration.</p> <p>Encourage more cycling and make the area more pleasant for pedestrians with green living walls.</p>

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 8 - Dover Town Centre
Rep ID	SDLP561
Rep Status	Processed
Consultee ID	1267584
Consultee Full Name	Jason Ransley
Consultee Company / Organisation	Dover Harbour Board
Agent Full Name	John Bowles
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Strategic Policy SP8 - Dover Town Centre
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Dover Harbour Board notes and welcomes the reference in Strategic Policy SP8 – Dover Town Centre to improvements to the connectivity of the town centre with the seafront, facilitated in part through planned improvements to the Townwall Street/A20 underpass and the development of Dover Waterfront. However, the wording of the policy and at paragraph 3.158 should be clarified to make clear what measures are already being implemented with the benefit of funding secured from the Future High Fund and what further measures are identified which should be delivered through the development of Dover Waterfront and the Bench Street Opportunity Area.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness	The wording of the policy and at paragraph 3.158 should be clarified to make clear what measures are already being implemented with the benefit of funding secured from the Future High Fund and what further measures are identified which should be delivered through the development of Dover Waterfront and the Bench Street Opportunity Area.

matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	N/A
Include files	Waterfront Plan - Update 2022.pdf (2) SDLP0561 Dover Harbour Board - Att 2.pdf
Local Plan Consultation Point	Strategic Policy 8 - Dover Town Centre
Rep ID	SDLP972
Rep Status	Processed
Consultee ID	1331795
Consultee Full Name	Mrs Talina Wells
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP8 p.59
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Item SP8- Dover Town Centre. Additional suggestions: a) Greening the main high street via avenue of ornamental trees. b) Less licensing of gambling establishments c) Encourage more world cuisine eateries, in addition to traditional ones.

d) More street art installations eg old Banksy wall as a nautical/ seascape backdrop to the anchor in situ-or even treat this site akin to Trafalgar Square's 4th plinth. This would create a continual cycle of interest from the art community.

e) In time...the high street going down to the port, to transform into a 'La Rambla' type tourist destination. To include Bench Street, and surrounds, being regenerated simultaneously.

f) Collaboration with the Premier Inn and the freeholder of the Gateway Flats & garages etc - in order to refurbish the currently shabby elevations facing the town centre.

g) Collaboration with the stores in St James retail park which back onto the A20/ sea face, to reinvigorate the aesthetic appeal here and complement the regeneration of the town centre.

h) Use of scenic printed hoarding panels to disguise dilapidated buildings etc pending renovations.

I) Encourage the perception first, which will then transform into a reality that Dover is a destination of choice, rather than a mere place for transit.

This will demand a holistic tourism strategy. Dover could certainly be marketed in terms of its unique heritage. It has one of the most iconic natural landforms in the whole of the UK - The white cliffs. The panoramic vistas from the coastal cliffs are unrivalled. The visitor is able to easily ascend the cliffs to take in the unrivalled panorama that is soon to be designated as a world Heritage site - the Dover Straits. Dover also contains not only one of the most spectacular, beautiful and historic castles in Europe, but it also contains the oldest building structure in England- the Roman lighthouse. A tourist strategy could easily be constructed around the huge Roman remains in the Town. The Roman house, somewhat tired, contains historic treasures.

One could obviously then develop a whole complimentary strategy around the role Dover played in the defence of Britain. From Napoleon, to the central role in Dunkirk and ultimately being the frontline of Britain.

Alternative tour interests could easily be developed. Dover's almost unique cliff top chalkland habitat would attract an array of nature enthusiasts. There are several rare species of flora and fauna found in this area - including many orchids and associated plants. There is the river Dour one of the rare chalk streams in the world.

The historic Saxon-Shore way walk to the unique St Margaret's Bay. In addition to breathtaking views, this will take visitors past one of the largest colonies of Skylarks in the South East, Peregrine falcons, Red-billed Choughs, past the lighthouse -the first in the world to be powered by electricity etc, descend the subterranean tunnels to the unique Fan-Bay shelter, stopping off for brief refreshment at Britains closest pub to France. Children and adults can then indulge in rock pooling in the stunning bay which was home to both Noel Coward and the Ian Fleming.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Item SP8- Dover Town Centre.

Additional suggestions:

a) Greening the main high street via avenue of ornamental trees.

b) Less licensing of gambling establishments

c) Encourage more world cuisine eateries, in addition to traditional ones.

d) More street art installations eg old Banksy wall as a nautical/ seascape backdrop to the anchor in situ-or even treat this site akin to Trafalgar Square's 4th plinth. This would create a continual cycle of interest from the art community.

e) In time...the high street going down to the port, to transform into a 'La Rambla' type tourist destination. To include Bench Street, and surrounds, being regenerated simultaneously.

f) Collaboration with the Premier Inn and the freeholder of the Gateway Flats & garages etc - in order to refurbish the currently shabby elevations facing the town centre.

g) Collaboration with the stores in St James retail park which back onto the A20/ sea face, to reinvigorate the aesthetic appeal here and complement the regeneration of the town centre.

h) Use of scenic printed hoarding panels to disguise dilapidated buildings etc pending renovations.

I) Encourage the perception first, which will then transform into a reality that Dover is a destination of choice, rather than a mere place for transit.

This will demand a holistic tourism strategy. Dover could certainly be marketed in terms of its unique heritage. It has one of the most iconic natural landforms in the whole of the UK - The white cliffs. The panoramic vistas from the coastal cliffs are unrivalled. The visitor is able to easily ascend the cliffs to take in the unrivalled panorama that is soon to be designated as a world Heritage site - the Dover Straits. Dover also contains not only one of the most spectacular, beautiful and historic castles in Europe, but it also contains the oldest building structure in England- the

	<p>Roman lighthouse. A tourist strategy could easily be constructed around the huge Roman remains in the Town. The Roman house, somewhat tired, contains historic treasures.</p> <p>One could obviously then develop a whole complimentary strategy around the role Dover played in the defence of Britain. From Napoleon, to the central role in Dunkirk and ultimately being the frontline of Britain.</p> <p>Alternative tour interests could easily be developed. Dover's almost unique cliff top chalkland habitat would attract an array of nature enthusiasts. There are several rare species of flora and fauna found in this area - including many orchids and associated plants. There is the river Dour one of the rare chalk streams in the world.</p> <p>The historic Saxon-Shore way walk to the unique St Margaret's Bay. In addition to breathtaking views, this will take visitors past one of the largest colonies of Skylarks in the South East, Peregrine falcons, Red-billed Choughs, past the lighthouse - the first in the world to be powered by electricity etc, descend the subterranean tunnels to the unique Fan-Bay shelter, stopping off for brief refreshment at Britain's closest pub to France. Children and adults can then indulge in rock pooling in the stunning bay which was home to both Noel Coward and the Ian Fleming.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 8 - Dover Town Centre
Rep ID	SDLP1067
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>See below</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>There is a need for pleasurable, retail-browsing experiences; This means stopping the Dover gridlock events that lasted most of April 2022 and in July 2022. It means cutting business rates for independent, innovative start-ups especially those allowing residents to reduce their carbon footprint (zero-waste / re-fill shops, cycle + skate repair stores, up-cycling stores, plant swap-shops, etc).</p> <p>The Sunday farmers' market should be tempted back all year round, so that there were more footfall further inland, up Biggin Street, further west than the St James retail centre. e.g. car park behind Costa coffee, if it were offered space under a solar canopy under which shoppers could stroll round protected from the worst of the rain. Dover town spatially has much potential, it has long been overdependent on disparate, charitable initiatives. There is an especial need to incentivise retail start-ups along London Road, Dover between the Charlton Centre and the Cadet centre. This area of one-way west-bound A256 is crying out for air pollution to be reduced and for embellishment, and it is Living Walls of vertical planting / urban hedges that are called for. The same applies to one-way, port-bound Barton Rd / Maison Dieu Rd A256.</p> <p>Many public buildings in mid Dover area, offer opportunities to enhance national and local energy security if they were to gain solar power installation that could be used by neighbouring carehomes, or doctors' surgeries (solar energy is most economical viable when exported to neighbouring premises using electricity during daylight hours all year round).</p> <p>Walking / cycling / driving along London Road could become a much more cheering experience if Living Walls referred to above, combined with murals (for years community groups have offered creative talents to do this, time for Dover TC/ DDC to become more hearing councils. Underpinning the promotion of the town is the urgent installation of public toilets. (See comments above SP6 Economic Growth / Tourism) The stalemate between DoverTC and DDC has to be overcome by installing a minimum of 3 new modern self-cleaning toilet blocks, one at Maison Dieu, in 2023; in the interests of Dover residents, and local visitors from around East Kent and visitors from further afield. And as the Port of Dover Community Forum pointed out, while PoD have provided lavatories at the Clock Tower space, it is not their role to take away from councils their responsibility to restore toilets and make the town as hygienic as it was in the 1980s.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.</p>
<p>Include files</p>	<p>v4 D&D Greens response 2022 Reg 19 new Local Plan .docx</p>
<p>Local Plan Consultation Point</p>	<p>Strategic Policy 8 - Dover Town Centre</p>
<p>Rep ID</p>	<p>SDLP925</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331999</p>
<p>Consultee Full Name</p>	<p>Claire Pamberi</p>
<p>Consultee Company / Organisation</p>	<p>Kent County Council</p>
<p>Agent Full Name</p>	<p></p>
<p>Agent Company / Organisation</p>	<p></p>

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP8
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p><u>Highways and Transportation</u>: The County Council recommends that this policy could further encourage car-free development within the Town Centre where existing and future controlled parking zones are present, to reduce unnecessary car-based journeys, especially from Whitfield.</p> <p><u>Heritage Conservation</u>: The County Council welcomes see General Principle 5 which highlights the role that dover's heritage can play in successful development, and which links the policy to the forthcoming Supplementary Planning Document (SPD) for the archaeology of Dover town.</p> <p><u>Development Investment</u>: The County Council recommends reference to the fact that any increase in households in Dover town centre will require a proportionate increase in infrastructure provision, commensurate with the profile of occupants/residents.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 8 - Dover Town Centre
Rep ID	SDLP1173
Rep Status	Processed
Consultee ID	1271293
Consultee Full Name	Mr Alan Byrne
Consultee Company / Organisation	Historic England

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP8
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The Council's aspirations for the town centre (for example, para 3.144) should more explicitly acknowledge the town's rich historic environment; e.g. how celebrating the town's rich past and heritage may contribute to its future attractiveness, vitality and success. Bullet point 5 of SP8 is welcomed as acknowledgement of the importance of the historic environment in the town's future, however the implementation section which follows the Principles could be strengthened by including a reference to the production of development briefs as an additional layer which will help ensure heritage is properly understood and celebrated within development sites, and that local character and distinctiveness is properly understood and embedded in the planning for a site. (DDC Note - This is an extract of the full Historic England representation which can be located at SDLP1169)
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 8 - Dover Town Centre
Rep ID	SDLP1477
Rep Status	Processed

Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP8
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note <i>The text below is an extract from the original representation which is attached to SDLP1438.</i></p> <p>SP8 Dover Town Centre</p> <p>There is a need for pleasurable, retail-browsing experiences; This means stopping the Dover gridlock events that lasted most of April 2022 and in July 2022. It means cutting business rates for independent, innovative start-ups especially those allowing residents to reduce their carbon footprint (zero-waste / re-fill shops, cycle + skate repair stores, up-cycling stores, plant swap-shops, etc).</p> <p>The Sunday farmers' market should be tempted back all year round, so that there were more footfall further inland, up Biggin Street, further west than the St James retail centre. e.g. car park behind Costa coffee, if it were offered space under a solar canopy under which shoppers could stroll round protected from the worst of the rain. Dover town spatially has much potential, it has long been overdependent on disparate, charitable initiatives. There is an especial need to incentivize retail start-ups along London Road, Dover between the Charlton Centre and the Cadet centre. This area of one-way west bound A256 is crying out for air pollution to be reduced and for embellishment, and it is Living Walls of vertical planting / urban hedges that are called for. The same applies to one-way, port-bound Barton Rd / Maison Dieu Rd A256.</p> <p>Many public buildings in mid Dover area, offer opportunities to enhance national and local energy security if they were to gain solar power installation that could be used by neighbouring care homes, or doctors' surgeries (solar energy is most economical viable when exported to neighbouring premises using electricity during daylight hours all year round).</p> <p>Walking / cycling / driving along London Road could become a much more cheering experience if Living Walls referred to above, combined with murals (for years community groups have offered creative talents to do this, time for Dover TC/ DDC to become more hearing councils. Underpinning the promotion of the town is the urgent installation of public toilets. (See comments above SP6 Economic Growth / Tourism) Dover TC and DDC have jointly agreed to install a minimum of 3 new modern self-cleaning toilet blocks, one at Maison Dieu, in 2023, in the interests of Dover residents, and local visitors from around East Kent and visitors from further afield. And as the Port of Dover Community Forum pointed out, while Port of Dover have provided lavatories at the Clock Tower space, it is not their role to take away from councils their responsibility to restore toilets and make the town as hygienic as it was in the 1980s.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant	

and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Strategic Policy 9 - Deal Town Centre

Local Plan Consultation Point	Strategic Policy 9 - Deal Town Centre
Rep ID	SDLP1068
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The relative success of Deal Town Centre is threatened by the congestion caused by over-development on the outskirts of Deal/ Walmer. With many developments still in the planning and building stage, even more congestion should be anticipated from 2023. Shoppers aged 50 – 90 will not want to sit in traffic queues to get to Deal Market on a Saturday, they will go elsewhere perhaps to Canterbury or to Thanet retail parks. Deal Town Council's report of June 2020 'Making Walking and cycling irresistible' is excellent, it provides detailed junction plans to make cycling safer and we fully endorse it.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Both of these compact centres would benefit from '20 is plenty' policies being introduced, Sandwich has. Walmer TC has put this on its HIP Highways Improvement Plan. This would protect the retail and residential streets that exist, and make the retail centres more attractive for young families with buggies, and for many others. A strong case exists for incentivising / cutting business rates for independent, innovative start-ups especially those allowing residents to reduce their carbon footprint (zero-waste / re-fill shops, cycle + skate repair stores, up-cycling stores, plant swap-shops, etc). The plan for a 'Park and Pedal', scheme at Borrowpit Carpark, Walmer is excellent. It would offer opportunities to SMEs to provide small electric hopper buses. This should be provided by a local CIC in preference to Stagecoach, who, experience shows, are disinclined to innovate in a timely fashion, and it could allow Deal town centre to retain footfall on the high street and cope with the developments which have already received planning permission, or are being built. The Deal / Walmer road system will not cope if permission is given for any more developments, these are reasons why we say SAP 14, SAP 15, SAP 34, are unsound. DDC dept of Planning are in danger of killing a Dealite goose laying golden eggs, if they don't put a brake on developments within 3 miles of the boundaries of Deal / Walmer.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	Strategic Policy 9 - Deal Town Centre
Rep ID	SDLP926
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP9
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<u>Heritage Conservation</u> : The County Council welcomes consideration of the role of the historic environment recognised as recognised in paragraph 4. <u>Development Investment</u> : With reference to paragraph 1, any increase in households in Deal town centre will require a proportionate increase in infrastructure provision, commensurate with the profile of occupants/residents.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 9 - Deal Town Centre
Rep ID	SDLP1479
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP9
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p><i>DDC Note The text below is an extract from the original representation which is attached to SDLP1438.</i></p> <p><i>DDC Note The text below is an extract from the original representation which is attached to SDLP1438.</i></p> <p>SP9 & SP 10 Deal & Sandwich Town Centres</p> <p>Both of these compact centres would benefit from '20 is plenty' policies being introduced, Sandwich has. Walmer TC has put this on its HIP Highways Improvement Plan. This would protect the retail and residential streets that exist and make the retail centres more attractive for young families with buggies, and for many others. A strong case exists for incentivising / cutting business rates for independent, innovative start-ups especially those allowing residents to reduce their carbon footprint (zero-waste / re-fill shops, cycle + skate repair stores, up-cycling stores, plant swap-shops, etc)</p> <p>The relative success of Deal Town Centre is threatened by the congestion caused by overdevelopment on the outskirts of Deal/ Walmer. With many developments still in the planning and building stage, even more congestion should be anticipated from 2023. Shoppers aged 50 – 90 will not want to sit in traffic queues to get to Deal Market on a Saturday, they will go elsewhere perhaps to Canterbury or to Thanet retail parks.</p>

	<p>Deal Town Council's report of June 2020 'Making Walking and cycling irresistible' is excellent, it provides detailed junction plans to make cycling safer and we fully endorse it. The plan for a 'Park and Pedal' scheme at Borrow pit Carpark, Walmer is excellent. It would offer opportunities to SMEs to provide small electric hopper buses. This should be provided by a local CIC in preference to Stagecoach, who, experience shows, are disinclined to innovate in a timely fashion, and it could allow Deal town centre to retain footfall on the high street and cope with the developments which have already received planning permission or are being built. The Deal / Walmer road system will not cope if permission is given for any more developments, these are reasons why we say SAP 14, SAP 15, SAP 34, are unsound. DDC dept of Planning are in danger of killing a 'Dealite' goose laying golden eggs, if they don't put a brake on developments within 3 miles of the boundaries of Deal / Walmer.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	

Strategic Policy 10 - Sandwich Town Centre

Local Plan Consultation Point	Strategic Policy 10 - Sandwich Town Centre
Rep ID	SDLP175
Rep Status	Processed
Consultee ID	1329874
Consultee Full Name	Ms Nicola Purcell
Consultee Company / Organisation	Aylesham Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Settlement Hierachy. (SP3 and SP10)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Aylesham is designated as a "Rural Service Centre" on par with the town of Sandwich. Although Sandwich and Aylesham have equal weighting in the settlement hierarchy, they are not getting an equal weighting in housing development or in terms of investment. The Site Allocations refer to the district's "existing larger settlements of Dover, Deal and Sandwich" but in reality Aylesham is now likely to have a larger population than Sandwich.</p> <p>Aylesham is receiving 649 new homes (SAP24 and SAP27), whilst Sandwich has a proposed development of just over 200 homes.</p> <p>The Draft Local Plan proposes investment in Sandwich to improve the town and protect its historic environment. In addition, it will see investment in culture. This is not the same for Aylesham.</p> <p>This relates to SP3 – Housing Growth and SP10 – Sandwich Town Centre.</p> <p>The residents of Aylesham should also see their cultural capital widened and enriched in such an extensive Draft Local Plan. Other than house building, there seems to be little else on offer. Funding should be provided for organisations such as cinemas, museums, galleries etc that will help to enrich people's lives.</p> <p>For a rural settlement, a further 640 houses, on top of a recent development of 1,360 seems to be somewhat excessive.</p> <p>Aylesham Parish Council believes that Aylesham is being left behind. Aylesham must receive equal investment in comparison to other Rural Service centres to ensure the village thrives.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 10 - Sandwich Town Centre
Rep ID	SDLP738
Rep Status	Processed
Consultee ID	1331585
Consultee Full Name	Terence Hopper
Consultee Company / Organisation	
Agent Full Name	Terence Hopper
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Strategic Policy 10 Sandwich Town Centre
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>SP 10 appears to be lacklustre in its approach.</p> <p>It makes no mention of increasing footfall to businesses by providing extra housing for potential residents. It would almost appear that DDC has ignored the settlement hierarchy and purposely restricted this, to Sandwich's detriment.</p> <p>It does not seek to capitalise on those positive attributes of the town that draw people to come to live in the town, such as its excellent schools, historic environment, good road, and rail connections, and its close proximity to the largest high-end employment in the area, at Discovery Park.</p> <p>In its foreword to Sandwich in this document, DDC claim in one section that the housing is limited due to the lack of local jobs while conveniently forgetting that it has stated that Sandwich lies adjacent (within walking distance) to the largest source of employment in the area.</p>

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	DDC should realise that Sandwich has more to it than history and golf and aim to make more of the other attributes the town has. It should look to increase the housing supply so that the town can benefit from residents who are drawn to live there rather than people who are drawn to visit.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 10 - Sandwich Town Centre
Rep ID	SDLP645
Rep Status	Processed
Consultee ID	1331372
Consultee Full Name	Laura Beech
Consultee Company / Organisation	Lidl Great Britain
Agent Full Name	Laura Beech
Agent Company / Organisation	Walsingham Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Strategic Policy 10 - Sandwich Town Centre
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

Introduction

Walsingham Planning is submitting this representation on behalf of Lidl Great Britain, who has an existing store at Honeywood Parkway in Dover, and who also hopes to deliver additional investment in the District over the course of the new plan period.

Context – The Need to Improve Convenience Retail Provision in Sandwich

It is important to note from the outset that the existing, adopted Dover Land Allocations Local Plan identifies a clear need to improve convenience retail provision within the Deal / Sandwich trade area. Indeed, paragraph 3.237 of the Land Allocations Local Plan states that there is an identified quantitative need over the Plan period for around 2,400 sq.m gross additional convenience goods floorspace within the area. Moreover, the adopted Plan explains that:

“The Council considers that there is potential to increase the quantity and quality of convenience floorspace provision in Sandwich to help broaden the range and choice to the benefit of its local catchment population, whilst also helping to strengthen the role of Sandwich in the settlement hierarchy. New floorspace of an appropriate scale in a location that is well connected to the town centre would help to increase the ‘claw back’ and retention of shoppers and expenditure from the 2012 position” [our emphasis].

The adopted Local Plan goes on to explain that the tight historic grain of Sandwich town centre does not readily provide opportunities for larger retail provision. The adopted Local Plan could not identify any suitable or viable sites within or on the edge of Sandwich town centre to accommodate such a scheme, and so the Plan sets out a criteria-based policy, against which any future retail applications can be assessed. Policy LA19 relates directly to ‘new convenience retail provision in Sandwich’, and states that planning permission for new convenience provision in Sandwich will be permitted, provided that the scheme meets the six specified criteria.

We understand that Policy LA19 of the adopted Local Plan was framed by an evidence base that is now considered to be out-of-date. Notwithstanding this, it is clear that the current Local Plan identifies a very clear quantitative and qualitative need for additional food and grocery provision within the settlement of Sandwich, and this need remains unmet. Indeed, no new foodstores have been delivered within the town, and thus residents continue to have to travel further afield to undertake their main food shop.

The evidence base that informs the Regulation 19 Draft Local Plan includes an updated Dover Retail and Town Centre Needs Assessment (2021). The updated Needs Assessment shows that there is no District-wide capacity for new convenience goods floorspace in the period up to 2040, after taking into account commitments. However, when the specific towns are considered, the Study identifies that there remains some capacity for additional floorspace in Deal and Sandwich, equating to between 256 and 458 sq.m net convenience floorspace by 2040. It should be noted, however, that the 2021 Study is based on the very conservative assumptions that the retail market is in ‘equilibrium’ (i.e. that no stores are over-trading) and that market shares will remain constant over the study period.

Moreover, whilst the calculated quantitative need may have reduced based on the latest data assumptions, there has been no change in practice to the very real qualitative need that continues to exist for additional foodstore provision within Sandwich.

It is relevant to note that the evidence base (the 2021 Retail and Town Centre Needs Assessment) records that there were 104 retail and leisure units within Sandwich, as of 2021. Out of this total, 37% of the units comprised non-food retail stores, 23% of units provided leisure services, and 14% of units offered retail services. However, only 8% of the units (7 units in total) accommodated convenience retail shopping facilities. This is lower than the national average representation, and also represents a decline since 2015, when there were 10 food and grocery outlets within the centre.

Sandwich has limited representation from convenience retailers. Whilst the centre benefits from some independent food stores (bakers, butchers and greengrocers), there are limited ‘main food’ shopping opportunities. The only medium-sized foodstore is the Co-op at Moat Sole Road.

As a result, it is evident that many residents need to travel further afield – to Dover, Deal and out-of-centre destinations – to undertake their main food shopping. The household survey shopping results, reported in the Retail and Town Centre Needs Assessment, confirm that only 3% of convenience goods expenditure from the District is spent in Sandwich Town Centre, which is a very low level of expenditure retention. Within the more localised Sandwich study zone (Zone 6), less than a quarter of convenience goods expenditure is retained by local stores, which represents significant leakage of local expenditure to destinations located further afield.

Indeed, the market share analysis for main food shopping (Table 2, Appendix 2, Volume 4 of the 2021 Needs Assessment) shows that only 14% of main food expenditure within Zone 6 is retained within Sandwich. Instead, residents are travelling to Tesco Extra at White Cliffs Business Park (29%), Aldi at Cherry Tree Avenue, Dover (13%), Sainsbury’s in Deal (11%), as well as destinations further afield (to Ramsgate, Margate and Canterbury) to undertake their weekly ‘main food’ shop. This is not a sustainable pattern of shopping, and the results highlight the clear deficiency in main food shopping provision within Sandwich that continues to exist.

We note that further growth is earmarked for Sandwich within the draft Local Plan. The identified disparity will continue to grow, as more residents move into the town, and the lack of local access to main food shopping opportunities becomes more apparent.

	<p><u>Strategic Policy 10 - Sandwich Town Centre</u></p> <p>It is our view that draft Strategic Policy 10 is unsound, because it fails to respond positively to the evidence base and does not reflect national policy.</p> <p>As set out above, it is clear that there is an identified qualitative need for additional foodstore provision within the settlement of Sandwich, to meet residents' shopping needs and clawback trade that currently leaks to destinations further afield.</p> <p>The policy justification text confirms that the proportion of convenience outlets in the town has reduced since 2018. As per the adopted Local Plan, the draft Local Plan also reiterates that the "<i>development potential of Sandwich Town Centre is limited due to its historic layout</i>". In these circumstances, we would expect the draft Local Plan to identify a suitable edge / out-of-centre site to accommodate future retail needs, or a criteria-based policy against which future development proposals can be positively assessed (akin to adopted Local Plan Policy LA19).</p> <p>However, the wording of draft Local Plan Policy SP10 is more restrictive, and – whilst it seeks to enhance the vitality and viability of Sandwich Town Centre – makes no provision for growth and does not identify how future needs can be met.</p> <p>The draft Local Plan does not therefore reflect a positive and flexible approach to plan-making, and is thus inconsistent with national policy. The draft Local Plan does not seek to allocate any sites for retail development within Sandwich, despite the evidence of need identified, and it does not represent a positive approach to the growth and management of the key settlement of Sandwich over the plan period.</p> <p>In summary, by failing to make any provision for additional convenience floorspace, either as a retail allocation or criteria-based policy, it is our view that draft Policy SP10 is not sound, because it has not been positively prepared, it does not represent an appropriate and justified strategy, the policy will not be effective and it is not consistent with the approach to planning for town centres that is set out in the NPPF.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>It is our view that the retail and town centre strategy put forward in the draft Local Plan is flawed and unsound. The strategy places an over-reliance on the quantitative need figures derived from 2021 Retail and Town Centre Needs Assessment, and does not take into account evidence of qualitative need. In particular, it is of great concern that the draft Local Plan does not consider the clear need that exists for additional convenience provision within Sandwich, which is identified in the adopted Local Plan, and which remains unaddressed.</p> <p>Whilst the adopted Local Plan contains a positive and proactive policy to support new retail development within Sandwich (Policy LA19), this strategy has not been carried through to the draft Local Plan.</p> <p>In order to be sound, the new Local Plan (within Strategic Policy 10) should provide policy support to addressing the ongoing retail needs identified within Sandwich, as this currently represents an omission from the draft Local Plan.</p> <p>In the absence of an appropriate strategy to support new convenience provision within Sandwich, local residents will need to continue to travel to Deal, Dover and destinations further afield to undertake their food and grocery shopping. This is not a sustainable strategy.</p> <p>Strategic Policy 10 should identify the need to enhance convenience provision within the settlement of Sandwich, and should allocate a site for such use, or set out a criteria-based approach to considering future foodstore development proposals.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>We would like to participate because we have recommended that modifications are required to Strategic Policy 10 (as well as other policies within the draft Local Plan).</p> <p>Given the technical nature of the retail evidence base, it would be useful to participate directly in the oral examination in order to have the opportunity to discuss the proposed retail and town centre strategy for Sandwich in detail and answer questions directly.</p>
<p>Include files</p>	<p>Lidl Reps - Reg 19 Draft Dover Local Plan (Dec 2022).docx (1)</p>
<p>Local Plan Consultation Point</p>	<p>Strategic Policy 10 - Sandwich Town Centre</p>
<p>Rep ID</p>	<p>SDLP1596</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1252100</p>
<p>Consultee Full Name</p>	<p>Mrs</p>

	Amandajayne Hollobon-Baxter
Consultee Company / Organisation	Sandwich Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP10
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	A new point 7 should be added stating 'Carry out a full, evidence led, review of pedestrianisation and vehicular traffic in the town centre.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	A new point 7 should be added stating 'Carry out a full, evidence led, review of pedestrianisation and vehicular traffic in the town centre.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 10 - Sandwich Town Centre
Rep ID	SDLP927

Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP10
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<u>Heritage Conservation</u> : The County Council welcomes consideration of the role of the historic environment recognised as recognised in paragraph 4. <u>Development Investment</u> : The County Council recommends reference to the fact that any increase in households in Sandwich town centre will require a proportionate increase in infrastructure provision, commensurate with the profile of occupants/residents.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 10 - Sandwich Town Centre
Rep ID	SDLP1069

Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	See below
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Both of these compact centres would benefit from '20 is plenty' policies being introduced, Sandwich has. Walmer TC has put this on its HIP Highways Improvement Plan. This would protect the retail and residential streets that exist, and make the retail centres more attractive for young families with buggies, and for many others. A strong case exists for incentivising / cutting business rates for independent, innovative start-ups especially those allowing residents to reduce their carbon footprint (zero-waste / re-fill shops, cycle + skate repair stores, up-cycling stores, plant swap-shops, etc).
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx

Local Plan Consultation Point	Strategic Policy 10 - Sandwich Town Centre
Rep ID	SDLP1480
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP10
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note The text below is an extract from the original representation which is attached to SDLP1438.</p> <p>SP9 & SP 10 Deal & Sandwich Town Centres</p> <p>Both of these compact centres would benefit from '20 is plenty' policies being introduced, Sandwich has. Walmer TC has put this on its HIP Highways Improvement Plan. This would protect the retail and residential streets that exist and make the retail centres more attractive for young families with buggies, and for many others. A strong case exists for incentivising / cutting business rates for independent, innovative start-ups especially those allowing residents to reduce their carbon footprint (zero-waste / re-fill shops, cycle + skate repair stores, up-cycling stores, plant swap-shops, etc)</p> <p>The relative success of Deal Town Centre is threatened by the congestion caused by overdevelopment on the outskirts of Deal/ Walmer. With many developments still in the planning and building stage, even more congestion should be anticipated from 2023. Shoppers aged 50 – 90 will not want to sit in traffic queues to get to Deal Market on a Saturday, they will go elsewhere perhaps to Canterbury or to Thanet retail parks. Deal Town Council's report of June 2020 'Making Walking and cycling irresistible' is excellent, it provides detailed junction plans to make cycling safer and we fully endorse it. The plan for a 'Park and Pedal' scheme at Borrow pit Carpark, Walmer is excellent. It would offer opportunities to SMEs to provide small electric hopper buses. This should be provided by a local CIC in preference to Stagecoach, who, experience shows, are disinclined to innovate in a timely fashion, and it could allow Deal town centre to retain footfall on the high street and cope with the developments which have already received planning permission or are being built. The Deal / Walmer road system will not cope if permission is given for any more developments, these are reasons why we say SAP 14, SAP 15, SAP 34, are unsound. DDC dept of Planning are in danger of killing a 'Dealite' goose laying golden eggs, if they don't put a brake on developments within 3 miles of the boundaries of Deal / Walmer.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s)	

you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Strategic Policy 11 - Infrastructure and Developer Contributions

Local Plan Consultation Point	Strategic Policy 11 - Infrastructure and Developer Contributions
Rep ID	SDLP42
Rep Status	Processed
Consultee ID	1254085
Consultee Full Name	Mrs Sue Ward
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP11
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The current development at Whitfield does not have the required infrastructure, which is why there have been flooding and sewerage problems. It also has inadequate transport links, resulting in more car use and all the problems which arise from that.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Infrastructure should be in place before developments are allowed to begin. Developments should not be permitted without a nearby rail connection.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 11 - Infrastructure and Developer Contributions
Rep ID	SDLP169
Rep Status	Processed
Consultee ID	1329874
Consultee Full Name	Ms Nicola Purcell
Consultee Company / Organisation	Aylesham Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>In October 2021, Aylesham Parish Council supported the Climate and Ecological Emergency (CEE) Bill which address the full extent of the climate and nature crisis in the UK. As a result, any local plan should use up-to-date science to make sound recommendations.</p> <p>As the district is extremely water scarce, all possible measures should be implemented to help mitigate water scarcity. The use of Sustainable Urban Drainage systems (SUDs) is required to be prominent in all future developments. This will help to deal with surface water flooding. We welcome the Draft Local Plan's hierarchy of methods of discharge, with the use of combined sewers coming last.</p> <p>This relates to CC6 of SP1 – Surface Water Management.</p> <p>There are a number of options to ensure new homes produce the least possible carbon emissions. Aylesham Parish Council would like to see Dover District Council require the full 2025 Future Homes Standard to be delivered now (this will reduce emissions by between 75-80% compared to current standards), not at some point during the Local Plan's lifetime.</p> <p>This relates to CC1 of SP1 – Reducing Carbon Emissions.</p>

We welcome the commitment to planting trees within new developments that are native to Kent. This will help to keep the rural feel of Aylesham alive. Currently we often see newly planted trees dying within the first few years of their lives. There must be a comprehensive plan to ensure that these trees reach maturity (part d) and how this will be enforced by the local authority.

This relates to CC8 of SP1 – Tree Planting and Protection.

Aylesham Parish Council welcomes the commitment to planting larger numbers of trees but feels this must come with a long-term solution to maintaining the trees. Dover District Council must also commit to the full 2025 future homes standard now.

Aylesham Parish Council welcomes the addition and enhancement of open spaces and play areas. However, there are two points to note in the IDP: why would \$106 monies from Aylesham be spent upgrading play areas in Nonington?; and play areas and open spaces are last to be delivered in developments – this must not happen in the future.

Aylesham Parish Council is identified as “Delivery Partners” on a number of projects due to be delivered: we have not been consulted on this prior to the Regulation 19 document being released.

The HRA[1] suggests that AYL003 – Land South of Aylesham is “high” suitability for the European Golden Plover, and so all measures must be taken to ensure this SPA protected bird species is still able to migrate and flourish in the area. SAP 25 (mixed use employment) is considered “moderate”.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Local Plan Consultation Point

Strategic Policy 11 - Infrastructure and Developer Contributions

Rep ID

SDLP460

Rep Status

Processed

Consultee ID

1266351

Consultee Full Name

Dr
Sharon
Danby

Consultee Company / Organisation

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP11 Infrastructure and developer contributions
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Paragraph 9.26 highlights the need for infrastructure, particularly transport infrastructure, and paragraphs 9.27 to 9.29 point out the difficulties of establishing what infrastructure is required to support each potential new development.</p> <p>Paragraph 9.30 concludes that infrastructure is best provided by Section 106 agreements rather than by a Community Infrastructure Levy (CIL). This underpins Strategic Policy 11 which concludes by stating that "In determining the nature and scale of any provision, the Council will have regard to viability considerations and site-specific circumstances."</p> <p>This statement, in effect and in practice, has allowed developers to reduce progressively the Section 106 payments and other conditions imposed on developments at the time of granting permission by suggesting that their potential developments are not financially viable once all the constraints have been factored in. A CIL would provide developers, planners and residents with the certainty of knowing what the community costs would be.</p> <p>It is not the Council's role to have regard to any planning application's financial viability. It is the responsibility of the applicant to have in place sufficient funding or access to sufficient funding in order to realise the project. It is the Council's responsibility to determine the use of the land and the conditions which make that use appropriate, and answer for its decisions before the electorate. The plan would become more sound and effective if it included Council intention to implement a CIL before the Plan has run a quarter of its projected course, and a further sentence should be added to SP11 stating that: "The Council intends to introduce a Community Infrastructure Levy as soon as possible but before 2025 so that the council, developers and residents can more clearly understand the financial requirements of any agreed planning permission."</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Implement CIL rather than S106
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

Local Plan Consultation Point	Strategic Policy 11 - Infrastructure and Developer Contributions
Rep ID	SDLP303
Rep Status	Processed
Consultee ID	1331112
Consultee Full Name	Miss Emma Waller
Consultee Company / Organisation	Kent Wildlife Trust
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP11 - Infrastructure and Developer Contributions
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SP11 - Infrastructure and Developer Contributions does not mention the recent legal compliance required under the Environment Act 2021, whereby new development will be legally required to compensate for habitat loss by providing a minimum of 10% BNG and to describe how this will be met and managed for a minimum 30 year period as part of a Biodiversity Net Gain Plan submitted with the planning application. We would recommend that the above is included or reference is made to other policies within the Plan. It is key that a strategic approach to Green and Blue Infrastructure and BNG is taken through the delivery of Local Nature Recovery Strategies, as set out within the Environment Act.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	

Include files	
Local Plan Consultation Point	Strategic Policy 11 - Infrastructure and Developer Contributions
Rep ID	SDLP306
Rep Status	Processed
Consultee ID	1331395
Consultee Full Name	Ms Jo Edwards
Consultee Company / Organisation	Sport England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP11
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Sport England fully supports this policy as it relates to sport and leisure facilities
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 11 - Infrastructure and Developer Contributions
Rep ID	SDLP562
Rep Status	Processed
Consultee ID	1267584
Consultee Full Name	Jason Ransley
Consultee Company / Organisation	Dover Harbour Board
Agent Full Name	John Bowles
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Strategic Policy SP11 - Infrastructure and Developer Contributions
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Dover Harbour Board supports the flexible approach adopted in Strategic Policy SP11 – Infrastructure and Developer Contributions to have regard to viability considerations, site-specific circumstances and most up to date and relevant evidence in determining the nature and scale of provision and the mechanisms available to allow development to proceed.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	N/A
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	N/A
Include files	
Local Plan Consultation Point	Strategic Policy 11 - Infrastructure and Developer Contributions
Rep ID	SDLP588
Rep Status	Processed
Consultee ID	1331781
Consultee Full Name	Mr John Townsend
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	10 Transport and Infrastructure
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p><i>This comment applies to SP11 & SP12</i></p> <p>TRANSPORT INFRASTRUCTURE</p> <p>In the rural hinterland of the District, most roads are single track so most, if not all, of the roads around settlements are single track. Larger villages, unless they have (or had) a classified road running through them, may have a few dual track roads but these, although wide enough for two cars to pass are generally not sufficiently wide for a car and a wider vehicle (e.g. a lorry) to pass: one has to find a suitable place to pull in. This issue is not considered at all in the Regulation 19 Local Plan.</p> <p>In this area, most roads do not have a separate footway and, of those that do, most have it for only a small portion of their length. Pedestrian traffic here is not considered at all in the Regulation 19 Local Plan.</p>

Cycling is a more sustainable form of transport and will be encouraged.

It is likely that cyclists living in rural settlements will often choose to use more minor (hence single track) roads, in the expectation of less traffic on these. However, these are used by motor vehicles and any car or lorry would be reduced to the cyclist's speed as, in most places, there would not be room for the cyclist, a 1.5 m gap and the car or lorry.

A similar problem arises with cycle use on the few dual track roads, which tend to be the main connecting routes: with oncoming traffic and limited forward visibility (because of bends and hedges/banks), motor vehicles would have difficulty safely passing a cyclist, reducing traffic to the cyclist's speed and increasing congestion.

This issue is not considered at all in the Regulation 19 Local Plan.

The only consideration given to increased rural traffic levels (with consequent congestion - and so air quality - and road safety issues) relates to junctions; that relating to local road networks is deliberately not done. The aspirations of the Local Plan in this regard are outlined in the first two paragraphs of T12 but any consideration of these is consciously postponed: the last two paragraphs of T12 make clear that traffic levels are for the applicant to consider and Appendix 1 - Infrastructure Delivery Schedule (IDS) 2022 proposes a review/assessment/Traffic Assessment.

This means, of course, that considerations of both the traffic levels (with consequent congestion and road safety issues) and the pollution implications are omitted.

This lacuna makes the plan unsound, for four reasons.

“Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs”: congestion on local roads is omitted, so there is no consideration of the needs this would present and what should be done to meet these.

“Justified – an appropriate strategy”: the strategy of having increased housing around rural settlements has not been justified because the effects on the local road networks are not considered.

“Effective – deliverable over the plan period”: there is no consideration of the improvements in local roads that would be needed, so no consideration of whether these would be deliverable over the plan period.

It is not **“Consistent with national policy”**, which the following extracts from the NPPF, especially paragraphs 104 and 110, illustrate.

8 sustainable development ... objectives:

a) **an economic objective** – to help build a strong, responsive and competitive economy, ... by identifying and coordinating the provision of infrastructure;

b) **a social objective** – ... safe places ...: (rural roads outside of the areas proposed for development are not considered and would become less safe);

11a) all plans should promote a sustainable pattern of development that seeks to: ... align growth and infrastructure...

16 Plans should:

a) be prepared with the objective of contributing to the achievement of sustainable development¹¹;

20 Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision¹³ for:

...

b) infrastructure for transport, ...

85. Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads (my underlining) and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). ...

104. Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

a) the potential impacts of development on transport networks can be addressed;

d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and
e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.

110. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
- b) safe and suitable access to the site can be achieved for all users;
- c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code 46; and
- d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

111. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

112. Within this context, applications for development should:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- c) create places that are safe, secure and attractive –which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards (my underlining);
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles;

Additionally, this lacuna is inconsistent with the following objectives (quoted from p 22 of the Plan):

(from 2.4) To focus new development at accessible and sustainable locations which can utilise existing infrastructure, facilities and services, and to ensure development contributes to the sustainability of local communities and services, supporting regeneration and wherever possible make the best use of brownfield land.

(from 2.5) To improve connectivity and movement through significantly enhancing the provision of walking and cycling routes and other sustainable modes of transport, as well as delivering improvements to the local and strategic road network.

To ensure infrastructure is delivered, in a timely manner, to support the needs of new and existing communities in the District.

This inconsistency of SP11 and SP12 with the Plan's objectives means that their implementation, through SP11 & SP12, is unsound because it is not consistent with national policy:

9. These objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework;

....

the implementation fails the test of soundness.

Furthermore, the Regulation 19 Local Plan, where it considers local traffic, only considers that from new development (paragraph 10.7): there is no consideration either of traffic now and how this is expected to develop (and so what needs this generates) or of the extra traffic both from construction vehicles and then traffic from newly constructed buildings before improvements are made.

As an example of the former (see representation submitted on REGULATION 19 TRANSPORT MODELLING FORECASTING REPORT), traffic on the (relatively) main road between the A2 and A256, through Shepherdswell and Eyethorne, is projected to grow at 15-19% on the DM (do minimum) scenario.

For the latter, it is the consistent assumption in both the report and its supporting evidence on infrastructure that road improvements will be paid for by developer contributions, but these are not normally made until a proportion of the houses are built (because by then the developer should have made sufficient money to do so). However, there would be a considerable amount of additional traffic to and from the new buildings in

	<p>the initial phase of development and then before any improvements could be completed; much of this additional traffic would be heavy construction vehicles (for which most local roads are unsuitable).</p> <p>The Government 'Guidance on plan-making', in paragraph 059, states</p> <p>A plan is an opportunity for the strategic policy-making authority to set out a positive vision for the area, but the plan should also be realistic about what can be achieved and when. This means paying careful attention to ... identifying what infrastructure is required and how it can be funded and brought forward.</p> <p>At an early stage in the plan-making process strategic policy-making authorities will need to work alongside infrastructure providers, service delivery organisations, other strategic bodies such as Local Enterprise Partnerships, developers, landowners and site promoters. A collaborative approach is expected to be taken to identifying infrastructure deficits and requirements, and opportunities for addressing them. In doing so they will need to:</p> <p>assess the quality and capacity of infrastructure, and its ability to meet forecast demands. Where deficiencies are identified, policies should set out how those deficiencies will be addressed; ...</p> <p>This Guidance, which amplifies paragraph 16c) of the NPPF, has clearly not been followed: the Plan fails to consider growth of traffic on local roads in any of the DM scenario, from construction traffic or, in the initial phase of development, to and from new buildings.</p> <p>Both this and not complying with paragraph 104 of the NPPF make the plan unsound.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>A full assessment of traffic (of all varieties) on local roads, taking into account an up-to-date assessment of traffic now and of likely growth in the scenarios of minimal, some and maximum planned building growth should be made; in co-operation with KCC plans should then be developed for the appropriate infrastructure enhancements and the planned growth reassessed in the light of this (an iterative process). These plans should not only consider the consequences of traffic growth when building is completed but also take into account</p> <p>a) traffic during construction & b) traffic from what construction is completed before the enhancements from S106 contributions are made.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>to provide any necessary clarification to the above.</p>
<p>Include files</p>	<p>SDLP0588 Townsend Att1.pdf</p>
<p>Local Plan Consultation Point</p>	<p>Strategic Policy 11 - Infrastructure and Developer Contributions</p>
<p>Rep ID</p>	<p>SDLP606</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331790</p>
<p>Consultee Full Name</p>	<p>Julie Davies</p>
<p>Consultee Company / Organisation</p>	<p>CPRE Kent</p>

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP11
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	CPRE would request that it is made clear what infrastructure will be required, who will provide it, where it will be delivered, when it'll be delivered and how much it will cost.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	CPRE Kent would wish to participate at the examination hearings to explore these issues further.
Include files	
Local Plan Consultation Point	Strategic Policy 11 - Infrastructure and Developer Contributions
Rep ID	SDLP1154
Rep Status	Processed
Consultee ID	1271448
Consultee Full Name	Kevin Bown

Consultee Company / Organisation	National Highways
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP11
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We note that SP11 formed Strategic Policy 13 of the Regulation 18 consultation. We previously stated that Strategic Policy 13 was satisfactory. We note that SP11 has now been updated to reference that appropriate phasing for the provision of infrastructure will be determined on a case-by-case basis with reference to the most up to date Infrastructure Delivery Plan and the priority classification along with other relevant evidence, and in consultation with the relevant providers. It also now sets out that in exceptional circumstances, should independently verified viability evidence funded by the applicant establish that it is not possible to deliver the infrastructure requirements set out in this Plan and the viability position is agreed by the Council, the Council will consider flexibility through a reduction in contributions and/or a deferred payments mechanism. Infrastructure and Developer Contributions are discussed further below in relation to mitigation requirements and the Infrastructure Delivery Plan.</p> <p>We appreciate that circumstances may change over time. However, development must always be accompanied by the appropriate, agreed SRN mitigation. It may, therefore, be necessary, based on a case-by-case assessment, to recommend Grampian conditions to ensure that development fully mitigates its SRN impacts. Equally, it may be appropriate to agree a Monitor and Manage approach encompassing both aspired to changes in sustainable travel etc but with a fall-back position of more traditional mitigation in the event the aspirations are not successful.</p> <p><i>(Note - This is an extract of the Full National Highways representation which can be located at SDLP1152)</i></p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Representation: Policy SP11 supporting text to be updated to reflect the need for SRN impacts always to be mitigated, but that the method of ensuring so may vary.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 11 - Infrastructure and Developer Contributions
Rep ID	SDLP929
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP11
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p><u>Highways and Transportation</u>: The Local Plan could be more succinct in its approach to transport infrastructure, by providing a level of traffic/trip impact assessment and a subsequent mitigation strategy to inform site by site policy and specifically commit linked development sites to related infrastructure.</p> <p>Whilst an element of overarching policy is required to encompass any windfall or opportunity sites that might be identified throughout the lifetime of the Local Plan, the wording of the policy does not provide sufficient indication of when infrastructure will be sought. Reference to site-by-site viability is noted, however it is essential that sufficient detail is included within the whole plan viability assessment, to ensure that the final site selection provides a realistic picture of the prospects of the county council receiving infrastructure contributions in the future. This also includes a realistic indication as to the level of affordable housing likely to be secured to assist in speeding up the development planning process at planning application stage.</p> <p>KCC would welcome further constructive dialogue with Dover District Council in identifying these requirements as the process moves forward and as further highway related evidence is produced.</p> <p><u>Development Investment</u>: The County Council welcomes the inclusion of County Council infrastructure and services as <i>Types of Infrastructure</i> within the explanatory paragraphs for this policy.</p> <p>Where viability evidence is presented by the applicant which may have a subsequent impact on mitigation for necessary county infrastructure, KCC requests that it is consulted by the District Council at the earliest opportunity.</p> <p>The County Council operates a network of 19 Household Waste and Recycling Centres, this should be corrected within paragraph 3.215.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s)	

you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 11 - Infrastructure and Developer Contributions
Rep ID	SDLP1597
Rep Status	Processed
Consultee ID	1252100
Consultee Full Name	Mrs Amandajayne Hollobon-Baxter
Consultee Company / Organisation	Sandwich Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP11
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails	Pooling of S106 funds should be utilised to address highways safety matters in Sandwich. Equal weight should be given to the consideration of walking, cycling, public transport and the highways network. Accessibility should be included. S106 funds be increased to allow disability

to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	access improvements within Sandwich. DM Policy 33: Protection of Open Space The Green Open Spaces must be protected from future development.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Pooling of S106 funds should be utilised to address highways safety matters in Sandwich. Equal weight should be given to the consideration of walking, cycling, public transport and the highways network. Accessibility should be included. S106 funds be increased to allow disability access improvements within Sandwich. DM Policy 33: Protection of Open Space The Green Open Spaces must be protected from future development.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 11 - Infrastructure and Developer Contributions
Rep ID	SDLP1270
Rep Status	Processed
Consultee ID	1271353
Consultee Full Name	Church Commissioners
Consultee Company / Organisation	
Agent Full Name	Mr Andrew Watson
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP11
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Text Extracted from Document sent from Savills on Behalf of the Church Commissioners. Representation has been split across relevant areas of the Local Plan. Full attachment and introduction to Policy comments can be found under reference SDLP1265 for Shepherdswell Site and SDLP1266 for Eastry Site.) SP11 - Infrastructure and Developer Contributions – COMMENTS Draft policy SP11 sets out how the Council intend to deliver infrastructure using developer contributions. It is acknowledged and welcomed that development will be required to agree to contributions and obligations. However, the Council must ensure that any developer contributions meet with the tests set out in NPPF paragraph 56 and 57. Recommendation: DDC to ensure that any developer contributions meet with the tests set out in paragraphs 56 and 57 in the NPPF.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 11 - Infrastructure and Developer Contributions
Rep ID	SDLP1070
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Paragraph 9.26 highlights the need for infrastructure, particularly transport infrastructure, and paragraphs 9.27 to 9.29 point out the difficulties of establishing what infrastructure is required to support each potential new development. Paragraph 9.30 concludes that infrastructure is best provided by Section 106 agreements rather than by a Community Infrastructure Levy (CIL). This underpins Strategic Policy 11 which concludes by stating that "In determining the nature and scale of any provision, the Council will have regard to viability considerations and site-specific circumstances."</p> <p>This statement, in effect and in practice, has allowed developers to reduce progressively the Section 106 payments and other conditions imposed on developments at the time of granting permission by suggesting that their potential developments are not financially viable once all the constraints have been factored in.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>A CIL would provide developers, planners and residents with the certainty of knowing what the community costs would be.</p> <p>It is not the Council's role to have regard to any planning application's financial viability. It is the responsibility of the applicant to have in place sufficient funding or access to sufficient funding in order to realise the project. It is the Council's responsibility to determine the use of the land and the conditions which make that use appropriate, and answer for its decisions before the electorate. The plan would become more sound and effective if it included Council intention to implement a CIL before the Plan has run a quarter of its projected course, and a further sentence should be added to SP11 stating that: "The Council intends to introduce a Community Infrastructure Levy as soon as possible but before 2025 so that the council, developers and residents can more clearly understand the financial requirements of any agreed planning permission."</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	Strategic Policy 11 - Infrastructure and Developer Contributions
Rep ID	SDLP1301
Rep Status	Processed
Consultee ID	1331928
Consultee Full Name	Matthew Porter
Consultee Company / Organisation	Fernham Homes Ltd
Agent Full Name	Matt Porter

Agent Company / Organisation	DHA Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy SAP15 - Land at Rays Bottom between Liverpool Road and Hawksdown, Walmer (WAL002) Policy SP3 - Housing Growth Policy SP4 - Windfall Development Policy SP11 - Infrastructure and Developer Contributions Policy SP12 - Strategic Transport Infrastructure
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We consider that the plan is sound, but object to elements of Policy SAP15 - Land at Rays Bottom between Liverpool Road and Hawksdown, Walmer (WAL002) and Policy SP3 - Housing Growth. These objections are set out in the consultation response submitted on behalf of Fernham Homes Limited (ref DHA/30359).</p> <p>1 Introduction</p> <p>1.1 Purpose of this Representation</p> <p>1.1.1 This representation has been prepared by DHA Planning on behalf of Fernham Homes Limited in response to the Dover District Council 'DDC' Local Plan (Regulation 19) consultation which runs until 9th December 2022.</p> <p>1.1.2 We understand that DDC is in the process of preparing a new Local Plan to set out a strategy for development for the period to 2040 and that the Council are presently seeking comments on the pre-submission Plan prior to its submission for examination in early 2023.</p> <p>1.1.3 Our client is promoting 'Land at Rays Bottom, Walmer, Deal' (hereafter referred to as 'Land at Rays Bottom' or 'the site') for the residential allocation of the site as part of the new Dover District Local Plan preparation process. The site is allocated for residential development in the Regulation 19 Pre-submission Plan for the provision of 75 dwellings under policy reference 'SAP15'.</p> <p>1.1.4 It is highlighted that as part of the Regulation 18 Local Plan, the Site was allocated under the 'Site Allocations Policy 1 Non-Strategic Housing Allocations' for approximately 100 dwellings (reference WAL 002).</p> <p>1.1.5 The purpose of the representation is to support the allocation of Land at Rays Bottom as a suitable and deliverable location for residential development and provide comment on the consistency of the allocation with the proposed strategy, draft policies and our client's position in respect of the 'soundness' of the Plan but to object to the indicative capacity set out in the policy.</p> <p>1.1.6 In this regard, we remain wholly supportive of the principle of the residential allocation of Land at Rays Bottom and agree that the Site represents a logical and sustainable location to direct growth in Deal consistent with the growth strategy of the Plan as a whole.</p> <p>1.1.7 Accordingly, we say that the allocation of Land at Rays Bottom is necessary in order for the Council in meeting the growing need for new homes in the district and help to ensure the DDC can have confidence in consistently meeting its market and affordable housing targets in full throughout the life of the new Dover District Plan.</p> <p>1.1.8 It is submitted that the SAP15 policy wording should be amended to reflect the capability of the Site to accommodate approximately 80 dwellings, deliverable early in the Plan period.</p> <p>1.1.9 Based on the current national and local planning context, we consider the Site to be a highly suitable edge-of-settlement location to allocate land for housing to help meet the need for new homes in the district and its effective use should be appropriately maximised in accordance with national policy objectives.</p> <p>1.1.10 Further details regarding the Site and commentary on the consistency of the allocation with the proposed strategy, draft policies and our client's position in respect of the 'soundness' of the Plan are set out in the following sections of this document.</p> <p>1.2 About Fernham Homes</p> <p>1.2.1 Fernham Homes Ltd are a local award winning small and medium sized (SME) housebuilder, established in 1997 and has a strong track record of delivering high quality residential and mixed use developments in Kent over the last 25 years. This has been acknowledged through the receipt of nationally recognised awards, including the gold Evening Standard Awards best family home 2022 and 2019 bronze WhatHouse Best Small Housebuilder.</p>

1.2.2 SME housebuilders are recognised in the National Planning Policy Framework ('NPPF') at paragraph 69 as making an important contribution to meeting the housing requirements of an area, and being able to build out relatively quickly. Similarly, this has also been recognised by the Planning Inspectorate. This is particularly the case with Fernham Homes, which is privately owned with access to significant resources. This provides significantly more flexibility than national and other regional housebuilders, and allows Fernham Homes to deliver housing rapidly and to a high quality, beautiful and sustainable standard (para 126 of the NPPF).

1.2.3 Fernham Homes has embarked on a sustained period of growth, with an adopted and robust business plan to deliver around 300 houses per year in five years time.

1.2.4 A key element of Fernham Homes' operations is to take a careful approach to site selection: a huge amount of due diligence is undertaken as part of this, and therefore Fernham Homes only invests in those sites which meet the NPPF requirements of being available, suitable, and deliverable. As set out below land at Rays Bottom, Walmer ('SAP15') is firmly considered to be such a site.

1.2.5 Similarly, a key feature of Fernham Homes' approach is to work positively and proactively with local planning authorities (LPAs), both during the preparation of local plans and at planning application stage. Fernham Homes are fully committed to engaging with DDC in the preparation of its Local Plan, and firmly subscribe to the national policy approach set out in paragraphs 15 and 16 c) of the NPPF that "the planning system should be genuinely plan-led" and should be shaped by early, proportionate and effective engagement between LPAs and others, including businesses and developers. Accordingly, Fernham Homes would welcome the opportunity to discuss the matters contained in this representation, including the availability, suitability, deliverability and capacity of land Rays Bottom, Walmer ('SAP15') directly with DDC members and officers, ahead of the submission of the Local Plan for examination.

1.3 Representation Structure

1.3.1 The representation structure is outlined below for ease of reference:

Chapter 2 (Consultation Background) – Sets out the context of the Dover District new Local Plan preparation, relevant national planning requirements and a summary of our current position.

Please refer to paragraph 52 of Appeal Decisions: APP/M2270/W/21/3283924 & APP/M2270/W/21/3288645

Chapter 3 (Legal Tests of Soundness) - Assessing whether the plan is sound, having regard to the tests of soundness outlined by paragraph 35 of the NPPF.

Chapter 4 (Duty to Co-operate) - Assessing whether the plan is sound, having regard to the duty to cooperate outlined by paragraph 24 of the NPPF.

Chapter 5 (Housing Need) - Consideration of market and affordable housing need and assessment of proposed housing allocations and supply sources.

Chapter 6 (Assessment of Suitability) - Re-introduces our client's Site and provides a summary of planning constraints and opportunities, including the quantum of development that could be accommodated, why the Site is suitable for development and why the principle of the draft allocation for residential development is both justified and consistent with the DDC's strategy for growth in the district.

Chapter 7 (Conclusion) - Summarises the key points raised throughout the representation and re-affirms our client's support for the principle of the Site's allocation and the principle of proposed strategy ahead of the submission of the Plan for examination, and the objections in terms of capacity.

2 DDC – Draft for Submission Local Plan (Regulation 19)

2.1 Consultation Background

2.1.1 DDC are required to prepare a new Local Plan, as the current suite of development plan documents were adopted in 2002, 2010 and 2015. The Core Strategy (CS) (adopted 2010) in particular has a time horizon up to 2026. The plans, and the policies contained within, pre-date current national policy, practice guidance and local evidence and consequently require updating.

2.1.2 The new Local Plan will set out the vision, strategic objectives and overarching development strategy for the growth of the District over the period to 2040. It provides the planning policy framework to guide the future development of the area, addressing needs and opportunities for housing, the economy, community facilities and infrastructure, as well as the basis for conserving and enhancing the natural and historic environments, mitigating and adapting to climate change, and achieving well designed places.

2.1.3 For the avoidance of doubt, the new Local Plan, on adoption, will replace the CS 2010 and the Land Allocations Plan 2015, as well as saved policies from the 2002 Local Plan.

2.1.4 DDC's Regulation 19 Local Plan outlines the key issues that need to be addressed between now and 2040. In particular, the Plan sets out the following key planning issues for the District:

- Ensuring that new development in the District contributes to the mitigation of, and adaptation to, climate change.
- Supporting DDC to deliver its intention to be a carbon neutral district by 2050.
- Managing flood risk and coastal change.
- Ensuring that a sufficient amount and variety of land is identified to deliver a continuous supply of housing across the Plan period and that DDC maintains a five-year housing land supply.
- Delivering growth in a way that focuses development in the least sensitive areas of the District in order to conserve and enhance the District's rich natural and historic environments.
- Supporting sustainable development in rural areas to enhance the vitality of rural communities.
- Working with partners to facilitate the delivery of the Whitfield Urban Expansion. Ensuring a range of housing tenures, types and sizes are provided across the District to meet the needs of the local community and provide choice and flexibility in the housing market.
- Promoting economic growth, tourism, and investment in the District's Town Centres in line with DDC's Economic Growth Strategy.
- To address the impact of the COVID-19 pandemic.
- Delivering strategic transport improvements, including upgrades to the Duke of York and Whitfield roundabouts to support the scale of housing and economic growth identified in the Plan.
- Promoting sustainable transport initiatives to encourage a modal shift to more sustainable forms of transport like walking and cycling.
- Ensuring that infrastructure is delivered, in the right place, at the right time, to meet the needs of the District and support the levels of development identified in the Local Plan.
- Supporting the delivery of attractive, high-quality, design led developments and the creation of healthy, inclusive and safe communities, that are well served by good quality services and facilities to support people's lives.
- Conserving and enhancing the District's rich and diverse natural landscape, including the five international sites within the district, the Kent Downs Area of Outstanding Natural Beauty (AONB), five Sites of Special Scientific Interest (SSSIs), two National Nature Reserves (NNRs), two stretches of Heritage Coasts and two Marine Conservation Zones.
- Delivering a net gain in biodiversity in the District over the plan period.
- To promote the conservation, restoration and where appropriate the enhancement of the District's heritage assets, in order to protect their significance and to ensure that they can be best appreciated and enjoyed by current and future generations.

2.1.5 The new Local Plan will be examined by an Inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is 'sound'.

2.1.6 This submission will comment on each of the above, highlighting where we believe any areas of concern lie or where modifications may be required.

2.2 DDC's Local Development Scheme

2.2.1 The District Council has a duty to review the policies contained within the development plan every five years. The 2014/2015 Authority Monitoring Report signalled the need to review key parts of DDC's adopted CS evidence base.

2.2.2 DDC's Local Development Scheme (LDS) first outlined the delivery timetable for the Local Plan Review (LPR) in the March 2017 publication. Since then, the LDS has been updated on an annual basis. The most recent September 2022 LDS summarises that following the preparation of the principal evidence base documents, the Local Plan Review Regulation 18 consultation took place for 8 weeks in January 2021. The Regulation 19 consultation was scheduled for 7 weeks during Q4 of 2022 and is the subject of this representation.

2.2.3 Moving forward, submission of the Plan is anticipated in Q1-2 2023 with the Examination in Public in Q3-4 2023. The new Local Plan is currently scheduled for adoption in 2024.

2.2.4 As planned, DDC are now undertaking the Regulation 19 Draft Local Plan Consultation, for which this submission is made

3 Legal Test of Soundness

3.1 Legislation and Guidance

3.1.1 The new Local Plan will be examined by an Inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is 'sound'. It is a statutory requirement that every development plan document must be submitted for independent examination to assess when it is "sound", as well as whether other statutory requirements have been satisfied (s.20(5) of the 2004 Act). By s.19 of the 2004 Act, in preparing a development plan document a local planning authority must have regard to several matters including national policies and advice contained in guidance issued by the Secretary of State. Such guidance currently exists in the form of the NPPF and is summarised below. This states that Plans must be:

(a) Positively Prepared: based on a strategy which seeks to meet objectively assessed development and infrastructure requirements

3.1.2 This means that the Local Plan should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. The NPPF set out principles through which the Government expects sustainable development can be achieved.

(b) Justified: an appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence

3.1.3 This sets out the requirement that the Local Plan should be based on a robust and credible evidence base involving:

I. Research/fact finding: the choices made in the plan are backed up by facts.

II. Evidence of participation of the local community and others having a stake in the area.

3.1.4 The Local Plan should demonstrate an appropriate strategy, taking into account reasonable alternatives and based on proportionate evidence. These alternatives should be realistic and subject to sustainability appraisal. The Plan should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

(c) Effective: deliverable over its period based on effective joint working on cross-boundary strategic priorities

3.1.5 This makes clear that the Local Plan should be deliverable, requiring evidence of:

- Sound infrastructure delivery planning;
- Having no regulatory or national planning barriers to delivery;
- Delivery partners who are signed up to it; and
- Coherence with the strategies of neighbouring authorities, including neighbouring marine planning authorities.
- The new Local Plan should be flexible and able to be monitored.

3.1.6 The Local Plan should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen. The plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the Local Plan should make clear that major changes may require a formal review including public consultation. Any measures which DDC has included to make sure that targets are met should be clearly linked to an Annual Monitoring Report.

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national policy.

3.1.7 This submission comments on each of the above in further detailing, highlighting areas of support and where modifications are required as appropriate.

3.2 Legal Compliance

3.2.1 In terms of legal compliance, the main requirements for the early stages of Local Plan consultation are in relation to:

- planning for community engagement;
- the sustainability appraisal (including consultation with the statutory environment consultation bodies);
- identifying significant cross boundary and inter-authority issues; and
- ensuring that the plan rests on a credible evidence base, including meeting the Act's requirement for keeping matters affecting the development of the area under review.

3.2.2 In addition to the above, the NPPF states² that: "Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:

a) All plans should promote a sustainable pattern of development that seeks to: meet the development needs of the area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effect.

b) Strategic policies should as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

(i) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or

Paragraph 11, National Planning Policy Framework 2021

(ii) Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”

3.2.3 In addition, to the above, the NPPF states³ that Plans should:

a) be prepared with the objective of contributing to the achievement of sustainable development;

b) be prepared positively, in a way that is aspirational but deliverable;

c) be shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;

d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

e) be accessible through the use of digital tools to assist public involvement and policy presentation; and

f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

3.2.4 It is important to note that the NPPF⁴ requires strategic policies to set out an overall strategy for the pattern, scale, and design quality of places, and make sufficient provision for:

a) housing (including affordable housing), employment, retail, leisure and other commercial development;

b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

c) community facilities (such as health, education and cultural infrastructure); and;

d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

3.2.5 It is clear from the above, that any local plan should set out a comprehensive and cohesive approach to future development.

Paragraph 16, NPPF 2021

Paragraph 20, NPPF 2021

4 Duty to Co-Operate

4.1 Legal and NPPF Requirements

4.1.1 Section 33A of the Planning and Compulsory Purchase Act 2004 sets out a statutory ‘Duty to Cooperate’ (DtC) – i.e. a legal obligation - to all bodies as prescribed by Regulation 4 of the Town and Country Planning (Local Planning) England Regulations 2012 (the Regulations).

4.1.2 The duty requires DDC to cooperate with other persons to ‘maximise the effectiveness’ with which named activities are undertaken. Those activities include the preparation of development plan documents (such as this local plan) and activities that support that activity ‘so far as relating to a strategic matter’.

4.1.3 A strategic matter is defined by S33A(4) in summary as: (a) ‘sustainable development or use of land that has or would have a significant impact on at least two planning areas’ (a planning area in this case is the area of a borough or district council); and (b) ‘sustainable development or use of land in a two tier area’ (as this is) ‘if the development or use (i) is a county matter, or (ii) has or would have a significant impact on a county matter’. County matters broadly relate to minerals and waste and associated developments as defined by Paragraph 1 of schedule 1 to the Town and Country Planning Act 1990 (as amended).

4.1.4 Section 33A (7) requires DDC (and persons subject to the DtC) to have regard to any guidance issued by the Secretary of State about how the duty is to be complied with. In that regard Paragraph ID 9-004-29140306 of the Government's Planning Practice Guidance (PPG) confirms amongst other things that the DtC is not a duty to agree (albeit that local planning authorities should make every effort to secure the necessary cooperation on strategic cross border matters before they submit local plans for examination).

4.1.5 The NPPF establishes that effective and on-going joint working is an integral part of the plan making process that will, amongst other things, determine whether development needs that cannot be met wholly within a plan can be met elsewhere. The NPPF goes on to state at paragraph 27 that in order to demonstrate effective and on-going joint working strategic policy making authorities should: "... prepare and maintain one or more statements of common ground documenting the cross-boundary matters being addressed".

4.1.6 In addition to the District's own housing pressures, part of the DtC involves considering whether neighbouring authorities' unmet housing need can be accommodated. It is worth highlighting that recent amendments to the London Plan have identified that the City's housing need has become increasingly more difficult to deliver and therefore areas outside London will be faced with having to absorb more of London's housing need. Consequently, DDC has a duty to explore whether it can accommodate some of this overspill of London's unmet need.

4.2 Assessment of DDC's discharging of the Duty to Co-operate

4.2.1 It is recognised that work to discharge the DtC remains ongoing by DDC and will continue prior to submission as part of the preparation of the Local Plan evidence base.

4.2.2 Notwithstanding the above, at this stage it is understood that DDC have engaged with the members of the East Kent Regeneration Board including neighbouring East Kent planning authorities, Kent County Council (KCC) and its subsidiary departments:

- Folkestone and Hythe District Council
- Canterbury City Council
- Thanet District Council
- KCC
 - KCC Highways & Transportation
 - KCC Minerals & Waste
 - KCC Heritage Conservation
 - KCC Flood & Water Management
 - KCC Natural Environment & Coast
 - KCC Infrastructure including Education

4.2.3 In February 2016, DDC adopted a Memorandum of Understanding (MOU) in respect of the DtC between the East Kent Regeneration Board members. A review of the MOU took place and was agreed in January 2021.

4.2.4 The East Kent MOU sets out the framework in which the authorities will work together on strategic issues and will actively engage. It forms the overarching framework and context within which Statements of Common Ground (SoCG) will be agreed between individual authorities.

4.2.5 Further engagement is also confirmed to have taken place between the following prescribed bodies and other relevant bodies:

- Environment Agency
- National Highways
- Historic England
- Natural England
- Network Rail
- NHS Kent and Medway Clinical Commissioning Group (CCG) – now known as Integrated Care Board (ICB) since July 2022
- Kent Downs AONB Unit
- Other infrastructure providers

4.2.6 Whilst work remains ongoing, at this stage it is understood that SoCGs have been agreed and signed between the following parties:

- DDC and Folkestone & Hythe District Council
- DDC and Canterbury City Council
- DDC and Thanet District Council

DDC and Kent County Council

DDC and National Highways

4.2.7 As part of the DtC Evidence Base documents, DDC prepared a detailed DtC Statement (dated September 2022) which sets out a summary of the engagement that has taken place, firstly by organisation, and then by issue. Whilst the statement focuses on strategic issues and duty to co-operate bodies it also includes information relating to engagement on non-strategic issues and co-operation with other bodies that are not prescribed by the regulations. In addition, Appendices 1, 3 and 4 identify the main meetings and other correspondence that has taken place throughout the plan making process.

4.3 Summary

4.3.1 On account of the above and the documents published within the DDC's Local Plan Evidence Base, we are satisfied that DDC as the strategic policy making authority has demonstrated effective and on-going joint working with neighbouring authorities, the county council, prescribed bodies and other relevant bodies. Further, we agree that DDC has prepared and maintained SoCG documenting the cross-boundary matters being addressed in accordance with the Framework and the DtC may be discharged by the Planning Inspector under Section 20(5) (c) of the Planning and Compulsory Purchase Act 2004.

4.3.2 Without prejudice to the above, should ongoing work by DDC result in significant changes in circumstances such that the signed SoCGs may be amended or withdrawn, our client reserves the right to alter their consultation response accordingly and be present at the examination of the Plan to discuss further.

5 Housing Need

5.1 Context

5.1.1 Paragraph 11 of the NPPF is explicit in its requirement for strategic policy-making authorities to promote a sustainable pattern of development that seeks to meet the need in full.

5.1.2 Paragraph 20 of the Framework is equally clear that strategic policies should set out an overall strategy for the pattern, scale and design quality of places. Policies should make sufficient provision for the development that is required as well as associated infrastructure, community facilities and should set out a strategy for the conservation and enhancement of the natural, built and historic environment.

5.1.3 Given this national planning context, the emerging Local Plan should provide a comprehensive and cohesive approach to future development in Dover district, capable of making sufficient provision for the identified needs, whilst balancing the conservation and enhancement of the natural, built and historic environment.

5.1.4 National guidance states that strategic policy-making authorities will need to calculate their local housing need figure at the start of the plan-making process. This number should be kept under review and revised where appropriate.

5.1.5 In calculating the local housing need, paragraph 61 of the NPPF states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance - unless exceptional circumstances justify an alternative approach.

5.1.6 Further, in addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

5.2 DDC's Housing Need

5.2.1 The Standard Method for assessing housing need, issued alongside the Ministerial Statement on 16 December 2020, sets an indicative housing need figure for Dover District of 596 dwellings per annum. However, the affordability ratio which factors into the local housing need assessment is updated annually. For Dover District the latest housing need calculation is 611 dwellings per annum (dpa), equating to a total housing need of 10,998 dwellings for the Plan period to 2040. We understand that the Regulation 19 Local Plan seeks to meet this need in full and in addition to the minimum figures, DDC have set an appropriate contingency buffer of 926 dwellings of the Plan period, equating to 8.4% of the total Plan period figure.

5.2.2 For context, the current adopted CS requirement is 700 dwellings per annum. This followed the adoption of a high-growth strategy in 2010 of 14,000 homes to 2026 based around the recommendations of the Dover Regeneration Strategy and above the minimum 10,100 requirement across the same period, as set out in the emerging (at the time) Regional Spatial Strategy.

5.2.3 For the avoidance of doubt, accounting for the Committed Supply Total of 5,282 dwellings, the new Local Plan will be required to allocate sufficient land to accommodate a minimum of 6,642 new homes over the remaining plan period to 2040. It is understood that this will be derived from the following sources:

- Whitfield Urban Expansion Allocation: 2,200 dwellings

- Local Plan Allocations (excluding Whitfield): 3,392 dwellings

- Windfall Allowance (70 a year from year 4): 1,050 dwellings

5.2.4 On this basis, it is evident that a substantial quantum of Plan-led housing delivery will be required in order to meet the new Local Plan's housing target. Due to the nature and dwindling supply of available urban land in Dover town and the remaining higher order settlements of Deal and Sandwich, the restrictive effect of the coast, the Kent Downs AONB, environmental constraints and the limited capacity of the district's remaining mid- and lower order settlements to accommodate significant levels of growth, meeting Dover's housing needs inevitably will require the release of significant greenfield land.

5.2.5 In our view, sustainable and accessible sites logically located adjacent to existing higher-order urban areas, including Deal, represent the most sustainable and reliable sources of growth for the Plan Period, to deliver the significant number of new homes that are required and are most capable of making meaningful contributions to the associated public infrastructure, affordable housing and mix of new homes that is urgently needed in the District.

6 Site Specific Assessment

6.1 Overview

6.1.1 The previous chapters of this representation (Chapter 3-5) outline our client's position relating to the soundness of the Plan in which our client is confirmed to be supportive of the Local Plan as a sound strategy for the growth of the district to 2040.

6.1.2 Paragraph 4.146 of the Local Plan states that the urban area of Deal encompasses the built-up areas of the parishes of Walmer and Sholden. Deal is identified in the Settlement Hierarchy and Confines Topic Paper (2022) as a 'District Centre', where there is a secondary focus for development. This position is reinforced by draft policy SP3 which states that development in Deal will be at a more limited scale than Dover Town, compatible with the more limited range of job opportunities, shops, services, and other facilities available in these locations.

6.1.3 As introduced in the preceding sections, Fernham Homes Limited are supporting the residential allocation of the Site 'Land at Rays Bottom, Walmer' and. The Site is allocated for residential development in the Regulation 19 Pre-submission Plan with an indicative capacity of 75 dwellings under policy reference 'SAP15' (WAL002).

6.1.4 Appendix 1a of the Housing and Economic Land Availability Assessment (HELAA) 2022 provides the following summary:

- No heritage concerns other than archaeology.
- Site will need to reflect character of surrounding area – low density, generous landscaping, well designed.
- Potential site for executive homes.
- Risk of surface water flooding.
- Transport Assessment required.

6.1.5 The Site was considered 'Green' in the red/amber/green (RAG) rating in terms of suitability, availability and achievability, with an anticipated timescale for delivery in the medium term (2027-2031). The information contained in the summary could be addressed as part of any future planning application.

6.1.6 We agree that the Site represents a logical and sustainable location to direct the growth required within Deal and consider that the land promoted at Rays Bottom, Walmer must remain included as a future housing allocation within the Dover District emerging Local Plan. The allocation is considered to be wholly consistent with the objectives of the Plan and forms part of a sound growth strategy for the district to 2040.

6.1.7 We are firmly of the view that the allocation of Land at Rays Bottom is a necessary component of the balanced growth strategy put forward within the Pre-submission

DDC Settlement hierarchy (2022): <https://www.doverdistrictlocalplan.co.uk/uploads/pdfs/settlement-hierarchy-and-confines-topic-paper-aug-2022.pdf>

Dover District Local Plan, comprising an appropriate mix of small, medium and strategic-scale sites deliverable across the Plan period. The allocation of well-located, reliable, greenfield sites such as our client's at Land at Rays Bottom is necessary in order for DDC to meet the growing need for new homes in the district and ensure that DDC can have confidence in consistently meeting its market and affordable housing targets in full throughout the life of the new Dover District Plan.

6.1.8 Notwithstanding our client's support of the draft allocation within the Regulation

19 Plan in principle, we suggest that the policy text be re-visited prior to submission, to allow a higher dwelling per hectare guide to ensure the Site is developed to its full potential. It is submitted that the SAP15 policy wording should be amended to more accurately reflect the capability

of the Site to accommodate approximately 80 dwellings deliverable early in the Plan period. Further commentary on this point is provided below in section 6.3.

6.2 Site and Surroundings

6.2.1 The Site is situated to the south of Walmer, Deal between Liverpool Road to the east and Hawksdown to the west immediately adjacent to existing residential development.

6.2.2 The Site comprises an undeveloped regular parcel of land in arable use totalling approximately 4.43 hectares, forming part of a larger arable unit to the south. The Site is bound primarily by hedgerow vegetation to the east along Liverpool Road with dense woodland and mid-storey vegetation to the north. The west boundary comprises a mix of hedgerows and trees set along the perimeter abutting residential development on Hawksdown.

Figure 6.1: Approximate Site Location (courtesy of Google Earth)

6.2.3 The wider surroundings are characterised by its edge-of-settlement location with low density existing residential development along Hawksdown to the north and west and undeveloped agricultural land to the east and south. The landscape assessment which informed the HELAA recognises that the site is:

“...relatively discrete, having housing on two sides and being located on the side of a dry valley. The sensitivity of the site is moderate as views in are limited and the flow of housing down the slope would not detract. The impact of development on the wider landscape would be minimal and this could be reduced further by providing additional buffer of landscaping along the southern boundary”.

6.2.4 The Site enjoys access to a number of day-to-day facilities and services which are within a reasonable walk distance, including primary and secondary schools, local shops, healthcare, employment, and public transport links within Walmer and Deal including Walmer mainline station and frequent buses along Dover Road between Dover, Deal, Sandwich and Canterbury.

6.2.5 In terms of overarching planning constraints, the site is not subject to any overarching landscape or ecological designations and is not itself subject to any heritage constraints.

6.2.6 To the north east of the site – with intervening land - is the grade II Registered Park and Garden of Walmer Castle which is a scheduled monument, and nearby to the east is an undesignated historic First World War Aerodrome and Second World War radar station within an area of Archaeological Potential.

6.2.7 There is a low risk of a surface water flow path through the non-wooded area of the site, and along the western boundary – both of which can be easily accommodated in a residential layout.

6.3 Development Capacity

6.3.1 As set out above, the proposed allocation is for 75 dwellings, reduced from 100 dwellings at the Regulation 18 stage. The reasoning set out in the “selection of Site Allocations” (September 2022) supporting document for the reduction in capacity is “To enable a scheme to come forward which reflects the character of the surrounding area, and enable sufficient landscaping to be provided”. Excluding the wooded area to the north of the site, the provision of 75 dwellings would equate to a density of 21 dwellings per hectare, with 100 dwellings equating to 28 dwellings per hectare. For the reasons set out subsequently, we consider that sites located in sustainable locations such as Land at Rays Bottom, adjacent to Deal, should take opportunities to maximise the potential for housing – whilst respecting the context and character of the area. For this reason we consider that the appropriate capacity is a little greater at approximately 80 dwellings, as part of a high-quality, landscape-led residential scheme capable of delivery within the early phase of the Plan period.

6.3.2 At this early stage, detailed proposals have not yet been advanced, however it is anticipated that any future development of the site – at 80 dwellings - will be of appropriate density, reflecting local patterns of development and sensitively designed to respect the existing character of the area, the topography of the site and to allow transition to the rural landscape and respond to its coastal location.

6.3.3 Particular care will be taken with regard to the low-risk surface flow route, impact on nearby heritage assets and ecologically sensitive sites with a particular emphasis on opportunities for biodiversity habitat creation and enhancement. Fernham Homes have a strong track record of delivering high quality housing whilst respecting such characteristics and constraints.

6.3.4 In terms of access, primary vehicular, pedestrian and cycle access to the site shall be provided from Liverpool Road. Road widening and traffic management should be provided to Liverpool Road along the frontage of the site and where possible up to the junction with Gram's Road; along with an extension to the 30mph speed limit zone. Appendix 1 indicates how this can be achieved, with the provision of a footway and suitable carriage width which meets relevant highways requirements. Alternatively, the footway could not be provided, and instead a wider carriage way could be provided. Appendix 1 also clearly shows how the required visibility splays can be achieved on land either within the site, or within the public highway.

6.4 Draft Policy Allocation ‘Land at Rays Bottom between Liverpool Road and Hawksdown, Walmer’ (SAP15)

6.4.1 As introduced in the preceding sections, our client's Site at Land at Rays Bottom is allocated for residential development within the Dover Pre-submission (Regulation 19) Local Plan. For ease of reference, the draft policy wording is as follows:

"SAP15 - Land at Rays Bottom between Liverpool Road and Hawksdown, Walmer (WAL002)

The site, Land at Rays Bottom between Liverpool Road and Hawksdown, as shown on the policies map is allocated for an indicative capacity of 75 dwellings.

Development proposals for the site shall include the following:

- a) Development should be low density and sensitively designed to respect the existing character of the area, the topography of the site and to allow transition to the rural landscape;
- b) A sensitive landscaping scheme and appropriate landscape buffer to the south, determined by a Landscape Visual Impact Assessment is required to mitigate the impact of development on the wider countryside and to provide opportunities for biodiversity habitat creation and enhancement responding to the nearby BOA and local wildlife site;
- c) The existing wooded area to the north of the site and the tree and shrub line along the western boundary, shall be maintained and enhanced as areas for biodiversity habitat creation.
- d) Primary vehicular, pedestrian and cycle access to the site shall be provided from Liverpool Road. Road widening and traffic management should be provided to Liverpool Road along the frontage of the site and where possible up to the junction with Gram's Road; along with an extension to the 30mph speed limit zone;
- e) The Transport Assessment that is required to be carried out in accordance with Policy TI2, must consider and identify mitigation (potential widening/traffic management measures/junction improvements) for the surrounding local road network, taking into account the cumulative impact of this and other sites allocated in this Plan, including (but not limited to) Liverpool Road and Gram's Road up to and including the Gram's Road/Dover Road junction.
- f) A site-specific Flood Risk Assessment must be carried out in accordance with Policy CC5. This shall also inform the application of the Sequential Approach to the layout of the site by locating the most vulnerable elements in the lowest risk areas;
- g) In accordance with Policy SP13, a wintering bird survey must be undertaken in advance of a planning application on the site. If the bird survey identifies that the development will exceed the threshold of significance, mitigation will be required. A suitable scheme of mitigation will need to be submitted with the planning application for the site;
- h) An Archaeological Assessment for the site must be carried out in accordance with Policy HE3 Archaeology, the results of which should inform the layout and design of the development which is necessary to avoid harm to any archaeological assets identified through the assessment;
- i) A Heritage Assessment carried out in accordance with Policy HE1 is required to identify any necessary measures to avoid or minimise harm to the nearby heritage assets; and
- j) The occupation of the development should be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider. Development should provide a connection to the sewerage system at the nearest point of adequate capacity and ensure future access to the existing sewerage infrastructure for maintenance and upsizing purposes."

6.4.2 To be clear, our client remains wholly supportive of the principle of the allocation of the Site for residential development. Fernham Homes has a strong track record of swift delivery, and commits to being able to deliver the Site within the early phase of the Plan period. We agree that it represents a logical and sustainable location to direct growth consistent with the growth strategy of the Plan as a whole, however we submit that more effective use of our client's Site can be made – and therefore object to the capacity identified.

6.4.3 Accordingly, we say that the allocation of Land at Rays Bottom is necessary in order for DDC deliver proportionate and high-quality sustainable growth within Deal, meet the growing need for new homes in the district and ensure that DDC can have greater confidence in meeting its market and affordable housing targets in full.

6.4.4 It is submitted that the SAP15 policy wording is sound and appropriately reflects the capability of the site to deliver a sensitive, landscape-led residential development but the wording should be amended to reflect the capability of the Site to accommodate approximately 80 dwellings, deliverable with the early phase of the forthcoming Plan period.

6.4.5

6.5 Strategic Justification for Development

Spatial Strategy

6.5.1 The proposed Housing Distribution for the district across the Plan period is established within Policy SP3 'Housing Growth' which sets out that the distribution

of housing growth in the district is primarily based on the settlement hierarchy and influenced by site availability, environmental constraints and factors of delivery.

6.5.2 Rightly, a key aim of the growth strategy is to focus development in the least sensitive areas of the district in order to conserve and enhance the Dover's rich natural and historical environment.

6.5.3 A retained theme from the adopted Plan, is that DDC's settlement strategy continues to focus on the development and regeneration of Dover Town and Whitfield (3381 dwellings). Approximately half of the district's planned housing is in this location, the majority of which again is to come forward as part of the strategic urban expansion of Whitfield 'SAP1' (2200 minimum dwellings).

6.5.4 Development will then be focused in the District Centre of Deal (223 dwellings), and the Rural Service Centres of Sandwich (227 dwellings) and Aylesham (649 dwellings). Following the settlement hierarchy rigidly would distribute housing in the preceding order, however the Plan recognises that housing delivery in Deal and Sandwich continues to be constrained by a number of factors including flood risk, ecological designations, heritage and highways. Further, Deal has experienced generally high levels of windfall development across the previous Plan period and accordingly there is now a dwindling supply of available, suitable sites in both settlements. On account of this context, DDC have sought to direct the majority of the remaining higher order settlement growth (outside of Dover & Whitfield) to Aylesham, through the strategic expansion to the town.

6.5.5 Outside of the four principal district settlements, the Rural Settlement Hierarchy (August 2022) identified that the majority of lower-order settlements in the district emerge as having a low level of facilities within the hierarchy and six settlements having none of the key indicators of sustainable services. Plainly, these settlements offer very limited opportunities for growth and it is evident that the forthcoming Plan will remain reliant on the settlements of Dover (including Whitfield), Deal, Sandwich and Aylesham to deliver the housing growth that is required.

6.5.6 Given this context, it is clear that where available and suitable opportunities for residential development do exist within the district's higher order settlements, including our client's Site at Land at Rays Bottom, Walmer which can provide a policy compliant level of much-needed affordable housing, it is imperative that the effective use of these sites are appropriately maximised in accordance with national policy objectives.

6.5.7 Notwithstanding our client's in principle support of the proposed strategy, we are concerned that highly sustainable, edge-of-settlement sites, particularly in higher tier settlements such as Deal have not been fully maximised to reflect their accessible location and capability to accommodate a greater quantum of development. On this basis, we are concerned that the strategic objectives underlying draft policy SP3 'Housing Growth' may not be fully realised, to the detriment of market and affordable housing delivery and the wider policies seeking to conserve and enhance the district's natural and historic environment.

6.5.8 Consequently, our clients object to policy SP3 as drafted, on the basis that there is a clear need to maximise the delivery of housing at sites around Deal (whilst ensuring that sensitive characteristics are reflected), and this has not been undertaken – for example at Rays Bottom, Liverpool Road. It is our view that the site has sufficient capacity to deliver approximately 5 additional units over the draft allocation, that will otherwise be required to be delivered elsewhere in the district, in potentially less accessible and more sensitive locations.

6.5.9

Greenfield Development and Consistency with Housing Trajectory

6.5.10 Due to the nature and dwindling supply of available urban land in Dover town and the remaining higher order settlements of Deal and Sandwich, the restrictive effect of the coast, the Kent Downs Area of Outstanding Natural Beauty, environmental constraints and the limited capacity of the district's remaining mid- and lower order settlements to accommodate significant levels of growth, greenfield development will inevitably be required if DDC is to meet its housing and development commitments in full moving forward.

6.5.11 In our view, sustainable and accessible unconstrained sites logically located adjacent to existing urban areas, including Deal, represent the most sustainable and reliable sources of growth for the Plan period, to support the role and timescales of strategic urban extensions and to deliver the significant number of new homes that are required within the forthcoming Plan period.

6.5.12 Within Deal itself, meaningful housing growth is inherently constrained on three sides due to the restrictive effect of the coast to the east and Flood Zone 2/3 land and ecologically sensitive sites including SSSIs to the north and west. Alongside overarching objectives to minimise the incursion of widespread development into the rural countryside, the scope for significant Plan-led development in Deal is becoming increasingly limited. Accordingly, we firmly agree that sites to the south of Deal, including that of our clients in Walmer, represent the least sensitive and most logical locations for future Plan-led growth, making effective use of the availability of sites in close proximity to the Urban Area and key infrastructure including Walmer train station.

6.5.13 In terms of housing delivery in Deal, the development of Land at Rays Bottom (75 dwellings) is anticipated to deliver completions with Years 9-11 of the Plan period, although as detailed above our clients have a strong track record of swift delivery, and consider that it could be

delivered ahead of this. When combined with extant permissions within Deal and nearby allocations at Land off Cross Road, Deal (SAP14) and Deal Small Housing Sites (SAP16) totalling 100 dwellings and 48 dwellings respectively, our client's site will assist in delivering a steady supply of new homes within Deal across the majority of the early and middle phases of the Plan period and contribute to providing genuine choice in the market.

6.5.14 Moreover, in our experience, greenfield edge-of-settlement sites are typically most capable of making meaningful contributions to the associated public infrastructure, affordable housing and mix of new homes that are urgently needed in the district.

6.5.15 The Sustainability Appraisal Scoping Report (2018) sets out that over the course of the adopted Plan period, the key sustainability issues facing Dover District in relation to housing are as follows:

Population growth, household growth and demographic change will place additional demand on key services and facilities such as housing, health, education and social care. The Local Plan offers a new opportunity to manage these pressures, encouraging mixed communities;

There is a need for affordable housing across the District. At present, the mean price of dwellings is higher than the national average. The Local Plan will help to expedite its delivery; and,

There is the need for a mix of housing types that cater for the needs of a range of people, including the growing number of single person and elderly households. Without an up-to date Local Plan, the required housing is less likely to be delivered.

6.5.16 It is evident that the new Dover Local Plan must allocate a mix of reliable sites capable of steadily delivering not only the quantum of housing that is required, but also the associated public infrastructure, affordable housing and a mix of unit types and tenures suitable for a wide range of future occupants.

6.5.17 The Housing Topic Paper (September 2022) provides further context and summarises under Chapter 7 'Historical Housing Delivery' that Dover has historically placed significant reliance on windfall development over the current adopted Plan period, with windfall sites accounting for 44% of all completed dwellings over the preceding 10-year period.

Figure 1: DDC Brownfield / Greenfield Completions 2010/11 to 2020/21
(source: Housing Topic Paper September 2022)

6.5.18 Moreover, it is highlighted that at the beginning of the 10 year period, the majority of new dwellings were being built on brownfield land. However, from the monitoring year 2013-14 onward development on greenfield land began to play a much greater part in the location for new development as show in figure 1 above. This trend of increased housing development on greenfield land is a result of the allocations within the CS and Land Allocation DPD being built out and is associated with an approximate doubling of completions in the district. From 2013-14 onwards the average number of completed dwellings per annum has doubled to that of the early years of the CS, as the strong delivery rates of greenfield sites formed the predominant source of housing. This is despite an overall declining trend of brownfield completions towards the latter half of the Plan period. This is not an uncommon trend whereby in the majority of local planning authorities areas, opportunities for available and suitable sites in urban centres typically dwindle throughout the Plan period.

6.5.19 In light of the above context, it is clear that the adopted Dover Local Plan suffered from an initial under delivery of Plan-led housing growth in which windfall development sources were largely required to take up the slack in the early phases of the Plan period, as major allocated sites failed to deliver at the rates initially expected.

6.5.20 It is equally apparent that initial slow completions rates were quickly renewed once greenfield allocations commenced development, feeding into strong completions in the latter half of the Plan period. In our experience, greenfield sites are typically associated with stronger delivery rates and provide a reliable source of housing growth. The allocation of an appropriate mix of sites and scales is required in order to ensure steady and sustained Plan-led housing delivery across the Plan period and to avoid a reliance on windfall development to address the shortfall.

6.5.21 Consequently, given all of the above, it is imperative that the new Local Plan allocates a sufficient variety and scales of site capable of both ensuring steady and sustained housing completions and capable of making necessary contributions to public infrastructure and services, affordable housing and mix of unit types to address the key issue raised in the Sustainability Appraisal.

6.5.22 In our view, edge-of-settlement greenfield sites such as our client's Site Land at Rays Bottom, Walmer represents the most reliable and sustainable source of housing delivery for the Plan period. Such sites are typically less constrained by wider factors and less affected by unforeseen delays such as land contamination. Moreover, greenfield sites typically are more capable of delivering the policy compliant affordable housing, unit mix and developer contributions that are urgently needed.

6.5.23 It is understood that the Plan is predicated on the delivery of strategic scale development at Whitfield comprising the development of circa 2,200 new homes. Consequently, in order to avoid a repetition of the previous Plan, DDC have sought to ensure that a pool of reliable

greenfield allocation, including that of our client's are included within the Plan, capable of delivering the early and middle phase growth that is required within the housing trajectory prior to the commencement of stronger delivery from major allocations later in the Plan period.

6.5.24 We note that within the Housing Trajectory 'Appendix D', DDC have included allocated units from Years 4 onwards, with extant permissions (accounting for 5% non-implementation) demonstrated to be solely capable of delivering the growth required in Years 1-3. Notwithstanding our client's considerations that it can deliver at Land at Rays Bottom early in the plan period, we support this pragmatic approach and suggest this represents a sound basis on which to set the district's housing trajectory. We note also the inclusion of an appropriate windfall allowance and the included contingency buffer to further ensure reasonably flexibility in the housing supply.

6.5.25 On account of all of the above, we submit that the allocation of Land at Rays Bottom, Walmer forms part of a sound strategy for growth in the district for the forthcoming Plan period. The Site is capable of delivery within the early phase of the Plan period. The Site represents a reliable source of housing growth in a highly sustainable and accessible location adjacent to the existing settlement boundary of Deal and Walmer mainline station, consistent with DDC's preferred settlement strategy. Proposals remain at an early stage, however the Site is unconstrained and is considered capable of providing a high-quality landscape-led residential development including a mix of unit types and tenures, a meaningful contribution to the supply of affordable housing and contributions to public services and infrastructure, benefiting both existing residents and future occupiers. However, we object on the submission that the Site is capable of making a greater contribution to the district's housing need and suggest an amended wording of the policy to allocate the Site for approximately 80 dwellings.
Policy SP4 'Windfall Development'

6.5.26 Separately, we note the provisions of policy SP4 windfall development. Proposals at Rays Bottom, Walmer would likely be acceptable in principle under this policy and we support the inclusion within the Plan for appropriate, proportionate windfall development.

6.5.27 Our client is fully committed to the delivery of the Site which is available and anticipated for delivery in the early phase of the Plan period. Notwithstanding the provisions of SP4, it is reiterated that our client fully supports the allocation of the Site under SAP15 as the most appropriate mechanism for delivery of the Site and the opportunity for genuinely Plan-led development in Deal, the provision of associated benefits to public services and infrastructure, contribution to affordable housing supply and the delivering of a mix of house types and tenures.

Infrastructure Delivery

6.5.28 Paragraph 11 of the Framework is clear that all plans should promote a sustainable pattern of development. This includes aligning growth and infrastructure. Paragraph 20 goes on to confirm that strategic polices will be expected to make sufficient provision for associated development infrastructure.

6.5.29 In this regard, draft policies SP11 'Infrastructure and Developer Contributions' and SP12 'Strategic Transport Infrastructure' of the emerging Plan form the key strategic polices for infrastructure delivery. We agree that where development would create a need, or would have an impact, or would exacerbate an existing deficiency in infrastructure provision, appropriate developer contributions may be sought.

6.5.30 It is however emphasised that in all developments, infrastructure requirements must be demonstrated to be necessary through assessment during determination of the application on a case-by-case basis. Where new development is proposed, it does not automatically follow that major infrastructure contributions are always required or contribution to strategic infrastructure proposals are appropriate. For instance, it is our client's view that any infrastructure requirements must be demonstrated through a robust and transparent assessment at application stage, taking into account the submission of detailed supporting evidence, for example following consideration of the Transport Assessment in the case of highway infrastructure contributions.

Alignment with Sustainability Appraisal Findings

6.5.31 As part of the preparation of the Local Plan, the Council has identified and appraised a range of growth and spatial options through the Sustainability Appraisal (SA) which provides an assessment of how different options perform in environmental, social and economic terms, to help inform which option should be taken forward and combined with wider evidence documents, have been used to determine the growth and spatial strategy set out in the Plan.

6.5.32 Five potential distributions of growth were identified during preparation of the draft Regulation 18 Local Plan:

- Spatial Option A: Distributing growth to the District's suitable and potentially suitable housing and employment site options (as needed to deliver the scale of growth required).
- Spatial Option B: Distributing growth proportionately amongst the District's existing settlements based on their population.

- Spatial Option C: Distributing growth proportionately amongst the District's existing settlements based on the District's defined settlement hierarchy.
- Spatial Option D: Distributing growth in the same way as the adopted Local Plan, focussing most growth in and around Dover town.
- Spatial Option E: Distributing growth more equally across the District's settlements: Dover, Deal, Sandwich and Aylesham, as well as the rural villages.

6.5.33 The conclusion of the SA was that Spatial Options C (settlement hierarchy) and D (adopted Core Strategy with Dover focus) generally perform the most strongly against the SA objectives, particularly when delivering the baseline growth scenario. However, given the environmental constraints that exist around Deal and Sandwich, very few suitable and potentially suitable sites have been identified in these towns. Given this, the Council's preferred option for the distribution of housing and economic growth comprises a combination of options A (HELAA sites), C (settlement hierarchy) and D (Dover focus). The distribution of housing and economic growth in the District is therefore primarily based on the settlement hierarchy, and influenced by site availability, environmental constraints and factors of delivery.

6.5.34 On account of the above, our client agrees that the proposed growth strategy, and by extension, policy SP3 in principle represents a sound and evidence-led strategy for growth. However, given the clear acknowledgement of the dwindling supply of available sites in the higher order settlements of Deal and Sandwich, which has necessitated a minor deviation from the strongest performing spatial options, we submit that where sites are available and suitable for development in Deal and Sandwich, these must be fully maximised, reflecting their accessible location and their ability to reduce the need to develop into less accessible and more sensitive sites elsewhere in the district to accommodate the growth that is required.

Site Specific Sustainability Appraisal

6.5.35 Land at Rays Bottom between Liverpool Road and Hawksdown is included under HELAA reference 'WAL002' within the SA Site Assessment (Appendix F). The site generally performs strongly, with particular positives identified with regards to SA Objectives related to housing and the economy.

6.5.36 We contest the assessment of 'minor negative' in regard to sustainable transport. To the contrary, the site is well-located adjacent to the settlement boundary of Deal with access to a range of high-quality day-to-day services and access to Walmer train station for convenient access to larger settlements. In what is otherwise a largely rural district, we strongly disagree with the suggestion that an edge-of-settlement site represents a less than preferable location in respect of sustainable travel and day-to-day access to amenities.

6.5.37 We also note negatives associated with the development of a greenfield site, including loss of agricultural land, however this would be true of the majority of greenfield sites and it is abundantly clear that Dover's housing need cannot be met solely on brownfield sites. We note also minor negatives / uncertain associated with biodiversity, the historic environment and landscape, however it is not clear whether these take into account the potential for high-quality design, biodiversity enhancement and landscape mitigation. Irrespective, these are not considered to outweigh the clear and tangible sustainability benefits associated with edge-of-settlement development, the site's consistency with the preferred spatial options and the wider benefits associated with reducing the need to develop into lesser accessible, more sensitive sites to otherwise deliver the housing growth that is required.

Summary

6.5.38 Taking all of the above into consideration, our client is wholly supportive of the inclusion of land promoted at Rays Bottom, Walmer as a future housing allocation within the Dover District emerging Local Plan. The allocation is considered wholly consistent with the objectives of the Plan and forms part of a sound growth strategy for the district to 2040.

6.6 Deliverability

6.6.1 Prior to the current appeal proposal, the Site has had no recent planning history of a residential nature or a history of unimplemented permissions. There are not considered to be any impediments to the Site being allocated for development commencing within the early (or mid) phase of the Plan period.

6.6.2 Fernham Homes – a local SME with a strong history and track record of delivery, together with an adopted and robust business plan for growth – is promoting the site, and are poised to commence work on its residential development promptly after the adoption of the Local Plan.

6.6.3 Combined with the delivery of extant permissions, an appropriate number and scale of wider allocations within Deal (including SAP 14 and SAP 16) and elsewhere across the district, this would ensure the steady delivery of housing both in Deal and in Dover district across the majority of the Plan period and support the role and timescales of strategic housing delivery at Whitfield towards the latter half of the Plan period.

6.6.4 For the reasons set out in this representation, the Site is considered suitable for the residential development of approximately 80 dwellings. The Site is adjacent to the overarching urban area of Deal, one of the four higher order settlements in the district and DDC's preferred locations for Plan-led growth within the district. Development at land at Rays Bottom would form a natural and logical development south of Walmer, Deal

with excellent accessibility to day-to-day services and amenities via active travel modes within Deal itself and convenient access to public transport infrastructure including Walmer train station for onward travel to key neighbouring settlements including Dover, Ramsgate, Canterbury and Ashford.

6.6.5 Finally, in respect of suitability there are no physical limitations or problems such as access, infrastructure, flood risk, hazardous risks, pollution or contamination.

6.6.6 On behalf of the landowner, we submit that there are no known financial restrictions that would impact upon the viability of a future housing scheme or that would prohibit development coming forward within the mid-stages of the Plan period. To the contrary, we consider there to be an opportunity to deliver a high-quality, sustainably located residential development scheme consistent with DDC's proposed growth strategy comprising an appropriate mix of market and affordable housing and capable of contributing to a range of community facilities, public infrastructure and services locally.

6.6.7 At the time of writing, proposals at Rays Bottom, Walmer remain at an early stage, however our clients are firmly committed to progressing the delivery of the Site on adoption of the Plan. The project team therefore does not anticipate any absolute constraints to the commencement of delivery on-site early in the plan period (potentially 2025-26) and completion by 2028/9).

6.6.8 The Site is in single ownership and there are no complicated legal agreements or covenants that would prohibit the ability to bring forward the Site in line with DDC's housing trajectory within the mid-phase of the Plan period. The Site is therefore considered available and achievable for the purposes of the tests of deliverability.

7 Conclusion

7.1 Summary

7.1.1 This representation has been prepared by DHA Planning on behalf of Fernham Homes Limited in response to the DDC Local Plan (Regulation 19) consultation which runs until 9th December 2022.

7.1.2 Our client is promoting 'Land at Rays Bottom, Walmer, Deal' for the residential allocation of the Site as part of the new Dover District Local Plan preparation process. The Site is allocated for residential development in the Regulation 19 Pre-submission Plan within an indicative capacity of 75 dwellings under policy reference 'SAP15'.

7.1.3 Taking the above representation contents into consideration, we remain wholly supportive of the principle of the allocation of Land at Rays Bottom and agree that the Site represents a logical and sustainable location to direct necessary growth within Deal.

7.1.4 Accordingly, we consider that the land promoted at Rays Bottom, Walmer must remain included as a future housing allocation within the Dover District emerging Local Plan. The allocation is considered to be wholly consistent with the objectives of the Plan and forms part of a sound growth strategy for the district to 2040. However, it is imperative that the effective use of these higher-order settlement sites are appropriately maximised in accordance with draft policy SP3 of the emerging Plan, and wider policies seeking to otherwise conserve and enhance the district's natural and historic environment and national planning policy objectives. We are concerned that this has not been fully undertaken and object solely on this basis.

7.1.5 Consequently, our clients object to policy SP3 as drafted, on the basis that there is a clear need to maximise the delivery of housing at sites around Deal, and this has not been undertaken – for example at Land at Rays Bottom, where it is considered that the site has sufficient capacity to deliver approximately 5 additional units over the draft allocation, that will otherwise be required to be delivered elsewhere in the district, in potentially less accessible and more sensitive locations.

7.1.6 Outside of the point regarding capacity, it is submitted that the SAP15 policy wording is sound and appropriately reflects the capability of the site to deliver a sensitive, landscape-led residential development with an indicative capacity of 80 dwellings, deliverable with the early phase of the forthcoming Plan period. Without prejudice to our client's support in principle of the proposed allocation, we would urge the Council to re-visit the allocation policy text and allow a higher dwelling capacity.

7.1.7 Accordingly, we say that the allocation of Land at Rays Bottom forms part of a balanced growth strategy comprising an appropriate mix of small, medium and strategic-scale sites deliverable across the Plan period. The allocation of well-located, reliable, greenfield sites such as our client's at Land at Rays Bottom is necessary in order for DDC to meet the growing need for new homes in the district and ensure that DDC can have confidence in consistently meeting its market and affordable housing targets in full throughout the life of the new Dover District Plan.

7.1.8 In addition to being a highly sustainable and logical edge-of-settlement allocation, the Site is deliverable in a single land ownership with no viability issues, legal or third-party constraints present. Our client is fully committed to the delivery of land at Rays Bottom Farm and there are no impediments to the Site being capable of delivery within the mid-phase of the Plan period.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	For the reasons set out in the consultation response submitted on behalf of Fernham Homes Limited (ref DHA/30359), the capacity of Land at Rays Bottom between Liverpool Road and Hawksdown, Walmer (WAL002) and Policy SP3 - Housing Growth should be increased to approximately 80 dwellings.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Please refer to the consultation response submitted on behalf of Fernham Homes Limited (ref DHA/30359).
Include files	30359 DDC Rep_Walmer FINAL 09 12 22.pdf
Local Plan Consultation Point	Strategic Policy 11 - Infrastructure and Developer Contributions
Rep ID	SDLP1314
Rep Status	Processed
Consultee ID	1331922
Consultee Full Name	Matthew Porter
Consultee Company / Organisation	Fernham Homes Ltd & Walker Residential Ltd
Agent Full Name	Matt Porter
Agent Company / Organisation	DHA Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy SAP22 - Land at Archers Low Farm, St Georges Road Sandwich (SAN023) Policy SP3 - Housing Growth Policy SP4 - Windfall Development Policy SP11 - Infrastructure and Developer Contributions Policy SP12 - Strategic Transport Infrastructure
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	We consider that the plan is sound, but object to elements of Policy SAP22 - Land at Archers Low Farm, St Georges Road Sandwich (SAN023) and Policy SP3 - Housing Growth. These objections are set out in the consultation response submitted on behalf of Fernham Homes Limited and Walker Residential Limited (ref DHA/30245).

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

1 Introduction

1.1 Purpose of this Representation

1.1.1 This representation has been prepared by DHA Planning on behalf of Fernham Homes Limited and Walker Residential Limited in response to the Dover District Council 'DDC' Local Plan (Regulation 19) consultation which runs until 9th December 2022.

1.1.2 We understand that DDC is in the process of preparing a new Local Plan to set out a strategy for development for the period to 2040 and that the Council are presently seeking comments on the pre-submission Plan prior to its submission for examination in early 2023.

1.1.3 Our client controls 'Land at Archers Low Farm, Sandown Road, St Georges Road, Sandwich' (hereafter referred to as 'Land at Archers Low' or 'the Site') and is promoting the residential allocation of the Site as part of the new Dover District Local Plan preparation process. The Site is allocated for residential development in the Regulation 19 Pre-submission Plan for the provision of 35 dwellings under policy reference 'SAP22'.

1.1.4 It is highlighted that as part of the Regulation 18 Local Plan, the Site was allocated under the 'Site Allocations Policy 1 Non-Strategic Housing Allocations' for approximately 40 dwellings (reference SAN023).

1.1.5 The purpose of the representation is to support the allocation of 'Land at Archers Low' for a greater quantum of development and provide comment on the consistency of the allocation with the proposed strategy, draft policies and our client's position in respect of the 'soundness' of the Plan, but to object to the indicative capacity set out in the policy.

1.1.6 In this regard, we remain wholly supportive of the principle of the residential allocation of the Site and agree that it represents a logical and sustainable location to direct growth consistent with the growth strategy of the Plan as a whole, however we submit that more effective use of our client's Site can be made – and object (solely) to this element of the policy.

1.1.7 Accordingly, we say that Land at Archers Low can further assist the Council in meeting the growing need for new homes in the district and help to ensure the Council can have greater confidence in meeting its market and affordable housing targets in full.

1.1.8 Based on the current national and local planning context, we consider the Site to be a highly suitable edge-of-settlement location to allocate land for housing to help meet the need for new homes in the district and its effective use should be appropriately maximised in accordance with national policy objectives.

1.1.9 Further details regarding the Site and commentary on the consistency of the allocation with the proposed strategy, draft policies and our client's position in respect of the 'soundness' of the Plan are set out in the following sections of this document.

1.2 About Fernham Homes

1.2.1 Fernham Homes Limited are a local award winning small and medium sized (SME) housebuilder, established in 1997 and has a strong track record of delivering high quality residential and mixed use developments in Kent over the last 25 years. This has been acknowledged through the receipt of nationally recognised awards, including the gold Evening Standard Awards best family home 2022 and 2019 bronze WhatHouse Best Small Housebuilder.

1.2.2 SME housebuilders are recognised in the National Planning Policy Framework ('NPPF') at paragraph 69 as making an important contribution to meeting the housing requirements of an area, and being able to build out relatively quickly. Similarly, this has also been recognised by the Planning Inspectorate. This is particularly the case with Fernham Homes, which is privately owned with access to significant resources. This provides significantly more flexibility than national and other regional housebuilders, and allows Fernham Homes to deliver housing rapidly and to a high quality, beautiful and sustainable standard (para 126 of the NPPF).

1.2.3 Fernham Homes Limited has embarked on a sustained period of growth, with an adopted and robust business plan to deliver around 300 houses per year in five years time.

1.2.4 A key element of Fernham Homes' operations is to take a very careful approach to site selection: a huge amount of due diligence is undertaken as part of this, and therefore Fernham Homes Limited only invests in those sites which meet the NPPF requirements of being available, suitable, and deliverable. As set out below land at Archers Low Farm, Sandwich ('SAP22') is firmly considered to be such a site.

1.2.5 Similarly, a key feature of Fernham Homes' approach is to work positively and proactively with local planning authorities (LPAs), both during the preparation of local plans and at planning application stage. Fernham Homes Limited are fully committed to engaging with Dover District Council in the preparation of its Local Plan, and firmly subscribe to the national policy approach set out in paragraphs 15 and 16 c) of the NPPF that "the planning system should be genuinely plan-led" and should be shaped by early, proportionate and effective engagement between LPAs and others, including businesses and developers. Accordingly, Fernham Homes Limited would welcome the opportunity to discuss the matters contained in this representation, including the availability, suitability, deliverability and capacity of land at Archers Low Farm, Sandwich ('SAP22') directly with Dover District Council members and officers, ahead of the submission of the Local Plan for examination.

1.3 Representation Structure

1.3.1 The representation structure is outlined below for ease of reference:

Chapter 2 (Consultation Background) – Sets out the context of the Dover District new Local Plan preparation, relevant national planning requirements and a summary of our current position.

Please refer to paragraph 52 of appeal decisions: APP/M2270/W/21/3283924 and APP/M2270/W/21/3288645

Chapter 3 (Legal Tests of Soundness) - Assessing whether the plan is sound, having regard to the tests of soundness outlined by paragraph 35 of the NPPF.

Chapter 4 (Duty to Co-operate) - Assessing whether the plan is sound, having regard to the duty to cooperate outlined by paragraph 24 of the NPPF.

Chapter 5 (Housing Need) - Consideration of market and affordable housing need and assessment of proposed housing allocations and supply sources.

Chapter 6 (Assessment of Suitability) - Re-introduces our client's Site and provides a summary of planning constraints and opportunities, including the quantum of development that could be accommodated, why the Site is suitable for development and why the principle of the draft allocation for residential development is both justified and consistent with the Council's strategy for growth in the district. It also sets out why we consider there is scope for a higher number of dwellings at the site. This consideration amounts to an objection to one element of the strategy – namely that those sites around the most sustainable settlements should be maximised.

Chapter 7 (Conclusion) - Summarises the key points raised throughout the representation and re-affirms our client's support for the principle of the Site's allocation and the principle of the proposed strategy ahead of the submission of the Plan for examination, and the objections in terms of capacity.

2 Dover District Council – Draft for Submission Local Plan (Regulation 19)

2.1 Consultation Background

2.1.1 DDC are required to prepare a new Local Plan, as the current suite of development plan documents were adopted in 2002, 2010 and 2015. The Core Strategy (CS) (adopted 2010) in particular has a time horizon up to 2026 and requires updating.

2.1.2 The new Local Plan will set out the vision, strategic objectives and overarching development strategy for the growth of the District over the period to 2040. It provides the planning policy framework to guide the future development of the area, addressing needs and opportunities for housing, the economy, community facilities and infrastructure, as well as the basis for conserving and enhancing the natural and historic environments, mitigating and adapting to climate change, and achieving well designed places.

2.1.3 For the avoidance of doubt, the new Local Plan, on adoption, will replace the CS 2010 and the Land Allocations Plan 2015, as well as saved policies from the 2002 Local Plan.

2.1.4 DDC's Regulation 19 Local Plan outlines the key issues that need to be addressed between now and 2040. In particular, the Plan sets out the following key planning issues for the District:

- Ensuring that new development in the District contributes to the mitigation of, and adaptation to, climate change.
- Supporting the Council to deliver its intention to be a carbon neutral district by 2050.
- Managing flood risk and coastal change.
- Ensuring that a sufficient amount and variety of land is identified to deliver a continuous supply of housing across the Plan period and that the Council maintains a five-year housing land supply.
- Delivering growth in a way that focuses development in the least sensitive areas of the District in order to conserve and enhance the District's rich natural and historic environments.
- Supporting sustainable development in rural areas to enhance the vitality of rural communities.
- Working with partners to facilitate the delivery of the Whitfield Urban Expansion.
- Ensuring a range of housing tenures, types and sizes are provided across the District to meet the needs of the local community and provide choice and flexibility in the housing market.
- Promoting economic growth, tourism, and investment in the District's Town Centres in line with the Council's Economic Growth Strategy.
- To address the impact of the COVID-19 pandemic.
- Delivering strategic transport improvements, including upgrades to the Duke of York and Whitfield roundabouts to support the scale of housing and economic growth identified in the Plan.

- Promoting sustainable transport initiatives to encourage a modal shift to more sustainable forms of transport like walking and cycling.
- Ensuring that infrastructure is delivered, in the right place, at the right time, to meet the needs of the District and support the levels of development identified in the Local Plan.
- Supporting the delivery of attractive, high-quality, design led developments and the creation of healthy, inclusive and safe communities, that are well served by good quality services and facilities to support people's lives.
- Conserving and enhancing the District's rich and diverse natural landscape, including the five international sites within the district, the Kent Downs Area of Outstanding Natural Beauty (AONB), five Sites of Special Scientific Interest (SSSIs), two National Nature Reserves (NNRs), two stretches of Heritage Coasts and two Marine Conservation Zones.
- Delivering a net gain in biodiversity in the District over the plan period.
- To promote the conservation, restoration and where appropriate the enhancement of the District's heritage assets, in order to protect their significance and to ensure that they can be best appreciated and enjoyed by current and future generations.

2.1.5 The new Local Plan will be examined by an Inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is 'sound'. This submission will comment on each of the above, highlighting where we believe any areas of concern lie or where modifications may be required.

2.2 DDC's Local Development Scheme

2.2.1 The District Council has a duty to review the policies contained within the development plan every five years. The 2014/2015 Authority Monitoring Report signalled the need to review key parts of the Council's adopted CS evidence base.

2.2.2 The Council's Local Development Scheme (LDS) first outlined the delivery timetable for the Local Plan Review (LPR) in the March 2017 publication. Since then, the LDS has been updated on an annual basis. The most recent September 2022 LDS summarises that following the preparation of the principal evidence base documents, the Local Plan Review Regulation 18 consultation took place for 8 weeks in January 2021. The Regulation 19 consultation was scheduled for 7 weeks during Q4 of 2022 and is the subject of this representation.

2.2.3 Moving forward, submission of the Plan is anticipated in Q1-2 2023 with the Examination in Public in Q3-4 2023. The new Local Plan is currently scheduled for adoption in 2024.

2.2.4 As planned, DDC are now undertaking the Regulation 19 Draft Local Plan Consultation, for which this submission is made

3 Legal Test of Soundness

3.1 Legislation and Guidance

3.1.1 The new Local Plan will be examined by an Inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is 'sound'. It is a statutory requirement that every development plan document must be submitted for independent examination to assess when it is "sound", as well as whether other statutory requirements have been satisfied (s.20(5) of the 2004 Act). By s.19 of the 2004 Act, in preparing a development plan document a local planning authority must have regard to several matters including national policies and advice contained in guidance issued by the Secretary of State. Such guidance currently exists in the form of the NPPF and is summarised below. This states that Plans must be:

(a) Positively Prepared: based on a strategy which seeks to meet objectively assessed development and infrastructure requirements

3.1.2 This means that the Local Plan should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. The NPPF set out principles through which the Government expects sustainable development can be achieved.

(b) Justified: an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence

3.1.3 This sets out the requirement that the Local Plan should be based on a robust and credible evidence base involving:

I. Research/fact finding: the choices made in the plan are backed up by facts.

II. Evidence of participation of the local community and others having a stake in the area.

3.1.4 The Local Plan should demonstrate an appropriate strategy, taking into account reasonable alternatives and based on proportionate evidence. These alternatives should be realistic and subject to sustainability appraisal. The Plan should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

(c) Effective: deliverable over its period based on effective joint working on cross-boundary strategic priorities

3.1.5 This makes clear that the Local Plan should be deliverable, requiring evidence of:

- Sound infrastructure delivery planning;
- Having no regulatory or national planning barriers to delivery;
- Delivery partners who are signed up to it; and
- Coherence with the strategies of neighbouring authorities, including neighbouring marine planning authorities.
- The new Local Plan should be flexible and able to be monitored.

3.1.6 The Local Plan should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen. The plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the Local Plan should make clear that major changes may require a formal review including public consultation. Any measures which the Council has included to make sure that targets are met should be clearly linked to an Annual Monitoring Report.

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national policy.

3.1.7 This submission comments on each of the above in further detailing, highlighting areas of support and where modifications are required as appropriate.

3.2 Legal Compliance

3.2.1 In terms of legal compliance, the main requirements for the early stages of Local Plan consultation are in relation to:

- planning for community engagement;
- the sustainability appraisal (including consultation with the statutory environment consultation bodies);
- identifying significant cross boundary and inter-authority issues; and
- ensuring that the plan rests on a credible evidence base, including meeting the Act's requirement for keeping matters affecting the development of the area under review.

3.2.2 In addition to the above, the NPPF states² that: "Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:

a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;

b) Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

(i) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or

Paragraph 11, NPPF 2021

(ii) Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

3.2.3 In addition, to the above, the NPPF states³ that Plans should:

a) be prepared with the objective of contributing to the achievement of sustainable development;

b) be prepared positively, in a way that is aspirational but deliverable;

c) be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;

d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

e) be accessible through the use of digital tools to assist public involvement and policy presentation; and

f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

3.2.4 It is important to note that the NPPF⁴ requires strategic policies to set out an overall strategy for the pattern, scale, and design quality of places, and make sufficient provision for:

- a) housing (including affordable housing), employment, retail, leisure and other commercial development;
- b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- c) community facilities (such as health, education and cultural infrastructure); and;
- d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

3.2.5 It is clear from the above, that any local plan should set out a comprehensive and cohesive approach to future development.

Paragraph 16, NPPF 2021

Paragraph 20, NPPF 2021

4 Duty to Co-Operate

4.1 Legal and NPPF Requirements

4.1.1 Section 33A of the Planning and Compulsory Purchase Act 2004 sets out a statutory 'Duty to Cooperate' (DtC) – i.e. a legal obligation - to all bodies as prescribed by Regulation 4 of the Town and Country Planning (Local Planning) England Regulations 2012 (the Regulations).

4.1.2 The duty requires DDC to cooperate with other persons to 'maximise the effectiveness' with which named activities are undertaken. Those activities include the preparation of development plan documents (such as this Local Plan document) and activities that support that activity 'so far as relating to a strategic matter'.

4.1.3 A strategic matter is defined by S33A(4) in summary as: (a) 'sustainable development or use of land that has or would have a significant impact on at least two planning areas' (a planning area in this case is the area of a borough or district council); and (b) 'sustainable development or use of land in a two tier area' (as this is) 'if the development or use (i) is a county matter, or (ii) has or would have a significant impact on a county matter'. County matters broadly relate to minerals and waste and associated developments as defined by Paragraph 1 of schedule 1 to the Town and Country Planning Act 1990 (as amended).

4.1.4 Section 33A (7) requires DDC (and persons subject to the DtC) to have regard to any guidance issued by the Secretary of State about how the duty is to be complied with. In that regard Paragraph ID 9-004-29140306 of the Government's Planning Practice Guidance (PPG) confirms amongst other things that the DtC is not a duty to agree (albeit that local planning authorities should make every effort to secure the necessary cooperation on strategic cross border matters before they submit local plans for examination).

4.1.5 The NPPF establishes that effective and on-going joint working is an integral part of the plan making process that will, amongst other things, determine whether development needs that cannot be met wholly within a plan can be met elsewhere. The NPPF goes on to state at paragraph 27 that in order to demonstrate effective and on-going joint working strategic policy making authorities should: "... prepare and maintain one or more statements of common ground documenting the cross-boundary matters being addressed".

4.1.6 In addition to the District's own housing pressures, part of the DtC involves considering whether neighbouring authorities' unmet housing need can be accommodated. It is worth highlighting that recent amendments to the London Plan have identified that the City's housing need has become increasingly more difficult to deliver and therefore areas outside London will be faced with having to absorb more of London's housing need. Consequently, DDC has a duty to explore whether it can accommodate some of this overspill of London's unmet need.

4.2 Assessment of DDC's discharging of the Duty to Co-operate

4.2.1 It is recognised that work to discharge the DtC remains ongoing by DDC and will continue prior to submission as part of the preparation of the Local Plan evidence base.

4.2.2 Notwithstanding the above, at this stage it is understood that DDC have engaged with the members of the East Kent Regeneration Board including neighbouring East Kent planning authorities, Kent County Council (KCC) and its subsidiary departments:

- Folkestone and Hythe District Council
- Canterbury City Council
- Thanet District Council

- KCC

- KCC Highways & Transportation
- KCC Minerals & Waste
- KCC Heritage Conservation
- KCC Flood & Water Management
- KCC Natural Environment & Coast
- KCC Infrastructure including Education

4.2.3 In February 2016, the Council adopted a Memorandum of Understanding (MOU) in respect of the DtC between the East Kent Regeneration Board members. A review of the MOU took place and was agreed in January 2021.

4.2.4 The East Kent MOU sets out the framework in which the authorities will work together on strategic issues and will actively engage. It forms the overarching framework and context within which Statements of Common Ground (SoCG) will be agreed between individual authorities.

4.2.5 Further engagement is also confirmed to have taken place between the following prescribed bodies and other relevant bodies:

- Environment Agency
- National Highways
- Historic England
- Natural England
- Network Rail
- NHS Kent and Medway Clinical Commissioning Group (CCG) – now known as Integrated Care Board (ICB) since July 2022
- Kent Downs AONB Unit
- Other infrastructure providers

4.2.6 Whilst work remains ongoing, at this stage it is understood that SoCGs have been agreed and signed between the following parties:

- DDC and Folkestone & Hythe District Council
- DDC and Canterbury City Council
- DDC and Thanet District Council
- DDC and Kent County Council
- Dover District Council and National Highways

4.2.7 As part of the DtC Evidence Base documents, DDC prepared a detailed DtC Statement (dated September 2022) which sets out a summary of the engagement that has taken place, firstly by organisation, and then by issue. Whilst the statement focuses on strategic issues and duty to co-operate bodies it also includes information relating to engagement on non-strategic issues and co-operation with other bodies that are not prescribed by the regulations. In addition, Appendices 1, 3 and 4 identify the main meetings and other correspondence that has taken place throughout the plan making process.

4.3 Summary

4.3.1 On account of the above and the documents published within the Council's Local Plan Evidence Base, we are satisfied that the Council as the strategic policy making authority has demonstrated effective and on-going joint working with neighbouring authorities, the county council, prescribed bodies and other relevant bodies. Further, we agree that DDC has prepared and maintained SoCG documenting the cross-boundary matters being addressed in accordance with the Framework and the DtC may be discharged by the Planning Inspector under Section 20(5) (c) of the Planning and Compulsory Purchase Act 2004.

4.3.2 Without prejudice to the above, should ongoing work by the Council result in significant changes in circumstances such that the signed SoCGs may be amended or withdrawn, our client reserves the right to alter their consultation response accordingly and be present at the examination of the Plan to discuss further.

5 Housing Need

5.1 Context

5.1.1 Paragraph 11 of the NPPF is explicit in its requirement for strategic policy-making authorities to promote a sustainable pattern of development that seeks to meet the need in full.

5.1.2 Paragraph 20 of the Framework is equally clear that strategic policies should set out an overall strategy for the pattern, scale and design quality of places. Policies should make sufficient provision for the development that is required as well as associated infrastructure, community facilities and should set out a strategy for the conservation and enhancement of the natural, built and historic environment.

5.1.3 Given this national planning context, the emerging Local Plan should provide a comprehensive and cohesive approach to future development in Dover district, capable of making sufficient provision for the identified needs, whilst balancing the conservation and enhancement of the natural, built and historic environment.

5.1.4 National guidance states that strategic policy-making authorities will need to calculate their local housing need figure at the start of the plan-making process. This number should be kept under review and revised where appropriate.

5.1.5 In calculating the local housing need, paragraph 61 of the NPPF states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance - unless exceptional circumstances justify an alternative approach.

5.1.6 Further, in addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

5.2 DDC's Housing Need

5.2.1 The Standard Method for assessing housing need, issued alongside the Ministerial Statement on 16 December 2020, sets an indicative housing need figure for Dover District of 596 dwellings per annum. However, the affordability ratio which factors into the local housing need assessment is updated annually. For Dover District the latest housing need calculation is 611 dwellings per annum (dpa), equating to a total housing need of 10,998 dwellings for the Plan period to 2040. We understand that the Regulation 19 Local Plan seeks to meet this need in full and in addition to the minimum figures, DDC have set an appropriate contingency buffer of 926 dwellings of the Plan period, equating to 8.4% of the total Plan period figure.

5.2.2 For context, the current adopted CS requirement is 700 dwellings per annum. This followed the adoption of a high-growth strategy in 2010 of 14,000 homes to 2026 based around the recommendations of the Dover Regeneration Strategy and above the minimum 10,100 requirement across the same period, as set out in the emerging (at the time) Regional Spatial Strategy.

5.2.3 For the avoidance of doubt, accounting for the Committed Supply Total of 5,282 dwellings, the new Local Plan will be required to allocate sufficient land to accommodate a minimum of 6,642 new homes over the remaining plan period to 2040. It is understood that this will be derived from the following sources:

- Whitfield Urban Expansion Allocation: 2,200 dwellings
- Local Plan Allocations (excluding Whitfield): 3,392 dwellings
- Windfall Allowance (70 a year from year 4): 1,050 dwellings

5.2.4 On this basis, it is evident that a substantial quantum of Plan-led housing delivery will be required in order to meet the new Local Plan's housing target. Due to the nature and dwindling supply of available urban land in Dover town and the remaining higher order settlements of Deal and Sandwich, the restrictive effect of the coast, the Kent Downs AONB, environmental constraints and the limited capacity of the district's remaining mid- and lower order settlements to accommodate significant levels of growth, meeting Dover's housing needs inevitably will require the release of significant greenfield land.

5.2.5 In our view, sustainable and accessible sites logically located adjacent to existing urban areas, including Sandwich, represent the most sustainable and reliable sources of growth for the Plan period, consistent with the overarching strategic objectives of draft policy SP3 within the emerging Plan. Such sites are best placed to deliver the significant number of new homes that are required and are most capable of making meaningful contributions to the associated public infrastructure, affordable housing and mix of new homes that is urgently needed in the District as well as further balancing the role of strategic-scale development at Whitfield within the emerging Plan's proposed growth pattern.

6 Site Specific Assessment

6.1 Overview

6.1.1 The previous chapters of this representation (Chapter 3-5) outline our client's position relating to the soundness of the Plan in which our client is confirmed to be supportive in principle of the Local Plan as a sound strategy for the growth of the district to 2040. It is clear that Sandwich must continue to form a principal location for focusing sustainable housing delivery in Dover district and will assist in ensuring an appropriate balance of sites are identified, capable of supporting the strategic role of Whitfield within the forthcoming Plan Period.

6.1.2 As introduced in the preceding sections, Fernham Homes Limited and Walker Residential Limited control 'Land at Archers Low, Sandwich' and are continuing to promote the residential allocation of the Site. The Site is allocated for residential development in the Regulation 19 Pre-submission Plan for the provision of 35 dwellings under policy reference 'SAP22'.

6.1.3 As aforementioned, the Site was allocated in the Regulation 18 Local Plan for approximately 40 dwellings under the 'Site Allocations Policy 1 Non-Strategic Housing Allocations' (reference SAN023).

6.1.4 Notwithstanding our client's support of the draft allocation within the Regulation 19 Plan in principle, we suggest that the policy text be re-visited prior to submission, to allow a higher dwelling per hectare guide to ensure the Site is developed to its full potential. It is submitted that the SAP22 policy wording should be amended to more accurately reflect the capability of the Site to accommodate approximately 40 - 45 dwellings (broadly in line with the previous site allocation in the Regulation 18 Local Plan), deliverable early in the Plan period.

6.1.5 Fernham Homes Limited and Walker Residential Limited are fully committed to the delivery of the Site within the next five years, and subject to a grant of planning permission in Spring 2023 – please see below – anticipate starting developing on site in 2023. Indeed, for the avoidance of doubt it is confirmed that Fernham Homes Limited and Walker Residential Limited have previously submitted a planning application ('ref: 22/00274') for the residential development of the Site for 44no. dwellings with associated access, parking, open space, landscaping, drainage, and infrastructure. (Amended plans and details).

6.1.6 Following a positive recommendation to grant planning permission by Officers at the DDC Planning Committee, the application was refused following consideration at Planning Committee on 31st March 2022. The application is now the subject of an appeal with a date confirmed for a two day hearing on the 17th - 18th January 2023. The site layout is shown in Figure 6.2.

6.1.7 For the avoidance of doubt, our client's support of the proposed allocation, subject to their objection to the capacity and considerations that it can accommodate an increased capacity of approximately 40 – 45 dwellings, is made without prejudice to the ongoing appeal. Should the appeal be allowed, this would realise the delivery of the residential allocation in accordance with the policy requirement (albeit more dwellings), which is consistent in its key elements with the submitted appeal scheme.

6.2 Site and Surroundings

6.2.1 The Site is situated to the southeast of St. George's Road and southwest of Sandown Road, on the southern edge of Sandwich.

6.2.2 The Site is a predominately undeveloped parcel of land totalling approximately 2.37 hectares, with tall and dense hedge and tree planting around the perimeter of the Site and an existing agricultural access point off St Georges Road to the north-west of the Site

6.2.3 The Site comprises a level enclosed field mainly formed of uniform improved grassland bounded on all sides by trees mixed in age, species, condition and character. There are also semi-derelict agricultural buildings in the southwest corner.

Figure 6.1: Site Location Plan (Drawing no. 29923A/01)

6.2.4 The Site comprises a level enclosed field mainly formed of grassland bounded on all sides by trees mixed in age, species, condition and character. There are also semi derelict agricultural buildings in the southwest corner.

6.2.5 The Site is bounded by existing residential development along St Georges Road to the north and west, undeveloped land to the east and south, Sandown Road to the north-east and a small area of residential development fronting Sandown Road further to the east of the Site.

6.2.6 The Site enjoys access to a number of local facilities and services which are within a reasonable walking distance, including schools, local shops, healthcare, employment, and public transport links. The Sir Roger Manwood Secondary School, Sandwich railway station and the historic town centre (including convenience stores) are all located within 800m of the Site. Sandwich Junior School and the local supermarket are located just over 800m from the Site. Larger shops and supermarkets are available in the local area, including Westwood Cross 8 miles to the north and Deal, 6 miles to the south. In terms of planning constraints, a Tree Preservation Order (TPO) protects trees on the northwest boundary of the Site and the belt of trees bounding the northeast and southeast.

6.3 Development Capacity

6.3.1 For the purposes of this representation, Land at Archers Low Farm, Sandwich is submitted with capacity for approximately 40 – 45 dwellings (broadly in line with the previous site allocation in the Regulation 18 Local Plan), as part of a high- quality, landscape-led residential scheme capable of delivery early in the Plan period.

6.3.2 Significant work has already been advanced by the project team as part of the submitted planning application and the subsequent appeal in which the proposed development has been informed following a thorough analysis of the Site opportunities, constraints and surroundings.

The key design principles have been to create an attractive, permeable and legible layout set with a strong landscape framework, utilising existing landscape features, to accommodate a mixture of high-quality and attractive homes, of a scale and design that reflect its setting and surroundings.

6.3.3 In summary the vision for the Site is to create a high quality residential development which includes:

Circa 40 – 45 no. residential dwellings, comprising 30% Affordable Housing and a mixture of 2, 3 and 4 bedroom properties.

A series of open spaces that perform multiple functions including informal space, a local area of play (LAP), ecological mitigation areas and incorporation of native and wildflower meadow planting.

Retention of trees on the northern and southern boundaries and the provision of new woodland planting. This will include proactive management of the retained and proposed woodland belts to encourage structural and species diversity and improve the overall health and longevity of these assets. The provision of significant biodiversity net gain is envisaged, and has been demonstrated can be delivered through the application and appeal.

Low key principle vehicular access point onto Sandown Road through landscaped entrance with trees and vegetation maintained, introduction of wildflower planting.

Footpath connectivity onto St Georges Road.

Tree lined connecting avenue creating strong legibility and navigation throughout the layout.

Figure 6.2: Proposed Site Plan as amended in December 2021 (Produced by Clague Architects – Drawing no. 29923A/11)

6.3.4 For context, at the time of determination of application ref: '22/00274', full planning permission was sought for the erection of 44 dwellings, together with associated access to Sandown Road, a pedestrian crossing point on St Georges Road, parking, open space, landscaping, drainage, and infrastructure works.

6.3.5 It is highlighted that draft policy PM1 seeks to provide a density typically between 30-50 net dwellings per hectare (dph). In this respect, it is highlighted that at 45 dwellings, the Site would provide a density of approximately 22.5 dph. Whilst it is acknowledged that lower density development may be more appropriate in edge of settlement locations, this demonstrates that even at a capacity 45 dwellings, the density is relatively low. Furthermore, as part of the previous application 22/00274, DDC confirmed at paragraph 2.23 of the Committee Report that subject to a detailed assessment of visual impacts, a proposed scheme of 44 dwellings on the Site is considered appropriate.

6.3.6 The above proposed Site plan submitted during the determination of the application demonstrates the capability of the Site to comfortably accommodate circa 40 – 45 residential units, together with significant boundary and internal landscaping elements.

Draft Allocation in the Regulation 18 Local Plan:

6.3.7 As aforementioned, the Site was proposed to be allocated for a capacity of approximately 40 dwellings in the Regulation 18 Local Plan under the 'Site Allocations Policy 1 Non-Strategic Housing Allocations' (reference SAN023).

6.3.8 The Site was considered as part of DDC's Housing and Economic Land Availability Assessment (HELAA) (December 2020) for the development of approximately 40 dwellings. The summary of suitability as provided by DDC is summarised as follows:

- The Site is in an Area of Archaeological potential and a Heritage Assessment will be required.
- The Site clips Flood Zone 2 and 4, along the boundary and an FRA would need to be undertaken.
- The Site was removed from the LALP (Local Allocations Local Plan) by the Inspector on landscape grounds, however, with the provision of an enhanced landscape buffer to the east, south and west of the site to provide year-round screening, it is considered that the impact on the landscape can be mitigated. The housing number on the site has also been reduced to address landscape concerns.
- Access to this site would be possible via Sandown Road, however vehicle access onto St Georges Road is likely to be challenging due to limited footway width and subsequent sightline requirements, so would need to be restricted to emergency/pedestrian access only.
- The provision of 40 dwellings is unlikely to create a severe impact on the surrounding highway network, however St Georges Road and Sandown Road (including Knightrider Street and the route to the High Street/Quay) are subject to constrained geometry due to on street parking, as such, a review on-street parking controls may be required to manage any increase in traffic-flow.
- There is a general concern over the potential cumulative impact of development in and around Sandwich and on routes within the town, which should be considered as part of future traffic modelling exercises.

- A Transport Assessment is required.

- Further information should be provided to demonstrate that access is achievable. However, cumulative impact on the highways network needs to be assessed.

6.3.9 At the time, owing to the matters set out above the Site was considered 'Amber' in the reg/amber/green (RAG) rating. However the clients have since demonstrated within the planning application and subsequent appeal submission that the proposed development for 44 dwellings would address the queries above.

6.4 Draft Policy Allocation 'Land at Archers Low Farm, Sandwich Road, Sandwich' (SAP22)

6.4.1 As introduced in the preceding sections, our client's Site at Archers Low is allocated for residential development within the Dover Pre-submission (Regulation 19) Local Plan. For ease of reference, the draft policy wording is as follows:

"SAP22 – Land at Archers Low Farm, St Georges Road, Sandwich (SAN023)

The Site, Land at Archers Low Farm, St Georges Road, Sandwich, as shown on the policies map is allocated for an indicative capacity of 35 dwellings.

Development proposals for the Site shall include the following:

- a) Development should be laid out to protect the residential amenity of the existing residential properties to the north-east and designed to take account of the character of the Sandwich Walled Town Conservation Area;
- b) The existing trees on the boundaries of the site should be retained and enhanced to mitigate the impact of development on the landscape and provide opportunities for biodiversity habitat creation and enhancement;
- c) Trees which need to be removed to enable an access to be provided to the site, shall be kept to the minimum needed to provide necessary visibility, and will be required to be replaced on-site;
- d) The layout of the scheme should provide a sufficient buffer between the existing mature trees on the site and residential properties, to ensure appropriate residential amenity for future residents and the protection of existing trees once the site is developed;
- e) A site-specific Flood Risk Assessment must be carried out in accordance with Policy CC5, including a comprehensive investigation into surface water flood risk. This shall also inform the application of the Sequential Approach to the layout of the site by locating the most vulnerable elements in the lowest risk areas;
- f) Primary vehicular, pedestrian and cycle access to the site shall be provided from Sandown Road;
- g) In accordance with Policy SP13 a wintering bird survey must be undertaken in advance of a planning application on the site. If the bird survey identifies that the development will exceed the threshold of significance, mitigation will be required. A suitable scheme of mitigation will need to be submitted with the planning application for the site;
- h) Environment assessment study required to address any potential impact on the Sandwich Bay SPA and Ramsar;
- i) A Heritage Assessment, to include appropriate archaeological investigations must be carried out in accordance with Policy HE1 and Policy HE3, the results of which should inform the layout and design of the development which is necessary to avoid harm to any heritage assets identified through the assessment; and
- j) The occupation of the development should be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider. Development should provide a connection to the sewerage system at the nearest point of adequate capacity."

6.4.2 To be clear, our client remains wholly supportive of the allocation of the Site for residential development and is committed to delivering the Site early in the Plan period (start on site in 2023). We agree that it represents a logical and sustainable location to direct growth consistent with the growth strategy of the Plan as a whole, however we submit that more effective use of our client's Site can be made – and therefore object to the capacity identified.

6.4.3 Accordingly, we say that Land at Archers Low can further assist the Council in meeting the growing need for new homes in the district and help to ensure the Council can have greater confidence in meeting its market and affordable housing targets in full.

6.4.4 It is submitted that the SAP22 policy wording should be amended to reflect the capability of the Site to accommodate approximately 40 – 45 dwellings (broadly in line with the previous site allocation in the Regulation 18 Local Plan), deliverable early in the Plan period.

6.5 Strategic Justification for Development

Spatial Strategy

6.5.1 The proposed Housing Distribution for the district across the Plan period is established within Policy SP3 'Housing Growth' which sets out that the distribution of housing growth in the district is primarily based on the settlement hierarchy and influenced by site availability, environmental constraints and factors of delivery.

6.5.2 Rightly, a key aim of the growth strategy is to focus development in the least sensitive areas of the district in order to conserve and enhance the Dover's rich natural and historical environment.

6.5.3 A retained theme from the adopted Plan, is that the Council's settlement strategy continues to focus on the development and regeneration of Dover Town and Whitfield (3381 dwellings). Approximately half of the district's planned housing is in this location, the majority of which again is to come forward as part of the strategic urban expansion of Whitfield 'SAP1' (2200 minimum dwellings).

6.5.4 Development will then be focused in the District Centre of Deal (223 dwellings), and the Rural Service Centres of Sandwich (227 dwellings) and Aylesham (649 dwellings). Following the settlement hierarchy rigidly would distribute housing in the preceding order, however the Plan recognises that housing delivery in Deal and Sandwich continues to be constrained by a number of factors including flood risk, ecological designations, heritage and highways. Further, Deal has experienced generally high levels of windfall development across the previous Plan period and accordingly there is now a dwindling supply of available, suitable sites in both settlements. On account of this context, the Council have sought to direct the majority of the remaining higher order settlement growth (outside of Dover & Whitfield) to Aylesham, through the strategic expansion to the town.

6.5.5 Outside of the four principal district settlements, the Rural Settlement Hierarchy (August 2022) identified that the majority of lower-order settlements in the district emerge as having a low level of facilities within the hierarchy and six settlements having none of the key indicators of sustainable services. Plainly, these settlements offer very limited opportunities for growth and it is evident that the forthcoming Plan will be reliant on the settlements of Dover (including Whitfield), Deal, Sandwich and Aylesham to deliver the housing growth that is required.

6.5.6 We further note the findings of the Strategic Housing Market Assessment (2017) which identified that Sandwich and the north is the most expensive part of district with median property prices for all sizes of homes significant in excess of prices in Deal and Dover town and the south. It is suggested that issues of unaffordability are most likely to effect entry-level properties and result in existing residents being forced to seek more affordable properties elsewhere in Dover district or neighbouring authority areas.

6.5.7 Given this context, it is clear that where available and suitable opportunities for residential development do exist within the district's higher order settlements, including our client's Site at Land at Archers Low which can provide a policy compliant level of affordable housing, it is imperative that the effective use of these sites are appropriately maximised in accordance with draft policy SP3 of the emerging Plan and national policy objectives.

6.5.8 Notwithstanding our client's in principle support of the proposed strategy, we are concerned that highly sustainable, edge-of-settlement sites, particularly in higher tier settlements such as Sandwich have not been fully maximised to reflect their accessible location and capability to accommodate a greater quantum of development. On this basis, we are concerned that the strategic objectives underlying draft policy SP3 'Housing Growth' may not be fully realised, to the detriment of market and affordable housing delivery and the wider policies seeking to conserve and enhance the district's natural and historic environment.

6.5.9 Consequently, our clients object to policy SP3 as drafted, on the basis that there is a clear need to maximise the delivery of housing at sites around Sandwich, and this has not been undertaken – for example at Land at Archers Low, where it has previously been demonstrated that the site has sufficient capacity to deliver approximately 5-10 additional units over the draft allocation, that will otherwise be required to be delivered elsewhere in the district, in potentially less accessible and more sensitive locations.

Greenfield Development and Consistency with Housing Trajectory

6.5.10 Due to the nature and dwindling supply of available urban land in Dover town and the remaining higher order settlements of Deal and Sandwich, the restrictive effect of the coast, the Kent Downs Area of Outstanding Natural Beauty, environmental constraints and the limited capacity of the district's remaining mid- and lower order settlements to accommodate significant levels of growth, release will be required if the Council is to meet its housing and development commitments moving forward.

6.5.11 In our view, sustainable and accessible sites logically located adjacent to existing urban areas, including Sandwich, represent the most sustainable and reliable sources of growth for the Plan period, to support the role and timescales of strategic urban extensions and to deliver the significant number of new homes that are required within the forthcoming Plan period.

6.5.12 Moreover, greenfield edge-of-settlement sites are, in our experience, typically most capable of making meaningful contributions to the associated public infrastructure, affordable housing and mix of new homes that is urgently needed in the district.

6.5.13 The Sustainability Appraisal Scoping Report (2018) sets out that over the course of the adopted Plan period, the key sustainability issues facing Dover District in relation to housing are as follows:

Population growth, household growth and demographic change will place additional demand on key services and facilities such as housing, health, education and social care. The Local Plan offers a new opportunity to manage these pressures, encouraging mixed communities;

There is a need for affordable housing across the District. At present, the mean price of dwellings is higher than the national average. The Local Plan will help to expedite its delivery; and,

There is the need for a mix of housing types that cater for the needs of a range of people, including the growing number of single person and elderly households. Without an up-to date Local Plan, the required housing is less likely to be delivered.

6.5.14 It is evident that the new Dover Local Plan must allocate a mix of reliable sites capable of steadily delivering not only the quantum of housing that is required, but also the associated public infrastructure, affordable housing and a mix of unit types and tenures suitable for a wide range of future occupants.

6.5.15 The Housing Topic Paper (September 2022) provides further context and summarises under Chapter 7 'Historical Housing Delivery' that Dover has historically placed significant reliance on windfall development over the current adopted Plan period, with windfall sites accounting for 44% of all completed dwellings over the preceding 10-year period.

6.5.16 Moreover, it is highlighted that at the beginning of the 10 year period, the majority of new dwellings were being built on brownfield land. However, from the monitoring year 2013-14 onward development on greenfield land began to play a much greater part in the location for new development as show in figure 1 below. This trend of increased housing development on greenfield land is a result of the allocations within the CS and Land Allocation DPD being built out and is associated with an approximate doubling of completions in the district. From 2013-14 onwards the average number of completed dwellings per annum has doubled to that of the early years of the CS, as the strong delivery rates of greenfield sites form the predominant source of housing. This is despite an overall declining trend of brownfield completions towards the latter half of the Plan period. This is generally not an uncommon trend in the majority of local planning authorities areas, where opportunities for available and suitable sites in urban centres dwindle throughout the Plan period.

Figure 1: DDC Brownfield / Greenfield Completions 2010/11 to 2020/21 (source: Housing Topic Paper September 2022)

6.5.17 In light of the above context, it is clear that the adopted Dover Local Plan suffered from an initial under delivery of Plan-led housing growth in which windfall development sources were largely required to take up the slack in the early phases of the Plan period, as major allocated sites failed to deliver at the rates initially expected.

6.5.18 It is equally apparent that initial slow completion rates were quickly addressed once greenfield allocations commenced development, feeding into strong completions in the latter half of the Plan period. In our experience, greenfield sites are typically associated with stronger delivery rates and provide a reliable source of housing growth. The allocation of an appropriate mix of sites and scales is required in order to ensure steady and sustained Plan-led housing delivery across the Plan period and to avoid a reliance on windfall development to address the shortfall.

6.5.19 Consequently, given all of the above, it is imperative that the new Local Plan allocates a sufficient variety and scales of site capable of both ensuring steady and sustained housing completions and capable of making necessary contributions to public infrastructure and services, affordable housing and mix of unit types to address the key issues raised in the Sustainability Appraisal.

6.5.20 In our view, edge-of-settlement greenfield sites such as our client's Site Land at Archers Low represents the most reliable and sustainable source of housing delivery for the Plan period. Such sites are typically less constrained by wider factors and less affected by unforeseen delays such as land contamination. Moreover, greenfield sites typically are more capable of delivering the policy compliant affordable housing, unit mix and developer contributions that are urgently needed and in the case of our client's Site, have already been demonstrated within the present planning application and appeal submission.

6.5.21 It is understood that the Plan is predicated on the delivery of strategic scale development at Whitfield comprising the development of circa 2,200 new homes. Consequently, in order to avoid a repetition of the previous Plan, the Council have sought to ensure that a pool of reliable greenfield allocation, including that of our client's are included within the Plan, capable of delivering the early growth that is required within the housing trajectory prior to the commencement of major allocations later in the Plan period.

6.5.22 We note that within the Housing Trajectory 'Appendix D', the Council have included allocated units from Years 4 onwards, with extant permissions (accounting for 5% non-implementation) demonstrated to be solely capable of delivering the growth required in Years 1-3. Notwithstanding our client's commitment to commencement on site in 2023 and the initial delivery of units at Land at Archers Low in 2024 (subject to successful appeal), we support this pragmatic approach and suggest this represents a sound basis on which to set the district's

housing trajectory. We note also the inclusion of an appropriate windfall allowance and the included contingency buffer to further ensure reasonably flexibility in the housing supply.

6.5.23 On account of all of the above, we submit that the allocation of Land at Archers Low forms part of a sound strategy for growth in the district for the forthcoming Plan period. Land at Archers Low is capable of delivery early in the Plan period, representing a reliable source of housing growth in a highly sustainable and accessible location adjacent to the existing settlement boundary of Sandwich, consistent with the Council's preferred settlement strategy. However, we object on the submission that the Site is capable of making a greater contribution to the district's housing need and suggest an amended wording of the policy to allocate the Site for approximately 40-45 dwellings. Nonetheless, the Site is unconstrained and capable of providing a high-quality residential development including a mix of unit types and tenures, a meaningful contribution to the supply of affordable housing and contributions to public services and infrastructure, benefiting both existing residents and future occupiers.

Policy SP4 'Windfall Development'

6.5.24 Separately, we note the provisions of policy SP4 windfall development. Proposals at Land at Archers Low would likely be acceptable in principle under this provision and we support the policy inclusion for appropriate, proportionate windfall development.

6.5.25 Our client is fully committed to the delivery of the Site which is available and suitable for delivery early in the Plan period and is presently pursuing an appeal on the Site for a greater quantum of units than the allocation in the Regulation 19 Plan. There is consequently little to be gained from potentially delaying delivery of the Site by withdrawing the allocation. Notwithstanding the provisions of SP4, it is reiterated that our client fully supports the allocation of the Site under SAP22 for residential development as the most appropriate mechanism for delivery of the Site and the opportunity for genuinely Plan-led development in Sandwich and the provision of associated benefits to public services and infrastructure, contribution to affordable housing supply and the delivering of a mix of house types and tenures.

Infrastructure Delivery

6.5.26 Paragraph 11 of the Framework is clear that all plans should promote a sustainable pattern of development. This includes aligning growth and infrastructure. Paragraph 20 goes on to confirm that strategic polices will be expected to make sufficient provision for associated development infrastructure.

6.5.27 In this regard, draft policies SP11 'Infrastructure and Developer Contributions' and SP12 'Strategic Transport Infrastructure' of the emerging Plan form the key strategic polices for infrastructure delivery. We agree that where development would create a need, or would have an impact, or would exacerbate an existing deficiency in infrastructure provision, appropriate developer contributions may be sought.

6.5.28 It is however emphasised that in all developments, infrastructure requirements must be demonstrated to be necessary through assessment during determination of the application on a case-by-case basis. Where new development is proposed, it does not automatically follow that major infrastructure contributions are always required or contribution to strategic infrastructure proposals are appropriate. For instance, it is our client's view that any infrastructure requirements must be demonstrated through a robust and transparent assessment at application stage, taking into account the submission of detailed supporting evidence, for example following consideration of the Transport Assessment in the case of highway infrastructure contributions.

Alignment with Sustainability Appraisal Findings

6.5.29 As part of the preparation of the Local Plan, the Council has identified and appraised a range of growth and spatial options through the Sustainability Appraisal (SA) which provides an assessment of how different options perform in environmental, social and economic terms, to help inform which option should be taken forward and combined with wider evidence documents, have been used to determine the growth and spatial strategy set out in the Plan.

6.5.30 Five potential distributions of growth were identified during preparation of the draft Regulation 18 Local Plan:

- Spatial Option A: Distributing growth to the District's suitable and potentially suitable housing and employment site options (as needed to deliver the scale of growth required).
- Spatial Option B: Distributing growth proportionately amongst the District's existing settlements based on their population.
- Spatial Option C: Distributing growth proportionately amongst the District's existing settlements based on the District's defined settlement hierarchy.
- Spatial Option D: Distributing growth in the same way as the adopted Local Plan, focussing most growth in and around Dover town.

- Spatial Option E: Distributing growth more equally across the District's settlements: Dover, Deal, Sandwich and Aylesham, as well as the rural villages.

6.5.31 The conclusion of the SA was that Spatial Options C (settlement hierarchy) and D (adopted Core Strategy with Dover focus) generally perform the most strongly against the SA objectives, particularly when delivering the baseline growth scenario. However, given the environmental constraints that exist around Deal and Sandwich, very few suitable and potentially suitable sites have been identified in these towns. Given this, the Council's preferred option for the distribution of housing and economic growth comprises a combination of options A (HELAA sites), C (settlement hierarchy) and D (Dover focus). The distribution of housing and economic growth in the District is therefore primarily based on the settlement hierarchy, and influenced by site availability, environmental constraints and factors of delivery.

6.5.32 On account of the above, our client agrees that the proposed growth strategy, and by extension, policy SP3 in principle represents a sound and evidence-led strategy for growth. However, given the clear acknowledgement of the dwindling supply of available sites in the higher order settlements of Deal and Sandwich, which has necessitated a minor deviation from the strongest performing spatial options, we submit that where sites are available and suitable for development in Deal and Sandwich, these must be fully maximised, reflecting their accessible location and their ability to reduce the need to develop into less accessible and more sensitive sites elsewhere in the district to accommodate the growth that is required.

Site Specific Sustainability Appraisal

6.5.33 Land at Archers Low Farm, St George's Road, Sandwich is included under HELAA reference 'SAN23' within the SA Site Assessment (Appendix F). The site performs strongly, with particular positives identified with regards to SA Objectives related to housing, accessibility, the economy, sustainable transport and climate change mitigation, in large parts due to the edge-of-settlement location and proximity of the site to key services in Sandwich.

6.5.34 We note negatives associated with the development of a greenfield site, including loss of agricultural land, however this would be true of the majority of greenfield sites and it is abundantly clear that Dover's housing need cannot be met solely on brownfield sites. We note also minor negatives / uncertain associated with biodiversity, the historic environment and landscape, however it is not clear whether these take into account the high-quality design, biodiversity enhancement and landscape mitigation proposed under the application/appeal. Irrespective, these are not considered to outweigh the clear and tangible sustainability benefits associated with edge-of-settlement development and the site's consistency with the preferred spatial options.

Summary

6.5.35 Taking all of the above into consideration, our client is wholly supportive of the inclusion of land promoted at Archers Low, as a future housing allocation within the Dover District emerging Local Plan. The allocation is considered wholly consistent with the objectives of the Plan and forms part of a sound evidence-led growth strategy consistent with the recommendations of the Sustainability Appraisal for the district to 2040, subject to the sole objection in relation to capacity.

6.6 Deliverability

6.6.1 Prior to the current appeal proposal, the Site has had no planning history of a residential nature or a history of unimplemented permissions. There are not considered to be any impediments to the Site being allocated for development commencing within the first five years of the Plan period. Combined with an appropriate number and scale of wider allocations in Sandwich and elsewhere across the district, this would ensure steady delivery of housing in Dover district across the majority of the Plan period and support the role and timescales of strategic housing delivery at Whitfield towards the latter half of the Plan period.

6.6.2 Fernham Homes Limited – a local SME with a strong history and track record of delivery, together with an adopted and robust business plan for growth – has control over the site, and are poised to commence work on its residential development very promptly after the receipt of planning permission, potentially (subject to the successful outcome of the current appeal) in 2023. Delivery of housing is expected from 2024.

6.6.3 For the reasons set out in this representation, the Site is considered suitable for the residential development of approximately 40 – 45 dwellings. The Site is adjacent to the urban area of Sandwich, one of the four higher order settlements in the district and the Council's preferred locations for Plan-led growth within the district. Development at Land at Archers Low would form a natural and logical development east of Sandwich with excellent accessibility to day-to-day services and amenities via active travel modes within Sandwich itself and convenient access to public transport infrastructure (including Sandwich train station) for onward travel to key neighbouring settlements including Dover, Ramsgate, Canterbury and Ashford.

6.6.4 Finally, in respect of suitability, there are no physical limitations or problems such as access, infrastructure, flood risk, hazardous risks, pollution or contamination.

6.6.5 On behalf of the landowner, we submit that there are no known financial restrictions that would impact upon the viability of a future housing scheme or that would prohibit development coming forward within the early stages of the Plan period. To the contrary, we consider there to be

an opportunity to deliver a high-quality, sustainably located residential development scheme consistent with the Council's proposed growth strategy comprising an appropriate mix of market and affordable housing and capable of contributing to a range of community facilities, public infrastructure and services locally.

6.6.6 Given the advanced nature of the proposals by virtue of the submitted planning application, in terms of specific timescales, should the ongoing appeal be allowed, we understand that Fernham Homes Limited and Walker Residential Limited are capable of commencing work on-site in early 2023, with delivery in 2024 and completion of the Site anticipated in 2025.

6.6.7 The Site is in single ownership and there are no complicated legal agreements or covenants that would prohibit the ability to bring forward the Site early in the Plan period. The Site is therefore considered available and achievable for the purposes of the tests of deliverability.

7 Conclusion
7.1 Summary

7.1.1 This representation has been prepared by DHA Planning on behalf of Fernham Homes Limited and Walker Residential Limited, in response to the Dover District Council Local Plan (Regulation 19) consultation which runs until 9th December 2022.

7.1.2 Our client controls 'Land at Archers Low Farm, Sandown Road, St Georges Road, Sandwich' and is promoting the residential allocation of the Site as part of the new Dover District Local Plan preparation process. The Site is allocated for residential development in the Regulation 19 Pre-submission Plan for the provision of 35 dwellings under policy reference 'SAP22'.

7.1.3 Taking all of the above into consideration, we consider that the Site promoted at Land at Archers Low should remain included as a future housing allocation within the Dover District emerging Local Plan. The allocation is considered, in principle, wholly consistent with the objectives of the Plan and forms part of a sound growth strategy for the district to 2040. However, it is imperative that the effective use of these higher-order settlement sites are appropriately maximised in accordance with draft policy SP3 of the emerging Plan, and wider policies seeking to otherwise conserve and enhance the district's natural and historic environment and national planning policy objectives. We are concerned that this has not been fully undertaken and object solely on this basis.

7.1.4 Consequently, our clients object to policy SP3 as drafted, on the basis that there is a clear need to maximise the delivery of housing at sites around Sandwich, and this has not been undertaken – for example at Land at Archers Low, where it has previously been demonstrated that the site has sufficient capacity to deliver approximately 5-10 additional units over the draft allocation, that will otherwise be required to be delivered elsewhere in the district, in potentially less accessible and more sensitive locations.

7.1.5 Without prejudice to our client's support in principle of the proposed allocation at Land at Archers Low, we would urge the Council to re-visit the allocation policy text and allow a higher dwelling per hectare guide to ensure the Site is developed to its full potential and the objectives of draft policy SP3 are most effectively realised. It is submitted that the SAP22 policy wording should be amended to more accurately reflect the capability of the Site to accommodate approximately 40 – 45 dwellings (broadly in line with the previous site allocation in the Regulation 18 Local Plan), deliverable early in the Plan period.

7.1.6 In addition to being a highly sustainable and logical edge-of-settlement allocation, the Site is deliverable in a single land ownership with no viability issues, legal or third-party constraints present. Our client is fully committed to the delivery of Land at Archers Low and there are no impediments to the Site being capable of delivery within the initial 0-5 years of the Plan period.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

For the reasons set out in the consultation response submitted on behalf of Fernham Homes Limited and Walker Residential Limited (ref DHA/30245), the capacity of Land at Archers Low Farm, St Georges Road Sandwich (SAN023) should be increased to 40 - 45 dwellings.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Please refer to the consultation response submitted on behalf of Fernham Homes Limited and Walker Residential Limited (ref DHA/30245).
Include files	30245 DDC Rep_Archers Low Farm FINAL 09 12 22.pdf
Local Plan Consultation Point	Strategic Policy 11 - Infrastructure and Developer Contributions
Rep ID	SDLP1351
Rep Status	Processed
Consultee ID	1333128
Consultee Full Name	David Powell
Consultee Company / Organisation	
Agent Full Name	Klaire Lander
Agent Company / Organisation	Lander Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP11
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Lander Planning sent a PDF document which has been split across the relevant sections of the Plan. See Original Attachment on SDLP1346) The provision of infrastructure and developer contributions is consistent with national policy and this policy is 'effective' and 'justified'. This policy is supported.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 11 - Infrastructure and Developer Contributions
Rep ID	SDLP1481
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP11
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note <i>The text below is an extract from the original representation which is attached to SDLP1438.</i></p> <p>SP11 Infrastructure and Developer Contributions</p> <p>Paragraph 9.26 highlights the need for infrastructure, particularly transport infrastructure, and paragraphs 9.27 to 9.29 point out the difficulties of establishing what infrastructure is required to support each potential new development. Paragraph 9.30 concludes that infrastructure is best provided by Section 106 agreements rather than by a Community Infrastructure Levy (CIL). This underpins Strategic Policy 11 which concludes by stating that "In determining the nature and scale of any provision, the Council will have regard to viability considerations and site-specific circumstances."</p> <p>This statement, in effect and in practice, has allowed developers to reduce progressively the Section 106 payments and other conditions imposed on developments at the time of granting permission by suggesting that their potential developments are not financially viable once all the constraints have been factored in. A CIL would provide developers, planners and residents with the certainty of knowing what the community costs would be.</p>

	It is not the Council's role to have regard to any planning application's financial viability. It is the responsibility of the applicant to have in place sufficient funding or access to sufficient funding in order to realise the project. It is the Council's responsibility to determine the use of the land and the conditions which make that use appropriate, and answer for its decisions before the electorate.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The plan would become more sound and effective if it included Council intention to implement a CIL before the Plan has run a quarter of its projected course, and a further sentence should be added to SP11 stating that: "The Council intends to introduce a Community Infrastructure Levy as soon as possible but before 2025 so that the council, developers and residents can more clearly understand the financial requirements of any agreed planning permission."
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 11 - Infrastructure and Developer Contributions
Rep ID	SDLP1727
Rep Status	Processed
Consultee ID	1333477
Consultee Full Name	Cllr T Byfield
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP11
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note: The text below is an extract from the original representation which is attached to SDLP1438.</p> <p>Dover District plan report on Development management</p> <p><i>I have been tasked with reviewing the Dover local plan in respect of design and development. This is a very large document, so I have tried to break it down into manageable portions.</i></p> <p><i>The Dover plan does acknowledge that there are constant improvements in design and the plan will need to evolve and to consider new technology, improvements in materials and methods of construction.</i></p> <p><i>I have therefore taken the policies which are attached at the end of this document and extracted sections which I think will be of interest the town council and where I believe comment is due.</i></p> <p><i>I believe that the planning committee needs to be aware of these points extracted. My comments in italics</i></p> <p>There are number of issues not clearly addressed, such as if developers would be made to better fund road improvements not just section 19.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 11 - Infrastructure and Developer Contributions
Rep ID	SDLP1976
Rep Status	Processed
Consultee ID	1273818
Consultee Full Name	Neil Oldfield
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP11
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Comments refer to the whole plan but I have particular concerns about the Walmer area plans When new housing is built it requires infrastructure: more and new roads, GP surgeries, schools, sewers, shops, etc. Dover District Council is not effectively seeking contributions from developers under section 106 agreements and the community infrastructure levy. DDC and local councilors are too cosy with the local developers and not setting the right level of infrastructure developed.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Proper cost contributions from developers and proper investments in existing and new infrastructure, legally enforceable obligations between DDC and developers. More supervision and inspection of developments and infrastructure by DDC
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I expect councillors and planners to do their job and enforce the obligations of developers to develop safely and to upgrade and future proof infrastructure.
Include files	
Local Plan Consultation Point	Strategic Policy 11 - Infrastructure and Developer Contributions
Rep ID	SDLP1781
Rep Status	Processed
Consultee ID	1331526
Consultee Full Name	Mrs Mairi Jones
Consultee Company / Organisation	

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note: Please see detailed representation (attached at 1770) which has been divided against numerous consultation points. The representation has images within the text. The text below is an extract from the detailed representation 'by an Alkham resident'.</p> <p>4 Planning for Climate Change</p> <p>The Plan identifies several measures , including sustainable design, reduction of NOX emissions, modal transport shifts etc</p> <p>Comment 4: I support the broad principles of low carbon design , incorporating low carbon technologies , maximising green infrastructure and consideration of sustainable transport modes and will return to this latter point later in the transport section</p> <p>No comment is made on the introduction of wind turbine development nor on the potential for solar hillside panels on the south facing sides of the valley, as I am not aware of any locally planned development in this respect.</p> <p>I welcome the steps being made which relate to water efficiency and would advise that through local action, the Water Authorities, the Parish Council and local landowners have tried to mitigate risk of flooding as the aquifer fills and manage surface water problems as they arise in Alkham. However I have concerns that as sewage regularly backs up in the base of the valley in winter, this possibly indicates a lack of capacity for housing expansion, an infrastructure problem which requires addressing.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Please see appended report
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I can speak to any of the points raised in the attached document
Include files	
Local Plan Consultation Point	Strategic Policy 11 - Infrastructure and Developer Contributions

Rep ID	SDLP1887
Rep Status	Processed
Consultee ID	1272184
Consultee Full Name	Tony and Valerie Armitage
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP11
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The Deal/Walmer road system will not cope if permission is given for anymore developments; SAP14, SAP15, SAP34 are unsound Congestion caused by over-development along the Dover Road from Ringwoud into Deal will result in traffic queues more frequently than at present making walking and cycling irresistible. June 2020 Deal Town Council report requires pavements, cycle lanes, wide roads and detailed junction plans. Traffic in Kingsdown would be gridlocked winter and summer
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	In an ideal world- Ringwoud Road in and out of Kingsdown to have cycle lanes and walking paths. Park and pedal scheme I Borrowpit Carpark to be activated Glen Road / Liverpool Road to have cycle lanes and walking paths St James Road / Upper Street junction to be redesigned and made safe to take all the construction traffic. Alexander Road / Upper Street junction to be redesigned and made safe to take construction / extra traffic
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

Strategic Policy 12 - Strategic Transport Infrastructure

Local Plan Consultation Point	Strategic Policy 12 - Strategic Transport Infrastructure
Rep ID	SDLP19
Rep Status	Processed
Consultee ID	1259309
Consultee Full Name	Mr Peter Jull
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP12
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>3.227 references KCC's Growth Without Gridlock which include a North Deal access road. This Local Plan doesn't mention it.</p> <p>The latest iteration of the Dover & Deal Transport Model Forecast acknowledges that the London Road/Manor Road junction operates, and will operate, above capacity in the am & pm peak hours and that there is no scope or space for mitigation. Even so it fails to evaluate or address the nearby Middle Deal Road/London Road junction which only operates with the goodwill of drivers in the Manor Road/London Road tailback when, as it frequently does during peak hours, stretches beyond Middle Deal Road blocking free egress. There is also no mention of the length of queues in Mongeham Road for drivers trying to join London Road, because of the volume on traffic thereon during peak hours.</p> <p>No attempt has been made to evaluate the impact of a North Deal Access Road, if it were built, on the level of traffic on London Road, without which it will be impractical to know how to assess windfall sites or other applications in and around Deal that might add to peak hour traffic on London Road.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>3.227 should be extended with: Growth Without Gridlock includes a North Deal Access Road which the Council will actively support. Any approved development that will add to the level of traffic on London Road will be required to make contributions under s106 towards the construction costs of this road.</p>

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	To provide any clarifications and answer any questions not anticipated by the written response.
Include files	
Local Plan Consultation Point	Strategic Policy 12 - Strategic Transport Infrastructure
Rep ID	SDLP152
Rep Status	Processed
Consultee ID	1329874
Consultee Full Name	Ms Nicola Purcell
Consultee Company / Organisation	Aylesham Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP12 Strategic Transport Infrastructure
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Over the past few years, Aylesham has seen a vast amount of development. This has put considerable strain on local amenities such as local shops and medical services.</p> <p>Any possible future developments, whatever size, must provide Aylesham with additional facilities, in particular for young people, local shopping facilities and the infrastructure that will allow more people to move freely around the village.</p> <p>Aylesham Parish Council believes that any future development must improve amenities and provisions for young people.</p> <p>In terms of transport, all future developments must focus on pedestrian and cycle traffic. With emphasis on the improvements of train and bus services appropriate to the size of the Parish, rather than road users to both combat road traffic and assist with the climate emergency.</p> <p>Aylesham and Snowdown only have a regular bus service to Canterbury, and more recently there have been attempts to end school bus services to Dover. New development should bring a net increase in public transport, not a steady decline.</p> <p>In addition, there is considerable strain on local roads and any future development must be accompanied with a plan to make significant upgrades to key routes such as Spinney Lane and B2046 (Adisham Road).</p> <p>Any chances of alleviating road traffic are severely hampered in Aylesham. Both the bus services and train service to Aylesham and Snowdown are completely substandard. Aylesham Train Station and Snowdown Train Station are both inaccessible for many residents.</p>

	<p>Aylesham Parish Council would welcome the opportunity to work with Network Rail and Southeastern to address the ongoing issues with train access to both Stations.</p> <p>Aylesham Parish Council believes that any further development can only happen after improvements to both the bus and train services to and from both Aylesham and Snowdown. Ensuring provisions are sustainable, accessible and appropriate for the size of the whole Parish.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
Include files	
Local Plan Consultation Point	Strategic Policy 12 - Strategic Transport Infrastructure
Rep ID	SDLP463
Rep Status	Processed
Consultee ID	1266351
Consultee Full Name	Dr Sharon Danby
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	SP12 - strategic transport infrastructure
<p>2 - Do you consider this part of the Plan sound?</p>	No
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared</p> <p>Justified</p> <p>Effective</p> <p>Consistent with National Policy</p>

4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The plan as it stands is unsound as bus services have been cut leaving rural communities with very poor connectivity to larger settlements and rail links. For SP1 and SP12 to be linked up and for the DDC to meet its carbon zero commitments, bus services should be reinstated and better integrated with the rail service timetables on the line running from Sandwich and Deal through Dover to Ashford, and the line running from Dover to Canterbury and Faversham and Victoria.</p> <p>DDC are on record 2021 'proposals generating levels and types of traffic movement resulting in severe cumulative residual impacts in terms of capacity and road safety will not be permitted'. The current plan has failed in effectiveness and to be effective and justified the new plan must cut the number of housing allocations particularly in rural areas to reflect the struggling roads and public transport network.</p> <p>The constraints of the East Kent road system (A258, A2, A256,) mean little can be done to ameliorate the situation, without long term road closures needed to dual the A2 from Jubilee Way to Lydden Hill. Neglect by DfT and Highways England means that with biometric passport checks in 2023, residents can expect gridlock again and again.</p> <p>Road improvements to separate local traffic from through freight traffic must be done to save lives; road improvements that central govt must pay for. The separation needed must include flyovers and underpasses and foot bridges, including under / over the A20 route through Dover town. It should be noted that Dover has too much experience of the gridlock and chaos caused by cross-channel delays. With more extreme weather events expected, and with 'frictionless freight flow' now a thing of the past, holding areas for freight OUTSIDE THIS DISTRICT, near the M25, are needed more now than they were before.</p> <p>Dualling of the A2 is needed from Eastern Docks to Lydden Hill. The separation of local traffic from through freight traffic by means of flyovers and underpasses at the Duke of York, and Whitfield roundabouts must be done at the expense of central govt, Dept for Transport/ Highways England. Residents of the garden of England should not suffer because national traffic flows on our roads, given the failure of implementing freight to rail policies.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>Dual the A2</p> <p>Improve access across the district to rail networks.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 12 - Strategic Transport Infrastructure
Rep ID	SDLP343
Rep Status	Processed
Consultee ID	1331495

Consultee Full Name	Peter Jull
Consultee Company / Organisation	Deal & Walmer Chamber of Trade
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP12
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	In response to the updated traffic figures in the evidence base Kent Highways have accepted at last that the London Road/Manor Road operates well above capacity during peak hours and no further development can be considered that would add to traffic flows though that junction. It is accepted that there is no possible mitigation to increase capacity at that junction. That judgement indicates that there can be no more economic development in Deal during the plan period at least. KCC's Growth Without Gridlock document supports a north Deal access road which would resolve the issue but there is no indication that there has been any co-operation between DDC & KCC to pursue this issue.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	SP12 requires an additional clause committing to pursue a north Deal access road in co-operation with KCC and supporting development that would contribute to the cost of its construction including employment land, none of which has been allocated to Deal in this plan
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	To clarify what is required if there is any uncertainty from the written response and to rebut any argument against its inclusion.
Include files	
Local Plan Consultation Point	Strategic Policy 12 - Strategic Transport Infrastructure
Rep ID	SDLP795

Rep Status	Processed
Consultee ID	1259612
Consultee Full Name	Mr Chris Shaw
Consultee Company / Organisation	Langdon Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP12 - Strategic Transport Infrastructure Clause 3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	There is no reference to this provision within the proposed site allocation at East Langdon.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Include the current and projected bus service levels which would encourage a sustainable use by residents, thus reducing unnecessary car usage into local town centres and business parks work work and shopping purposes.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 12 - Strategic Transport Infrastructure

Rep ID	SDLP500
Rep Status	Processed
Consultee ID	1331555
Consultee Full Name	Mr. Trevor Johns
Consultee Company / Organisation	Alkham Valley Society
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	3.233
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	There are unintended side effects to the plan forcing traffic because of the widespread use of sat navs into inappropriate single lane roads within areas of the Alkham valley ANOB endangering walkers cyclists, horse riders, wildlife and the biodiversity of the area
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Alkham Valley road is an unclassified local road unsuitable for expansion and already operating near capacity as well as being unsuitable for heavy or fast traffic. Any major road upgrades should be planned in conjunction with traffic calming measures to avoid unintended adverse consequences.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

Local Plan Consultation Point	Strategic Policy 12 - Strategic Transport Infrastructure
Rep ID	SDLP495
Rep Status	Processed
Consultee ID	1268017
Consultee Full Name	Ms Penelope James
Consultee Company / Organisation	Dover and Deal Liberal Democrats
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	3.222 and 3.233
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	n/a
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>While we agree that the A2 at Dover needs dualling urgently and the roundabouts at Whitfield and Duke of York also need upgrading, but how can residents be ensured the A256 to Deal and Walmer will not be impacted severely as a result? The A256 finds it difficult to cope with heavy traffic as it is, and drivers increasingly take to rat runs through the local villages to avoid it.</p> <p>Other local villages will also be impacted by the proposed upgrading of key junctions along the A256, in particular at the junctions with the A257 and A258. We accept this is needed, but this will impact on villages nearby. What mitigation is planned for this?</p> <p>Also concerned how the A250 to Folkestone particularly through Denton and Wingham is going to cope with the increased traffic (car, bus & HGV) which will be created by the new residential development proposed at Aylesham. The A250 at Denton is not wide enough for two HGVs or buses to pass each other as it is, and the road cannot be widened as homes are located right on the road. What mitigation is planned for Denton and Wingham?</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	n/a

Include files	
Local Plan Consultation Point	Strategic Policy 12 - Strategic Transport Infrastructure
Rep ID	SDLP1060
Rep Status	Processed
Consultee ID	1331808
Consultee Full Name	Mr Robert Hogben
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	1 Introduction
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The plan is unsound as it does not comply with the legally binding commitment made by DDC when they declared a climate emergency in 2020 and prepared their climate change strategy. The plan will not do enough to meet the target of the district being net zero by 2050. DDC should be much more ambitious about the green credentials of new housing. If new homes generated their own power, were insulated to the highest standards, and collected rain water, it would greatly help stretched local services and go a long way towards making the housing stock fit for the coming decades.</p> <p>The regulation 19 stage of the consultation is not fit for purpose as it is overly complicated and very difficult to use. The process has left many members of the public including me and my wife feeling overwhelmed and confused as to how to make a representation. For those who are working full time this has been a task for which they do not have enough time. As a result those who may have wanted to make a submission have not been able to. The format of the submission form is also difficult to navigate. Without prior experience of planning law it is difficult to say whether a part of the plan is legal or not. As to the duty to cooperate it is impossible to know. The unsound plan needs updating after the government announcement on 5/12/22 that mandatory housing targets are not to be imposed. The figure of nearly 11,000 is unsustainable and should now be reviewed, particularly with respect to allocated land around Station Rd Walmer and proposed developments around villages.</p> <p>The character and landscape value of the district is being rapidly eroded under the current plan and this must not continue as it is contrary to NPPF 21. It is not sustainable to build on agricultural land which is in short supply as we are only 50% self sufficient in producing food in the UK. The CPRE has found that almost 14,500 hectares of farmland has been permanently lost to development since 2010. The contribution from the districts agricultural land is of vital importance. Much of the agricultural land is also vital for flood protection, and field margins are important for wildlife and biodiversity, forming corridors between habitats for vertebrates and nesting and roosting sites for birds. Dover District also has a wealth of character landscapes, AONB, heritage coast, nature reserves, internationally rare chalk grassland and rewilded areas such as Betteshanger Park. Overdevelopment under the last weak plan has meant that these areas are under pressure and being denuded as their boundaries are eroded and wildlife corridors between sites are cut off. The new plan does not do enough to protect these areas, wildlife and</p>

	<p>biodiversity. Developments should not be allowed to remove ancient woodlands and trees and biodiverse rich habitats even if it is argued that this is for the greater good. This is not sustainable as all nature is interconnected and if it fails then we all fail. The UK is one of the worst countries in the world for biodiversity loss, we have lost half of our biodiversity since the 1970's.</p> <p>Development has been at such a pace that infrastructure cannot keep up. Buses have been cut recently, cycle and pedestrian routes have not been upgraded sufficiently to connect some developments to main bus and train routes without car dependence. Aylesham has not had a secondary school which would mean children could walk to school. Many rural communities are entirely car dependent due to lack of buses and the roads not being safe to use their bikes. Not enough emphasis is put on renovating existing housing stock to provide greener, insulated, fuel efficient homes. Each new build generates around 56 tonnes of embedded carbon. The NPPF states that we should prioritise brownfield sites over greenfield but although there are many opportunities to develop brownfield sites in Dover, this has not been prioritised. Many developments have been for larger houses in villages and there is not enough provision for affordable housing.</p> <p>The wording of the local plan is not definitive, it leaves too many loop holes and vague preferences which enable large developers to argue and get what they want, to maximise profits, not what the people of the Dover area need.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Better mapping and understanding of the Dover District, taking into account internationally rare areas of chalk grassland, woodland and trees wherever they occur.</p> <p>Large buffers around the AONB to protect its character from the built environment. Stronger protection for the AONB and the Ripple LCA F3.</p> <p>Tighter protections on our remaining biodiversity.</p> <p>Tighter definitions in the local plan so that developers have no room to argue what has been specified in the local plan.</p> <p>Hire several biodiversity officers to monitor closely and prevent loss of ancient woodland, chalk grassland, veteran trees, protected wildlife and rich habitats and to actively go out into the community, looking for ways to improve biodiversity by such things as accessing grants for hedge planting and the creation of ponds where ever possible in our district.</p> <p>Employ experts to liaise with farmers in our area to encourage the most environmentally friendly farming and land management practices which will encourage maximum biodiversity in the countryside and maximum sequestration of carbon in soils and biomass.</p> <p>Stop the use of agricultural land for development.</p> <p>Renovate and insulate rather than build new houses, brownfield not greenfield.</p> <p>Turn attention away from destroying village communities with unsustainable housing estates outside their village boundaries.</p> <p>Do not give developers the get out clause of financial mitigation for destruction of wildlife and habitat. No development should further deplete our critically low levels of biodiversity.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>Strategic Policy 12 - Strategic Transport Infrastructure</p>
<p>Rep ID</p>	<p>SDLP607</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331790</p>
<p>Consultee Full Name</p>	<p>Julie Davies</p>

Consultee Company / Organisation	CPRE Kent
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP12
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Despite the Council's aspirations for a 'spectacular and sustainable environment', in terms of climate change and reducing reliance on the private car, it is clear that the strategic transport infrastructure is being driven by traditional road transport – with lip service being paid to strategic <i>sustainable</i> transport infrastructure.</p> <p>Modelling has identified strategic and local junctions which are detrimentally affected by growth of traffic identified from allocations – this, in itself is surely an indication that development not being sited in the most suitable places.</p> <p>Increased rural bus network connectivity is welcomed. However, with KCC withdrawing its bus funding subsidies, CPRE queries whether this increased connectivity has been confirmed in its Infrastructure Delivery Plan. Have Statements of Common Ground been signed confirming that the bus operators are in agreement; and it is clear what infrastructure will be required, who will provide it, where it will be delivered, when it'll be delivered and how much it will cost?</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	CPRE Kent would wish to participate at the examination hearings to explore these issues further.
Include files	
Local Plan Consultation Point	Strategic Policy 12 - Strategic Transport Infrastructure
Rep ID	SDLP1054

Rep Status	Processed
Consultee ID	1331838
Consultee Full Name	Christian Pryce
Consultee Company / Organisation	Dover Harbour Board
Agent Full Name	Paul Carnell
Agent Company / Organisation	Strutt and Parker
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	TIF - Overnight Lorry Parking Facilities
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>These representations to the Regulation 19 stage local plan consultation are made by Dover Harbour Board. The Harbour Board is responsible for the administration, maintenance and improvement of the harbour at the Port of Dover, which itself is the busiest international roll-on roll-off ferry port in the UK.</p> <p>The Port of Dover is one of the UK's most important strategic economic assets. The Port of Dover is the UK's busiest international ferry port, handling more lorries than all other UK ports. Its operation is capable of facilitating 120 ferry movements and 110 miles of freight per day. £144bn worth of UK trade and 33% of all trade with the EU is handled by the Port of Dover.</p> <p>Further, Dover is the UK's second busiest cruise port. Over 200,000 cruise passengers visit the Port of Dover, a number The Harbour Board is actively looking to grow. Embarkations on day trips and excursions directly boost the local and regional economy, with an average passenger spend equivalent to £322 pre-embarkation, and £84 during a port visit. The benefits to the local Dover economy are significant; it is estimated that this generates circa £47m of direct passenger spending annually in the local economy. The Port of Dover indirectly supports over 5,000 jobs, many of them in the local area, many of which would be affected by any reduction in cruise calls.</p> <p>The Port of Dover therefore is a significant stakeholder in Dover District with a large influence on the local economy, both directly in terms of visitors, passenger throughput and employment, and indirectly by its impact on the highway network. The Harbour Board considers that the emerging Dover Local Plan needs to appropriately consider and account for the aspirations of The Harbour Board to improve operations more widely and plan for a low carbon future.</p> <p><i>Port Operations</i></p> <p>Port activity and operations can have a wide impact on the District and County. This is particularly the case in terms of highways given the volume of freight and passenger traffic experienced each year. This results in logistical challenges to ensure effective port operations which safeguard the economic benefits delivered by the Port, whilst also ensuring any adverse impacts on the locality are limited.</p> <p>In recent years the Port of Dover has experienced more periods of travel disruption (outside of The Harbour Board's control) than has previously been the case, resulting in national and international media coverage. This has had an adverse impact on the Port itself and Dover District. The Harbour Board is therefore committed to reducing wider impacts on both the highway network and the amenity of local residents from future disruptions to channel crossings.</p>

Draft Policy T14 – Overnight Lorry Parking Facilities

Paragraph 109 of the National Planning Policy Framework (NPPF) notes that “*Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance.*”

A lack of overnight parking in Dover District has been identified by Kent County Council and Draft Policy T14 seeks to address this issue through a criteria-based policy for a lorry park and associated facilities. The Harbour Board supports the principle of such provision to remove HGVs from the highway, but the provision of a truck stop alone deals with only part of the identified problem, especially at times of channel crossing disruption.

Dover District Council are aware of the Harbour Board’s intention to deliver an Inland Terminal. This is considered a vital piece of Port infrastructure which will need to come online during the plan period (see below for further detail). Lorry parking facilities and the Inland Terminal are compatible and complementary land uses (as evidenced by the facilities provided at Sevington in Ashford) and The Harbour Board considers that there are significant benefits of co-joining these facilities.

Inland Terminal

Dover Harbour Board needs to deliver an Inland Terminal Facility. This is required to ease pressure on the Port of Dover by supplementing existing facilities or, in some cases, relocating them entirely to the inland site. There are a number of reasons why the Port needs this facility.

EU Entry/Exit System (EES)

The Council will be very aware of the Dover Traffic Assessment Project (TAP) and the associated Brexit Operations Across Kent, otherwise known as Operation Brock. These are measures put in place to deal with HGV traffic when Port operations have been disrupted, for example as a result of delays to channel crossings. The aim is to regulate the flow of HGVs into Dover along the A20 and M20 to ease congestion and allow residents and other users of the strategic road network to access Dover and go about their business.

The measures include left hand lane only use of the A20 by HGVs, queuing on the A20, contraflows on the M20, separation of traffic between Euro Tunnel and the Port, and the use of Manston Airport as a temporary lorry park.

TAP and Operation Brock are emergency measures to keep non-freight traffic moving and allow HGVs and their drivers to be safely located whilst the problems causing issues at the Port are dealt with, and until such time as crossings and travel return to normal. However, events in the past 12 months have demonstrated that significant disruption can still occur, particularly at times of prolonged delays. This results in an economic cost in terms of time lost by both freight business and other road users, and also a social cost given the number of lorry drivers held for long periods on motorway and trunk road verges with no welfare facilities.

The Harbour Board have been looking at more permanent solutions. However, the pending introduction of the EU Entry/Exit System (EES) is a further driver to pursue this goal. EES is a large-scale IT system that is being implemented as part of the European Union’s ‘Smart Borders Package’, and is due to launch in May 2023. It will enable automatic monitoring of border crossings by ‘third-country nationals’ into and out of the EU. This includes UK nationals in addition to all members of non-EU states outside the Schengen Area.

The system will register a person’s name, type of travel document, biometric data (fingerprints and captured facial images) and the date and place of entry and exit, and will fully replace the system of manually stamping passports. The Port of Dover has undertaken an assessment of the impacts of EES and has concluded it is very likely to have a profound effect on its operations if undertaken within the bounds of the Port itself. In a worst case scenario this would include excessive queues outside the Port for up to 365 days per year, necessitating the permanent operation of TAP and Operation Brock.

The provision of an appropriately located Inland Terminal facility would help to alleviate pressure on the Port and A20 given it would allow certain checks to be undertaken prior to entry to the main Port facility, speeding up operations whilst also removing large numbers of HGVs off the road and allowing drivers to rest and use welfare facilities.

Facilities/Welfare

An Inland Terminal facility would allow provision of significant improvements to HGV driver facilities in the District. This would enable the Port of Dover to contribute toward the wider government objective of improving conditions for HGV drivers and logistics workers more generally.

The Government’s Road Freight Supply Chain Transport Committee¹ noted the difficulties the sector has had with recruitment and retention of staff, both of which contributed to the wider supply chain shocks experienced since the start of the pandemic. The committee heard evidence that one of the key reasons drivers do not stay in the sector is the lack of high-quality rest facilities, especially on key road freight routes.

Therefore improving the working conditions of HGV drivers is an important element of both retaining staff and encouraging others to choose transport logistics as a career.

This issue is also raised in the Department for Transport's publication "Future of Freight: a long-term plan" (June 2022)² which includes 'People and Skills' as one of its priority areas. One strategic goal is to ensure "*the freight and logistics sector will be seen as an industry of choice for a diverse group of talented and skilled people at all stages of their career and will have the people and skills that it needs to thrive*". Improving general working conditions through the provision of better facilities for drivers will be an important part of the wider strategy to improve the UK's freight and logistics sector.

Sustainability

The Inland Terminal would also be an important element of The Harbour Board plans to decarbonise Port of Dover activity and respond to wider changes in logistics such as the predicted increase in electric vehicles. This is explored more generally later in this representation, but the Inland Terminal would provide opportunities for on-site microgeneration of power and opportunities for electric vehicles to recharge where necessary before proceeding to the port.

Co-location of Inland Terminal and Overnight Lorry Park

An overnight lorry park and the Inland Terminal facility share a common set of site search criteria. They both require a large, level site which can be appropriately accessed from the Strategic Highway Network without causing disruption for other road users. They should also be located in close proximity to the Port, provide opportunities for landscaping to limit visual impact, be able to deliver biodiversity net gains and be located an appropriate distance from sensitive receptors such as residential properties.

There is a need to deliver the Inland Terminal and overnight Lorry Parking in Dover, but the very specific site criteria noted above reduces the amount of suitable sites in the District. The Local Plan should therefore seek to co-locate these facilities in order to increase the chances of delivery of both pieces of important infrastructure.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Recommended Policy

The Harbour Board proposes amendments to Policy TI4 so that it includes an area of search for the co-joined Inland Terminal and Lorry Park.

The most appropriate location for an Inland Terminal would be to the east of the Roundhill Tunnels. This would ensure the facility is located wholly within Dover District and reduces the potential for conflict with Eurotunnel traffic and operations. It would also allow The Harbour Board to manage Port traffic more efficiently (through use of traffic cameras etc).

Land within the Kent Downs Area of Outstanding Natural Beauty (AONB) should not be excluded from the Area of Search. The NPPF provides a high degree of protection against inappropriate development in AONBs. Paragraph 177 notes applications for major development (such as an Inland Terminal/Lorry Park) should only be allowed in "*exceptional circumstances*" and where it can be demonstrated that "*the development is in the public interest*".

The need for the Inland Terminal within the area of search suggested by The Harbour Board is significant and could meet these tests, which set a high bar for development proposals. This should be tested at Planning Application stage rather than excluded by Local Plan Policy.

The Harbour Board is therefore proposing an area of search along the A20 corridor, east of the Roundhill Tunnels.

An amended criteria-based policy should then be applied to potential development sites which come forward. The following amended Policy text is recommended:

TI4 – Inland Terminal and Overnight Lorry Parking Facilities

Inland Terminal Facilities to serve the Port of Dover to include overnight lorry parking facilities will be supported, subject to other policies in the Local Plan, within the following areas of search:

- *A20 corridor east of the Roundhill Tunnels*
- *A2/M2 Corridor*

Development will be subject to the following criteria:

- 1 *The site must be accessed from the Strategic Road Network (A20);*
- 2 *Applications must be supported by a Landscape and Visual Impact Assessment which informs the site layout, capacity and mitigation requirements;*
- 3 *A comprehensive landscape scheme should be provided to conserve and enhance the AONB and/or its setting;*
- 4 *Proposals for the mitigation of noise and air quality impacts from lorry movements and any associated commercial, welfare and support services will need to be provided as part of any application;*
- 5 *A lighting strategy must be submitted with any application and suitable mitigation will be required to deal with artificial lighting, to restrict the impact of the development on neighbouring residential properties or vulnerable uses;*

	<p>6 Adequate space for access, sight lines, turning and manoeuvring must be provided in addition to the required parking spaces</p> <p>The inclusion of a Policy which seeks to deliver inland terminal facilities will ensure Dover District Council retains control over the provision and location of these facilities.</p> <p><i>Summary</i></p> <p>The NPPF sets out that the purpose of the planning system is to contribute to the achievement of sustainable development. Achieving sustainable development includes an economic objective – to help build a strong responsive competitive economy. Local planning policies and decisions are expected to help create the conditions in which businesses can invest, expand and adapt.</p> <p>The NPPF makes clear that planning policies and decisions should recognise and address the specific locational requirements of different sectors and that planning policies should also provide for large scale transport facilities, located in areas of need, taking into account any local shortages.</p> <p>The 'Future of Freight' document notes that <i>"In 2021, the Department for Transport made a Written Ministerial Statement with the Department for Levelling Up, Housing and Communities, which made clear that in preparing local plans and deciding planning applications, the specific locational requirements of different industrial sectors should be recognised and addressed by local planning authorities."</i></p> <p>The Inland Terminal will be needed by Dover Harbour Board during the life of the plan. It is a key piece of infrastructure required to support The Port of Dover and its continued substantial contribution to the local and national economy. There is a need to provide significantly improved driver welfare facilities as part of the wider government strategy to create attractive working conditions within the transport and logistics sector. Further, there is an identified local need for a facility to take HGVs off local roads.</p> <p>Delivery of a site that can provide a co-located facility would represent a positively prepared, justified and effective strategy consistent with national policy. The plan would be unsound without these proposed amendments to the policy.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	The Port of Dover is a significant stakeholder within Dover District. Matters relating to its effective operation have a direct impact on the wider district with implications to the national economy. Therefore it would benefit the Inspector to have Dover Harbour Board present at the examination in public.
Include files	
Local Plan Consultation Point	Strategic Policy 12 - Strategic Transport Infrastructure
Rep ID	SDLP758
Rep Status	Processed
Consultee ID	1331862
Consultee Full Name	Sindy Denyer
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Reference: Infrastructure Delivery Plan – Draft for Consultation October 2022 PART 1: Physical Infrastructure Theme 1: Transport SP12 - Strategic Transport Infrastructure- Bus Infrastructure note b: The Council will support proposals for the rural demand-responsive bus service and other improvements to local bus service provision. SAP 36,37, 28, 29 and 30 will place significant pressure on Shepherdswell local transportation routes & amenities, the plan is unsound as there is no commitment to address funding and improvement of services in the Dover Local Plan or SP12.

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>SP12 uses as part of the evidence base Transport for the South-East Transportation Strategy for the South East 2020 report which acknowledges bus services have come under significant pressure in rural areas limiting public transport service provision and increasing car dependency. The report recommends government funding to protect services to vulnerable populations and enhance socially necessary bus services in rural areas.</p> <p>In 2022/23 KCC transport authority budget and service provider cuts have radically reduced the rural bus network in Shepherdswell, Coldred, Elvington, Eythorne as well as other surrounding villages, leaving vulnerable parishioners isolated and unable to access key services. Currently Elvington and Eythorne resident main access to public transport is through Shepherdswell Train Station involving a 2 mile walk along an unlit rural road without pavements representing a significant road safety concern. Shepherdswell residents seeking employment in the Eythorne trading estate face a similar dilemma.</p> <p>SP12 states that consultation with Network Rail will seek to increase rail service frequency from hourly to every 30 minutes from Shepherdswell Station however disabled access and first and last mile improvements (car parking, cycling parking, pedestrian access improvements) should be implemented. Additional community run for hire bus services should be made available to improve the availability of public bus services to Shepherdswell, Coldred Elvington and Eythorne. SP12 does not address required future funding to support improvement of public transportation services to Shepherdswell and Coldred, Elvington and Eythorne or surrounding villages so the feasibility of implementing these requirements is in question.</p> <p>The Dover Local Plan SAP36 and SAP37 has proposed 70 new houses are built in Shepherdswell and SAP 51 Coldred 5 new houses: SAP36 access to public transportation involves pedestrian or cyclist travel to Shepherdswell train station along largely unlit roads without pavements a public road safety concern. SAP37 transport statement specifies that the development must account for the cumulative impact of all developments allocated in this Plan on common road links. The Dover Local Plan for Eythorne and Elvington, SAP 28, 29 and 30 proposes 355 new houses (where public transportation services were withdrawn in Sept 2022).</p> <p>If all developments were to move ahead Shepherdswell will be the nearest centre to access train services and the main route by car to the A2 road network. SAP 36,37, 28, 29 and 30 will place significant pressure on Shepherdswell local transportation routes & amenities however there is no material consideration to address funding and improvement of services in the Dover Local Plan or SP12. Additionally there are no substantive measures to ensure a variety of transportation alternatives required within the Dover Local Plan (ref: Transportation Plan Section 29 T11 - Sustainable Transport and Travel page 301).</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	To implement the Dover Local Plan critical public transportation support gaps must be addressed and appropriate funding for infra-structure improvements allocated.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 12 - Strategic Transport Infrastructure
Rep ID	SDLP1036
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Transport and Infrastructure
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p><u>Highways and Transportation:</u> The document is relatively silent on policy relating to the emerging Dover Fastrack project (formally known as Dover BRT). It is essential that this extremely important project is reflected in specific policy requirements relating to.</p> <ul style="list-style-type: none"> • Identified routes that should be secured within the Whitfield/Dover areas that are safeguarded for the provision of Fastrack infrastructure. • Funding requirements of bus services and off-site infrastructure (potentially within the Infrastructure Delivery Plan). • Provision of on-site highway routes and complimentary infrastructure. • Strategy for the ongoing maintenance of bus shelter infrastructure, identifying delivery partners and funding opportunities. • Requirements in relation to development phasing and an active policy to avoid ransom between different phases of development.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will	It is essential that this extremely important project is reflected in specific policy requirements

make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 12 - Strategic Transport Infrastructure
Rep ID	SDLP1018
Rep Status	Processed
Consultee ID	1331955
Consultee Full Name	Matthew Porter
Consultee Company / Organisation	Danescroft Land Ltd and Pentland Homes Ltd
Agent Full Name	Matt Porter
Agent Company / Organisation	DHA Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy SAP1 - Whitfield Urban Extension Policy SP3 - Housing Growth Policy SP4 - Windfall Development Policy SP11 - Infrastructure and Developer Contributions Policy SP12 - Strategic Transport Infrastructure
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	We consider that the plan is sound, for the reasons set out in the consultation response submitted on behalf of Danescroft Land Ltd and Pentland Homes Ltd (ref DHA/30242).
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	For the reasons set out in the consultation response submitted on behalf of Danescroft Land Ltd and Pentland Homes Ltd ref DHA/302 42, no modifications are proposed.

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	On account of the scale of the allocation proposed at Whitfield, we consider it necessary for our clients to participate in the oral part of the examination. Please refer to the consultation response submitted on behalf of Danescroft Land Ltd and Pentland Homes Ltd (ref DHA/30242).
Include files	DHA_30242_DDC Regulation 19 Consultation Response.pdf
Local Plan Consultation Point	Strategic Policy 12 - Strategic Transport Infrastructure
Rep ID	SDLP1055
Rep Status	Processed
Consultee ID	1331933
Consultee Full Name	Nigel Snape
Consultee Company / Organisation	
Agent Full Name	Paul Carnell
Agent Company / Organisation	Strutt and Parker
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	TIF - Overnight Lorry Parking Facilities
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Dear Sir/Madam, Dover District Council Local Plan Publication Stage (Regulation 19) Consultation Comments in relation to Policy T14 Strutt and Parker's planning team has been instructed by HW Snape and son to make representations to the Regulation 19 Dover District Council Local Plan consultation. Our clients are farmers in the District with land holdings located to the west of Dover town. Our clients are aware that the Regulation 19 Stage Consultation is seeking comment on whether the Plan is 'Sound' in planning terms, meaning that it has been positively prepared, is justified, effective and consistent with national policy. We are instructed to respond to the consultation

in relation to Draft Policy T14 in relation to two matters; firstly the soundness of the policy as written; and secondly as to how our clients could facility its delivery during the plan period.

Draft Policy T14 – Overnight Lorry Parking Facilities

Soundness

Our clients have noted Draft Policy T14 – Overnight Lorry Parking Facilities with interest given their own experiences with HGV movements associated with the Port of Dover. There is no doubt that poorly parked HGVs causes problems in and around Dover. This issues worsens considerably when ferry crossings are delayed or cancelled (as has happened numerous times in the past 12 months). Problems with HGVs generally exacerbates when Operation Stack is implemented with HGVs backed up out of the town along all major routes into Dover.

The supporting text for the Policy notes at Paragraph 10.31 that “KCC surveys of overnight lorry parking have determined that the Dover area and A2/M2 corridor has significant numbers of HGVs parked inappropriately overnight, and that there are local shortages in parking provision to address this.” Our clients are concerned that the A20 has not been specifically referenced in this work.

Our clients land interests are to the west of Dover predominantly adjacent to and accessed by the A20 which also suffers from the same problems identified by Kent County Council surveys of the A2/M2 corridor. An appropriate site to deliver facilities which could offer HGVs a place to park overnight, or indeed to provide additional welfare for drivers as they approach Dover, should also be considered along the A20 corridor.

Our clients consider that Policy T14 (a) should therefore be amended as follows in order to make it properly effective:

*“The site must be accessed from the Strategic Road Network (A2/M2 corridor or **A20**). **Sites along the A2/M2 corridor should also be complimentary to the A2 Improvements.**”*

The A20 passes through the Kent Downs Area of Outstanding Natural Beauty (AONB) and our clients support policies which seek to protect its special character and landscape value. However, the problems associated with HGV movements along the A20 corridor are acute and have wider impacts than just within the boundaries of Dover District. The national and international news stories earlier this year in respect of HGV queues into the port, for example, resulted in significant reputational damage for Dover.

Protection is offered to the AONB by way of the National Planning Policy Framework (NPPF) which states at Paragraph 177 that applications for major development should only be allowed in “*exceptional circumstances*” and where it can be demonstrated that “*the development is in the public interest*”. It is possible that the development of a facility for HGV parking could meet these tests provided a site could be delivered together with all appropriate measures to address and mitigate potential harm to the landscape.

Our clients consider that the NPPF provides significant protection against harmful development in the AONB, and therefore the policy should not specifically exclude such sites from consideration.

Our clients consider that Policy T14 (b) should therefore be amended as follows in order for it to align with National Policy related to major developments in the AONB:

“Planning applications must be supported by a Landscape and Visual Impact Assessment which in turn should support the proposed layout of the site and its capacity. Development with the AONB will be supported where it complies with the provisions of the NPPF relating to major development in the AONB.”

Our clients consider that the above proposed changes to Policy T14 are necessary in order to make it effective, justified and consistent with National Policy.

Delivery

As noted above, our clients have first-hand experience of the problems associated with HGV movements to and from the Port of Dover. They support the delivery of facilities which would help to alleviate these problems, subject to the amendments proposed in this representation.

Our clients feel that they could contribute directly to delivering such a facility given their land ownership interests along the A20 corridor. Our client owns land within the area shown in the image attached:

The land is located immediately adjacent to the A20 and, significantly, a short distance from the Court Wood Interchange. The location adjacent to the interchange means the Site is uniquely able to provide access to both east and westbound HGVs using the A20 via upgrades of the existing junction rather than the provision of new highways infrastructure. This would therefore significantly reduce the costs of developing a facility in this location.

Furthermore, the site itself is relatively flat with screening provided by existing trees on its southern and western boundaries. The site topography provides opportunities for further landscaping which could appropriately screen the facility from longer range views. The site is not in close proximity with receptors who would be sensitive to noise impacts.

	<p>Our clients are keen to put this site forward into the local plan process to help facilitate delivery of this important piece of infrastructure.</p> <p>Our client would be keen to take part in the oral examination of the plan if it would help the Inspector consider the deliverability of the facility.</p> <p>Yours sincerely,</p> <p>Paul Carnell BA (Hons) MA MRTPI Associate Director</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Our clients consider that Policy T14 (a) should therefore be amended as follows in order to make it properly effective: <i>“The site must be accessed from the Strategic Road Network (A2/M2 corridor or A20). Sites along the A2/M2 corridor should also be complimentary to the A2 Improvements.</i></p> <p>Our clients consider that Policy T14 (b) should therefore be amended as follows in order for it to align with National Policy related to major developments in the AONB: <i>Planning applications must be supported by a Landscape and Visual Impact Assessment which in turn should support the proposed layout of the site and its capacity. Development with the AONB will be supported where it complies with the provisions of the NPPF relating to major development in the AONB.</i></p> <p>Our clients consider that the above proposed changes to Policy T14 are necessary in order to make it effective, justified and consistent with National Policy.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>Our client would be keen to take part in the oral examination of the plan if it would help the Inspector consider the deliverability of the facility</p>
<p>Include files</p>	<p>Dover rep.jpg</p>
<p>Local Plan Consultation Point</p>	<p>Strategic Policy 12 - Strategic Transport Infrastructure</p>
<p>Rep ID</p>	<p>SDLP930</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331999</p>
<p>Consultee Full Name</p>	<p>Claire Pamberi</p>
<p>Consultee Company / Organisation</p>	<p>Kent County Council</p>
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SP12</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is ‘unsound’, on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified</p>

	Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p><u>Highways and Transportation</u>: The A2 corridor is a key consideration within the proposed growth aspirations, it is important that this is reflected in policy, however this could equally form part of a future Transport Strategy for the district, which is absent from this round of consultation. Given the wide-ranging traffic challenges within the district, there would be merit in encompassing highway and transportation matters into a single supporting document. As the Dover Access Project is potentially several years away from being completed/clarified in full, it is accepted that mitigation proposals in relation to the A2 corridor will need to be suitably fluid in nature.</p> <p>Modelling forecasts indicate that infrastructure improvements are required on the A256 corridor. Given that this road corridor forms part of the Major Road Network, it would be prudent to consider policy to safeguard future upgrading opportunities on this road corridor.</p> <p>The policy should also specifically allow for the provision and maintenance of bus shelters under the heading of Bus Infrastructure.</p> <p><u>PRoW</u>: The County Council requests that this policy includes consideration for how walking and cycling opportunities, including the PRoW network, can be improved and how this investment in Active Travel will complement the road, rail and bus networks. The County Council is in discussion with National Highways for designated funding and funding through section 106 agreements should also be explored.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 12 - Strategic Transport Infrastructure
Rep ID	SDLP1318
Rep Status	Processed
Consultee ID	1252081
Consultee Full Name	Planning Department
Consultee Company / Organisation	Canterbury City Council
Agent Full Name	

Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP12
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Key strategic transport issues between Canterbury and Dover districts include the A2/M2 corridor and the implications of the Lower Thames Crossing, which are also matters for Swale BC, Kent CC and National Highways.</p> <p>We have prepared an additional SoCG on this strategic matter (Appendix B) (<i>DDC note - not attached as published as part of evidence</i>), signed by CCC, DDC, SBC and KCC, and awaiting sign-off from NH, which sets out our collective agreed approach that the Local Plans being developed by the LPAs will ensure that the A2/M2 junctions and improvements within LPA boundaries will be improved through those Local Plans to ensure that growth along the corridor is effectively mitigated.</p> <p>The Regulation 19 Dover District Local Plan identifies upgrades within Dover district on the A2 including A2 Lydden to Dover dualling, improvements at Whitfield Roundabout and improvements at the Duke of York Roundabout and CCC is fully supportive of these measures. In line with the SoCG, CCC is progressing mitigation schemes for the A2 junctions at Bridge, Wincheap and Harbledown and we understand that SBC is developing schemes for J6 and J7 of the A2/M2.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 12 - Strategic Transport Infrastructure
Rep ID	SDLP1605
Rep Status	Processed
Consultee ID	1252100

Consultee Full Name	Mrs Amandajayne Hollobon-Baxter
Consultee Company / Organisation	Sandwich Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP12
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Sandwich Town Council strongly support the expansion of the A2 to resolve some of the traffic issues within the town and district.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 12 - Strategic Transport Infrastructure
Rep ID	SDLP1155
Rep Status	Processed

Consultee ID	1271448
Consultee Full Name	Kevin Bown
Consultee Company / Organisation	National Highways
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP12
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We note that SP12 formed Strategic Policy 14 of the Regulation 18 response. As you will be aware, our Regulation 18 response noted that there was a scheme waiting to be implemented at the Whitfield roundabout arising from Condition 10 attached to the application DOV/10/01010 which has a trigger of 800 dwellings to be implemented, but it is unlikely to be reached for some time. Given the nature of development surrounding the Urban Extension, we had taken the approach of requiring all planning applications coming forward in this area, or which will have an impact on the Duke of York roundabout and Whitfield roundabout to consider a cumulative impact assessment in the Transport Assessment.</p> <p>This trigger is yet to be reached and therefore mitigation has therefore not been delivered when it was originally envisaged. Considering the amount of lapsed time, we subsequently modelled the mitigation scheme and found that it does not create any meaningful capacity at the junction to mitigate impacts by the consented schemes and advised DDC that they could not support entering into a S278 agreement. It has therefore been necessary to identify an alternative scheme which could mitigate this development and Local Plan growth.</p> <p>The mitigation schemes at both roundabouts have now been agreed and are outlined in detail in the accompanying Infrastructure Delivery Plan and the Infrastructure Delivery Schedule.</p> <p>As a result of the above, we recognise that paragraph 233 of the Policy supporting text notes that the A2 Whitfield roundabout and the A2 Duke of York roundabout require upgrading to enable Local Plan growth to come forward. The supporting text also notes that DDC has worked with us and KCC to identify improvement schemes for these junctions which would mitigate Local Plan growth and that these schemes would provide interim improvements in advance of any RIS scheme being brought forward.</p> <p>The policy now notes that we will work with DDC and KCC to deliver transport improvements to mitigate the impacts of development or remove impediment to future growth. Key strategic transport schemes are stated as being:</p> <ul style="list-style-type: none"> • A2 Dover Access – states that promoters of sites impacted by improvements to the A2 will need to take account of emerging proposals by us or other licensed strategic highway authority appointed by the Secretary of State under the Infrastructure Act 2015 • Strategic Highway Improvements / Mitigation at A2 junctions: <ul style="list-style-type: none"> - Whitfield roundabout - Duke of York roundabout - A257 / A256 junction - A258 / A256 junction <p>We welcome that the policy identifies that that these improvements are required as a result of the cumulative impact from a number of allocations in this Plan as identified in the transport modelling and it will therefore be expected that proportionate financial contributions will be made from developments which impact upon the junctions. We support the fact that readers are directed to the Infrastructure Delivery Plan for further information.</p>

	<p>Representation: National Highways are content with Policy SP12 and its supporting text, subject to the following additional representations:</p> <p>We note that the policy states that further guidance will be produced which sets out how the proportionate contributions towards these junction improvements will be calculated, which is also referenced in the Infrastructure Delivery Plan. We require that we are consulted on this guidance note at the earliest opportunity to ensure that the guidance is in place for when development starts to come forward and the opportunity to gain developer contributions for essential infrastructure is not missed.</p> <p>Representation: DDC to consult with us on the proportional financial development contributions guidance note at the earliest opportunity.</p> <p>As per the SoCG, further work has been agreed to be required to support the mitigation schemes at the A2 Whitfield roundabout and the A2 Duke of York roundabout. It is noted that a Stage 1 Road Safety Audit is required to support both of these mitigation schemes, and we would suggest reference is made to this requirement in SP12. We would also suggest that the requirement for third party land to be identified to support the A2 Duke of York roundabout scheme is included. These changes should also be made to the relevant sections of the Infrastructure Delivery Plan.</p> <p>Representation: Policy SP12 to reference the need for a Stage 1 Safety Audit to be undertaken to support the mitigation schemes at the A2 Whitfield roundabout and the A2 Duke of York roundabout. SP12 should also reference the requirement for third party land to be identified to support the A2 Duke of York roundabout scheme is included. These changes should also be made to the relevant sections of the Infrastructure Delivery Plan.</p> <p><i>(Note - This is an extract of the Full National Highways representation which can be located at SDLP1152)</i></p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Policy SP12 to reference the need for a Stage 1 Safety Audit to be undertaken to support the mitigation schemes at the A2 Whitfield roundabout and the A2 Duke of York roundabout. SP12 should also reference the requirement for third party land to be identified to support the A2 Duke of York roundabout scheme is included. These changes should also be made to the relevant sections of the Infrastructure Delivery Plan.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>Strategic Policy 12 - Strategic Transport Infrastructure</p>
<p>Rep ID</p>	<p>SDLP1174</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1271293</p>
<p>Consultee Full Name</p>	<p>Mr Alan Byrne</p>

Consultee Company / Organisation	Historic England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP12
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Historic England understands the unique strategic transport infrastructure challenges that face the district and in particular Dover town and also the way that infrastructure upgrades could benefit heritage, e.g. by enhancing permeability between Dover town centre and the waterfront. However, strategic infrastructure work also has the potential to cause harm to the historic environment and we would expect any proposals to demonstrate that the harm to heritage significance has been avoided or minimised, and where possible heritage significance is enhanced. We note that in some cases, strategic infrastructure upgrades have the greatest potential to impact non-designated archaeological remains, for example along the A2 corridor, and we would encourage the Council and their partners to seek early engagement with the Council's own archaeological advisor as proposals come forward.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 12 - Strategic Transport Infrastructure
Rep ID	SDLP1161

Rep Status	Processed
Consultee ID	1271448
Consultee Full Name	Kevin Bown
Consultee Company / Organisation	National Highways
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP12
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We have identified that only policy details of SAP1 and SAP2 suggest that developers of these allocations will be required to fund the Local Plan mitigation schemes at the A2 Whitfield roundabout and the A2 Duke of York roundabout. However, when reviewing the Infrastructure Delivery Plan, Table 1 sets out proportionate contributions (per dwelling rate £) for the A2 Whitfield roundabout and the A2 Duke of York roundabout mitigation schemes in relation to the wider Dover and Deal area.</p> <p>We note that the total contributions expected from the developer obligations cannot be confirmed at this stage and that the expected funding is an indicative starting point only. The Infrastructure Delivery Plan notes that DDC, KCC and National Highways are working together to develop a delivery plan for the implementation of the mitigation measures and any further schemes which are required to mitigate the Local Plan growth. This is acknowledged in the SoCG which states that proportionality assessment for contributions from development, the identification of forward funding and the delivery mechanism is still required to be agreed.</p> <p>As stated above, it is understood that a more detailed guidance note on developer contributions will be produced in liaison with the delivery partners in due course. We would reiterate the request to be consulted on this document at the earliest opportunity.</p> <p>Notwithstanding the above, it is clear that Local Plan allocations over and above SAP1 and SAP2 will be required to contribute to the mitigation schemes at these two junctions and this should be referenced in the Local Plan. We would suggest that SP12 be updated to note that developments in "certain zones" (as per Infrastructure Delivery Schedule wording) will be subject to proportionate contributions to the A2 Whitfield roundabout and the A2 Duke of York roundabout Local Plan mitigation schemes in line with the upcoming developer contribution guidance note. However, additional sites can only be added and contribute where the capacity of the mitigations can accommodate them. It will be for DDC to monitor take up of capacity, and as necessary, to start to require additional mitigation from developments where capacity will be exceeded.</p> <p>Representation: SP12 should be updated to note that developments in "certain zones" (as per Infrastructure Delivery Schedule wording) will be subject to proportionate contributions to the A2 Whitfield roundabout and the A2 Duke of York roundabout Local Plan mitigation schemes in line with the upcoming developer contribution guidance note. It should also note that if and when LP mitigation capacity is used up, developments will then need to bring forward further mitigations.</p> <p>We would also request clarification from DDC on whether the mitigation schemes at the A2 Whitfield roundabout and the A2 Duke of York roundabout will be fully funded by developers, or whether public monies will be sought alongside developer contributions (for example from the Levelling up Fund)</p>

	<p>Representation: DDC to provide clarification on whether the mitigation schemes at the A2 Whitfield roundabout and the A2 Duke of York roundabout will be fully funded by developers, or whether public monies will be sought alongside developer contributions.</p> <p>(Note - This is an extract of the Full National Highways representation which can be located at SDLP1152)</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	Strategic Policy 12 - Strategic Transport Infrastructure
<p>Rep ID</p>	SDLP1316
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1331922
<p>Consultee Full Name</p>	Matthew Porter
<p>Consultee Company / Organisation</p>	Fernham Homes Ltd & Walker Residential Ltd
<p>Agent Full Name</p>	Matt Porter
<p>Agent Company / Organisation</p>	DHA Planning
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	Policy SAP22 - Land at Archers Low Farm, St Georges Road Sandwich (SAN023) Policy SP3 - Housing Growth Policy SP4 - Windfall Development Policy SP11 - Infrastructure and Developer Contributions Policy SP12 - Strategic Transport Infrastructure
<p>2 - Do you consider this part of the Plan sound?</p>	Yes
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	Yes

<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Yes</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>We consider that the plan is sound, but object to elements of Policy SAP22 - Land at Archers Low Farm, St Georges Road Sandwich (SAN023) and Policy SP3 - Housing Growth. These objections are set out in the consultation response submitted on behalf of Fernham Homes Limited and Walker Residential Limited (ref DHA/30245).</p> <p>1 Introduction</p> <p>1.1 Purpose of this Representation</p> <p>1.1.1 This representation has been prepared by DHA Planning on behalf of Fernham Homes Limited and Walker Residential Limited in response to the Dover District Council 'DDC' Local Plan (Regulation 19) consultation which runs until 9th December 2022.</p> <p>1.1.2 We understand that DDC is in the process of preparing a new Local Plan to set out a strategy for development for the period to 2040 and that the Council are presently seeking comments on the pre-submission Plan prior to its submission for examination in early 2023.</p> <p>1.1.3 Our client controls 'Land at Archers Low Farm, Sandown Road, St Georges Road, Sandwich' (hereafter referred to as 'Land at Archers Low' or 'the Site') and is promoting the residential allocation of the Site as part of the new Dover District Local Plan preparation process. The Site is allocated for residential development in the Regulation 19 Pre-submission Plan for the provision of 35 dwellings under policy reference 'SAP22'.</p> <p>1.1.4 It is highlighted that as part of the Regulation 18 Local Plan, the Site was allocated under the 'Site Allocations Policy 1 Non-Strategic Housing Allocations' for approximately 40 dwellings (reference SAN023).</p> <p>1.1.5 The purpose of the representation is to support the allocation of 'Land at Archers Low' for a greater quantum of development and provide comment on the consistency of the allocation with the proposed strategy, draft policies and our client's position in respect of the 'soundness' of the Plan, but to object to the indicative capacity set out in the policy.</p> <p>1.1.6 In this regard, we remain wholly supportive of the principle of the residential allocation of the Site and agree that it represents a logical and sustainable location to direct growth consistent with the growth strategy of the Plan as a whole, however we submit that more effective use of our client's Site can be made – and object (solely) to this element of the policy.</p> <p>1.1.7 Accordingly, we say that Land at Archers Low can further assist the Council in meeting the growing need for new homes in the district and help to ensure the Council can have greater confidence in meeting its market and affordable housing targets in full.</p> <p>1.1.8 Based on the current national and local planning context, we consider the Site to be a highly suitable edge-of-settlement location to allocate land for housing to help meet the need for new homes in the district and its effective use should be appropriately maximised in accordance with national policy objectives.</p> <p>1.1.9 Further details regarding the Site and commentary on the consistency of the allocation with the proposed strategy, draft policies and our client's position in respect of the 'soundness' of the Plan are set out in the following sections of this document.</p> <p>1.2 About Fernham Homes</p> <p>1.2.1 Fernham Homes Limited are a local award winning small and medium sized (SME) housebuilder, established in 1997 and has a strong track record of delivering high quality residential and mixed use developments in Kent over the last 25 years. This has been acknowledged through the receipt of nationally recognised awards, including the gold Evening Standard Awards best family home 2022 and 2019 bronze WhatHouse Best Small Housebuilder.</p> <p>1.2.2 SME housebuilders are recognised in the National Planning Policy Framework ('NPPF') at paragraph 69 as making an important contribution to meeting the housing requirements of an area, and being able to build out relatively quickly. Similarly, this has also been recognised by the Planning Inspectorate . This is particularly the case with Fernham Homes, which is privately owned with access to significant resources. This provides significantly more flexibility than national and other regional housebuilders, and allows Fernham Homes to deliver housing rapidly and to a high quality, beautiful and sustainable standard (para 126 of the NPPF).</p> <p>1.2.3 Fernham Homes Limited has embarked on a sustained period of growth, with an adopted and robust business plan to deliver around 300 houses per year in five years time.</p> <p>1.2.4 A key element of Fernham Homes' operations is to take a very careful approach to site selection: a huge amount of due diligence is undertaken as part of this, and therefore Fernham Homes Limited only invests in those sites which meet the NPPF requirements of being available, suitable, and deliverable. As set out below land at Archers Low Farm, Sandwich ('SAP22') is firmly considered to be such a site.</p>

1.2.5 Similarly, a key feature of Fernham Homes' approach is to work positively and proactively with local planning authorities (LPAs), both during the preparation of local plans and at planning application stage. Fernham Homes Limited are fully committed to engaging with Dover District Council in the preparation of its Local Plan, and firmly subscribe to the national policy approach set out in paragraphs 15 and 16 c) of the NPPF that "the planning system should be genuinely plan-led" and should be shaped by early, proportionate and effective engagement between LPAs and others, including businesses and developers. Accordingly, Fernham Homes Limited would welcome the opportunity to discuss the matters contained in this representation, including the availability, suitability, deliverability and capacity of land at Archers Low Farm, Sandwich ('SAP22') directly with Dover District Council members and officers, ahead of the submission of the Local Plan for examination.

1.3 Representation Structure

1.3.1 The representation structure is outlined below for ease of reference:

Chapter 2 (Consultation Background) – Sets out the context of the Dover District new Local Plan preparation, relevant national planning requirements and a summary of our current position.

Please refer to paragraph 52 of appeal decisions: APP/M2270/W/21/3283924 and APP/M2270/W/21/3288645

Chapter 3 (Legal Tests of Soundness) - Assessing whether the plan is sound, having regard to the tests of soundness outlined by paragraph 35 of the NPPF.

Chapter 4 (Duty to Co-operate) - Assessing whether the plan is sound, having regard to the duty to cooperate outlined by paragraph 24 of the NPPF.

Chapter 5 (Housing Need) - Consideration of market and affordable housing need and assessment of proposed housing allocations and supply sources.

Chapter 6 (Assessment of Suitability) - Re-introduces our client's Site and provides a summary of planning constraints and opportunities, including the quantum of development that could be accommodated, why the Site is suitable for development and why the principle of the draft allocation for residential development is both justified and consistent with the Council's strategy for growth in the district. It also sets out why we consider there is scope for a higher number of dwellings at the site. This consideration amounts to an objection to one element of the strategy – namely that those sites around the most sustainable settlements should be maximised.

Chapter 7 (Conclusion) - Summarises the key points raised throughout the representation and re-affirms our client's support for the principle of the Site's allocation and the principle of the proposed strategy ahead of the submission of the Plan for examination, and the objections in terms of capacity.

2 Dover District Council – Draft for Submission Local Plan (Regulation 19)

2.1 Consultation Background

2.1.1 DDC are required to prepare a new Local Plan, as the current suite of development plan documents were adopted in 2002, 2010 and 2015. The Core Strategy (CS) (adopted 2010) in particular has a time horizon up to 2026 and requires updating.

2.1.2 The new Local Plan will set out the vision, strategic objectives and overarching development strategy for the growth of the District over the period to 2040. It provides the planning policy framework to guide the future development of the area, addressing needs and opportunities for housing, the economy, community facilities and infrastructure, as well as the basis for conserving and enhancing the natural and historic environments, mitigating and adapting to climate change, and achieving well designed places.

2.1.3 For the avoidance of doubt, the new Local Plan, on adoption, will replace the CS 2010 and the Land Allocations Plan 2015, as well as saved policies from the 2002 Local Plan.

2.1.4 DDC's Regulation 19 Local Plan outlines the key issues that need to be addressed between now and 2040. In particular, the Plan sets out the following key planning issues for the District:

- Ensuring that new development in the District contributes to the mitigation of, and adaptation to, climate change.
- Supporting the Council to deliver its intention to be a carbon neutral district by 2050.
- Managing flood risk and coastal change.
- Ensuring that a sufficient amount and variety of land is identified to deliver a continuous supply of housing across the Plan period and that the Council maintains a five-year housing land supply.
- Delivering growth in a way that focuses development in the least sensitive areas of the District in order to conserve and enhance the District's rich natural and historic environments.
- Supporting sustainable development in rural areas to enhance the vitality of rural communities.

- Working with partners to facilitate the delivery of the Whitfield Urban Expansion.
 - Ensuring a range of housing tenures, types and sizes are provided across the District to meet the needs of the local community and provide choice and flexibility in the housing market.
 - Promoting economic growth, tourism, and investment in the District's Town Centres in line with the Council's Economic Growth Strategy.
 - To address the impact of the COVID-19 pandemic.
 - Delivering strategic transport improvements, including upgrades to the Duke of York and Whitfield roundabouts to support the scale of housing and economic growth identified in the Plan.
 - Promoting sustainable transport initiatives to encourage a modal shift to more sustainable forms of transport like walking and cycling.
 - Ensuring that infrastructure is delivered, in the right place, at the right time, to meet the needs of the District and support the levels of development identified in the Local Plan.
 - Supporting the delivery of attractive, high-quality, design led developments and the creation of healthy, inclusive and safe communities, that are well served by good quality services and facilities to support people's lives.
 - Conserving and enhancing the District's rich and diverse natural landscape, including the five international sites within the district, the Kent Downs Area of Outstanding Natural Beauty (AONB), five Sites of Special Scientific Interest (SSSIs), two National Nature Reserves (NNRs), two stretches of Heritage Coasts and two Marine Conservation Zones.
 - Delivering a net gain in biodiversity in the District over the plan period.
 - To promote the conservation, restoration and where appropriate the enhancement of the District's heritage assets, in order to protect their significance and to ensure that they can be best appreciated and enjoyed by current and future generations.
- 2.1.5 The new Local Plan will be examined by an Inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is 'sound'. This submission will comment on each of the above, highlighting where we believe any areas of concern lie or where modifications may be required.

2.2 DDC's Local Development Scheme

2.2.1 The District Council has a duty to review the policies contained within the development plan every five years. The 2014/2015 Authority Monitoring Report signalled the need to review key parts of the Council's adopted CS evidence base.

2.2.2 The Council's Local Development Scheme (LDS) first outlined the delivery timetable for the Local Plan Review (LPR) in the March 2017 publication. Since then, the LDS has been updated on an annual basis. The most recent September 2022 LDS summarises that following the preparation of the principal evidence base documents, the Local Plan Review Regulation 18 consultation took place for 8 weeks in January 2021. The Regulation 19 consultation was scheduled for 7 weeks during Q4 of 2022 and is the subject of this representation.

2.2.3 Moving forward, submission of the Plan is anticipated in Q1-2 2023 with the Examination in Public in Q3-4 2023. The new Local Plan is currently scheduled for adoption in 2024.

2.2.4 As planned, DDC are now undertaking the Regulation 19 Draft Local Plan Consultation, for which this submission is made

3 Legal Test of Soundness

3.1 Legislation and Guidance

3.1.1 The new Local Plan will be examined by an Inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is 'sound'. It is a statutory requirement that every development plan document must be submitted for independent examination to assess when it is "sound", as well as whether other statutory requirements have been satisfied (s.20(5) of the 2004 Act). By s.19 of the 2004 Act, in preparing a development plan document a local planning authority must have regard to several matters including national policies and advice contained in guidance issued by the Secretary of State. Such guidance currently exists in the form of the NPPF and is summarised below. This states that Plans must be:

(a) Positively Prepared: based on a strategy which seeks to meet objectively assessed development and infrastructure requirements

3.1.2 This means that the Local Plan should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. The NPPF set out principles through which the Government expects sustainable development can be achieved.

(b) Justified: an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence

3.1.3 This sets out the requirement that the Local Plan should be based on a robust and credible evidence base involving:

I. Research/fact finding: the choices made in the plan are backed up by facts.

II. Evidence of participation of the local community and others having a stake in the area.

3.1.4 The Local Plan should demonstrate an appropriate strategy, taking into account reasonable alternatives and based on proportionate evidence. These alternatives should be realistic and subject to sustainability appraisal. The Plan should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

(c) Effective: deliverable over its period based on effective joint working on cross-boundary strategic priorities

3.1.5 This makes clear that the Local Plan should be deliverable, requiring evidence of:

- Sound infrastructure delivery planning;
- Having no regulatory or national planning barriers to delivery;
- Delivery partners who are signed up to it; and
- Coherence with the strategies of neighbouring authorities, including neighbouring marine planning authorities.
- The new Local Plan should be flexible and able to be monitored.

3.1.6 The Local Plan should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen. The plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the Local Plan should make clear that major changes may require a formal review including public consultation. Any measures which the Council has included to make sure that targets are met should be clearly linked to an Annual Monitoring Report.

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national policy.

3.1.7 This submission comments on each of the above in further detailing, highlighting areas of support and where modifications are required as appropriate.

3.2 Legal Compliance

3.2.1 In terms of legal compliance, the main requirements for the early stages of Local Plan consultation are in relation to:

- planning for community engagement;
- the sustainability appraisal (including consultation with the statutory environment consultation bodies);
- identifying significant cross boundary and inter-authority issues; and
- ensuring that the plan rests on a credible evidence base, including meeting the Act's requirement for keeping matters affecting the development of the area under review.

3.2.2 In addition to the above, the NPPF states² that: "Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:

- a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;
- b) Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:
 - (i) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or

Paragraph 11, NPPF 2021

(ii) Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

3.2.3 In addition, to the above, the NPPF states³ that Plans should:

- a) be prepared with the objective of contributing to the achievement of sustainable development;
- b) be prepared positively, in a way that is aspirational but deliverable;
- c) be shaped by early, proportionate and effective engagement between plan- makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;

- d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
- e) be accessible through the use of digital tools to assist public involvement and policy presentation; and
- f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

3.2.4 It is important to note that the NPPF4 requires strategic policies to set out an overall strategy for the pattern, scale, and design quality of places, and make sufficient provision for:

- a) housing (including affordable housing), employment, retail, leisure and other commercial development;
- b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- c) community facilities (such as health, education and cultural infrastructure); and;
- d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

3.2.5 It is clear from the above, that any local plan should set out a comprehensive and cohesive approach to future development.

Paragraph 16, NPPF 2021

Paragraph 20, NPPF 2021

4 Duty to Co-Operate

4.1 Legal and NPPF Requirements

4.1.1 Section 33A of the Planning and Compulsory Purchase Act 2004 sets out a statutory 'Duty to Cooperate' (DtC) – i.e. a legal obligation - to all bodies as prescribed by Regulation 4 of the Town and Country Planning (Local Planning) England Regulations 2012 (the Regulations).

4.1.2 The duty requires DDC to cooperate with other persons to 'maximise the effectiveness' with which named activities are undertaken. Those activities include the preparation of development plan documents (such as this Local Plan document) and activities that support that activity 'so far as relating to a strategic matter'.

4.1.3 A strategic matter is defined by S33A(4) in summary as: (a) 'sustainable development or use of land that has or would have a significant impact on at least two planning areas' (a planning area in this case is the area of a borough or district council); and (b) 'sustainable development or use of land in a two tier area' (as this is) 'if the development or use (i) is a county matter, or (ii) has or would have a significant impact on a county matter'. County matters broadly relate to minerals and waste and associated developments as defined by Paragraph 1 of schedule 1 to the Town and Country Planning Act 1990 (as amended).

4.1.4 Section 33A (7) requires DDC (and persons subject to the DtC) to have regard to any guidance issued by the Secretary of State about how the duty is to be complied with. In that regard Paragraph ID 9-004-29140306 of the Government's Planning Practice Guidance (PPG) confirms amongst other things that the DtC is not a duty to agree (albeit that local planning authorities should make every effort to secure the necessary cooperation on strategic cross border matters before they submit local plans for examination).

4.1.5 The NPPF establishes that effective and on-going joint working is an integral part of the plan making process that will, amongst other things, determine whether development needs that cannot be met wholly within a plan can be met elsewhere. The NPPF goes on to state at paragraph 27 that in order to demonstrate effective and on-going joint working strategic policy making authorities should: "... prepare and maintain one or more statements of common ground documenting the cross-boundary matters being addressed".

4.1.6 In addition to the District's own housing pressures, part of the DtC involves considering whether neighbouring authorities' unmet housing need can be accommodated. It is worth highlighting that recent amendments to the London Plan have identified that the City's housing need has become increasingly more difficult to deliver and therefore areas outside London will be faced with having to absorb more of London's housing need. Consequently, DDC has a duty to explore whether it can accommodate some of this overspill of London's unmet need.

4.2 Assessment of DDC's discharging of the Duty to Co-operate

4.2.1 It is recognised that work to discharge the DtC remains ongoing by DDC and will continue prior to submission as part of the preparation of the Local Plan evidence base.

4.2.2 Notwithstanding the above, at this stage it is understood that DDC have engaged with the members of the East Kent Regeneration Board including neighbouring East Kent planning authorities, Kent County Council (KCC) and its subsidiary departments:

- Folkestone and Hythe District Council
- Canterbury City Council
- Thanet District Council
- KCC
- KCC Highways & Transportation
- KCC Minerals & Waste
- KCC Heritage Conservation
- KCC Flood & Water Management
- KCC Natural Environment & Coast
- KCC Infrastructure including Education

4.2.3 In February 2016, the Council adopted a Memorandum of Understanding (MOU) in respect of the DtC between the East Kent Regeneration Board members. A review of the MOU took place and was agreed in January 2021.

4.2.4 The East Kent MOU sets out the framework in which the authorities will work together on strategic issues and will actively engage. It forms the overarching framework and context within which Statements of Common Ground (SoCG) will be agreed between individual authorities.

4.2.5 Further engagement is also confirmed to have taken place between the following prescribed bodies and other relevant bodies:

- Environment Agency
- National Highways
- Historic England
- Natural England
- Network Rail
- NHS Kent and Medway Clinical Commissioning Group (CCG) – now known as Integrated Care Board (ICB) since July 2022
- Kent Downs AONB Unit
- Other infrastructure providers

4.2.6 Whilst work remains ongoing, at this stage it is understood that SoCGs have been agreed and signed between the following parties:

- DDC and Folkestone & Hythe District Council
- DDC and Canterbury City Council
- DDC and Thanet District Council
- DDC and Kent County Council
- Dover District Council and National Highways

4.2.7 As part of the DtC Evidence Base documents, DDC prepared a detailed DtC Statement (dated September 2022) which sets out a summary of the engagement that has taken place, firstly by organisation, and then by issue. Whilst the statement focuses on strategic issues and duty to co-operate bodies it also includes information relating to engagement on non-strategic issues and co-operation with other bodies that are not prescribed by the regulations. In addition, Appendices 1, 3 and 4 identify the main meetings and other correspondence that has taken place throughout the plan making process.

4.3 Summary

4.3.1 On account of the above and the documents published within the Council's Local Plan Evidence Base, we are satisfied that the Council as the strategic policy making authority has demonstrated effective and on-going joint working with neighbouring authorities, the county council, prescribed bodies and other relevant bodies. Further, we agree that DDC has prepared and maintained SoCG documenting the cross-boundary matters being addressed in accordance with the Framework and the DtC may be discharged by the Planning Inspector under Section 20(5) (c) of the Planning and Compulsory Purchase Act 2004.

4.3.2 Without prejudice to the above, should ongoing work by the Council result in significant changes in circumstances such that the signed SoCGs may be amended or withdrawn, our client reserves the right to alter their consultation response accordingly and be present at the examination of the Plan to discuss further.

5 Housing Need

5.1 Context

5.1.1 Paragraph 11 of the NPPF is explicit in its requirement for strategic policy-making authorities to promote a sustainable pattern of development that seeks to meet the need in full.

5.1.2 Paragraph 20 of the Framework is equally clear that strategic policies should set out an overall strategy for the pattern, scale and design quality of places. Policies should make sufficient provision for the development that is required as well as associated infrastructure, community facilities and should set out a strategy for the conservation and enhancement of the natural, built and historic environment.

5.1.3 Given this national planning context, the emerging Local Plan should provide a comprehensive and cohesive approach to future development in Dover district, capable of making sufficient provision for the identified needs, whilst balancing the conservation and enhancement of the natural, built and historic environment.

5.1.4 National guidance states that strategic policy-making authorities will need to calculate their local housing need figure at the start of the plan-making process. This number should be kept under review and revised where appropriate.

5.1.5 In calculating the local housing need, paragraph 61 of the NPPF states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance - unless exceptional circumstances justify an alternative approach.

5.1.6 Further, in addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

5.2 DDC's Housing Need

5.2.1 The Standard Method for assessing housing need, issued alongside the Ministerial Statement on 16 December 2020, sets an indicative housing need figure for Dover District of 596 dwellings per annum. However, the affordability ratio which factors into the local housing need assessment is updated annually. For Dover District the latest housing need calculation is 611 dwellings per annum (dpa), equating to a total housing need of 10,998 dwellings for the Plan period to 2040. We understand that the Regulation 19 Local Plan seeks to meet this need in full and in addition to the minimum figures, DDC have set an appropriate contingency buffer of 926 dwellings of the Plan period, equating to 8.4% of the total Plan period figure.

5.2.2 For context, the current adopted CS requirement is 700 dwellings per annum. This followed the adoption of a high-growth strategy in 2010 of 14,000 homes to 2026 based around the recommendations of the Dover Regeneration Strategy and above the minimum 10,100 requirement across the same period, as set out in the emerging (at the time) Regional Spatial Strategy.

5.2.3 For the avoidance of doubt, accounting for the Committed Supply Total of 5,282 dwellings, the new Local Plan will be required to allocate sufficient land to accommodate a minimum of 6,642 new homes over the remaining plan period to 2040. It is understood that this will be derived from the following sources:

- Whitfield Urban Expansion Allocation: 2,200 dwellings
- Local Plan Allocations (excluding Whitfield): 3,392 dwellings
- Windfall Allowance (70 a year from year 4): 1,050 dwellings

5.2.4 On this basis, it is evident that a substantial quantum of Plan-led housing delivery will be required in order to meet the new Local Plan's housing target. Due to the nature and dwindling supply of available urban land in Dover town and the remaining higher order settlements of Deal and Sandwich, the restrictive effect of the coast, the Kent Downs AONB, environmental constraints and the limited capacity of the district's remaining mid- and lower order settlements to accommodate significant levels of growth, meeting Dover's housing needs inevitably will require the release of significant greenfield land.

5.2.5 In our view, sustainable and accessible sites logically located adjacent to existing urban areas, including Sandwich, represent the most sustainable and reliable sources of growth for the Plan period, consistent with the overarching strategic objectives of draft policy SP3 within the emerging Plan. Such sites are best placed to deliver the significant number of new homes that are required and are most capable of making meaningful contributions to the associated public infrastructure, affordable housing and mix of new homes that is urgently needed in the District as well as further balancing the role of strategic-scale development at Whitfield within the emerging Plan's proposed growth pattern.

6 Site Specific Assessment

6.1 Overview

6.1.1 The previous chapters of this representation (Chapter 3-5) outline our client's position relating to the soundness of the Plan in which our client is confirmed to be supportive in principle of the Local Plan as a sound strategy for the growth of the district to 2040. It is clear that Sandwich must continue to form a principal location for focusing sustainable housing delivery in Dover district and will assist in ensuring an appropriate balance of sites are identified, capable of supporting the strategic role of Whitfield within the forthcoming Plan Period.

6.1.2 As introduced in the preceding sections, Fernham Homes Limited and Walker Residential Limited control 'Land at Archers Low, Sandwich' and are continuing to promote the residential allocation of the Site. The Site is allocated for residential development in the Regulation 19 Pre-submission Plan for the provision of 35 dwellings under policy reference 'SAP22'.

6.1.3 As aforementioned, the Site was allocated in the Regulation 18 Local Plan for approximately 40 dwellings under the 'Site Allocations Policy 1 Non-Strategic Housing Allocations' (reference SAN023).

6.1.4 Notwithstanding our client's support of the draft allocation within the Regulation 19 Plan in principle, we suggest that the policy text be re-visited prior to submission, to allow a higher dwelling per hectare guide to ensure the Site is developed to its full potential. It is submitted that the SAP22 policy wording should be amended to more accurately reflect the capability of the Site to accommodate approximately 40 - 45 dwellings (broadly in line with the previous site allocation in the Regulation 18 Local Plan), deliverable early in the Plan period.

6.1.5 Fernham Homes Limited and Walker Residential Limited are fully committed to the delivery of the Site within the next five years, and subject to a grant of planning permission in Spring 2023 – please see below – anticipate starting developing on site in 2023. Indeed, for the avoidance of doubt it is confirmed that Fernham Homes Limited and Walker Residential Limited have previously submitted a planning application ('ref: 22/00274') for the residential development of the Site for 44no. dwellings with associated access, parking, open space, landscaping, drainage, and infrastructure. (Amended plans and details).

6.1.6 Following a positive recommendation to grant planning permission by Officers at the DDC Planning Committee, the application was refused following consideration at Planning Committee on 31st March 2022. The application is now the subject of an appeal with a date confirmed for a two day hearing on the 17th - 18th January 2023. The site layout is shown in Figure 6.2.

6.1.7 For the avoidance of doubt, our client's support of the proposed allocation, subject to their objection to the capacity and considerations that it can accommodate an increased capacity of approximately 40 – 45 dwellings, is made without prejudice to the ongoing appeal. Should the appeal be allowed, this would realise the delivery of the residential allocation in accordance with the policy requirement (albeit more dwellings), which is consistent in its key elements with the submitted appeal scheme.

6.2 Site and Surroundings

6.2.1 The Site is situated to the southeast of St. George's Road and southwest of Sandown Road, on the southern edge of Sandwich.

6.2.2 The Site is a predominately undeveloped parcel of land totalling approximately 2.37 hectares, with tall and dense hedge and tree planting around the perimeter of the Site and an existing agricultural access point off St Georges Road to the north-west of the Site

6.2.3 The Site comprises a level enclosed field mainly formed of uniform improved grassland bounded on all sides by trees mixed in age, species, condition and character. There are also semi-derelict agricultural buildings in the southwest corner.

Figure 6.1: Site Location Plan (Drawing no. 29923A/01)

6.2.4 The Site comprises a level enclosed field mainly formed of grassland bounded on all sides by trees mixed in age, species, condition and character. There are also semi derelict agricultural buildings in the southwest corner.

6.2.5 The Site is bounded by existing residential development along St Georges Road to the north and west, undeveloped land to the east and south, Sandown Road to the north-east and a small area of residential development fronting Sandown Road further to the east of the Site.

6.2.6 The Site enjoys access to a number of local facilities and services which are within a reasonable walking distance, including schools, local shops, healthcare, employment, and public transport links. The Sir Roger Manwood Secondary School, Sandwich railway station and the historic town centre (including convenience stores) are all located within 800m of the Site. Sandwich Junior School and the local supermarket are located just over 800m from the Site. Larger shops and supermarkets are available in the local area, including Westwood Cross 8 miles to the north and Deal, 6 miles to the south. In terms of planning constraints, a Tree Preservation Order (TPO) protects trees on the northwest boundary of the Site and the belt of trees bounding the northeast and southeast.

6.3 Development Capacity

6.3.1 For the purposes of this representation, Land at Archers Low Farm, Sandwich is submitted with capacity for approximately 40 – 45 dwellings (broadly in line with the previous site allocation in the Regulation 18 Local Plan), as part of a high- quality, landscape-led residential scheme capable of delivery early in the Plan period.

6.3.2 Significant work has already been advanced by the project team as part of the submitted planning application and the subsequent appeal in which the proposed development has been informed following a thorough analysis of the Site opportunities, constraints and surroundings. The key design principles have been to create an attractive, permeable and legible layout set with a strong landscape framework, utilising existing landscape features, to accommodate a mixture of high-quality and attractive homes, of a scale and design that reflect its setting and surroundings.

6.3.3 In summary the vision for the Site is to create a high quality residential development which includes:

Circa 40 – 45 no. residential dwellings, comprising 30% Affordable Housing and a mixture of 2, 3 and 4 bedroom properties.

A series of open spaces that perform multiple functions including informal space, a local area of play (LAP), ecological mitigation areas and incorporation of native and wildflower meadow planting.

Retention of trees on the northern and southern boundaries and the provision of new woodland planting. This will include proactive management of the retained and proposed woodland belts to encourage structural and species diversity and improve the overall health and longevity of these assets. The provision of significant biodiversity net gain is envisaged, and has been demonstrated can be delivered through the application and appeal.

Low key principle vehicular access point onto Sandown Road through landscaped entrance with trees and vegetation maintained, introduction of wildflower planting.

Footpath connectivity onto St Georges Road.

Tree lined connecting avenue creating strong legibility and navigation throughout the layout.

Figure 6.2: Proposed Site Plan as amended in December 2021 (Produced by Clague Architects – Drawing no. 29923A/11)

6.3.4 For context, at the time of determination of application ref: '22/00274', full planning permission was sought for the erection of 44 dwellings, together with associated access to Sandown Road, a pedestrian crossing point on St Georges Road, parking, open space, landscaping, drainage, and infrastructure works.

6.3.5 It is highlighted that draft policy PM1 seeks to provide a density typically between 30-50 net dwellings per hectare (dph). In this respect, it is highlighted that at 45 dwellings, the Site would provide a density of approximately 22.5 dph. Whilst it is acknowledged that lower density development may be more appropriate in edge of settlement locations, this demonstrates that even at a capacity 45 dwellings, the density is relatively low. Furthermore, as part of the previous application 22/00274, DDC confirmed at paragraph 2.23 of the Committee Report that subject to a detailed assessment of visual impacts, a proposed scheme of 44 dwellings on the Site is considered appropriate.

6.3.6 The above proposed Site plan submitted during the determination of the application demonstrates the capability of the Site to comfortably accommodate circa 40 – 45 residential units, together with significant boundary and internal landscaping elements.

Draft Allocation in the Regulation 18 Local Plan:

6.3.7 As aforementioned, the Site was proposed to be allocated for a capacity of approximately 40 dwellings in the Regulation 18 Local Plan under the 'Site Allocations Policy 1 Non-Strategic Housing Allocations' (reference SAN023).

6.3.8 The Site was considered as part of DDC's Housing and Economic Land Availability Assessment (HELAA) (December 2020) for the development of approximately 40 dwellings. The summary of suitability as provided by DDC is summarised as follows:

- The Site is in an Area of Archaeological potential and a Heritage Assessment will be required.
- The Site clips Flood Zone 2 and 4, along the boundary and an FRA would need to be undertaken.
- The Site was removed from the LALP (Local Allocations Local Plan) by the Inspector on landscape grounds, however, with the provision of an enhanced landscape buffer to the east, south and west of the site to provide year-round screening, it is considered that the impact on the landscape can be mitigated. The housing number on the site has also been reduced to address landscape concerns.
- Access to this site would be possible via Sandown Road, however vehicle access onto St Georges Road is likely to be challenging due to limited footway width and subsequent sightline requirements, so would need to be restricted to emergency/pedestrian access only.

- The provision of 40 dwellings is unlikely to create a severe impact on the surrounding highway network, however St Georges Road and Sandown Road (including Knightrider Street and the route to the High Street/Quay) are subject to constrained geometry due to on street parking, as such, a review on-street parking controls may be required to manage any increase in traffic-flow.
- There is a general concern over the potential cumulative impact of development in and around Sandwich and on routes within the town, which should be considered as part of future traffic modelling exercises.
- A Transport Assessment is required.

• Further information should be provided to demonstrate that access is achievable. However, cumulative impact on the highways network needs to be assessed.

6.3.9 At the time, owing to the matters set out above the Site was considered 'Amber' in the reg/amber/green (RAG) rating. However the clients have since demonstrated within the planning application and subsequent appeal submission that the proposed development for 44 dwellings would address the queries above.

6.4 Draft Policy Allocation 'Land at Archers Low Farm, Sandwich Road, Sandwich' (SAP22)

6.4.1 As introduced in the preceding sections, our client's Site at Archers Low is allocated for residential development within the Dover Pre-submission (Regulation 19) Local Plan. For ease of reference, the draft policy wording is as follows:
"SAP22 – Land at Archers Low Farm, St Georges Road, Sandwich (SAN023)

The Site, Land at Archers Low Farm, St Georges Road, Sandwich, as shown on the policies map is allocated for an indicative capacity of 35 dwellings.

Development proposals for the Site shall include the following:

- a) Development should be laid out to protect the residential amenity of the existing residential properties to the north-east and designed to take account of the character of the Sandwich Walled Town Conservation Area;
- b) The existing trees on the boundaries of the site should be retained and enhanced to mitigate the impact of development on the landscape and provide opportunities for biodiversity habitat creation and enhancement;
- c) Trees which need to be removed to enable an access to be provided to the site, shall be kept to the minimum needed to provide necessary visibility, and will be required to be replaced on-site;
- d) The layout of the scheme should provide a sufficient buffer between the existing mature trees on the site and residential properties, to ensure appropriate residential amenity for future residents and the protection of existing trees once the site is developed;
- e) A site-specific Flood Risk Assessment must be carried out in accordance with Policy CC5, including a comprehensive investigation into surface water flood risk. This shall also inform the application of the Sequential Approach to the layout of the site by locating the most vulnerable elements in the lowest risk areas;
- f) Primary vehicular, pedestrian and cycle access to the site shall be provided from Sandown Road;
- g) In accordance with Policy SP13 a wintering bird survey must be undertaken in advance of a planning application on the site. If the bird survey identifies that the development will exceed the threshold of significance, mitigation will be required. A suitable scheme of mitigation will need to be submitted with the planning application for the site;
- h) Environment assessment study required to address any potential impact on the Sandwich Bay SPA and Ramsar;
- i) A Heritage Assessment, to include appropriate archaeological investigations must be carried out in accordance with Policy HE1 and Policy HE3, the results of which should inform the layout and design of the development which is necessary to avoid harm to any heritage assets identified through the assessment; and
- j) The occupation of the development should be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider. Development should provide a connection to the sewerage system at the nearest point of adequate capacity."

6.4.2 To be clear, our client remains wholly supportive of the allocation of the Site for residential development and is committed to delivering the Site early in the Plan period (start on site in 2023). We agree that it represents a logical and sustainable location to direct growth consistent with the growth strategy of the Plan as a whole, however we submit that more effective use of our client's Site can be made – and therefore object to the capacity identified.

6.4.3 Accordingly, we say that Land at Archers Low can further assist the Council in meeting the growing need for new homes in the district and help to ensure the Council can have greater confidence in meeting its market and affordable housing targets in full.

6.4.4 It is submitted that the SAP22 policy wording should be amended to reflect the capability of the Site to accommodate approximately 40 – 45 dwellings (broadly in line with the previous site allocation in the Regulation 18 Local Plan), deliverable early in the Plan period.

6.5 Strategic Justification for Development

Spatial Strategy

6.5.1 The proposed Housing Distribution for the district across the Plan period is established within Policy SP3 'Housing Growth' which sets out that the distribution of housing growth in the district is primarily based on the settlement hierarchy and influenced by site availability, environmental constraints and factors of delivery.

6.5.2 Rightly, a key aim of the growth strategy is to focus development in the least sensitive areas of the district in order to conserve and enhance the Dover's rich natural and historical environment.

6.5.3 A retained theme from the adopted Plan, is that the Council's settlement strategy continues to focus on the development and regeneration of Dover Town and Whitfield (3381 dwellings). Approximately half of the district's planned housing is in this location, the majority of which again is to come forward as part of the strategic urban expansion of Whitfield 'SAP1' (2200 minimum dwellings).

6.5.4 Development will then be focused in the District Centre of Deal (223 dwellings), and the Rural Service Centres of Sandwich (227 dwellings) and Aylesham (649 dwellings). Following the settlement hierarchy rigidly would distribute housing in the preceding order, however the Plan recognises that housing delivery in Deal and Sandwich continues to be constrained by a number of factors including flood risk, ecological designations, heritage and highways. Further, Deal has experienced generally high levels of windfall development across the previous Plan period and accordingly there is now a dwindling supply of available, suitable sites in both settlements. On account of this context, the Council have sought to direct the majority of the remaining higher order settlement growth (outside of Dover & Whitfield) to Aylesham, through the strategic expansion to the town.

6.5.5 Outside of the four principal district settlements, the Rural Settlement Hierarchy (August 2022) identified that the majority of lower-order settlements in the district emerge as having a low level of facilities within the hierarchy and six settlements having none of the key indicators of sustainable services. Plainly, these settlements offer very limited opportunities for growth and it is evident that the forthcoming Plan will be reliant on the settlements of Dover (including Whitfield), Deal, Sandwich and Aylesham to deliver the housing growth that is required.

6.5.6 We further note the findings of the Strategic Housing Market Assessment (2017) which identified that Sandwich and the north is the most expensive part of district with median property prices for all sizes of homes significant in excess of prices in Deal and Dover town and the south. It is suggested that issues of unaffordability are most likely to effect entry-level properties and result in existing residents being forced to seek more affordable properties elsewhere in Dover district or neighbouring authority areas.

6.5.7 Given this context, it is clear that where available and suitable opportunities for residential development do exist within the district's higher order settlements, including our client's Site at Land at Archers Low which can provide a policy compliant level of affordable housing, it is imperative that the effective use of these sites are appropriately maximised in accordance with draft policy SP3 of the emerging Plan and national policy objectives.

6.5.8 Notwithstanding our client's in principle support or the proposed strategy, we are concerned that highly sustainable, edge-of-settlement sites, particularly in higher tier settlements such as Sandwich have not been fully maximised to reflect their accessible location and capability to accommodate a greater quantum of development. On this basis, we are concerned that the strategic objectives underlying draft policy SP3 'Housing Growth' may not be fully realised, to the detriment of market and affordable housing delivery and the wider policies seeking to conserve and enhance the district's natural and historic environment.

6.5.9 Consequently, our clients object to policy SP3 as drafted, on the basis that there is a clear need to maximise the delivery of housing at sites around Sandwich, and this has not been undertaken – for example at Land at Archers Low, where it has previously been demonstrated that the site has sufficient capacity to deliver approximately 5-10 additional units over the draft allocation, that will otherwise be required to be delivered elsewhere in the district, in potentially less accessible and more sensitive locations.

Greenfield Development and Consistency with Housing Trajectory

6.5.10 Due to the nature and dwindling supply of available urban land in Dover town and the remaining higher order settlements of Deal and Sandwich, the restrictive effect of the coast, the Kent Downs Area of Outstanding Natural Beauty, environmental constraints and the limited capacity of the district's remaining mid- and lower order settlements to accommodate significant levels of growth, release will be required if the Council is to meet its housing and development commitments moving forward.

6.5.11 In our view, sustainable and accessible sites logically located adjacent to existing urban areas, including Sandwich, represent the most sustainable and reliable sources of growth for the Plan period, to support the role and timescales of strategic urban extensions and to deliver the significant number of new homes that are required within the forthcoming Plan period.

6.5.12 Moreover, greenfield edge-of-settlement sites are, in our experience, typically most capable of making meaningful contributions to the associated public infrastructure, affordable housing and mix of new homes that is urgently needed in the district.

6.5.13 The Sustainability Appraisal Scoping Report (2018) sets out that over the course of the adopted Plan period, the key sustainability issues facing Dover District in relation to housing are as follows:

Population growth, household growth and demographic change will place additional demand on key services and facilities such as housing, health, education and social care. The Local Plan offers a new opportunity to manage these pressures, encouraging mixed communities;

There is a need for affordable housing across the District. At present, the mean price of dwellings is higher than the national average. The Local Plan will help to expedite its delivery; and,

There is the need for a mix of housing types that cater for the needs of a range of people, including the growing number of single person and elderly households. Without an up-to date Local Plan, the required housing is less likely to be delivered.

6.5.14 It is evident that the new Dover Local Plan must allocate a mix of reliable sites capable of steadily delivering not only the quantum of housing that is required, but also the associated public infrastructure, affordable housing and a mix of unit types and tenures suitable for a wide range of future occupants.

6.5.15 The Housing Topic Paper (September 2022) provides further context and summarises under Chapter 7 'Historical Housing Delivery' that Dover has historically placed significant reliance on windfall development over the current adopted Plan period, with windfall sites accounting for 44% of all completed dwellings over the preceding 10-year period.

6.5.16 Moreover, it is highlighted that at the beginning of the 10 year period, the majority of new dwellings were being built on brownfield land. However, from the monitoring year 2013-14 onward development on greenfield land began to play a much greater part in the location for new development as show in figure 1 below. This trend of increased housing development on greenfield land is a result of the allocations within the CS and Land Allocation DPD being built out and is associated with an approximate doubling of completions in the district. From 2013-14 onwards the average number of completed dwellings per annum has doubled to that of the early years of the CS, as the strong delivery rates of greenfield sites form the predominant source of housing. This is despite an overall declining trend of brownfield completions towards the latter half of the Plan period. This is generally not an uncommon trend in the majority of local planning authorities areas, where opportunities for available and suitable sites in urban centres dwindle throughout the Plan period.

Figure 1: DDC Brownfield / Greenfield Completions 2010/11 to 2020/21 (source: Housing Topic Paper September 2022)

6.5.17 In light of the above context, it is clear that the adopted Dover Local Plan suffered from an initial under delivery of Plan-led housing growth in which windfall development sources were largely required to take up the slack in the early phases of the Plan period, as major allocated sites failed to deliver at the rates initially expected.

6.5.18 It is equally apparent that initial slow completion rates were quickly addressed once greenfield allocations commenced development, feeding into strong completions in the latter half of the Plan period. In our experience, greenfield sites are typically associated with stronger delivery rates and provide a reliable source of housing growth. The allocation of an appropriate mix of sites and scales is required in order to ensure steady and sustained Plan-led housing delivery across the Plan period and to avoid a reliance on windfall development to address the shortfall.

6.5.19 Consequently, given all of the above, it is imperative that the new Local Plan allocates a sufficient variety and scales of site capable of both ensuring steady and sustained housing completions and capable of making necessary contributions to public infrastructure and services, affordable housing and mix of unit types to address the key issues raised in the Sustainability Appraisal.

6.5.20 In our view, edge-of-settlement greenfield sites such as our client's Site Land at Archers Low represents the most reliable and sustainable source of housing delivery for the Plan period. Such sites are typically less constrained by wider factors and less affected by unforeseen delays such as land contamination. Moreover, greenfield sites typically are more capable of delivering the policy compliant affordable housing, unit mix and developer contributions that are urgently needed and in the case of our client's Site, have already been demonstrated within the present planning application and appeal submission.

6.5.21 It is understood that the Plan is predicated on the delivery of strategic scale development at Whitfield comprising the development of circa 2,200 new homes. Consequently, in order to avoid a repetition of the previous Plan, the Council have sought to ensure that a pool of

reliable greenfield allocation, including that of our client's are included within the Plan, capable of delivering the early growth that is required within the housing trajectory prior to the commencement of major allocations later in the Plan period.

6.5.22 We note that within the Housing Trajectory 'Appendix D', the Council have included allocated units from Years 4 onwards, with extant permissions (accounting for 5% non-implementation) demonstrated to be solely capable of delivering the growth required in Years 1-3. Notwithstanding our client's commitment to commencement on site in 2023 and the initial delivery of units at Land at Archers Low in 2024 (subject to successful appeal), we support this pragmatic approach and suggest this represents a sound basis on which to set the district's housing trajectory. We note also the inclusion of an appropriate windfall allowance and the included contingency buffer to further ensure reasonable flexibility in the housing supply.

6.5.23 On account of all of the above, we submit that the allocation of Land at Archers Low forms part of a sound strategy for growth in the district for the forthcoming Plan period. Land at Archers Low is capable of delivery early in the Plan period, representing a reliable source of housing growth in a highly sustainable and accessible location adjacent to the existing settlement boundary of Sandwich, consistent with the Council's preferred settlement strategy. However, we object on the submission that the Site is capable of making a greater contribution to the district's housing need and suggest an amended wording of the policy to allocate the Site for approximately 40-45 dwellings. Nonetheless, the Site is unconstrained and capable of providing a high-quality residential development including a mix of unit types and tenures, a meaningful contribution to the supply of affordable housing and contributions to public services and infrastructure, benefiting both existing residents and future occupiers.

Policy SP4 'Windfall Development'

6.5.24 Separately, we note the provisions of policy SP4 windfall development. Proposals at Land at Archers Low would likely be acceptable in principle under this provision and we support the policy inclusion for appropriate, proportionate windfall development.

6.5.25 Our client is fully committed to the delivery of the Site which is available and suitable for delivery early in the Plan period and is presently pursuing an appeal on the Site for a greater quantum of units than the allocation in the Regulation 19 Plan. There is consequently little to be gained from potentially delaying delivery of the Site by withdrawing the allocation. Notwithstanding the provisions of SP4, it is reiterated that our client fully supports the allocation of the Site under SAP22 for residential development as the most appropriate mechanism for delivery of the Site and the opportunity for genuinely Plan-led development in Sandwich and the provision of associated benefits to public services and infrastructure, contribution to affordable housing supply and the delivering of a mix of house types and tenures.

Infrastructure Delivery

6.5.26 Paragraph 11 of the Framework is clear that all plans should promote a sustainable pattern of development. This includes aligning growth and infrastructure. Paragraph 20 goes on to confirm that strategic polices will be expected to make sufficient provision for associated development infrastructure.

6.5.27 In this regard, draft policies SP11 'Infrastructure and Developer Contributions' and SP12 'Strategic Transport Infrastructure' of the emerging Plan form the key strategic polices for infrastructure delivery. We agree that where development would create a need, or would have an impact, or would exacerbate an existing deficiency in infrastructure provision, appropriate developer contributions may be sought.

6.5.28 It is however emphasised that in all developments, infrastructure requirements must be demonstrated to be necessary through assessment during determination of the application on a case-by-case basis. Where new development is proposed, it does not automatically follow that major infrastructure contributions are always required or contribution to strategic infrastructure proposals are appropriate. For instance, it is our client's view that any infrastructure requirements must be demonstrated through a robust and transparent assessment at application stage, taking into account the submission of detailed supporting evidence, for example following consideration of the Transport Assessment in the case of highway infrastructure contributions.

Alignment with Sustainability Appraisal Findings

6.5.29 As part of the preparation of the Local Plan, the Council has identified and appraised a range of growth and spatial options through the Sustainability Appraisal (SA) which provides an assessment of how different options perform in environmental, social and economic terms, to help inform which option should be taken forward and combined with wider evidence documents, have been used to determine the growth and spatial strategy set out in the Plan.

6.5.30 Five potential distributions of growth were identified during preparation of the draft Regulation 18 Local Plan:

- Spatial Option A: Distributing growth to the District's suitable and potentially suitable housing and employment site options (as needed to deliver the scale of growth required).
- Spatial Option B: Distributing growth proportionately amongst the District's

existing settlements based on their population.

- Spatial Option C: Distributing growth proportionately amongst the District's existing settlements based on the District's defined settlement hierarchy.
- Spatial Option D: Distributing growth in the same way as the adopted Local Plan, focussing most growth in and around Dover town.
- Spatial Option E: Distributing growth more equally across the District's settlements: Dover, Deal, Sandwich and Aylesham, as well as the rural villages.

6.5.31 The conclusion of the SA was that Spatial Options C (settlement hierarchy) and D (adopted Core Strategy with Dover focus) generally perform the most strongly against the SA objectives, particularly when delivering the baseline growth scenario. However, given the environmental constraints that exist around Deal and Sandwich, very few suitable and potentially suitable sites have been identified in these towns. Given this, the Council's preferred option for the distribution of housing and economic growth comprises a combination of options A (HELAA sites), C (settlement hierarchy) and D (Dover focus). The distribution of housing and economic growth in the District is therefore primarily based on the settlement hierarchy, and influenced by site availability, environmental constraints and factors of delivery.

6.5.32 On account of the above, our client agrees that the proposed growth strategy, and by extension, policy SP3 in principle represents a sound and evidence-led strategy for growth. However, given the clear acknowledgement of the dwindling supply of available sites in the higher order settlements of Deal and Sandwich, which has necessitated a minor deviation from the strongest performing spatial options, we submit that where sites are available and suitable for development in Deal and Sandwich, these must be fully maximised, reflecting their accessible location and their ability to reduce the need to develop into less accessible and more sensitive sites elsewhere in the district to accommodate the growth that is required.

Site Specific Sustainability Appraisal

6.5.33 Land at Archers Low Farm, St George's Road, Sandwich is included under HELAA reference 'SAN23' within the SA Site Assessment (Appendix F). The site performs strongly, with particular positives identified with regards to SA Objectives related to housing, accessibility, the economy, sustainable transport and climate change mitigation, in large parts due to the edge-of-settlement location and proximity of the site to key services in Sandwich.

6.5.34 We note negatives associated with the development of a greenfield site, including loss of agricultural land, however this would be true of the majority of greenfield sites and it is abundantly clear that Dover's housing need cannot be met solely on brownfield sites. We note also minor negatives / uncertain associated with biodiversity, the historic environment and landscape, however it is not clear whether these take into account the high-quality design, biodiversity enhancement and landscape mitigation proposed under the application/appeal. Irrespective, these are not considered to outweigh the clear and tangible sustainability benefits associated with edge-of-settlement development and the site's consistency with the preferred spatial options.

Summary

6.5.35 Taking all of the above into consideration, our client is wholly supportive of the inclusion of land promoted at Archers Low, as a future housing allocation within the Dover District emerging Local Plan. The allocation is considered wholly consistent with the objectives of the Plan and forms part of a sound evidence-led growth strategy consistent with the recommendations of the Sustainability Appraisal for the district to 2040, subject to the sole objection in relation to capacity.

6.6 Deliverability

6.6.1 Prior to the current appeal proposal, the Site has had no planning history of a residential nature or a history of unimplemented permissions. There are not considered to be any impediments to the Site being allocated for development commencing within the first five years of the Plan period. Combined with an appropriate number and scale of wider allocations in Sandwich and elsewhere across the district, this would ensure steady delivery of housing in Dover district across the majority of the Plan period and support the role and timescales of strategic housing delivery at Whitfield towards the latter half of the Plan period.

6.6.2 Fernham Homes Limited – a local SME with a strong history and track record of delivery, together with an adopted and robust business plan for growth – has control over the site, and are poised to commence work on its residential development very promptly after the receipt of planning permission, potentially (subject to the successful outcome of the current appeal) in 2023. Delivery of housing is expected from 2024.

6.6.3 For the reasons set out in this representation, the Site is considered suitable for the residential development of approximately 40 – 45 dwellings. The Site is adjacent to the urban area of Sandwich, one of the four higher order settlements in the district and the Council's preferred locations for Plan-led growth within the district. Development at Land at Archers Low would form a natural and logical development east of Sandwich with excellent accessibility to day-to-day services and amenities via active travel modes within Sandwich itself and convenient access

to public transport infrastructure (including Sandwich train station) for onward travel to key neighbouring settlements including Dover, Ramsgate, Canterbury and Ashford.

6.6.4 Finally, in respect of suitability, there are no physical limitations or problems such as access, infrastructure, flood risk, hazardous risks, pollution or contamination.

6.6.5 On behalf of the landowner, we submit that there are no known financial restrictions that would impact upon the viability of a future housing scheme or that would prohibit development coming forward within the early stages of the Plan period. To the contrary, we consider there to be an opportunity to deliver a high-quality, sustainably located residential development scheme consistent with the Council's proposed growth strategy comprising an appropriate mix of market and affordable housing and capable of contributing to a range of community facilities, public infrastructure and services locally.

6.6.6 Given the advanced nature of the proposals by virtue of the submitted planning application, in terms of specific timescales, should the ongoing appeal be allowed, we understand that Fernham Homes Limited and Walker Residential Limited are capable of commencing work on-site in early 2023, with delivery in 2024 and completion of the Site anticipated in 2025.

6.6.7 The Site is in single ownership and there are no complicated legal agreements or covenants that would prohibit the ability to bring forward the Site early in the Plan period. The Site is therefore considered available and achievable for the purposes of the tests of deliverability.

7 Conclusion

7.1 Summary

7.1.1 This representation has been prepared by DHA Planning on behalf of Fernham Homes Limited and Walker Residential Limited, in response to the Dover District Council Local Plan (Regulation 19) consultation which runs until 9th December 2022.

7.1.2 Our client controls 'Land at Archers Low Farm, Sandown Road, St Georges Road, Sandwich' and is promoting the residential allocation of the Site as part of the new Dover District Local Plan preparation process. The Site is allocated for residential development in the Regulation 19 Pre-submission Plan for the provision of 35 dwellings under policy reference 'SAP22'.

7.1.3 Taking all of the above into consideration, we consider that the Site promoted at Land at Archers Low should remain included as a future housing allocation within the Dover District emerging Local Plan. The allocation is considered, in principle, wholly consistent with the objectives of the Plan and forms part of a sound growth strategy for the district to 2040. However, it is imperative that the effective use of these higher-order settlement sites are appropriately maximised in accordance with draft policy SP3 of the emerging Plan, and wider policies seeking to otherwise conserve and enhance the district's natural and historic environment and national planning policy objectives. We are concerned that this has not been fully undertaken and object solely on this basis.

7.1.4 Consequently, our clients object to policy SP3 as drafted, on the basis that there is a clear need to maximise the delivery of housing at sites around Sandwich, and this has not been undertaken – for example at Land at Archers Low, where it has previously been demonstrated that the site has sufficient capacity to deliver approximately 5-10 additional units over the draft allocation, that will otherwise be required to be delivered elsewhere in the district, in potentially less accessible and more sensitive locations.

7.1.5 Without prejudice to our client's support in principle of the proposed allocation at Land at Archers Low, we would urge the Council to re-visit the allocation policy text and allow a higher dwelling per hectare guide to ensure the Site is developed to its full potential and the objectives of draft policy SP3 are most effectively realised. It is submitted that the SAP22 policy wording should be amended to more accurately reflect the capability of the Site to accommodate approximately 40 – 45 dwellings (broadly in line with the previous site allocation in the Regulation 18 Local Plan), deliverable early in the Plan period.

7.1.6 In addition to being a highly sustainable and logical edge-of-settlement allocation, the Site is deliverable in a single land ownership with no viability issues, legal or third-party constraints present. Our client is fully committed to the delivery of Land at Archers Low and there are no impediments to the Site being capable of delivery within the initial 0-5 years of the Plan period.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will

For the reasons set out in the consultation response submitted on behalf of Fernham Homes Limited and Walker Residential Limited (ref DHA/30245), the capacity of Land at Archers Low Farm, St Georges Road Sandwich (SAN023) should be increased to 40 - 45 dwellings.

make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Please refer to the consultation response submitted on behalf of Fernham Homes Limited and Walker Residential Limited (ref DHA/30245).
Include files	30245 DDC Rep_Archers Low Farm FINAL 09 12 22.pdf
Local Plan Consultation Point	Strategic Policy 12 - Strategic Transport Infrastructure
Rep ID	SDLP1071
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC are on record 2021 <i>proposals generating levels and types of traffic movement resulting in severe cumulative residual impacts in terms of capacity and road safety will not be permitted</i> '. The real-world constraints of the EK road system (A258, A2, A256,) mean little can be done to ameliorate the situation, without long term road closures needed to dual the A2 from Jubilee Way to Lydden Hill. Neglect by DfT and Highways England means that with biometric passport checks in 2023, residents can expect gridlock again and again.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant	For SP1 and SP12 to be linked up, Bus services should be better integrated with the rail service timetables on the line running from Sandwich and Deal through Dover to Ashford, and the line running from Dover to Canterbury and Faversham and Victoria. See comments in SP1, on the many engineered cycle routes needed.

<p>and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Road improvements to separate <u>local traffic</u> from <u>through freight traffic</u> must be done to save lives; road improvements that central govt must pay for. The separation needed must include flyovers and underpasses and foot bridges, including under / over the A20 route through Dover town. It should be noted that Dover has too much experience of the gridlock and chaos caused by cross-channel delays, especially the community of Aycliffe, (and Guston may suffer similar blight). With more extreme weather events expected, and with 'frictionless freight flow' now a thing of the past, holding areas for freight OUTSIDE THIS DISTRICT, near the M25, are needed more now than they were before.</p> <p>The Council's 'commitment to work with HE on long term improvements to A2' must be more than pious lip-service reiterated to political friends in central government. It must result in the complete dualling of the A2 and Jubilee Way from Eastern Docks to Lydden Hill. The separation of local traffic from through freight traffic by means of flyovers and underpasses at the Duke of York, and Whitfield roundabouts must be done at the expense of central govt, Dept for Transport/ Highways England. Residents of the garden of England should not suffer because national traffic flows on our roads, given the failure of implement freight to rail policies. <i>SP12 would become more sound with the following: "Proposals which assist in the provision of alternative transport modes across a dualled A2 will be encouraged. The Council will work with Highways England and Kent County Council to improve accessibility elsewhere in Kent between the two principal access routes to the Port of Dover, the M20 and the A2. The Council will work with partners to improve access to the local and High Speed rail network."</i></p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.</p>
<p>Include files</p>	<p>v4 D&D Greens response 2022 Reg 19 new Local Plan .docx</p>
<p>Local Plan Consultation Point</p>	<p>Strategic Policy 12 - Strategic Transport Infrastructure</p>
<p>Rep ID</p>	<p>SDLP1482</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1333265</p>
<p>Consultee Full Name</p>	<p>Cllr John Lonsdale</p>
<p>Consultee Company / Organisation</p>	<p>Walmer Town Council</p>
<p>Agent Full Name</p>	<p></p>
<p>Agent Company / Organisation</p>	<p></p>
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SP12</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified Effective Consistent with National Policy</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>No</p>

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note The text below is an extract from the original representation which is attached to SDLP1438.</p> <p>DDC Note The text below is an extract from the original representation which is attached to SDLP1438.</p> <p>SP12 Strategic Transport Infrastructure</p> <p>For SP1 and SP12 to be linked up, Bus services should be better integrated with the rail service timetables on the line running from Sandwich and Deal through Dover to Ashford, and the line running from Dover to Canterbury and Faversham and Victoria. See comments in SP1, on the many engineered cycle routes needed.</p> <p>DDC are on record 2021 proposals generating levels and types of traffic movement resulting in severe cumulative residual impacts in terms of capacity and road safety will not be permitted. The real-world constraints of the EK road system (A258, A2, A256,) mean little can be done to ameliorate the situation, without long term road closures needed to dual the A2 from Jubilee Way to Lydden Hill. Neglect by DfT and Highways England means that with biometric passport checks in 2023, residents can expect gridlock again and again.</p> <p>Road improvements to separate local traffic from through freight traffic must be done to save lives; road improvements that central govt must pay for. The separation needed must include flyovers and underpasses and foot bridges, including under / over the A20 route through Dover town. It should be noted that Dover has too much experience of the gridlock and chaos caused by cross-channel delays, especially the community of Aycliffe, (and Guston may suffer similar blight). With more extreme weather events expected, and with 'frictionless freight flow' now a thing of the past, holding areas for freight OUTSIDE THIS DISTRICT, near the M25, are needed more now than they were before.</p> <p>The Council's 'commitment to work with HE on long term improvements to A2' must be more than pious lip-service reiterated to political friends in central government. It must result in the complete dualling of the A2 and Jubilee Way from Eastern Docks to Lydden Hill. The separation of local traffic from through freight traffic by means of flyovers and underpasses at the Duke of York, and Whitfield roundabouts must be done at the expense of central govt, Dept for Transport/ Highways England. Residents of the garden of England should not suffer because national traffic flows on our roads, given the failure of implement freight to rail policies. SP12 would become sounder with the following: "Proposals which assist in the provision of alternative transport modes across a dualled A2 will be encouraged. The Council will work with Highways England and Kent County Council to improve accessibility elsewhere in Kent between the two principal access routes to the Port of Dover, the M20 and the A2. The Council will work with partners to improve access to the local and High Speed rail network."</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>SP12 would become sounder with the following: "Proposals which assist in the provision of alternative transport modes across a dualled A2 will be encouraged. The Council will work with Highways England and Kent County Council to improve accessibility elsewhere in Kent between the two principal access routes to the Port of Dover, the M20 and the A2. The Council will work with partners to improve access to the local and High Speed rail network."</p> <p>DDC note: text below extracted from the SP1 section of the original representation.</p> <p>'Mitigation' should include the following in order to become effective and sound. ' All new developments of over 40 dwellings must contribute to a Community Infrastructure Levy so that engineered kerbed cycle routes can enhance cycle paths 1, 2,15,16,17, and new engineered cycle tracks must be made safe in winter dark afternoons, new engineered cycle routes must link Whitfield Urban Development with Kearsney and Martin Mill stations and Elvington with Snowdown and Aylesham and Shepherdswell Stations, especially given the rural bus cuts implemented in these villages in 2022. Also trains and buses on the key commuter routes should be equipped to carry (electric + cargo) bikes. Cross referenced with DM policy T11. CIL is also needed to pay for other infrastructure essential for the local plan to be sound which is referred to below.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 12 - Strategic Transport Infrastructure

Rep ID	SDLP1453
Rep Status	Processed
Consultee ID	1331895
Consultee Full Name	Ben Olney
Consultee Company / Organisation	HS1 Limited
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP12
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>HS1 Ltd holds the 30 year concession from the Government to operate, manage and maintain High Speed 1 (HS1), the 109 kilometre high speed rail line connecting St Pancras International to the Channel Tunnel. The line is used for high speed domestic services throughout Kent; international passenger services to destinations in continental Europe including Paris and Brussels; as well as for freight traffic. The concession includes the stations along the route: St Pancras International, Stratford International, Ebbsfleet International and Ashford International.</p> <p>HS1 welcomes the commitment in the Regulation 19 submission to the development of Strategic Transport Infrastructure included within Policy SP12.</p> <p>Dover in 60</p> <p>HS1 has been a major advocate of improving journey times from Eastern Kent to London, and has already investigated proposals for a new connection at Dollands Moor. This new infrastructure would enable High Speed trains to cross onto HS1 tracks before the existing connection at Ashford, thus allowing some services to use the Ashford flyover and save up to 7 mins off the travel time to London. This would result in the realistic prospect of passengers from Dover arriving into St Pancras or Stratford International Stations in under an hour.</p> <p>Network Rail Infrastructure Limited (NRIL) business case analysis of the socio-economic benefits of the Dollands Moor crossover submitted to the Department for Transport demonstrates that the scheme has the potential to deliver £301m of socio-economic benefits. A significant proportion of these benefits would accrue to the communities of Dover and the surrounding areas. NRIL rated the scheme 'high' in terms of its value for money as Web-Tag analysis (the HM Treasury standard for examining the cost/benefit ratio of new infrastructure) shows the scheme has a potential Benefits Cost Ratio (BCR) of over 3, i.e. for every pound spent on the scheme, it would deliver £3+ in socio-economic benefit.</p> <p>It is clear that a broad pool of funding options will need to be investigated and therefore the recognition in the Reg 19 document of the need for developer contributions is fully supported. HS1 would be happy to work closely with Dover District Council in potentially setting tariffs for proportional developer contributions towards improving journey times and we would be keen to understand more about how the Council intends to bring forward further policy/guidance on developer contributions.</p> <p>The proposed site for the crossing is located within Folkestone and Hythe District Council boundary and it would therefore also require cross Borough working and the potential pooling of developer contributions to bring this proposal forward.</p> <p>Infrastructure Delivery Plan (IDP)</p> <p>It is welcomed that "Dover in 60" is clearly referenced in the draft IDP, however we consider that HS1 Ltd should be referenced as a key delivery partner. Likewise, our 2019 publication 'Delivering for Kent: The Economic Impact of HS1' (Steer, September 2019) should be listed as part of</p>

	<p>the evidence base. The document should also clearly set out the proposed Dollands Moor Crossing as a “future need to deliver growth from the Local Plan” so that there is a clear link between the need and ability to raise developer contributions.</p> <p>Indicative Fasttrack Route</p> <p>HS1 supports the proposal for a sustainable fast track bus service from the major growth area of Whitfield to Dover Priory Station, this will help to provide a fast and sustainable door to door experience for passengers. The proposed route appears to show a rather restricted loop through existing housing areas, we presume that a much expanded route throughout the future site allocation has been reserved for future delivery and if so it would be useful to indicate this on the Proposals Map.</p> <p>We look forward to working with you further on the development of the Strategic Transport Infrastructure within Dover District Council and beyond.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Not Applicable
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
Include files	
Local Plan Consultation Point	Strategic Policy 12 - Strategic Transport Infrastructure
Rep ID	SDLP1212
Rep Status	Processed
Consultee ID	1332924
Consultee Full Name	Amy Aldridge
Consultee Company / Organisation	Gladman Developments Ltd
Agent Full Name	Amy Aldridge
Agent Company / Organisation	Gladman Developments Ltd
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	SP12
<p>2 - Do you consider this part of the Plan sound?</p>	Yes

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Gladman acknowledge the Council's identification of key strategic transport schemes across the district and their intention to seek proportionate developer contributions in order to support the delivery of these schemes and do not object to the principle of Policy SP12. However, more clarity and detail is needed to identify which development sites are anticipated to provide contributions towards for each of the strategic schemes as it is currently unclear. (DDC Note - Text Extracted from Document sent from Gladman Developments Ltd. Full attachment can be found under the introduction comment reference SDLP1192)
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 12 - Strategic Transport Infrastructure
Rep ID	SDLP1302
Rep Status	Processed
Consultee ID	1331928
Consultee Full Name	Matthew Porter
Consultee Company / Organisation	Fernham Homes Ltd
Agent Full Name	Matt Porter
Agent Company / Organisation	DHA Planning

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy SAP15 - Land at Rays Bottom between Liverpool Road and Hawksdown, Walmer (WAL002) Policy SP3 - Housing Growth Policy SP4 - Windfall Development Policy SP11 - Infrastructure and Developer Contributions Policy SP12 - Strategic Transport Infrastructure
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We consider that the plan is sound, but object to elements of Policy SAP15 - Land at Rays Bottom between Liverpool Road and Hawksdown, Walmer (WAL002) and Policy SP3 - Housing Growth. These objections are set out in the consultation response submitted on behalf of Fernham Homes Limited (ref DHA/30359).</p> <p>1 Introduction</p> <p>1.1 Purpose of this Representation</p> <p>1.1.1 This representation has been prepared by DHA Planning on behalf of Fernham Homes Limited in response to the Dover District Council 'DDC' Local Plan (Regulation 19) consultation which runs until 9th December 2022.</p> <p>1.1.2 We understand that DDC is in the process of preparing a new Local Plan to set out a strategy for development for the period to 2040 and that the Council are presently seeking comments on the pre-submission Plan prior to its submission for examination in early 2023.</p> <p>1.1.3 Our client is promoting 'Land at Rays Bottom, Walmer, Deal' (hereafter referred to as 'Land at Rays Bottom' or 'the site') for the residential allocation of the site as part of the new Dover District Local Plan preparation process. The site is allocated for residential development in the Regulation 19 Pre-submission Plan for the provision of 75 dwellings under policy reference 'SAP15'.</p> <p>1.1.4 It is highlighted that as part of the Regulation 18 Local Plan, the Site was allocated under the 'Site Allocations Policy 1 Non-Strategic Housing Allocations' for approximately 100 dwellings (reference WAL 002).</p> <p>1.1.5 The purpose of the representation is to support the allocation of Land at Rays Bottom as a suitable and deliverable location for residential development and provide comment on the consistency of the allocation with the proposed strategy, draft policies and our client's position in respect of the 'soundness' of the Plan but to object to the indicative capacity set out in the policy.</p> <p>1.1.6 In this regard, we remain wholly supportive of the principle of the residential allocation of Land at Rays Bottom and agree that the Site represents a logical and sustainable location to direct growth in Deal consistent with the growth strategy of the Plan as a whole.</p> <p>1.1.7 Accordingly, we say that the allocation of Land at Rays Bottom is necessary in order for the Council in meeting the growing need for new homes in the district and help to ensure the DDC can have confidence in consistently meeting its market and affordable housing targets in full throughout the life of the new Dover District Plan.</p> <p>1.1.8 It is submitted that the SAP15 policy wording should be amended to reflect the capability of the Site to accommodate approximately 80 dwellings, deliverable early in the Plan period.</p> <p>1.1.9 Based on the current national and local planning context, we consider the Site to be a highly suitable edge-of-settlement location to allocate land for housing to help meet the need for new homes in the district and its effective use should be appropriately maximised in accordance with national policy objectives.</p> <p>1.1.10 Further details regarding the Site and commentary on the consistency of the allocation with the proposed strategy, draft policies and our client's position in respect of the 'soundness' of the Plan are set out in the following sections of this document.</p> <p>1.2 About Fernham Homes</p> <p>1.2.1 Fernham Homes Ltd are a local award winning small and medium sized (SME) housebuilder, established in 1997 and has a strong track record of delivering high quality residential and mixed use developments in Kent over the last 25 years. This has been acknowledged through the receipt of nationally recognised awards, including the gold Evening Standard Awards best family home 2022 and 2019 bronze WhatHouse Best Small Housebuilder.</p>

1.2.2 SME housebuilders are recognised in the National Planning Policy Framework ('NPPF') at paragraph 69 as making an important contribution to meeting the housing requirements of an area, and being able to build out relatively quickly. Similarly, this has also been recognised by the Planning Inspectorate. This is particularly the case with Fernham Homes, which is privately owned with access to significant resources. This provides significantly more flexibility than national and other regional housebuilders, and allows Fernham Homes to deliver housing rapidly and to a high quality, beautiful and sustainable standard (para 126 of the NPPF).

1.2.3 Fernham Homes has embarked on a sustained period of growth, with an adopted and robust business plan to deliver around 300 houses per year in five years time.

1.2.4 A key element of Fernham Homes' operations is to take a careful approach to site selection: a huge amount of due diligence is undertaken as part of this, and therefore Fernham Homes only invests in those sites which meet the NPPF requirements of being available, suitable, and deliverable. As set out below land at Rays Bottom, Walmer ('SAP15') is firmly considered to be such a site.

1.2.5 Similarly, a key feature of Fernham Homes' approach is to work positively and proactively with local planning authorities (LPAs), both during the preparation of local plans and at planning application stage. Fernham Homes are fully committed to engaging with DDC in the preparation of its Local Plan, and firmly subscribe to the national policy approach set out in paragraphs 15 and 16 c) of the NPPF that "the planning system should be genuinely plan-led" and should be shaped by early, proportionate and effective engagement between LPAs and others, including businesses and developers. Accordingly, Fernham Homes would welcome the opportunity to discuss the matters contained in this representation, including the availability, suitability, deliverability and capacity of land Rays Bottom, Walmer ('SAP15') directly with DDC members and officers, ahead of the submission of the Local Plan for examination.

1.3 Representation Structure

1.3.1 The representation structure is outlined below for ease of reference:

Chapter 2 (Consultation Background) – Sets out the context of the Dover District new Local Plan preparation, relevant national planning requirements and a summary of our current position.

Please refer to paragraph 52 of Appeal Decisions: APP/M2270/W/21/3283924 & APP/M2270/W/21/3288645

Chapter 3 (Legal Tests of Soundness) - Assessing whether the plan is sound, having regard to the tests of soundness outlined by paragraph 35 of the NPPF.

Chapter 4 (Duty to Co-operate) - Assessing whether the plan is sound, having regard to the duty to cooperate outlined by paragraph 24 of the NPPF.

Chapter 5 (Housing Need) - Consideration of market and affordable housing need and assessment of proposed housing allocations and supply sources.

Chapter 6 (Assessment of Suitability) - Re-introduces our client's Site and provides a summary of planning constraints and opportunities, including the quantum of development that could be accommodated, why the Site is suitable for development and why the principle of the draft allocation for residential development is both justified and consistent with the DDC's strategy for growth in the district.

Chapter 7 (Conclusion) - Summarises the key points raised throughout the representation and re-affirms our client's support for the principle of the Site's allocation and the principle of proposed strategy ahead of the submission of the Plan for examination, and the objections in terms of capacity.

2 DDC – Draft for Submission Local Plan (Regulation 19)

2.1 Consultation Background

2.1.1 DDC are required to prepare a new Local Plan, as the current suite of development plan documents were adopted in 2002, 2010 and 2015. The Core Strategy (CS) (adopted 2010) in particular has a time horizon up to 2026. The plans, and the policies contained within, pre-date current national policy, practice guidance and local evidence and consequently require updating.

2.1.2 The new Local Plan will set out the vision, strategic objectives and overarching development strategy for the growth of the District over the period to 2040. It provides the planning policy framework to guide the future development of the area, addressing needs and opportunities for housing, the economy, community facilities and infrastructure, as well as the basis for conserving and enhancing the natural and historic environments, mitigating and adapting to climate change, and achieving well designed places.

2.1.3 For the avoidance of doubt, the new Local Plan, on adoption, will replace the CS 2010 and the Land Allocations Plan 2015, as well as saved policies from the 2002 Local Plan.

2.1.4 DDC's Regulation 19 Local Plan outlines the key issues that need to be addressed between now and 2040. In particular, the Plan sets out the following key planning issues for the District:

- Ensuring that new development in the District contributes to the mitigation of, and adaptation to, climate change.
- Supporting DDC to deliver its intention to be a carbon neutral district by 2050.
- Managing flood risk and coastal change.
- Ensuring that a sufficient amount and variety of land is identified to deliver a continuous supply of housing across the Plan period and that DDC maintains a five-year housing land supply.
- Delivering growth in a way that focuses development in the least sensitive areas of the District in order to conserve and enhance the District's rich natural and historic environments.
- Supporting sustainable development in rural areas to enhance the vitality of rural communities.
- Working with partners to facilitate the delivery of the Whitfield Urban Expansion. Ensuring a range of housing tenures, types and sizes are provided across the District to meet the needs of the local community and provide choice and flexibility in the housing market.
- Promoting economic growth, tourism, and investment in the District's Town Centres in line with DDC's Economic Growth Strategy.
- To address the impact of the COVID-19 pandemic.
- Delivering strategic transport improvements, including upgrades to the Duke of York and Whitfield roundabouts to support the scale of housing and economic growth identified in the Plan.
- Promoting sustainable transport initiatives to encourage a modal shift to more sustainable forms of transport like walking and cycling.
- Ensuring that infrastructure is delivered, in the right place, at the right time, to meet the needs of the District and support the levels of development identified in the Local Plan.
- Supporting the delivery of attractive, high-quality, design led developments and the creation of healthy, inclusive and safe communities, that are well served by good quality services and facilities to support people's lives.
- Conserving and enhancing the District's rich and diverse natural landscape, including the five international sites within the district, the Kent Downs Area of Outstanding Natural Beauty (AONB), five Sites of Special Scientific Interest (SSSIs), two National Nature Reserves (NNRs), two stretches of Heritage Coasts and two Marine Conservation Zones.
- Delivering a net gain in biodiversity in the District over the plan period.
- To promote the conservation, restoration and where appropriate the enhancement of the District's heritage assets, in order to protect their significance and to ensure that they can be best appreciated and enjoyed by current and future generations.

2.1.5 The new Local Plan will be examined by an Inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is 'sound'.

2.1.6 This submission will comment on each of the above, highlighting where we believe any areas of concern lie or where modifications may be required.

2.2 DDC's Local Development Scheme

2.2.1 The District Council has a duty to review the policies contained within the development plan every five years. The 2014/2015 Authority Monitoring Report signalled the need to review key parts of DDC's adopted CS evidence base.

2.2.2 DDC's Local Development Scheme (LDS) first outlined the delivery timetable for the Local Plan Review (LPR) in the March 2017 publication. Since then, the LDS has been updated on an annual basis. The most recent September 2022 LDS summarises that following the preparation of the principal evidence base documents, the Local Plan Review Regulation 18 consultation took place for 8 weeks in January 2021. The Regulation 19 consultation was scheduled for 7 weeks during Q4 of 2022 and is the subject of this representation.

2.2.3 Moving forward, submission of the Plan is anticipated in Q1-2 2023 with the Examination in Public in Q3-4 2023. The new Local Plan is currently scheduled for adoption in 2024.

2.2.4 As planned, DDC are now undertaking the Regulation 19 Draft Local Plan Consultation, for which this submission is made

3 Legal Test of Soundness

3.1 Legislation and Guidance

3.1.1 The new Local Plan will be examined by an Inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is 'sound'. It is a statutory requirement that every development plan document must be submitted for independent examination to assess when it is "sound", as well as whether other statutory requirements have been satisfied (s.20(5) of the 2004 Act). By s.19 of the 2004 Act, in preparing a development plan document a local planning authority must have regard to several matters including national policies and advice contained in guidance issued by the Secretary of State. Such guidance currently exists in the form of the NPPF and is summarised below. This states that Plans must be:

(a) Positively Prepared: based on a strategy which seeks to meet objectively assessed development and infrastructure requirements

3.1.2 This means that the Local Plan should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. The NPPF set out principles through which the Government expects sustainable development can be achieved.

(b) Justified: an appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence

3.1.3 This sets out the requirement that the Local Plan should be based on a robust and credible evidence base involving:

I. Research/fact finding: the choices made in the plan are backed up by facts.

II. Evidence of participation of the local community and others having a stake in the area.

3.1.4 The Local Plan should demonstrate an appropriate strategy, taking into account reasonable alternatives and based on proportionate evidence. These alternatives should be realistic and subject to sustainability appraisal. The Plan should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

(c) Effective: deliverable over its period based on effective joint working on cross-boundary strategic priorities

3.1.5 This makes clear that the Local Plan should be deliverable, requiring evidence of:

- Sound infrastructure delivery planning;
- Having no regulatory or national planning barriers to delivery;
- Delivery partners who are signed up to it; and
- Coherence with the strategies of neighbouring authorities, including neighbouring marine planning authorities.
- The new Local Plan should be flexible and able to be monitored.

3.1.6 The Local Plan should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen. The plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the Local Plan should make clear that major changes may require a formal review including public consultation. Any measures which DDC has included to make sure that targets are met should be clearly linked to an Annual Monitoring Report.

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national policy.

3.1.7 This submission comments on each of the above in further detailing, highlighting areas of support and where modifications are required as appropriate.

3.2 Legal Compliance

3.2.1 In terms of legal compliance, the main requirements for the early stages of Local Plan consultation are in relation to:

- planning for community engagement;
- the sustainability appraisal (including consultation with the statutory environment consultation bodies);
- identifying significant cross boundary and inter-authority issues; and
- ensuring that the plan rests on a credible evidence base, including meeting the Act's requirement for keeping matters affecting the development of the area under review.

3.2.2 In addition to the above, the NPPF states² that: "Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:

a) All plans should promote a sustainable pattern of development that seeks to: meet the development needs of the area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effect.

b) Strategic policies should as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

(i) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or

Paragraph 11, National Planning Policy Framework 2021

(ii) Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”

3.2.3 In addition, to the above, the NPPF states³ that Plans should:

a) be prepared with the objective of contributing to the achievement of sustainable development;

b) be prepared positively, in a way that is aspirational but deliverable;

c) be shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;

d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

e) be accessible through the use of digital tools to assist public involvement and policy presentation; and

f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

3.2.4 It is important to note that the NPPF⁴ requires strategic policies to set out an overall strategy for the pattern, scale, and design quality of places, and make sufficient provision for:

a) housing (including affordable housing), employment, retail, leisure and other commercial development;

b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

c) community facilities (such as health, education and cultural infrastructure); and;

d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

3.2.5 It is clear from the above, that any local plan should set out a comprehensive and cohesive approach to future development.

Paragraph 16, NPPF 2021

Paragraph 20, NPPF 2021

4 Duty to Co-Operate

4.1 Legal and NPPF Requirements

4.1.1 Section 33A of the Planning and Compulsory Purchase Act 2004 sets out a statutory ‘Duty to Cooperate’ (DtC) – i.e. a legal obligation - to all bodies as prescribed by Regulation 4 of the Town and Country Planning (Local Planning) England Regulations 2012 (the Regulations).

4.1.2 The duty requires DDC to cooperate with other persons to ‘maximise the effectiveness’ with which named activities are undertaken. Those activities include the preparation of development plan documents (such as this local plan) and activities that support that activity ‘so far as relating to a strategic matter’.

4.1.3 A strategic matter is defined by S33A(4) in summary as: (a) ‘sustainable development or use of land that has or would have a significant impact on at least two planning areas’ (a planning area in this case is the area of a borough or district council); and (b) ‘sustainable development or use of land in a two tier area’ (as this is) ‘if the development or use (i) is a county matter, or (ii) has or would have a significant impact on a county matter’. County matters broadly relate to minerals and waste and associated developments as defined by Paragraph 1 of schedule 1 to the Town and Country Planning Act 1990 (as amended).

4.1.4 Section 33A (7) requires DDC (and persons subject to the DtC) to have regard to any guidance issued by the Secretary of State about how the duty is to be complied with. In that regard Paragraph ID 9-004-29140306 of the Government's Planning Practice Guidance (PPG) confirms amongst other things that the DtC is not a duty to agree (albeit that local planning authorities should make every effort to secure the necessary cooperation on strategic cross border matters before they submit local plans for examination).

4.1.5 The NPPF establishes that effective and on-going joint working is an integral part of the plan making process that will, amongst other things, determine whether development needs that cannot be met wholly within a plan can be met elsewhere. The NPPF goes on to state at paragraph 27 that in order to demonstrate effective and on-going joint working strategic policy making authorities should: "... prepare and maintain one or more statements of common ground documenting the cross-boundary matters being addressed".

4.1.6 In addition to the District's own housing pressures, part of the DtC involves considering whether neighbouring authorities' unmet housing need can be accommodated. It is worth highlighting that recent amendments to the London Plan have identified that the City's housing need has become increasingly more difficult to deliver and therefore areas outside London will be faced with having to absorb more of London's housing need. Consequently, DDC has a duty to explore whether it can accommodate some of this overspill of London's unmet need.

4.2 Assessment of DDC's discharging of the Duty to Co-operate

4.2.1 It is recognised that work to discharge the DtC remains ongoing by DDC and will continue prior to submission as part of the preparation of the Local Plan evidence base.

4.2.2 Notwithstanding the above, at this stage it is understood that DDC have engaged with the members of the East Kent Regeneration Board including neighbouring East Kent planning authorities, Kent County Council (KCC) and its subsidiary departments:

- Folkestone and Hythe District Council
- Canterbury City Council
- Thanet District Council
- KCC
 - KCC Highways & Transportation
 - KCC Minerals & Waste
 - KCC Heritage Conservation
 - KCC Flood & Water Management
 - KCC Natural Environment & Coast
 - KCC Infrastructure including Education

4.2.3 In February 2016, DDC adopted a Memorandum of Understanding (MOU) in respect of the DtC between the East Kent Regeneration Board members. A review of the MOU took place and was agreed in January 2021.

4.2.4 The East Kent MOU sets out the framework in which the authorities will work together on strategic issues and will actively engage. It forms the overarching framework and context within which Statements of Common Ground (SoCG) will be agreed between individual authorities.

4.2.5 Further engagement is also confirmed to have taken place between the following prescribed bodies and other relevant bodies:

- Environment Agency
- National Highways
- Historic England
- Natural England
- Network Rail
- NHS Kent and Medway Clinical Commissioning Group (CCG) – now known as Integrated Care Board (ICB) since July 2022
- Kent Downs AONB Unit
- Other infrastructure providers

4.2.6 Whilst work remains ongoing, at this stage it is understood that SoCGs have been agreed and signed between the following parties:

- DDC and Folkestone & Hythe District Council
- DDC and Canterbury City Council
- DDC and Thanet District Council

DDC and Kent County Council

DDC and National Highways

4.2.7 As part of the DtC Evidence Base documents, DDC prepared a detailed DtC Statement (dated September 2022) which sets out a summary of the engagement that has taken place, firstly by organisation, and then by issue. Whilst the statement focuses on strategic issues and duty to co-operate bodies it also includes information relating to engagement on non-strategic issues and co-operation with other bodies that are not prescribed by the regulations. In addition, Appendices 1, 3 and 4 identify the main meetings and other correspondence that has taken place throughout the plan making process.

4.3 Summary

4.3.1 On account of the above and the documents published within the DDC's Local Plan Evidence Base, we are satisfied that DDC as the strategic policy making authority has demonstrated effective and on-going joint working with neighbouring authorities, the county council, prescribed bodies and other relevant bodies. Further, we agree that DDC has prepared and maintained SoCG documenting the cross-boundary matters being addressed in accordance with the Framework and the DtC may be discharged by the Planning Inspector under Section 20(5) (c) of the Planning and Compulsory Purchase Act 2004.

4.3.2 Without prejudice to the above, should ongoing work by DDC result in significant changes in circumstances such that the signed SoCGs may be amended or withdrawn, our client reserves the right to alter their consultation response accordingly and be present at the examination of the Plan to discuss further.

5 Housing Need

5.1 Context

5.1.1 Paragraph 11 of the NPPF is explicit in its requirement for strategic policy-making authorities to promote a sustainable pattern of development that seeks to meet the need in full.

5.1.2 Paragraph 20 of the Framework is equally clear that strategic policies should set out an overall strategy for the pattern, scale and design quality of places. Policies should make sufficient provision for the development that is required as well as associated infrastructure, community facilities and should set out a strategy for the conservation and enhancement of the natural, built and historic environment.

5.1.3 Given this national planning context, the emerging Local Plan should provide a comprehensive and cohesive approach to future development in Dover district, capable of making sufficient provision for the identified needs, whilst balancing the conservation and enhancement of the natural, built and historic environment.

5.1.4 National guidance states that strategic policy-making authorities will need to calculate their local housing need figure at the start of the plan-making process. This number should be kept under review and revised where appropriate.

5.1.5 In calculating the local housing need, paragraph 61 of the NPPF states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance - unless exceptional circumstances justify an alternative approach.

5.1.6 Further, in addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

5.2 DDC's Housing Need

5.2.1 The Standard Method for assessing housing need, issued alongside the Ministerial Statement on 16 December 2020, sets an indicative housing need figure for Dover District of 596 dwellings per annum. However, the affordability ratio which factors into the local housing need assessment is updated annually. For Dover District the latest housing need calculation is 611 dwellings per annum (dpa), equating to a total housing need of 10,998 dwellings for the Plan period to 2040. We understand that the Regulation 19 Local Plan seeks to meet this need in full and in addition to the minimum figures, DDC have set an appropriate contingency buffer of 926 dwellings of the Plan period, equating to 8.4% of the total Plan period figure.

5.2.2 For context, the current adopted CS requirement is 700 dwellings per annum. This followed the adoption of a high-growth strategy in 2010 of 14,000 homes to 2026 based around the recommendations of the Dover Regeneration Strategy and above the minimum 10,100 requirement across the same period, as set out in the emerging (at the time) Regional Spatial Strategy.

5.2.3 For the avoidance of doubt, accounting for the Committed Supply Total of 5,282 dwellings, the new Local Plan will be required to allocate sufficient land to accommodate a minimum of 6,642 new homes over the remaining plan period to 2040. It is understood that this will be derived from the following sources:

- Whitfield Urban Expansion Allocation: 2,200 dwellings

- Local Plan Allocations (excluding Whitfield): 3,392 dwellings

- Windfall Allowance (70 a year from year 4): 1,050 dwellings

5.2.4 On this basis, it is evident that a substantial quantum of Plan-led housing delivery will be required in order to meet the new Local Plan's housing target. Due to the nature and dwindling supply of available urban land in Dover town and the remaining higher order settlements of Deal and Sandwich, the restrictive effect of the coast, the Kent Downs AONB, environmental constraints and the limited capacity of the district's remaining mid- and lower order settlements to accommodate significant levels of growth, meeting Dover's housing needs inevitably will require the release of significant greenfield land.

5.2.5 In our view, sustainable and accessible sites logically located adjacent to existing higher-order urban areas, including Deal, represent the most sustainable and reliable sources of growth for the Plan Period, to deliver the significant number of new homes that are required and are most capable of making meaningful contributions to the associated public infrastructure, affordable housing and mix of new homes that is urgently needed in the District.

6 Site Specific Assessment

6.1 Overview

6.1.1 The previous chapters of this representation (Chapter 3-5) outline our client's position relating to the soundness of the Plan in which our client is confirmed to be supportive of the Local Plan as a sound strategy for the growth of the district to 2040.

6.1.2 Paragraph 4.146 of the Local Plan states that the urban area of Deal encompasses the built-up areas of the parishes of Walmer and Sholden. Deal is identified in the Settlement Hierarchy and Confines Topic Paper (2022) as a 'District Centre', where there is a secondary focus for development. This position is reinforced by draft policy SP3 which states that development in Deal will be at a more limited scale than Dover Town, compatible with the more limited range of job opportunities, shops, services, and other facilities available in these locations.

6.1.3 As introduced in the preceding sections, Fernham Homes Limited are supporting the residential allocation of the Site 'Land at Rays Bottom, Walmer' and. The Site is allocated for residential development in the Regulation 19 Pre-submission Plan with an indicative capacity of 75 dwellings under policy reference 'SAP15' (WAL002).

6.1.4 Appendix 1a of the Housing and Economic Land Availability Assessment (HELAA) 2022 provides the following summary:

- No heritage concerns other than archaeology.
- Site will need to reflect character of surrounding area – low density, generous landscaping, well designed.
- Potential site for executive homes.
- Risk of surface water flooding.
- Transport Assessment required.

6.1.5 The Site was considered 'Green' in the red/amber/green (RAG) rating in terms of suitability, availability and achievability, with an anticipated timescale for delivery in the medium term (2027-2031). The information contained in the summary could be addressed as part of any future planning application.

6.1.6 We agree that the Site represents a logical and sustainable location to direct the growth required within Deal and consider that the land promoted at Rays Bottom, Walmer must remain included as a future housing allocation within the Dover District emerging Local Plan. The allocation is considered to be wholly consistent with the objectives of the Plan and forms part of a sound growth strategy for the district to 2040.

6.1.7 We are firmly of the view that the allocation of Land at Rays Bottom is a necessary component of the balanced growth strategy put forward within the Pre-submission

DDC Settlement hierarchy (2022): <https://www.doverdistrictlocalplan.co.uk/uploads/pdfs/settlement-hierarchy-and-confines-topic-paper-aug-2022.pdf>

Dover District Local Plan, comprising an appropriate mix of small, medium and strategic-scale sites deliverable across the Plan period. The allocation of well-located, reliable, greenfield sites such as our client's at Land at Rays Bottom is necessary in order for DDC to meet the growing need for new homes in the district and ensure that DDC can have confidence in consistently meeting its market and affordable housing targets in full throughout the life of the new Dover District Plan.

6.1.8 Notwithstanding our client's support of the draft allocation within the Regulation

19 Plan in principle, we suggest that the policy text be re-visited prior to submission, to allow a higher dwelling per hectare guide to ensure the Site is developed to its full potential. It is submitted that the SAP15 policy wording should be amended to more accurately reflect the capability

of the Site to accommodate approximately 80 dwellings deliverable early in the Plan period. Further commentary on this point is provided below in section 6.3.

6.2 Site and Surroundings

6.2.1 The Site is situated to the south of Walmer, Deal between Liverpool Road to the east and Hawksdown to the west immediately adjacent to existing residential development.

6.2.2 The Site comprises an undeveloped regular parcel of land in arable use totalling approximately 4.43 hectares, forming part of a larger arable unit to the south. The Site is bound primarily by hedgerow vegetation to the east along Liverpool Road with dense woodland and mid-storey vegetation to the north. The west boundary comprises a mix of hedgerows and trees set along the perimeter abutting residential development on Hawksdown.

Figure 6.1: Approximate Site Location (courtesy of Google Earth)

6.2.3 The wider surroundings are characterised by its edge-of-settlement location with low density existing residential development along Hawksdown to the north and west and undeveloped agricultural land to the east and south. The landscape assessment which informed the HELAA recognises that the site is:

“...relatively discrete, having housing on two sides and being located on the side of a dry valley. The sensitivity of the site is moderate as views in are limited and the flow of housing down the slope would not detract. The impact of development on the wider landscape would be minimal and this could be reduced further by providing additional buffer of landscaping along the southern boundary”.

6.2.4 The Site enjoys access to a number of day-to-day facilities and services which are within a reasonable walk distance, including primary and secondary schools, local shops, healthcare, employment, and public transport links within Walmer and Deal including Walmer mainline station and frequent buses along Dover Road between Dover, Deal, Sandwich and Canterbury.

6.2.5 In terms of overarching planning constraints, the site is not subject to any overarching landscape or ecological designations and is not itself subject to any heritage constraints.

6.2.6 To the north east of the site – with intervening land - is the grade II Registered Park and Garden of Walmer Castle which is a scheduled monument, and nearby to the east is an undesignated historic First World War Aerodrome and Second World War radar station within an area of Archaeological Potential.

6.2.7 There is a low risk of a surface water flow path through the non-wooded area of the site, and along the western boundary – both of which can be easily accommodated in a residential layout.

6.3 Development Capacity

6.3.1 As set out above, the proposed allocation is for 75 dwellings, reduced from 100 dwellings at the Regulation 18 stage. The reasoning set out in the “selection of Site Allocations” (September 2022) supporting document for the reduction in capacity is “To enable a scheme to come forward which reflects the character of the surrounding area, and enable sufficient landscaping to be provided”. Excluding the wooded area to the north of the site, the provision of 75 dwellings would equate to a density of 21 dwellings per hectare, with 100 dwellings equating to 28 dwellings per hectare. For the reasons set out subsequently, we consider that sites located in sustainable locations such as Land at Rays Bottom, adjacent to Deal, should take opportunities to maximise the potential for housing – whilst respecting the context and character of the area. For this reason we consider that the appropriate capacity is a little greater at approximately 80 dwellings, as part of a high-quality, landscape-led residential scheme capable of delivery within the early phase of the Plan period.

6.3.2 At this early stage, detailed proposals have not yet been advanced, however it is anticipated that any future development of the site – at 80 dwellings - will be of appropriate density, reflecting local patterns of development and sensitively designed to respect the existing character of the area, the topography of the site and to allow transition to the rural landscape and respond to its coastal location.

6.3.3 Particular care will be taken with regard to the low-risk surface flow route, impact on nearby heritage assets and ecologically sensitive sites with a particular emphasis on opportunities for biodiversity habitat creation and enhancement. Fernham Homes have a strong track record of delivering high quality housing whilst respecting such characteristics and constraints.

6.3.4 In terms of access, primary vehicular, pedestrian and cycle access to the site shall be provided from Liverpool Road. Road widening and traffic management should be provided to Liverpool Road along the frontage of the site and where possible up to the junction with Gram's Road; along with an extension to the 30mph speed limit zone. Appendix 1 indicates how this can be achieved, with the provision of a footway and suitable carriage width which meets relevant highways requirements. Alternatively, the footway could not be provided, and instead a wider carriage way could be provided. Appendix 1 also clearly shows how the required visibility splays can be achieved on land either within the site, or within the public highway.

6.4 Draft Policy Allocation ‘Land at Rays Bottom between Liverpool Road and Hawksdown, Walmer’ (SAP15)

6.4.1 As introduced in the preceding sections, our client's Site at Land at Rays Bottom is allocated for residential development within the Dover Pre-submission (Regulation 19) Local Plan. For ease of reference, the draft policy wording is as follows:

"SAP15 - Land at Rays Bottom between Liverpool Road and Hawksdown, Walmer (WAL002)

The site, Land at Rays Bottom between Liverpool Road and Hawksdown, as shown on the policies map is allocated for an indicative capacity of 75 dwellings.

Development proposals for the site shall include the following:

- a) Development should be low density and sensitively designed to respect the existing character of the area, the topography of the site and to allow transition to the rural landscape;
- b) A sensitive landscaping scheme and appropriate landscape buffer to the south, determined by a Landscape Visual Impact Assessment is required to mitigate the impact of development on the wider countryside and to provide opportunities for biodiversity habitat creation and enhancement responding to the nearby BOA and local wildlife site;
- c) The existing wooded area to the north of the site and the tree and shrub line along the western boundary, shall be maintained and enhanced as areas for biodiversity habitat creation.
- d) Primary vehicular, pedestrian and cycle access to the site shall be provided from Liverpool Road. Road widening and traffic management should be provided to Liverpool Road along the frontage of the site and where possible up to the junction with Gram's Road; along with an extension to the 30mph speed limit zone;
- e) The Transport Assessment that is required to be carried out in accordance with Policy TI2, must consider and identify mitigation (potential widening/traffic management measures/junction improvements) for the surrounding local road network, taking into account the cumulative impact of this and other sites allocated in this Plan, including (but not limited to) Liverpool Road and Gram's Road up to and including the Gram's Road/Dover Road junction.
- f) A site-specific Flood Risk Assessment must be carried out in accordance with Policy CC5. This shall also inform the application of the Sequential Approach to the layout of the site by locating the most vulnerable elements in the lowest risk areas;
- g) In accordance with Policy SP13, a wintering bird survey must be undertaken in advance of a planning application on the site. If the bird survey identifies that the development will exceed the threshold of significance, mitigation will be required. A suitable scheme of mitigation will need to be submitted with the planning application for the site;
- h) An Archaeological Assessment for the site must be carried out in accordance with Policy HE3 Archaeology, the results of which should inform the layout and design of the development which is necessary to avoid harm to any archaeological assets identified through the assessment;
- i) A Heritage Assessment carried out in accordance with Policy HE1 is required to identify any necessary measures to avoid or minimise harm to the nearby heritage assets; and
- j) The occupation of the development should be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider. Development should provide a connection to the sewerage system at the nearest point of adequate capacity and ensure future access to the existing sewerage infrastructure for maintenance and upsizing purposes."

6.4.2 To be clear, our client remains wholly supportive of the principle of the allocation of the Site for residential development. Fernham Homes has a strong track record of swift delivery, and commits to being able to deliver the Site within the early phase of the Plan period. We agree that it represents a logical and sustainable location to direct growth consistent with the growth strategy of the Plan as a whole, however we submit that more effective use of our client's Site can be made – and therefore object to the capacity identified.

6.4.3 Accordingly, we say that the allocation of Land at Rays Bottom is necessary in order for DDC deliver proportionate and high-quality sustainable growth within Deal, meet the growing need for new homes in the district and ensure that DDC can have greater confidence in meeting its market and affordable housing targets in full.

6.4.4 It is submitted that the SAP15 policy wording is sound and appropriately reflects the capability of the site to deliver a sensitive, landscape-led residential development but the wording should be amended to reflect the capability of the Site to accommodate approximately 80 dwellings, deliverable with the early phase of the forthcoming Plan period.

6.4.5

6.5 Strategic Justification for Development

Spatial Strategy

6.5.1 The proposed Housing Distribution for the district across the Plan period is established within Policy SP3 'Housing Growth' which sets out that the distribution

of housing growth in the district is primarily based on the settlement hierarchy and influenced by site availability, environmental constraints and factors of delivery.

6.5.2 Rightly, a key aim of the growth strategy is to focus development in the least sensitive areas of the district in order to conserve and enhance the Dover's rich natural and historical environment.

6.5.3 A retained theme from the adopted Plan, is that DDC's settlement strategy continues to focus on the development and regeneration of Dover Town and Whitfield (3381 dwellings). Approximately half of the district's planned housing is in this location, the majority of which again is to come forward as part of the strategic urban expansion of Whitfield 'SAP1' (2200 minimum dwellings).

6.5.4 Development will then be focused in the District Centre of Deal (223 dwellings), and the Rural Service Centres of Sandwich (227 dwellings) and Aylesham (649 dwellings). Following the settlement hierarchy rigidly would distribute housing in the preceding order, however the Plan recognises that housing delivery in Deal and Sandwich continues to be constrained by a number of factors including flood risk, ecological designations, heritage and highways. Further, Deal has experienced generally high levels of windfall development across the previous Plan period and accordingly there is now a dwindling supply of available, suitable sites in both settlements. On account of this context, DDC have sought to direct the majority of the remaining higher order settlement growth (outside of Dover & Whitfield) to Aylesham, through the strategic expansion to the town.

6.5.5 Outside of the four principal district settlements, the Rural Settlement Hierarchy (August 2022) identified that the majority of lower-order settlements in the district emerge as having a low level of facilities within the hierarchy and six settlements having none of the key indicators of sustainable services. Plainly, these settlements offer very limited opportunities for growth and it is evident that the forthcoming Plan will remain reliant on the settlements of Dover (including Whitfield), Deal, Sandwich and Aylesham to deliver the housing growth that is required.

6.5.6 Given this context, it is clear that where available and suitable opportunities for residential development do exist within the district's higher order settlements, including our client's Site at Land at Rays Bottom, Walmer which can provide a policy compliant level of much-needed affordable housing, it is imperative that the effective use of these sites are appropriately maximised in accordance with national policy objectives.

6.5.7 Notwithstanding our client's in principle support of the proposed strategy, we are concerned that highly sustainable, edge-of-settlement sites, particularly in higher tier settlements such as Deal have not been fully maximised to reflect their accessible location and capability to accommodate a greater quantum of development. On this basis, we are concerned that the strategic objectives underlying draft policy SP3 'Housing Growth' may not be fully realised, to the detriment of market and affordable housing delivery and the wider policies seeking to conserve and enhance the district's natural and historic environment.

6.5.8 Consequently, our clients object to policy SP3 as drafted, on the basis that there is a clear need to maximise the delivery of housing at sites around Deal (whilst ensuring that sensitive characteristics are reflected), and this has not been undertaken – for example at Rays Bottom, Liverpool Road. It is our view that the site has sufficient capacity to deliver approximately 5 additional units over the draft allocation, that will otherwise be required to be delivered elsewhere in the district, in potentially less accessible and more sensitive locations.

6.5.9

Greenfield Development and Consistency with Housing Trajectory

6.5.10 Due to the nature and dwindling supply of available urban land in Dover town and the remaining higher order settlements of Deal and Sandwich, the restrictive effect of the coast, the Kent Downs Area of Outstanding Natural Beauty, environmental constraints and the limited capacity of the district's remaining mid- and lower order settlements to accommodate significant levels of growth, greenfield development will inevitably be required if DDC is to meet its housing and development commitments in full moving forward.

6.5.11 In our view, sustainable and accessible unconstrained sites logically located adjacent to existing urban areas, including Deal, represent the most sustainable and reliable sources of growth for the Plan period, to support the role and timescales of strategic urban extensions and to deliver the significant number of new homes that are required within the forthcoming Plan period.

6.5.12 Within Deal itself, meaningful housing growth is inherently constrained on three sides due to the restrictive effect of the coast to the east and Flood Zone 2/3 land and ecologically sensitive sites including SSSIs to the north and west. Alongside overarching objectives to minimise the incursion of widespread development into the rural countryside, the scope for significant Plan-led development in Deal is becoming increasingly limited. Accordingly, we firmly agree that sites to the south of Deal, including that of our clients in Walmer, represent the least sensitive and most logical locations for future Plan-led growth, making effective use of the availability of sites in close proximity to the Urban Area and key infrastructure including Walmer train station.

6.5.13 In terms of housing delivery in Deal, the development of Land at Rays Bottom (75 dwellings) is anticipated to deliver completions with Years 9-11 of the Plan period, although as detailed above our clients have a strong track record of swift delivery, and consider that it could be

delivered ahead of this. When combined with extant permissions within Deal and nearby allocations at Land off Cross Road, Deal (SAP14) and Deal Small Housing Sites (SAP16) totalling 100 dwellings and 48 dwellings respectively, our client's site will assist in delivering a steady supply of new homes within Deal across the majority of the early and middle phases of the Plan period and contribute to providing genuine choice in the market.

6.5.14 Moreover, in our experience, greenfield edge-of-settlement sites are typically most capable of making meaningful contributions to the associated public infrastructure, affordable housing and mix of new homes that are urgently needed in the district.

6.5.15 The Sustainability Appraisal Scoping Report (2018) sets out that over the course of the adopted Plan period, the key sustainability issues facing Dover District in relation to housing are as follows:

Population growth, household growth and demographic change will place additional demand on key services and facilities such as housing, health, education and social care. The Local Plan offers a new opportunity to manage these pressures, encouraging mixed communities;

There is a need for affordable housing across the District. At present, the mean price of dwellings is higher than the national average. The Local Plan will help to expedite its delivery; and,

There is the need for a mix of housing types that cater for the needs of a range of people, including the growing number of single person and elderly households. Without an up-to date Local Plan, the required housing is less likely to be delivered.

6.5.16 It is evident that the new Dover Local Plan must allocate a mix of reliable sites capable of steadily delivering not only the quantum of housing that is required, but also the associated public infrastructure, affordable housing and a mix of unit types and tenures suitable for a wide range of future occupants.

6.5.17 The Housing Topic Paper (September 2022) provides further context and summarises under Chapter 7 'Historical Housing Delivery' that Dover has historically placed significant reliance on windfall development over the current adopted Plan period, with windfall sites accounting for 44% of all completed dwellings over the preceding 10-year period.

Figure 1: DDC Brownfield / Greenfield Completions 2010/11 to 2020/21
(source: Housing Topic Paper September 2022)

6.5.18 Moreover, it is highlighted that at the beginning of the 10 year period, the majority of new dwellings were being built on brownfield land. However, from the monitoring year 2013-14 onward development on greenfield land began to play a much greater part in the location for new development as show in figure 1 above. This trend of increased housing development on greenfield land is a result of the allocations within the CS and Land Allocation DPD being built out and is associated with an approximate doubling of completions in the district. From 2013-14 onwards the average number of completed dwellings per annum has doubled to that of the early years of the CS, as the strong delivery rates of greenfield sites formed the predominant source of housing. This is despite an overall declining trend of brownfield completions towards the latter half of the Plan period. This is not an uncommon trend whereby in the majority of local planning authorities areas, opportunities for available and suitable sites in urban centres typically dwindle throughout the Plan period.

6.5.19 In light of the above context, it is clear that the adopted Dover Local Plan suffered from an initial under delivery of Plan-led housing growth in which windfall development sources were largely required to take up the slack in the early phases of the Plan period, as major allocated sites failed to deliver at the rates initially expected.

6.5.20 It is equally apparent that initial slow completions rates were quickly renewed once greenfield allocations commenced development, feeding into strong completions in the latter half of the Plan period. In our experience, greenfield sites are typically associated with stronger delivery rates and provide a reliable source of housing growth. The allocation of an appropriate mix of sites and scales is required in order to ensure steady and sustained Plan-led housing delivery across the Plan period and to avoid a reliance on windfall development to address the shortfall.

6.5.21 Consequently, given all of the above, it is imperative that the new Local Plan allocates a sufficient variety and scales of site capable of both ensuring steady and sustained housing completions and capable of making necessary contributions to public infrastructure and services, affordable housing and mix of unit types to address the key issue raised in the Sustainability Appraisal.

6.5.22 In our view, edge-of-settlement greenfield sites such as our client's Site Land at Rays Bottom, Walmer represents the most reliable and sustainable source of housing delivery for the Plan period. Such sites are typically less constrained by wider factors and less affected by unforeseen delays such as land contamination. Moreover, greenfield sites typically are more capable of delivering the policy compliant affordable housing, unit mix and developer contributions that are urgently needed.

6.5.23 It is understood that the Plan is predicated on the delivery of strategic scale development at Whitfield comprising the development of circa 2,200 new homes. Consequently, in order to avoid a repetition of the previous Plan, DDC have sought to ensure that a pool of reliable

greenfield allocation, including that of our client's are included within the Plan, capable of delivering the early and middle phase growth that is required within the housing trajectory prior to the commencement of stronger delivery from major allocations later in the Plan period.

6.5.24 We note that within the Housing Trajectory 'Appendix D', DDC have included allocated units from Years 4 onwards, with extant permissions (accounting for 5% non-implementation) demonstrated to be solely capable of delivering the growth required in Years 1-3. Notwithstanding our client's considerations that it can deliver at Land at Rays Bottom early in the plan period, we support this pragmatic approach and suggest this represents a sound basis on which to set the district's housing trajectory. We note also the inclusion of an appropriate windfall allowance and the included contingency buffer to further ensure reasonably flexibility in the housing supply.

6.5.25 On account of all of the above, we submit that the allocation of Land at Rays Bottom, Walmer forms part of a sound strategy for growth in the district for the forthcoming Plan period. The Site is capable of delivery within the early phase of the Plan period. The Site represents a reliable source of housing growth in a highly sustainable and accessible location adjacent to the existing settlement boundary of Deal and Walmer mainline station, consistent with DDC's preferred settlement strategy. Proposals remain at an early stage, however the Site is unconstrained and is considered capable of providing a high-quality landscape-led residential development including a mix of unit types and tenures, a meaningful contribution to the supply of affordable housing and contributions to public services and infrastructure, benefiting both existing residents and future occupiers. However, we object on the submission that the Site is capable of making a greater contribution to the district's housing need and suggest an amended wording of the policy to allocate the Site for approximately 80 dwellings.
Policy SP4 'Windfall Development'

6.5.26 Separately, we note the provisions of policy SP4 windfall development. Proposals at Rays Bottom, Walmer would likely be acceptable in principle under this policy and we support the inclusion within the Plan for appropriate, proportionate windfall development.

6.5.27 Our client is fully committed to the delivery of the Site which is available and anticipated for delivery in the early phase of the Plan period. Notwithstanding the provisions of SP4, it is reiterated that our client fully supports the allocation of the Site under SAP15 as the most appropriate mechanism for delivery of the Site and the opportunity for genuinely Plan-led development in Deal, the provision of associated benefits to public services and infrastructure, contribution to affordable housing supply and the delivering of a mix of house types and tenures.

Infrastructure Delivery

6.5.28 Paragraph 11 of the Framework is clear that all plans should promote a sustainable pattern of development. This includes aligning growth and infrastructure. Paragraph 20 goes on to confirm that strategic polices will be expected to make sufficient provision for associated development infrastructure.

6.5.29 In this regard, draft policies SP11 'Infrastructure and Developer Contributions' and SP12 'Strategic Transport Infrastructure' of the emerging Plan form the key strategic polices for infrastructure delivery. We agree that where development would create a need, or would have an impact, or would exacerbate an existing deficiency in infrastructure provision, appropriate developer contributions may be sought.

6.5.30 It is however emphasised that in all developments, infrastructure requirements must be demonstrated to be necessary through assessment during determination of the application on a case-by-case basis. Where new development is proposed, it does not automatically follow that major infrastructure contributions are always required or contribution to strategic infrastructure proposals are appropriate. For instance, it is our client's view that any infrastructure requirements must be demonstrated through a robust and transparent assessment at application stage, taking into account the submission of detailed supporting evidence, for example following consideration of the Transport Assessment in the case of highway infrastructure contributions.

Alignment with Sustainability Appraisal Findings

6.5.31 As part of the preparation of the Local Plan, the Council has identified and appraised a range of growth and spatial options through the Sustainability Appraisal (SA) which provides an assessment of how different options perform in environmental, social and economic terms, to help inform which option should be taken forward and combined with wider evidence documents, have been used to determine the growth and spatial strategy set out in the Plan.

6.5.32 Five potential distributions of growth were identified during preparation of the draft Regulation 18 Local Plan:

- Spatial Option A: Distributing growth to the District's suitable and potentially suitable housing and employment site options (as needed to deliver the scale of growth required).
- Spatial Option B: Distributing growth proportionately amongst the District's existing settlements based on their population.

- Spatial Option C: Distributing growth proportionately amongst the District's existing settlements based on the District's defined settlement hierarchy.
- Spatial Option D: Distributing growth in the same way as the adopted Local Plan, focussing most growth in and around Dover town.
- Spatial Option E: Distributing growth more equally across the District's settlements: Dover, Deal, Sandwich and Aylesham, as well as the rural villages.

6.5.33 The conclusion of the SA was that Spatial Options C (settlement hierarchy) and D (adopted Core Strategy with Dover focus) generally perform the most strongly against the SA objectives, particularly when delivering the baseline growth scenario. However, given the environmental constraints that exist around Deal and Sandwich, very few suitable and potentially suitable sites have been identified in these towns. Given this, the Council's preferred option for the distribution of housing and economic growth comprises a combination of options A (HELAA sites), C (settlement hierarchy) and D (Dover focus). The distribution of housing and economic growth in the District is therefore primarily based on the settlement hierarchy, and influenced by site availability, environmental constraints and factors of delivery.

6.5.34 On account of the above, our client agrees that the proposed growth strategy, and by extension, policy SP3 in principle represents a sound and evidence-led strategy for growth. However, given the clear acknowledgement of the dwindling supply of available sites in the higher order settlements of Deal and Sandwich, which has necessitated a minor deviation from the strongest performing spatial options, we submit that where sites are available and suitable for development in Deal and Sandwich, these must be fully maximised, reflecting their accessible location and their ability to reduce the need to develop into less accessible and more sensitive sites elsewhere in the district to accommodate the growth that is required.

Site Specific Sustainability Appraisal

6.5.35 Land at Rays Bottom between Liverpool Road and Hawksdown is included under HELAA reference 'WAL002' within the SA Site Assessment (Appendix F). The site generally performs strongly, with particular positives identified with regards to SA Objectives related to housing and the economy.

6.5.36 We contest the assessment of 'minor negative' in regard to sustainable transport. To the contrary, the site is well-located adjacent to the settlement boundary of Deal with access to a range of high-quality day-to-day services and access to Walmer train station for convenient access to larger settlements. In what is otherwise a largely rural district, we strongly disagree with the suggestion that an edge-of-settlement site represents a less than preferable location in respect of sustainable travel and day-to-day access to amenities.

6.5.37 We also note negatives associated with the development of a greenfield site, including loss of agricultural land, however this would be true of the majority of greenfield sites and it is abundantly clear that Dover's housing need cannot be met solely on brownfield sites. We note also minor negatives / uncertain associated with biodiversity, the historic environment and landscape, however it is not clear whether these take into account the potential for high-quality design, biodiversity enhancement and landscape mitigation. Irrespective, these are not considered to outweigh the clear and tangible sustainability benefits associated with edge-of-settlement development, the site's consistency with the preferred spatial options and the wider benefits associated with reducing the need to develop into lesser accessible, more sensitive sites to otherwise deliver the housing growth that is required.

Summary

6.5.38 Taking all of the above into consideration, our client is wholly supportive of the inclusion of land promoted at Rays Bottom, Walmer as a future housing allocation within the Dover District emerging Local Plan. The allocation is considered wholly consistent with the objectives of the Plan and forms part of a sound growth strategy for the district to 2040.

6.6 Deliverability

6.6.1 Prior to the current appeal proposal, the Site has had no recent planning history of a residential nature or a history of unimplemented permissions. There are not considered to be any impediments to the Site being allocated for development commencing within the early (or mid) phase of the Plan period.

6.6.2 Fernham Homes – a local SME with a strong history and track record of delivery, together with an adopted and robust business plan for growth – is promoting the site, and are poised to commence work on its residential development promptly after the adoption of the Local Plan.

6.6.3 Combined with the delivery of extant permissions, an appropriate number and scale of wider allocations within Deal (including SAP 14 and SAP 16) and elsewhere across the district, this would ensure the steady delivery of housing both in Deal and in Dover district across the majority of the Plan period and support the role and timescales of strategic housing delivery at Whitfield towards the latter half of the Plan period.

6.6.4 For the reasons set out in this representation, the Site is considered suitable for the residential development of approximately 80 dwellings. The Site is adjacent to the overarching urban area of Deal, one of the four higher order settlements in the district and DDC's preferred locations for Plan-led growth within the district. Development at land at Rays Bottom would form a natural and logical development south of Walmer, Deal

with excellent accessibility to day-to-day services and amenities via active travel modes within Deal itself and convenient access to public transport infrastructure including Walmer train station for onward travel to key neighbouring settlements including Dover, Ramsgate, Canterbury and Ashford.

6.6.5 Finally, in respect of suitability there are no physical limitations or problems such as access, infrastructure, flood risk, hazardous risks, pollution or contamination.

6.6.6 On behalf of the landowner, we submit that there are no known financial restrictions that would impact upon the viability of a future housing scheme or that would prohibit development coming forward within the mid-stages of the Plan period. To the contrary, we consider there to be an opportunity to deliver a high-quality, sustainably located residential development scheme consistent with DDC's proposed growth strategy comprising an appropriate mix of market and affordable housing and capable of contributing to a range of community facilities, public infrastructure and services locally.

6.6.7 At the time of writing, proposals at Rays Bottom, Walmer remain at an early stage, however our clients are firmly committed to progressing the delivery of the Site on adoption of the Plan. The project team therefore does not anticipate any absolute constraints to the commencement of delivery on-site early in the plan period (potentially 2025-26) and completion by 2028/9).

6.6.8 The Site is in single ownership and there are no complicated legal agreements or covenants that would prohibit the ability to bring forward the Site in line with DDC's housing trajectory within the mid-phase of the Plan period. The Site is therefore considered available and achievable for the purposes of the tests of deliverability.

7 Conclusion

7.1 Summary

7.1.1 This representation has been prepared by DHA Planning on behalf of Fernham Homes Limited in response to the DDC Local Plan (Regulation 19) consultation which runs until 9th December 2022.

7.1.2 Our client is promoting 'Land at Rays Bottom, Walmer, Deal' for the residential allocation of the Site as part of the new Dover District Local Plan preparation process. The Site is allocated for residential development in the Regulation 19 Pre-submission Plan within an indicative capacity of 75 dwellings under policy reference 'SAP15'.

7.1.3 Taking the above representation contents into consideration, we remain wholly supportive of the principle of the allocation of Land at Rays Bottom and agree that the Site represents a logical and sustainable location to direct necessary growth within Deal.

7.1.4 Accordingly, we consider that the land promoted at Rays Bottom, Walmer must remain included as a future housing allocation within the Dover District emerging Local Plan. The allocation is considered to be wholly consistent with the objectives of the Plan and forms part of a sound growth strategy for the district to 2040. However, it is imperative that the effective use of these higher-order settlement sites are appropriately maximised in accordance with draft policy SP3 of the emerging Plan, and wider policies seeking to otherwise conserve and enhance the district's natural and historic environment and national planning policy objectives. We are concerned that this has not been fully undertaken and object solely on this basis.

7.1.5 Consequently, our clients object to policy SP3 as drafted, on the basis that there is a clear need to maximise the delivery of housing at sites around Deal, and this has not been undertaken – for example at Land at Rays Bottom, where it is considered that the site has sufficient capacity to deliver approximately 5 additional units over the draft allocation, that will otherwise be required to be delivered elsewhere in the district, in potentially less accessible and more sensitive locations.

7.1.6 Outside of the point regarding capacity, it is submitted that the SAP15 policy wording is sound and appropriately reflects the capability of the site to deliver a sensitive, landscape-led residential development with an indicative capacity of 80 dwellings, deliverable with the early phase of the forthcoming Plan period. Without prejudice to our client's support in principle of the proposed allocation, we would urge the Council to re-visit the allocation policy text and allow a higher dwelling capacity.

7.1.7 Accordingly, we say that the allocation of Land at Rays Bottom forms part of a balanced growth strategy comprising an appropriate mix of small, medium and strategic-scale sites deliverable across the Plan period. The allocation of well-located, reliable, greenfield sites such as our client's at Land at Rays Bottom is necessary in order for DDC to meet the growing need for new homes in the district and ensure that DDC can have confidence in consistently meeting its market and affordable housing targets in full throughout the life of the new Dover District Plan.

7.1.8 In addition to being a highly sustainable and logical edge-of-settlement allocation, the Site is deliverable in a single land ownership with no viability issues, legal or third-party constraints present. Our client is fully committed to the delivery of land at Rays Bottom Farm and there are no impediments to the Site being capable of delivery within the mid-phase of the Plan period.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	For the reasons set out in the consultation response submitted on behalf of Fernham Homes Limited (ref DHA/30359), the capacity of Land at Rays Bottom between Liverpool Road and Hawksdown, Walmer (WAL002) and Policy SP3 - Housing Growth should be increased to approximately 80 dwellings.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Please refer to the consultation response submitted on behalf of Fernham Homes Limited (ref DHA/30359).
Include files	30359 DDC Rep_Walmer FINAL 09 12 22.pdf
Local Plan Consultation Point	Strategic Policy 12 - Strategic Transport Infrastructure
Rep ID	SDLP1512
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP12
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>DDC Note <i>The text below is an extract from the original representation which is attached to SDLP1438.</i></p> <p>SP12 Strategic Transport Infrastructure</p> <p>For SP1 and SP12 to be linked up, Bus services should be better integrated with the rail service timetables on the line running from Sandwich and Deal through Dover to Ashford, and the line running from Dover to Canterbury and Faversham and Victoria. See comments in SP1, on the many engineered cycle routes needed.</p> <p>DDC are on record 2021 proposals generating levels and types of traffic movement resulting in severe cumulative residual impacts in terms of capacity and road safety will not be permitted'. The real-world constraints of the EK road system (A258, A2, A256,) mean little can be done to ameliorate the situation, without long term road closures needed to dual the A2 from Jubilee Way to Lydden Hill. Neglect by DfT and Highways England means that with biometric passport checks in 2023, residents can expect gridlock again and again.</p> <p>Road improvements to separate local traffic from through freight traffic must be done to save lives; road improvements that central govt must pay for. The separation needed must include flyovers and underpasses and foot bridges, including under / over the A20 route through Dover town. It should be noted that Dover has too much experience of the gridlock and chaos caused by cross-channel delays, especially the community of Aycliffe, (and Guston may suffer similar blight). With more extreme weather events expected, and with 'frictionless freight flow' now a thing of the past, holding areas for freight OUTSIDE THIS DISTRICT, near the M25, are needed more now than they were before.</p> <p>The Council's 'commitment to work with HE on long term improvements to A2' must be more than pious lip-service reiterated to political friends in central government. It must result in the complete dualling of the A2 and Jubilee Way from Eastern Docks to Lydden Hill. The separation of local traffic from through freight traffic by means of flyovers and underpasses at the Duke of York, and Whitfield roundabouts must be done at the expense of central govt, Dept for Transport/ Highways England. Residents of the garden of England should not suffer because national traffic flows on our roads, given the failure of implement freight to rail policies. SP12 would become sounder with the following: "Proposals which assist in the provision of alternative transport modes across a dualled A2 will be encouraged. The Council will work with Highways England and Kent County Council to improve accessibility elsewhere in Kent between the two principal access routes to the Port of Dover, the M20 and the A2. The Council will work with partners to improve access to the local and High Speed rail network."</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>DDC note: text below extracted from the SP1 section of the original representation.</p> <p>'Mitigation' should include the following in order to become effective and sound. ' All new developments of over 40 dwellings must contribute to a Community Infrastructure Levy so that engineered kerbed cycle routes can enhance cycle paths 1, 2, 15, 16, 17, and new engineered cycle tracks must be made safe in winter dark afternoons, new engineered cycle routes must link Whitfield Urban Development with Kearsney and Martin Mill stations and Elvington with Snowdown and Aylesham and Shepherdswell Stations, especially given the rural bus cuts implemented in these villages in 2022. Also trains and buses on the key commuter routes should be equipped to carry (electric + cargo) bikes. Cross referenced with DM policy TI1. CIL is also needed to pay for other infrastructure essential for the local plan to be sound which is referred to below.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>Strategic Policy 12 - Strategic Transport Infrastructure</p>
<p>Rep ID</p>	<p>SDLP1671</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331868</p>

Consultee Full Name	Ruth Marczin-Bundy (Parish Cllr)
Consultee Company / Organisation	Alkham Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP12
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>9 Transport Links Roads</p> <p>9.1 The village itself sits on an unclassified road along which there are a series of steep arterial lanes to access other parts of the parish. Figure 2 shows a map indicating road transport links (<i>See attached document for map</i>)</p> <p>9.2 The road was downgraded from a B road upon completion of the A20 link in the mid 1990s. Unfortunately, unlike many recent KCC developments at Lamberhurst, Bells Yew Green, Manston Northern Links Road and Pegwell Bay, no traffic calming measures were put in place to encourage use of the recognised A20 route and the valley became a 'rat run' for commuters place heading out from the new developments at Whitfield and the East Kent coast.</p> <p>9.3 The volume of traffic along the main road has developed over recent times as it has become a through route for residents of Whitfield and River wishing to access the M20 from the Alkham Valley road.</p> <p>9.4 The increase in traffic noise, pollution and fear for residents' safety led to a traffic action group being formed in the village to monitor the situation and bring forward proposals for traffic calming as part of the defined actions within the neighbourhood plan.</p> <p>9.5 That traffic action group reported in 2017 that there were approximately 7000 to 10000 traffic movements per day passing through the village as shown in the graphs below :</p> <p><i>(see attachment for graphs and images)</i></p> <p>9.6 The housing development plan for the District and The Transport Plan 2015-2030 took no account of this problem .</p> <p>9.7 The current KCC and Dover Transport strategic priorities concentrate on the bifurcation of traffic from and to the port of Dover along the M20/A20 and M2/A2 routes, increased provision for lorry parking and access to Ashford and Thanet Parkway stations.</p> <p>9.8 In terms of Dover the current transport priorities are identified as the Sandwich coach and car park, a study of the A257, Whitfield Bus Rapid Transit system, projects to develop a Park and Ride to Whitfield, the A2 Dover to Lydden improvement, A260 upgrade, Dover waterfront link to the town centre, Dover Priory Car Park, Dover Western Docks Revival, Improvement of Sandwich Station, North Deal A258 Easter connecting road, Deal improvements and alternative access routes to compliment the A258 corridor, the A258 study review improved strategic network to manage the port traffic and improvements to the A2/A258 roundabout.</p> <p>9.9 Since 2017 the Covid pandemic reduced the amount of traffic along the Alkham Valley but that is now believed to have reached pre-pandemic levels. This is further exacerbated by the increase in the number of speeding vehicles. Speedwatch have regularly reported vehicles driven in excess of 54mph and one driver was recently prosecuted for approaching the 30mph limit at 70mph. On average a Speedwatch session delivers about 40 vehicles per hour exceeding 35mph in the 30mph limit</p>

	<p>9.10 The new plan being proposed by Dover District states that improvements must be made to the roundabouts at Whitfield , the Duke of York and assessments should be made of local infrastructure including the Alkham Valley Road. For information although a historic document I have attached a link of the Traffic Action Report which indicates traffic levels 5 years ago. Traffic is now back to those levels following covid and will only increase with the new proposals.</p> <p>9.11 As can be seen above many assessments have been carried out, this data and analysis is available from local Speedwatch Groups</p> <p>9.12 A Highway Improvement Plan was developed and yet nothing has been done.</p> <p>Comment 9</p> <p>Transport and Infrastructure – (DDC Plan –TI1 - 10.1-10.6) (DDC note - assigned to SP12)</p> <p>I believe serious consideration must be given immediately to put in place management actions to ensure the safety of the Alkham Valley Road and to mitigate the effects of the Whitfield Urban Expansion.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Not Applicable
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>Marczin-Bundy Alkham PC Em Att1.pdf</p>
<p>Local Plan Consultation Point</p>	Strategic Policy 12 - Strategic Transport Infrastructure
<p>Rep ID</p>	SDLP1642
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1333394
<p>Consultee Full Name</p>	Shelley Miller (Clerk)
<p>Consultee Company / Organisation</p>	Tilmanstone Parish Council
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	SP12

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Traffic measurement flows were taken just post pandemic and clearly show a flow much lower than the parish's normal traffic volume. If development is to be permitted it should be linked to a S106 agreements to improve the facilities within the parish, parishioners have mentioned that they "have a bus pass, but have no buses to use it on" The Parish Council should be consulted on allocation of funding to provide Road improvements to Barville Road. Greater consideration to prevent ad hoc use of 'windfall sites' which do not meet specified road safety or other material standards. Proposed developments will put additional strain on the current drainage system and inevitably cause traffic congestion with resulting increase in pollution levels. Whilst we acknowledge that the parish must grow, future developments should not put additional strain on the current infrastructure. <i>(DDC note - this is an extract from full representation SDLP1639)</i>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 12 - Strategic Transport Infrastructure
Rep ID	SDLP1790
Rep Status	Processed
Consultee ID	1331526
Consultee Full Name	Mrs Mairi

	Jones
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP12
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note: Please see detailed representation (attached at 1770) which has been divided against numerous consultation points. The representation has images within the test. The text below is an extract from the detailed representation 'by an Alkham resident'.</p> <p>9 Transport Links</p> <p>Roads</p> <p>9.1 The village itself sits on an unclassified road along which there are a series of steep arterial lanes to access other parts of the parish.</p> <p>9.2 The road was downgraded from a B road upon completion of the A20 link in the mid 1990s. Unfortunately unlike many recent KCC developments at Lamberhurst, Bells Yew Green, Manston Northern Links Road and Pegwell Bay, no traffic calming measures were put in place to encourage use of the recognised A20 route and the valley became a 'rat run' for commuters place heading out from the new developments at Whitfield and the East Kent coast.</p> <p>9.3 The volume of traffic along the main road has developed over recent times as it has become a through route for residents of Whitfield and River wishing to access the M20 from the Alkham Valley road.</p> <p>9.4 The increase in traffic noise, pollution and fear for residents' safety led to a traffic action group being formed in the village to monitor the situation and bring forward proposals for traffic calming as part of the defined actions within the neighbourhood plan.</p> <p>9.5 That traffic action group reported in 2017 that there were approximately 7000 to 10000 traffic movements per day passing through the village as shown in the graphs below :- SEE attachment</p> <p>9.6 The housing development plan for the District and The Transport Plan 2015-2030 took no account of this problem .</p> <p>9.7 The current KCC and Dover Transport strategic priorities concentrate on the bifurcation of traffic from and to the port of Dover along the M20/A20 and M2/A2 routes, increased provision for lorry parking and access to Ashford and Thanet Parkway stations.</p> <p>9.8 In terms of Dover the current transport priorities are identified as the Sandwich coach and car park, a study of the A257, Whitfield Bus Rapid Transit system, projects to develop a Park and Ride to Whitfield, the A2 Dover to Lydden improvement, A260 upgrade, Dover waterfront link to the town centre, Dover Priory Car Park, Dover Western Docks Revival, Improvement of Sandwich Station, North Deal A258 Easter connecting road, Deal improvements and alternative access routes to compliment the A258 corridor, the A258 study review improved strategic network to manage the port traffic and improvements to the A2/A258 roundabout.</p> <p>9.9 Since 2017 the Covid pandemic reduced the amount of traffic along the Alkham Valley but that is now believed to have reached pre-pandemic levels. This is further exacerbated by the increase in the number of speeding vehicles. Speedwatch have regularly reported vehicles driven in excess of 54mph and one driver was recently prosecuted for approaching the 30mph limit at 70mph. On average a Speedwatch session delivers about 40 vehicles per hour exceeding 35mph in the 30mph limit</p> <p>9.10 The new plan being proposed by Dover District states that improvements must be made to the roundabouts at Whitfield , the Duke of York and assessments should be made of local infrastructure including the Alkham Valley Road. For information although a historic document I have</p>

	<p>attached a link of the Traffic Action Report which indicates traffic levels 5 years ago . Traffic is now back to those levels following covid and will only increase with the new proposals.</p> <p>9.11 As can be seen above many assessments have been carried out ,this data and analysis is available from local Speedwatch Groups</p> <p>9.12 A Highway Improvement Plan was developed and yet nothing has been done</p> <p>Comment 9</p> <p>I believe serious consideration must be given immediately to put in place management actions to ensure the safety of the Alkham Valley Road and the mitigate the effects of the Whitfield Urban Expansion.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Please see appended report. I believe serious consideration must be given immediately to put in place management actions to ensure the safety of the Alkham Valley Road and the mitigate the effects of the Whitfield Urban Expansion.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>I can speak to any of the points raised in the attached document</p>
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>Strategic Policy 12 - Strategic Transport Infrastructure</p>
<p>Rep ID</p>	<p>SDLP2027</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1274701</p>
<p>Consultee Full Name</p>	<p>Mark Heath</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to?Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>Eythorne</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	You have plans for Whitfield and Dover that Eythorne will be helping to fund, but no plans to allow safe travel for cyclists leaving Eythorne via Kennel hill or Barville rd. Both of these roads are too dangerous for safe cycling or walking. Barville road is also unsuitable for the number and size of trucks currently using it. Those of us using it regularly find trucks crossing the centre line whilst trying to negotiate the bends on this narrow road. Do we need to block it like the idiots from the eco groups do to get something done?
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 12 - Strategic Transport Infrastructure
Rep ID	SDLP1803
Rep Status	Processed
Consultee ID	1330508
Consultee Full Name	Mrs linda symes
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Pages 73-79
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Strategic vision re Transport SP Policy 12 Pages 73-79 SAP36 St Andrew//Mill Lane It is feared that the increase in additional traffic would be unacceptable from a proposed site increase of 50+ houses . This is simply too big and there are few, if any improvements that could be made to alleviate this . Allowing for an additional of a minimum vehicle use of , 4 journeys household per day x57 = 228 additional vehicle movements. More than the suggested 20% increase predicted . Existing traffic movements recorded in and out of St Andrews Gdns recorded 246 vehicles movements during a period 6am -9pm, Speedwatch have recorded a total of 130 vehicles coming into and exiting the village along Mill Laned during the period 7,30am-9.30am See photos attached of the issues of congestion along Mill Lane where the road is at points single track. This being the suggested exit proposed to Eythorne/Sandwich /256 . Should vehicles go in the opposite direction to Church Hill the road allows for single traffic at most times of the day. There is no footpath and pedestrian access is dangerous. Traffic would then enter on to Coxhill (see further details under Sec SAP37) KCC report states The development of this site for residential use would place additional pressure on the surrounding highway network, in particular St Andrews Gardens, Mill Lane and Church Hill. KCC Highways advice should therefore be sought as part of any development proposals to ensure that any cumulative impacts can be mitigated The local bus has recently been given a short term reprieve after Stagecoach decided the route was not viable and as yet no plans have been formulated to offer residents a viable alternative. Unless this is forthcoming current and any future residents will use their cars DDC acknowledge climate change issues do need to be tackled in a holistic manner There are no suitable cycle paths and in addition being a rural community we have many horse riders using the lanes which adds to the worry that more cars equals more dangerous conditions. The Transport Report whilst acknowledging the issues does not provide the necessary solutions. SAP37 SHE006 Land at Botolph Street Farm Coxhill and the lower end of the village do not have access to a bus service ,without a walk up Church Hill ,with no pavements , to pick up the bus at Mill Lane, which as has been said is under threat , Whilst this part of the village is nearer to Railway Station is via a non-existent pavement from Whittington Terrace , the nearest houses to the proposed development, to the junction of Westcourt Lane. See photos of pedestrians having to go into residents gardens to avoid traffic. This is not only the major route out of the village for our residents but also those from our neighbouring villages ,

	<p>SAP28/29/30 at Eythorne and Elvington face even larger scale developments . These will undoubtedly have the effect of increasing traffic going through Shepherdswell making a dangerous situation even worse. Allowing for 50% of their homes coming through our village twice a day that is a further 350 traffic movements.</p> <p>Speedwatch , authorised and run in association with Kent Police, have undertaken sessions along Coxhill when in a period from 7.30am-9am 255 vehicles were observed going out of the village , and on another occasion between 4,30pm-6pm 211 coming back into the village.</p> <p>DDCs own document highlights potential issues with this site such as :States the cumulative impact on of this AND OTHER developments on common road use.</p> <p>.</p> <p>Some widening works may be required at the access point Coxhill Road is narrow, and is particularly constrained to the east of the site by on-street parking. Any proposals coming forward on the site should seek the views of KCC Highways at an early stage to ensure that the cumulative impacts of development can be accommodated by the surrounding roads.</p> <p>No footway serving site.</p> <p>Concern regarding cumulative impact from potential allocation sites on wider highway network, particularly routes through to A2/A256 (issues with width, on-street parking and significant increase in use of junctions)</p> <p>. More than recommended 400 metre walking distance to nearest bus stops in Mill Lane, but limited services and no footway.</p> <p>It would be wise to note a recently agreed and yet to be built Community Land Trust development of 13 dwellings is about to start construction within 50 metres of the proposed site at Botolph Farm The effect of this has yet to be assessed . The impact of additional vehicle movements and the removal of on road parking for existing residents may well increase the speeds of traffic heading for the A2.</p> <p>Speedwatch group carried out an observation this morning (25/11/22) on Coxhill Rd by Oast House . between 07:30-09:00</p> <p>A total of 336 vehicles were counted heading SW towards the A2. A similar number travelled into the village. This indicates about 200 vehicle movements an hour in each direction. There was considerable congestion, due to a number of lorries, which slowed traffic, but 69 vehicles (1 in 5 - 20%) was exceeding 30mph, of which 7 will be reported for travelling in excess of 34mph (3 at 40/41 mph)</p> <p><i>(DDC note: This representation was made on the IDP consultation and has been duplicated in sections of the Local Plan as referenced by the representor)</i></p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Not Applicable</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	

Strategic Policy 13 - Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets

Local Plan Consultation Point	Strategic Policy 13 - Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets
Rep ID	SDLP18
Rep Status	Processed
Consultee ID	1259309
Consultee Full Name	Mr Peter Jull
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Why?
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	N?A
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 13 - Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets
Rep ID	SDLP43
Rep Status	Processed
Consultee ID	1254085
Consultee Full Name	Mrs Sue Ward
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP13 and 3.271
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	In the 2010 Core Strategy, it was recognised that the Lydden and Temple Ewell SAC suffered from poor air quality. At that stage the proposed expansion of Whitfield was considerably less than what is now proposed. This expansion is contrary to Section 2 of the NPPF which requires protection of the environment. The Whitfield development has been extended beyond what was previously proposed, so that it now covers arable land up to the boundaries of 3 ancient woodlands, Captains Wood, Singledge Wood and Waddling Wood. This is contrary to Section 20 and 180 of the NPPF
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Protect the environment by building on brownfield or vacant sites and only where jobs are available nearby or accessible by public transport. We must bear in mind that Dover is currently a net exporter of labour. Bring back the boundaries of the Whitfield expansion to previous plans to ensure the protection of ancient historic woodlands.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 13 - Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets
Rep ID	SDLP466
Rep Status	Processed
Consultee ID	1266351
Consultee Full Name	Dr Sharon Danby
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Strategic policy 13 - protecting the districts hierarchy of designated environmental sites and biodiversity assets
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	To be sound and effective, SP13 must be underpinned by a requirement that nothing is done without 'robust auditing' (as Wildlife Trusts insisted on in Environment Act 2021). This means that honest, objective, before-and-after evaluations / baseline measurements must be used. Reports paid for by developer applicants are deceptive in the extreme. Developers are ill-placed to self-certify their own work in this area, and DDC need a DM policy requiring Environmental Impact Assessments on all planning applications for developments of over 15 dwellings on greenfield or rewilded brownfield sites. SP13 Policy on International sites includes the very unsound and ineffective and non compliant with Environmental Act 2021 statement d. Wintering bird surveys . . . <i>That when impacts cannot be avoided, appropriate mitigation in the form of new habitat creation / management in perpetuity or provision of sites for these species elsewhere .</i> When wild bird habitats are taken, they fail to thrive, fail to breed and die out. Hence the 6th mass extinction of species. And the species evidenced on just one typical section of East Kent include : breeding Mute Swan, Moorhen, Collared Dove, Cuckoo, Skylark, Meadow Pipit, Blackbird, Cetti's, Reed and Sedge Warblers, Wren, Linnet and Reed Bunting. It is also a partial feeding area for a number of species such as Heron, Little Grebe, Grey Partridge, Kestrel, Buzzard, Black-headed and Herring Gulls, Woodpigeon, Stock Dove, Barn Owl, Swift, Swallow,

	<p>House Martin, Yellow Wagtail, Dunnock, Song Thrush, Carrion Crow, Rook, Starling, House Sparrow and Chaffinch. Historically Redshank, Lapwing, Snipe and Yellow Wagtail used to nest here. Many species of native plant and habitat for invertebrates, mammals such as bats, Hedgehogs, Harvest Mice and Water Voles will also be lost. Losing these species will be a considerable biodiversity loss and contrary to the requirement for the unsatisfactory 10% biodiversity gain and KCC requirement for 20% biodiversity net gain. The Kent recorder is also concerned about the area because of rare flora, bats, fungal species which need protecting.</p> <p>The UK has lost 50% of its biodiversity, we are in the middle of a crisis. All nature is precious. Each site must be carefully assessed on its merits, all trees should be retained and developments fit around and protect them. Each mature tree has a great value in terms of amenity value and to sequester carbon.</p> <p>The AONB is very important to the character of Dover district and along with the heritage coast underpins the tourist industry. A clear buffer should be maintained between the built environment of settlements and the AONB boundary.</p> <p>Irreplaceable habitats g - not sound - not compliant with NPPF 21 - a line must be drawn where development will not happen. Ancient trees and woodland CAN NOT be replaced and there should not be a get out clause where compensation can be made as they are priceless.</p> <p>Locally designated environmental sites -SP13 h- should also have full protection and there should not be the get out clause for developers that clever lawyers can argue a case for their destruction if the right money is offered.</p> <p>The mitigation hierarchy is too weak and offers developers too many options. We are in the midst of a climate and nature crisis. NPPF 21 requires that all development be sustainable - legally this must surely require that nature and biodiversity are left intact for future generations. As all of our survival is intrinsically linked with nature then what could be more sustainable but to put nature first?</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>More robust auditing when assessments are made of biodiversity in areas ie developers cannot self certify.</p> <p><i>That when impacts cannot be avoided, appropriate mitigation in the form of new habitat creation / management in perpetuity or provision of sites for these species elsewhere .</i></p> <p>....should be changed to <i>That when a proposed development is deemed to cause potential adverse impacts to habitat of qualifying bird species, permission should not be granted.</i></p> <p>The same should be applied to other protected species.</p> <p>Protect all trees with TPO's, this will do far more for meeting the zero carbon commitments than anything else.</p> <p>SP13 e - add to this <i>A clear buffer must be maintained between the AONB and the built environment of settlements.</i></p> <p>SP13 g - There should not be a line drawn where development cannot take place if it will harm ancient trees or woodland. Chalk grassland should also be included in this as it is internationally rare.</p> <p>SP13 - h - locally designated environmental sites should have full protection and there should not be the option to mitigate for their damage or destruction.</p> <p>The mitigation hierarchy needs to be scrapped. All nature is vital if we are to survive as a species - the very definition of sustainability - the cornerstone of the NPPF 21. Sustainable development has been defined as development that meets the needs of the present without compromising the ability of future generations to meet their own needs. The current LDP has left us a lot worse off in terms of biodiversity, the next LDP needs to do a lot better.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>Strategic Policy 13 - Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets</p>

Rep ID	SDLP395
Rep Status	Processed
Consultee ID	1266669
Consultee Full Name	Mrs Susan Sullivan
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP13. Locally designated environmental sites.
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I consider this section of the Local Plan to be unsound. The Government has set a target of halting species decline by 2030. Unless a greater effort is made through the planning system to protect all wildlife sites, including Local Nature Reserves and Local Wildlife sites, both of which support some of our most important habitats and species, then it will be impossible to reach this target. It should be noted that in the Dover District Betteshanger Country Park (formerly Fowlmead) was the subject of a S106 agreement attached to planning permission 02/00905 in 2004 which obliged the Council to designate the whole Park as a Local Nature Reserve. Dover District Council is unable to explain why it was never designated. The Park is now the subject of development proposals.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Suggested wording. In order to contribute to the Government target of halting species decline by 2030 all Local Wildlife sites, Local Nature Reserves and sites with identified high biodiversity value, in the Dover District will be protected from development.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I consider it to be necessary as the current planning system is failing wildlife.

Include files	
Local Plan Consultation Point	Strategic Policy 13 - Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets
Rep ID	SDLP230
Rep Status	Processed
Consultee ID	1331290
Consultee Full Name	Mrs Helen Williams
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP13
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>There is no mention in this policy of the Rich Biodiversity asset of Betteshanger Country Park, formerly called Foulmead Park, and before that Foulmead Marsh. As noted by CPRE, <i>this is an unusual and valuable, elevated openspace consisting of scrub, slag, priority habitat and mature trees and grassland supporting an array of protected species such as the Lizard Orchid</i>, (a schedule 8 plant protected under the Wildlife and countryside Act), <i>intermingled local ecology, biodiversity and Priority Habitats</i> . When created with funding by SEEDA, 130,000 trees and bushes were planted here. it is a foraging ground for the threatened species of turtle Dove (<i>Streptopelia turtur</i>), There is at present very limited light pollution, and noise pollution, which makes it a good area for a variety of bats. There are a number of surveys and reports on the wildlife that can be seen in the 2 planning applications mentioned below. In addition, local naturalists have been photographing and logging the fungi species at Betteshanger Country Park this Autumn. They have shown that the Park is a fungi hotspot and has several nationally rare species. (see details in objection dated 23 November, by Sue Sullivan) .</p> <p>The original intentions of this site was for it to be preserved for nature, as can be seen in the original planning application to create this park. Dov/02/00905. Looking historically at this site, when it was created by SEEDA with special funding, after the Betteshanger Pit was closed, one of the S106 conditions on the 2002 planning application, approved in 2004, was that Dover District Council would make this site into a local Nature Reserve, with Natural England's support " within the meaning of section 15 of the National Parks and access to countryside Act 1949, and that it shall be managed as such" . But this did not happen... DDC says they don't know why, and it's too long ago to sort this out. I disagree and suggest this be investigated further.</p> <p>This site should be designated as an area of high biodiversity and therefore protected from building, both a 120bed hotel and a large wave pool which it is now threatened by. (see planning applications 22/01152 and 22/01156) . The wave pool would concrete over a significant area of diverse land, and kill of the many lizard orchids growing here.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness	

matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 13 - Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets
Rep ID	SDLP304
Rep Status	Processed
Consultee ID	1331112
Consultee Full Name	Miss Emma Waller
Consultee Company / Organisation	Kent Wildlife Trust
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP13 - Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SP13 - Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets. We appreciate the inclusion of Local Wildlife Sites (LWS) within Figure 3.5 and dedicating paragraph 3.268 to LWS. However, we are incredibly concerned that the Plan does not state there should be no loss of priority habitats. In line with the Council's duty under the NERC Act to conserve biodiversity, the Plan should ensure that there is no loss of priority habitats, with the biodiversity policies updated to reflect these requirements. We do not feel paragraph 3.275 provides enough evidence that priority habitats and species are protected.

	<p>Further, clarity on the definition of “locally important habitat” is required in the context of Dover. Habitats such as chalk grasslands, rough-grazed grassland and semi-improved grasslands are a vital part of the ecological network within Dover and should be incorporated within a strategic Local Nature Recovery Strategy.</p> <p>We would advise that policy SP13 be accompanied by a detailed evidence base of locally important habitats, including unimproved grassland, identifying key areas for the creation, restoration and enhancement as part of the Local Nature Recovery Strategy.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>An assessment of impacts to Stodmarsh Special Area of Conservation (SAC) should be undertaken as part of your Habitats Regulations assessment. Proposals that fall within the Stour catchment, including the Little Stour catchment, have potential to adversely impact the condition of the SAC due to increased nutrients. Based on the outcome of your hydrological advice, we would advise that a specific policy is included for implementing suitable mitigation measures. We are happy to engage with you in developing a suitable strategy for achieving nutrient neutrality. Such a strategy could identify a clear set of principles for on-site habitat mitigation, upgrades to waste water treatment plants and appropriate locations for off-site habitat creation to mitigate for nutrient inputs.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Not Applicable</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>Strategic Policy 13 - Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets</p>
<p>Rep ID</p>	<p>SDLP254</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331383</p>
<p>Consultee Full Name</p>	<p>Mrs Katie Miller</p>
<p>Consultee Company / Organisation</p>	<p>Kent Downs AONB Unit</p>
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SP13</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>Yes</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	

4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Support.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 13 - Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets
Rep ID	SDLP652
Rep Status	Processed
Consultee ID	1221958
Consultee Full Name	Ms Bridget Fox
Consultee Company / Organisation	The Woodland Trust
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Strategic Policy 13 - Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets
2 - Do you consider this part of the Plan sound?	Yes

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We welcome the explicit inclusion of ancient woodland and ancient & veteran trees in section g) on irreplaceable habitats, and the supporting commentary in paragraph 3.271.</p> <p>We welcome the guidance on buffers for ancient woodland in paragraph 3.284, in particular that the 15m buffer is a minimum requirement, and that wider buffers will be sought when appropriate.</p> <p>Where development sites are adjacent to ancient woodland, we recommend that as a precautionary principle, a minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice. A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance.</p> <p>The preferred approach is to create new habitat, including native woodland, around existing ancient woodland. This will help reverse the historic fragmentation of this important habitat, contribute to biodiversity net gain, and can also provide accessible green space for nearby residents.</p> <p>Further information is available in the Trust's <i>Planners' Manual for ancient woodland</i> (2019).</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	planners-manual-for-ancient-woodland.pdf
Local Plan Consultation Point	Strategic Policy 13 - Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets
Rep ID	SDLP498
Rep Status	Processed
Consultee ID	1268017
Consultee Full Name	Ms Penelope James
Consultee Company / Organisation	Dover and Deal Liberal Democrats

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	13
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	n/a
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	n/a
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	<p>1. Why is the fact that Kent Downs AONB is working to secure Cross-Channel UNESCO Global Geopark status?</p> <p>2. There does not appear to be any reference to light pollution in this section. Kent Downs AONB has some of the darkest night skies in the UK - according to research by the CPRE. Light pollution is having a serious impact on insect die-off worldwide. About half of insect species are nocturnal, requiring darkness to feed and find a mate. DDC could be ahead of the curve on this, especially as the AONB and night skies are attracting more tourists.</p>
Include files	
Local Plan Consultation Point	Strategic Policy 13 - Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets
Rep ID	SDLP779
Rep Status	Processed
Consultee ID	1331333
Consultee Full Name	Ms Marie

	Canny
Consultee Company / Organisation	Marine Management Organisation
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	3.267
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The inspector may seek to see that the plan lay out the statutory duty of the Local Authority to take account of Marine Plans and Marine Planning documents when developing local plans in accordance with the Marine and Coastal Access Act 2009. The current reference to Marine Plans in section 3.267 correctly refers to the marine plans but does not explicitly demonstrate this requirement being met.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The inspector may seek to see that the plan lay out the statutory duty of the Local Authority to take account of Marine Plans and Marine Planning documents when developing local plans in accordance with the Marine and Coastal Access Act 2009. The current reference to Marine Plans in section 3.267 correctly refers to the marine plans but does not explicitly demonstrate this requirement being met.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 13 - Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets
Rep ID	SDLP508
Rep Status	Processed
Consultee ID	1331555
Consultee Full Name	Mr.

	Trevor Johns
Consultee Company / Organisation	Alkham Valley Society
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	3.260 / 3.262 / 3.271 / 3.277
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The Alkham Valley is an opportunity for an easy net biodiversity gain with some simple traffic controls immediately reducing wildlife carnage particularly of badgers, reducing air and noise pollution and the pollution of priority habitat and a vital aquifer.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Redirecting through traffic to the intended major routes whilst reducing and slowing local traffic through the ANOB.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	The AVS is a local association (since 1977) containing local expertise and landowners that supports and advises on the development of an important local ANOB / environmental asset and currently advocates for becoming a Local Conservation area.
Include files	
Local Plan Consultation Point	Strategic Policy 13 - Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets
Rep ID	SDLP1061
Rep Status	Processed
Consultee ID	1331808

Consultee Full Name	Mr Robert Hogben
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	1 Introduction
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The plan is unsound as it does not comply with the legally binding commitment made by DDC when they declared a climate emergency in 2020 and prepared their climate change strategy. The plan will not do enough to meet the target of the district being net zero by 2050. DDC should be much more ambitious about the green credentials of new housing. If new homes generated their own power, were insulated to the highest standards, and collected rain water, it would greatly help stretched local services and go a long way towards making the housing stock fit for the coming decades.</p> <p>The regulation 19 stage of the consultation is not fit for purpose as it is overly complicated and very difficult to use. The process has left many members of the public including me and my wife feeling overwhelmed and confused as to how to make a representation. For those who are working full time this has been a task for which they do not have enough time. As a result those who may have wanted to make a submission have not been able to. The format of the submission form is also difficult to navigate. Without prior experience of planning law it is difficult to say whether a part of the plan is legal or not. As to the duty to cooperate it is impossible to know. The unsound plan needs updating after the government announcement on 5/12/22 that mandatory housing targets are not to be imposed. The figure of nearly 11,000 is unsustainable and should now be reviewed, particularly with respect to allocated land around Station Rd Walmer and proposed developments around villages.</p> <p>The character and landscape value of the district is being rapidly eroded under the current plan and this must not continue as it is contrary to NPPF 21. It is not sustainable to build on agricultural land which is in short supply as we are only 50% self sufficient in producing food in the UK. The CPRE has found that almost 14,500 hectares of farmland has been permanently lost to development since 2010. The contribution from the districts agricultural land is of vital importance. Much of the agricultural land is also vital for flood protection, and field margins are important for wildlife and biodiversity, forming corridors between habitats for vertebrates and nesting and roosting sites for birds. Dover District also has a wealth of character landscapes, AONB, heritage coast, nature reserves, internationally rare chalk grassland and rewilded areas such as Betteshanger Park. Overdevelopment under the last weak plan has meant that these areas are under pressure and being denuded as their boundaries are eroded and wildlife corridors between sites are cut off. The new plan does not do enough to protect these areas, wildlife and biodiversity. Developments should not be allowed to remove ancient woodlands and trees and biodiverse rich habitats even if it is argued that this is for the greater good. This is not sustainable as all nature is interconnected and if it fails then we all fail. The UK is one of the worst countries in the world for biodiversity loss, we have lost half of our biodiversity since the 1970's.</p> <p>Development has been at such a pace that infrastructure cannot keep up. Buses have been cut recently, cycle and pedestrian routes have not been upgraded sufficiently to connect some developments to main bus and train routes without car dependence. Aylesham has not had a secondary school which would mean children could walk to school. Many rural communities are entirely car dependent due to lack of buses</p>

	<p>and the roads not being safe to use their bikes. Not enough emphasis is put on renovating existing housing stock to provide greener, insulated, fuel efficient homes. Each new build generates around 56 tonnes of embedded carbon. The NPPF states that we should prioritise brownfield sites over greenfield but although there are many opportunities to develop brownfield sites in Dover, this has not been prioritised. Many developments have been for larger houses in villages and there is not enough provision for affordable housing.</p> <p>The wording of the local plan is not definitive, it leaves too many loop holes and vague preferences which enable large developers to argue and get what they want, to maximise profits, not what the people of the Dover area need.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Better mapping and understanding of the Dover District, taking into account internationally rare areas of chalk grassland, woodland and trees wherever they occur.</p> <p>Large buffers around the AONB to protect its character from the built environment. Stronger protection for the AONB and the Ripple LCA F3.</p> <p>Tighter protections on our remaining biodiversity.</p> <p>Tighter definitions in the local plan so that developers have no room to argue what has been specified in the local plan.</p> <p>Hire several biodiversity officers to monitor closely and prevent loss of ancient woodland, chalk grassland, veteran trees, protected wildlife and rich habitats and to actively go out into the community, looking for ways to improve biodiversity by such things as accessing grants for hedge planting and the creation of ponds where ever possible in our district.</p> <p>Employ experts to liaise with farmers in our area to encourage the most environmentally friendly farming and land management practices which will encourage maximum biodiversity in the countryside and maximum sequestration of carbon in soils and biomass.</p> <p>Stop the use of agricultural land for development.</p> <p>Renovate and insulate rather than build new houses, brownfield not greenfield.</p> <p>Turn attention away from destroying village communities with unsustainable housing estates outside their village boundaries.</p> <p>Do not give developers the get out clause of financial mitigation for destruction of wildlife and habitat. No development should further deplete our critically low levels of biodiversity.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>Strategic Policy 13 - Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets</p>
<p>Rep ID</p>	<p>SDLP1012</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331934</p>
<p>Consultee Full Name</p>	<p>Mr. PETER FINDLEY</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP14
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	It is not applied consistently and has sites left out.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Betteshanger Country Park's unique habitat (Open Mosaic) should be protected by Dover District Council. It is a scarce habitat in Kent and should be valued above development.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 13 - Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets
Rep ID	SDLP936
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP13
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p><u>Biodiversity</u>: Section D of this policy states: <i>Wintering bird surveys will be required for all sites with high or moderate suitability (as identified in the HRA or subsequent habitat assessment) for qualifying bird species of Thanet Coast and Sandwich Bay SPA and Ramsar Site, Stodmarsh SPA and Ramsar Site and Dungeness, Romney Marsh and Rye Bay SPA, in order to determine their individual and cumulative importance for these species and whether the thresholds of significance are exceeded (greater than 1% of the associated European or international site). In such circumstances, when impacts cannot be avoided, appropriate mitigation in the form of habitat creation and management in perpetuity on-site in the first instance, or through provision of strategic sites for these species elsewhere within Dover District, will be required. Permission will only be granted when proposals for appropriate, adequate and achievable mitigation measures have been agreed. All such necessary mitigation will need to be fully functional prior to any development which would affect significant numbers of SPA or Ramsar Site birds.</i></p> <p>Some of the allocated sites are close to the border of other districts (such as PRE017 Site north-west of Appletree Farm, Stourmouth Road) therefore it might not be appropriate for the habitat creation and management to be carried in the Dover district. For example for site PRE017 Site north-west of Appletree Farm, Stourmouth Road it may be more appropriate for habitat creation/management works to be carried out in Canterbury. It is therefore recommended that the policy allows for flexibility for works to be carried out outside there district where it may be appropriate.</p> <p>The County Council recommends that Section H requires details of compensation for loss or damage to locally identified biodiversity assets to be submitted as part of planning applications.</p> <p>The County Council recommends reference to Kent's Plan Bee, a pollinator action plan developed by the County Council that seeks to improve the food sources and general habitat for pollinators.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>Some of the allocated sites are close to the border of other districts (such as PRE017 Site north-west of Appletree Farm, Stourmouth Road) therefore it might not be appropriate for the habitat creation and management to be carried in the Dover district. For example for site PRE017 Site north-west of Appletree Farm, Stourmouth Road it may be more appropriate for habitat creation/management works to be carried out in Canterbury. It is therefore recommended that the policy allows for flexibility for works to be carried out outside there district where it may be appropriate.</p> <p>The County Council recommends that Section H requires details of compensation for loss or damage to locally identified biodiversity assets to be submitted as part of planning applications.</p> <p>The County Council recommends reference to Kent's Plan Bee, a pollinator action plan developed by the County Council that seeks to improve the food sources and general habitat for pollinators.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

Local Plan Consultation Point	Strategic Policy 13 - Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets
Rep ID	SDLP876
Rep Status	Processed
Consultee ID	1331934
Consultee Full Name	Mr. PETER FINDLEY
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	3.269
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	N/A
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Betteshanger Country Park should have some sort of designation for its biodiversity value. Leaving it out is irresponsible. The designation could/should include Biodiversity opportunity Area, Open Green Space, Local Nature Reserve or something similar. An application to make this site a Site of Special Scientific Interest has been made to Natural England.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	

Include files	
Local Plan Consultation Point	Strategic Policy 13 - Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets
Rep ID	SDLP1175
Rep Status	Processed
Consultee ID	1271293
Consultee Full Name	Mr Alan Byrne
Consultee Company / Organisation	Historic England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP13
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>While not commenting in detail on this policy, we note that work is underway to explore UNESCO World Heritage Site status for the Straits of Dover, and global Geopark or Biosphere Reserve status for the Kent Downs AONB including the Heritage Coast between Dover and Folkestone. As heritage is a component of this work, we would be pleased to work with key partners as proposals are developed.</p> <p>We also note that the Scheduled Monument of Western Heights is a local wildlife site (LWS) and that positive management of this site for landscape and ecological reasons could in turn enhance the heritage significance of and engagement with the site. We would therefore encourage a joined-up approach to the management of this LWS so that opportunities for heritage can be capitalised on as part of any programme to positively manage the site's wildlife.</p> <p><i>(DDC Note - This is an extract of the full Historic England representation which can be located at SDLP1169)</i></p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 13 - Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets
Rep ID	SDLP1608
Rep Status	Processed
Consultee ID	1252100
Consultee Full Name	Mrs Amandajayne Hollobon-Baxter
Consultee Company / Organisation	Sandwich Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP13
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	As an integral part of the towns history and natural environment, Sandwich Town Council would like to see The Delf Stream, Sandwich Waterways and adjoining green areas be considered for inclusion within this strategic policy.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	As an integral part of the towns history and natural environment, Sandwich Town Council would like to see The Delf Stream, Sandwich Waterways and adjoining green areas be considered for inclusion within this strategic policy.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 13 - Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets
Rep ID	SDLP1101
Rep Status	Processed
Consultee ID	1266669
Consultee Full Name	Mrs Susan Sullivan
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP13 Sections 3.274-3.276
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Representation 2 Local Plan FOB SP13 Priority Habitats and Species 3.274-3.275 These sections should specify that Dover District Council supports the Kent Biodiversity Strategy 2020 and is committed to implementing the target species that are important in the Dover District, as set out in the Green and Blue Infrastructure Evidence Report. The Turtle Dove target is of particular concern. Dover District contains 4 of the RSPB's Turtle Dove Friendly Zones where efforts are being made to stem the decline of a species that is threatened with extinction. Numbers of Turtle Doves have declined by 98% since the 1970's but they are still clinging on in East Kent. Recent Dover planning applications indicate that any serious intention to contribute to stemming their decline in the District, is lacking. This year, for example, planning permission was granted for application 20/00419 at Betteshanger Grove. This will result in the removal of known Turtle Dove territory. The mitigation set up to compensate for this loss is at Betteshanger Country Park, a sister site to Betteshanger Grove and part of the old Betteshanger Colliery site. The mitigation scheme is now threatened by two planning applications, at the Park - one for a Hotel (DOV22/01152) and one for a Surf Lagoon (DOV22/01158). When the mitigation sites were allocated the ecologists employed by the developer, it was claimed that the areas chosen were

	<p>in relatively undisturbed parts of the Park and gave the birds the best chance of thriving. Now we find that both the proposed sites for the Hotel and Surf Lagoon are immediately adjacent to the Turtle Dove mitigation areas. The noise, light and human disturbance caused by the very large numbers of expected visitors (perhaps 500,000 per annum) now threaten to jeopardise the mitigation scheme and meeting condition 54 of application 20/00419 now looks doubtful.</p> <p>Turtle Doves are a target species in the Kent Biodiversity Strategy so these issues are significant and there is nothing in SP13 which convinces us that Turtle Doves will be properly protected by Dover District Council.</p> <p>3.276. This states 'protection for priority habitats and species is afforded through the Local Plan.'</p> <p>I think this statement is unjustified. A more accurate statement would be 'mitigation for priority species and habitats is afforded through the Local Plan.'</p> <p>There is no evidence from recent planning applications in the Dover District that protection will be given to priority habitats and species. For example planning permission relating to application 20/00419, will see the removal of the priority habitat Open Mosaic Habitat on Previously Developed Land and significant damage to a wide range of priority species. There is no protection for many of the priority species and not even mitigation or compensation. For this application the only compensation provided was for Turtle Doves (now under threat) and Grass Poly.</p> <p>There is nothing under the terms of the Local Plan that convinces us that priority habitats and species will be adequately protected in the future. Unless the word 'protection' really means 'protection' and not mitigation, we will continue to see species declining. This is particularly significant at a time when COP 15 is urging the world to take action to address the global biodiversity crisis.</p> <p>In this Local Plan Dover District Council does not show the necessary ambition to contribute to this aim and this is indicated by the fact that SP13 does not even contain separate sections on priority habitats and species and protected species, especially when these occur outside designated sites.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>We think that SP 13 should have separate sections on a: priority habitats and priority species and b) protected species with a detailed explanation as to how this will be achieved through the planning system especially on undesignated sites.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>We consider it to be necessary as we are not convinced that the Council will deliver on the stated protections for priority species and habitats and protected species.</p>
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>Strategic Policy 13 - Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets</p>
<p>Rep ID</p>	<p>SDLP1105</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1266669</p>
<p>Consultee Full Name</p>	<p>Mrs Susan Sullivan</p>
<p>Consultee Company / Organisation</p>	

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP13 - 3.274-3.275 SP13 3.278
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>SP13 Priority Habitats and Species 3.274-3.275 SP 13 Protected species 3.278 3.274-3.275. The following relates to these sections of the Local Plan These sections should specify that Dover District Council supports the Kent Biodiversity Strategy 2020 and is committed to implementing the targets for species that are important in the Dover area, such as Turtle Doves. The Dover District contains four of the RSPB Turtle Dove Friendly Zones, where efforts are being made, by working with landowners, to stem the decline of a species threatened with extinction, but clinging on in East Kent. Recent planning applications indicate that any serious intentions to contribute to the Strategy and assist in stemming this decline are lacking. This year for example, planning permission was granted for Betteshanger Grove, planning application 20/00419 and a site situated within a Turtle Dove Friendly Zone. The permission will result in the removal of known Turtle Dove territory. Mitigation for this loss involved setting up designated areas for nesting and foraging at Betteshanger Country Park, a sister site to Betteshanger Grove and part of the old Betteshanger Colliery site. This mitigation scheme is now threatened by two planning applications at the Park (also in a Turtle Dove Friendly Zone) one for a Hotel (22/01152) and a second for a Surf Lagoon (22/01158) When the mitigation sites were allocated the ecologists employed by the developer, claimed that they were in relatively undisturbed areas of the Park and gave the birds the best chance of thriving. Now we find that both of the proposed sites for the Hotel and the Surf Lagoon, are immediately adjacent to the mitigation areas. The noise, light and human disturbance, caused by the very large number of expected visitors (perhaps 500,000 per annum) now threatens to jeopardise the mitigation scheme and the ability to meet condition 54 of the planning application 20/00419. Turtle Doves are a target species in the Kent Biodiversity Strategy, which Dover District Council supports, so these issues are significant and there is nothing in SP13 which convinces me that Dover District Council will be taking the necessary steps to secure the future of Turtle Doves in the future. 3.276 says: 'Protection for priority habitats and species is afforded through the Local Plan.' There is no evidence from recent planning applications in this part of the Dover District that protection will be given to priority habitats and priority species. For example planning permission relating to 20/00419 will see the removal of the priority habitat , Open Mosaic Habitat on Previously Developed Land and significant damage to a wide range of priority species; for example, 18 Red listed birds, 12 plants on the Kent rare Plant Register, invertebrates of County importance ,slow worms and common lizards. There was no apparent mitigation or compensation for the loss /damage to these species. This is contrary to the NPPF 179b) which says Plans should promote 'the restoration and enhancement of priority habitats and the protection and recovery of priority species.' There is nothing in the Local Plan that convinces me that things will be different in the future. There is no explanation as to how priority habitats and species will be protected and recovered. Unless the word 'protection' really means protection and not 'mitigation' then we will continue to see species declining in the Dover District. This is particularly significant at the time of COP 15 when the head of the UN is saying that 'humanity has become a weapon of mass extinction' such is the damage we are wreaking on the natural world. SP 13. 3.278</p>

	This states that ecological surveys will need to be undertaken on sites with protected species to inform approaches to mitigation. Again the implication here is that mitigation rather than protection is the solution. It is of great concern that the avoidance part of the mitigation hierarchy appears to be entirely voluntary. In planning application 20/00419 the effects on Turtle Dove territory could have been avoided by a change in design but mitigation was, instead, seen as the solution. This avoiding of the 'avoidance' principle is I believe, facilitated by wording in the NPPF which states in 180b) that if significant harm cannot be avoided 'through locating on an alternative site with less harmful impacts) It appears from this that the only avoidance that needs to be heeded is location to a different site and if this is not possible then mitigation is the answer. What about avoidance through site and landscape design? What about avoiding the most important undesignated sites for biodiversity?
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	I think that within SP 13 there should be additional sections on a) priority habitats and species and b) protected species. there should be a detailed explanation as to how these will be protected i the case of species, and how they will be protected and restored in the case of habitats.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Because I am concerned that the planning system is failing priority habitats and priority and protected species
Include files	
Local Plan Consultation Point	Strategic Policy 13 - Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets
Rep ID	SDLP1423
Rep Status	Processed
Consultee ID	1271139
Consultee Full Name	Katy Wiseman
Consultee Company / Organisation	National Trust
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP13
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	

4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The National Trust fully supports Policy SP13 which is sound and seeks to protect the integrity of international or European designated sites.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 13 - Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets
Rep ID	SDLP1072
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>SP13 Policy on International sites includes the very unsound and ineffective and non compliant with Environmental Act 2021 statement d. <i>Wintering bird surveys . . . That when impacts cannot be avoided, appropriate mitigation in the form of new habitat creation / management in perpetuity or provision of sites for these species elsewhere .</i></p> <p>Wild fauna, wild birds in particular, are very disinclined to read and heed the instructions of DDC / or developers. When their habitats are taken, they fail to thrive, fail to breed and die out. Hence the 6th mass extinction of species. And the species evidenced on just one typical section of East Kent include : breeding Mute Swan, Moorhen, Collared Dove, Cuckoo, Skylark, Meadow Pipit, Blackbird, Cetti's, Reed and Sedge Warblers, Wren, Linnet and Reed Bunting. It is also a partial feeding area for a number of species such as Heron, Little Grebe, Grey Partridge, Kestrel, Buzzard, Black-headed and Herring Gulls, Woodpigeon, Stock Dove, Barn Owl, Swift, Swallow, House Martin, Yellow Wagtail, Dunnock, Song Thrush, Carrion Crow, Rook, Starling, House Sparrow and Chaffinch. Historically Redshank, Lapwing, Snipe and Yellow Wagtail used to nest here. Many species of native plant and habitat for invertebrates, mammals such as bats, Hedgehogs, Harvest Mice and Water Voles will also be lost. Losing these species will be a considerable biodiversity loss and contrary to the requirement for the unsatisfactory 10% biodiversity gain DDC commitment, and very contrary to the KCC requirement for 20% biodiversity net gain. The Kent recorder is also concerned about the area because of rare flora, bats, fungal species need protecting.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>To be sound and effective, the SP13 must be underpinned by a requirement that nothing is done without 'robust auditing' (as Wildlife Trusts insisted on in Environment Act 2021). This means that honest, objective-because-independent, before-and-after evaluations / baseline measurements must be used. Sketchy, google-map-based ecology reports paid for by developer applicants are deceptive in the extreme. Developers are ill-placed to self-certify their own work in this area, and DDC need a DM policy requiring Environmental Impact Assessments on all planning applications for developments of over 15 dwellings on greenfield or rewilded brownfield sites.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	Strategic Policy 13 - Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets
Rep ID	SDLP1563
Rep Status	Processed
Consultee ID	1333349
Consultee Full Name	Nikky

	Warden
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP13
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>SP13 must be underpinned by a requirement that nothing is done without 'robust auditing' (as Wildlife Trusts insisted on in Environment Act 2021). This means that honest, objective-because-independent, before-and-after evaluations / baseline measurements must be used.</p> <p>DDC need a DM policy requiring Environmental Impact Assessments on all planning applications for developments of over 15 dwellings on greenfield or rewilded brownfield sites.</p> <p>SP13 Policy on International sites includes the very unsound and ineffective and non compliant with Environmental Act 2021 statement d. <i>Wintering bird surveys . . . That when impacts cannot be avoided, appropriate mitigation in the form of new habitat creation / management in perpetuity or provision of sites for these species elsewhere .</i></p> <p>Losing many species of birds native plants, habitat for invertebrates , mammals such as bats ,hedgehogs, and water voles there will be a considerable biodiversity loss.</p> <p>This is and contrary to the requirement for the 10% biodiversity gain DDC commitment, and way below the KCC requirement for 20% biodiversity net gain.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	

Include files	SDLP1561 Warden Att1.pdf
Local Plan Consultation Point	Strategic Policy 13 - Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets
Rep ID	SDLP1661
Rep Status	Processed
Consultee ID	1331868
Consultee Full Name	Ruth Marczin-Bundy (Parish Cllr)
Consultee Company / Organisation	Alkham Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP13
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>7 THE NATURAL ENVIRONMENT</p> <p>7.1 The plan has a clear vision for the future in terms of measuring biodiversity net gain, protection of Kent's AONB and landscape character and I believe Alkham Parish could assist the District Council in achieving these aims.</p> <p>7.2 The Valley has been recognised as an Area of Outstanding Natural Beauty (AONB). It contains Ancient Woodland, Special Landscape areas, Sites of Special Scientific Interest (SSSIs) and a Conservation Area.</p> <p><i>(DDC note - for Figure 1 map - see attachment)</i></p> <p>7.3 ALKHAM, LYDDEN AND SWINGFIELD WOODS are one of the areas declared a Site of Special Scientific Interest (SSSI) notified under Section 28 of the Wildlife and Countryside Act 1981 as amended. This site was formerly two SSSIs: Alkham Valley Woods and Lydden to Swingfield Downs. The former is included in 'A Nature Conservation Review'. There have been a few minor deletions.</p> <p>7.4 This site comprises several woodlands situated on the steep slopes of dry chalk valleys. The soils vary from calcareous loams on the slopes to acid-neutral clays on the plateaux. Ash-hazel is the main woodland type with field maple on the more calcareous soils and hornbeam on the heavier clay. There is some unimproved chalk grassland in the site near Lydden. A number of uncommon plants occur including lady orchid <i>Orchis purpurea</i> in the woods and burnt orchid <i>Orchis ustulata</i> in the grassland.</p> <p>7.5 Until recently these woods have been managed by coppicing. Ash and hazel are the common coppiced species with some field maple, hornbeam and sweet chestnut under pedunculate oak standards. Other trees and shrubs include wild cherry, birch, hawthorn, blackthorn and also wayfaring-tree and dogwood on the calcareous soils. There is some dense hawthorn scrub in places.</p> <p>7.6 The ground flora is varied but generally dominated by dog's mercury <i>Mercurialis perennis</i>, bluebell <i>Hyacinthoides non-scripta</i> and brambles <i>Rubus fruticosus</i>. Among more abundant flowering plants are wood anemone <i>Anemone nemorosa</i>, yellow archangel <i>Lamium galeobdolon</i> and wood spurge <i>Euphorbia amygdaloides</i>. Some uncommon plants also occur, particularly on the chalk soils. These include green hellebore</p>

	<p>Helleborus viridis, herb paris Paris quadrifolia, fly orchid Ophrys insectifera, greater butterfly orchid Platanthera chlorantha and lady orchid. The latter is restricted in Britain to Kent.</p> <p>7.7 The chalk grassland is dominated by sheep's fescue Festuca ovina, tor-grass Brachypodium pinnatum and glaucous sedge Carex flacca. Many flowering plants typical of improved chalk grassland occur such as dropwort Filipendula vulgaris, salad burnet Sanguisorba minor, small scabious Scabiosa columbaria and several orchids including burnt orchid.'</p> <p>7.8 The previous Dover District Plan recognised the importance of the aims of conserving and enhancing the biodiversity of the area, stated the importance of managing such areas and stressed that they should not be developed as recreational areas without quantitative or qualitative assessments prior to development.</p> <p>7.9 The Dover District Green Infrastructure Strategy 2014 described the environment which provides essential natural resources for life and a pleasant healthy place for people of all ages and considered the importance of multi functionality of an area.</p> <p>7.10 The National Planning Policy Framework defines Green Infrastructure as 'a network of multi-functional green space, urban and rural which is capable of delivering a wide range of environmental and quality of life benefits to local communities'</p> <p>Comment 7</p> <p>The Natural environment (DDC Plan – 11) I believe Dover District Council has an opportunity to consider the potential offered by the Alkham Valley the AONB, the SSSI and the means by which the delicate balance of conservation and recreation can be utilised and maintained as a major rural asset within a planned housing growth area, potentially recognising it as a designated Conservation Area and bringing huge benefit to an area about to experience huge growth at either end of the said valley.</p> <p><i>(DDC note - The full representation from Alkham PC is attached. However, specific comments from the full representation document have been extracted into separate consultation points/policy areas, relevant to the comments made)</i></p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Not Applicable
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>Marczin-Bundy Alkham PC Em Att1.pdf</p>
<p>Local Plan Consultation Point</p>	Strategic Policy 13 - Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets
<p>Rep ID</p>	SDLP1352
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1333128
<p>Consultee Full Name</p>	David

	Powell
Consultee Company / Organisation	
Agent Full Name	Klaire Lander
Agent Company / Organisation	Lander Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP13
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Protecting the District's hierarchy of designated environmental sites and biodiversity assets is consistent with the national policy and this policy is 'effective' and 'justified'. This policy is supported. Preserving the Kent Downs AONB and Heritage Coasts is similarly supported. (DDC Note - Lander Planning sent a PDF document which has been split across the relevant sections of the Plan. See Original Attachment on SDLP1346)
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 13 - Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets
Rep ID	SDLP1447
Rep Status	Processed
Consultee ID	1333265

Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP13
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<i>DDC Note The text below is an extract from the original representation which is attached to SDLP1438.</i> It must also be pointed out that at least one of the sites included in the 23.3% of brownfield sites is actually a site intended by SEEDA as local nature reserve having rewilded on unstable slag (only rendered stable by tree-planting), a site which DDC forgot to make a local nature reserve in 2004, and it has become a biodiversity hotspot well known to genuine ecologists nationally, Betteshanger Park, and ought to be designated a Biodiversity Opportunity Area.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 13 - Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets

Rep ID	SDLP1484
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP13
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note <i>The text below is an extract from the original representation which is attached to SDLP1438.</i></p> <p>SP13 Protecting Hierarchy of Designated Environmental Sites & Biodiversity Assets</p> <p>To be sound and effective, the SP13 must be underpinned by a requirement that nothing is done without 'robust auditing' (as Wildlife Trusts insisted on in Environment Act 2021). This means that honest, objective-because-independent, before-and-after evaluations / baseline measurements must be used. Sketchy, google-map-based ecology reports paid for by developer applicants are deceptive in the extreme. Developers are ill-placed to self-certify their own work in this area, and DDC need a DM policy requiring Environmental Impact Assessments on all planning applications for developments of over 15 dwellings on greenfield or rewilded brownfield sites.</p> <p>SP13 Policy on International sites includes the very unsound and ineffective and non-compliant with Environmental Act 2021 statement d. Wintering bird surveys . . . That when impacts cannot be avoided, appropriate mitigation in the form of new habitat creation / management in perpetuity or provision of sites for these species elsewhere .</p> <p>Wild fauna, wild birds in particular, are very disinclined to read and heed the instructions of DDC / or developers. When their habitats are taken, they fail to thrive, fail to breed and die out. Hence the 6th mass extinction of species. And the species evidenced on just one typical section of East Kent include: breeding Mute Swan, Moorhen, Collared Dove, Cuckoo, Skylark, Meadow Pipit, Blackbird, Cetti's, Reed and Sedge Warblers, Wren, Linnet and Reed Bunting.</p> <p>It is also a partial feeding area for a number of species such as Heron, Little Grebe, Grey Partridge, Kestrel, Buzzard, Black-headed and Herring Gulls, Woodpigeon, Stock Dove, Barn Owl, Swift, Swallow, House Martin, Yellow Wagtail, Dunnock, Song Thrush, Carrion Crow, Rook, Starling, House Sparrow and Chaffinch. Historically Redshank, Lapwing, Snipe and Yellow Wagtail used to nest here. Many species of native plant and habitat for invertebrates, mammals such as bats, Hedgehogs, Harvest Mice and Water Voles will also be lost. Losing these species will be a considerable biodiversity loss and contrary to the requirement for the unsatisfactory 10% biodiversity gain DDC commitment, and very contrary to the KCC requirement for 20% biodiversity net gain. The Kent recorder is also concerned about the area because of rare flora, bats, fungal species need protecting.</p>

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 13 - Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets
Rep ID	SDLP1788
Rep Status	Processed
Consultee ID	1331526
Consultee Full Name	Mrs Mairi Jones
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP13
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	DDC Note: Please see detailed representation (attached at 1770) which has been divided against numerous consultation points. The representation has images within the text. The text below is an extract from the detailed representation 'by an Alkham resident'. 7 THE NATURAL ENVIRONMENT

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

7.1 The plan has a clear vision for the future in terms of measuring biodiversity net gain , protection of Kent's AONB and landscape character and I believe Alkham Parish could assist the District Council in achieving these aims.

7.2 The Valley has been recognised as an Area of Outstanding Natural Beauty (AONB). It contains Ancient Woodland, Special Landscape areas, Sites of Special Scientific Interest (SSSIs) and a Conservation Area.

7.3 ALKHAM, LYDDEN AND SWINGFIELD WOODS are one of the areas declared a Site of Special Scientific Interest (SSSI) notified under Section 28 of the Wildlife and Countryside Act 1981 as amended. 'This site was formerly two SSSIs: Alkham Valley Woods and Lydden to Swingfield Downs. The former is included in 'A Nature Conservation Review'. There have been a few minor deletions.

7.4 This site comprises several woodlands situated on the steep slopes of dry chalk valleys. The soils vary from calcareous loams on the slopes to acid-neutral clays on the plateaux. Ash-hazel is the main woodland type with field maple on the more calcareous soils and hornbeam on the heavier clay. There is some unimproved chalk grassland in the site near Lydden. A number of uncommon plants occur including lady orchid *Orchis purpurea* in the woods and burnt orchid *Orchis ustulata* in the grassland.

7.5 Until recently these woods have been managed by coppicing. Ash and hazel are the common coppiced species with some field maple, hornbeam and sweet chestnut under pedunculate oak standards. Other trees and shrubs include wild cherry, birch, hawthorn, blackthorn and also wayfaring-tree and dogwood on the calcareous soils. There is some dense hawthorn scrub in places.

7.6 The ground flora is varied but generally dominated by dog's mercury *Mercurialis perennis*, bluebell *Hyacinthoides non-scripta* and brambles *Rubus fruticosus*. Among more abundant flowering plants are wood anemone *Anemone nemorosa*, yellow archangel *Lamium galeobdolon* and wood spurge *Euphorbia amygdaloides*. Some uncommon plants also occur, particularly on the chalk soils. These include green hellebore *Helleborus viridis*, herb paris *Paris quadrifolia*, fly orchid *Ophrys insectifera*, greater butterfly orchid *Platanthera chlorantha* and lady orchid. The latter is restricted in Britain to Kent.

7.7 The chalk grassland is dominated by sheep's fescue *Festuca ovina*, tor-grass *Brachypodium pinnatum* and glaucous sedge *Carex flacca*. Many flowering plants typical of improved chalk grassland occur such as dropwort *Filipendula vulgaris*, salad burnet *Sanguisorba minor*, small scabious *Scabiosa columbaria* and several orchids including burnt orchid.'

7.8 The previous Dover District Plan recognised the importance of the aims of conserving and enhancing the biodiversity of the area, stated the importance of managing such areas and stressed that they should not be developed as recreational areas without quantitative or qualitative assessments prior to development.

7.9 The Dover District Green Infrastructure Strategy 2014 described the environment which provides essential natural resources for life and a pleasant healthy place for people of all ages and considered the importance of multi functionality of an area.

7.10 The National Planning Policy Framework defines Green Infrastructure as 'a network of multi-functional green space, urban and rural which is capable of delivering a wide range of environmental and quality of life benefits to local communities'

Comment 7

I believe Dover District Council has an opportunity to consider the potential offered by the Alkham Valley the AONB, the SSSI and the means by which the delicate balance of conservation and recreation can be utilised and maintained as a major asset within a planned housing growth area potentially recognising it as a designated Conservation Area and bringing huge benefit to an area about to experience huge growth at either end of the said valley.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see appended report

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I can speak to any of the points raised in the attached document
Include files	
Local Plan Consultation Point	Strategic Policy 13 - Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets
Rep ID	SDLP1704
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP13
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	11.20 Tilmanstone Colliery Tip should be landscaped to become a local nature reserve and an amenity of Elvington and SAP 28.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Strategic Policy 14 - Enhancing Green Infrastructure and Biodiversity

Local Plan Consultation Point	Strategic Policy 14 - Enhancing Green Infrastructure and Biodiversity
Rep ID	SDLP207
Rep Status	Processed
Consultee ID	1261329
Consultee Full Name	Mr Colin Watson
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP22
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I believe this draft plan is "unsound". It may well place climate change at top of the agenda under Strategic Policy 1 but then contradicts itself seeking to destroy legally protected and extremely rare woodland by attempting to secure a quick housing allocation gain (SAP22, SAN023). We must not dilute how important this issue is not only for our district but the entire planet.</p> <p>The HELAA was both out of step with environmental protection issues and inconsistent in its reasoning. It did not place sufficient importance on protection of our environment over short-term housing gain.</p> <p>Within this proposed draft plan Policy SP14 needs a firm and unambiguous statement to ensure all brown field and redevelopment options are fully exhausted before any green field areas can be exploited.</p> <p>In particular, the site (SAP22, SAN023) Land at Archers Low Farm, Sandwich, should clearly be deleted. It is environmentally a sensitive site with officially protected woodland and trees. It has been rejected for development by our elected Councillors who recognised its' very important contribution to our rural landscape. The small proposed reduction (within this Regulation 19 Draft) in number of proposed housing units suggested for this site is nonsense! Any size of development would inevitably destroy this area and have catastrophic effect on the well-established natural eco systems and cause an unnecessary release of large amounts of stored carbon with removal of mature woodland and trees.</p> <p>Unfortunately, I suspect you will desperately cling to your plan as drafted and take no notice of my words or the many hundreds of other people and local town council who have objected to this site being developed or the district councillors who rejected the planning application with sound</p>

	reasoning or the previous independent planning inspector who said the last draft local plan could only be considered as “sound” with removal of the allocation for land at Archers Low Farm Incidentally the only site he singled out in the entire district!
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Deletion of SAP22 will contribute towards making this plan sound.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 14 - Enhancing Green Infrastructure and Biodiversity
Rep ID	SDLP471
Rep Status	Processed
Consultee ID	1266351
Consultee Full Name	Dr Sharon Danby
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP14 - enhancing green infrastructure and biodiversity
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is ‘unsound’, on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No

<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Yes</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>SP14 is unsound for the following reasons:</p> <p>The Environment Act of 2021 has a legally binding 2030 species abundance target, whose professed aim is to help reverse the drastic decline in wildlife and put the nation on track to protecting 30% of land and sea for nature by 2030; also there is a new requirement for planning applications to provide Biodiversity net gain and for Local Nature Recovery Strategies to create a framework for a national system of interconnected sites for nature. In SP14 the words about Local Nature Recovery Strategy and the Kent Biodiversity Strategy are impressive and reassuring. But the very restricted BOAs (Biodiversity Opportunity Areas), to which they are applied renders them less than effective. Residents' local knowledge (members of Sandwich Bay Bird Observatory, Kent Wildlife Trust, local members British Trust for Ornithology, etc, etc), could increase DDC's awareness of more potential BOAs by approx. ten times at a conservative estimate.</p> <p>Net Gain should be measured using the latest DEFRA measurement tool The Biodiversity Metric 3.1 - JP039 - GOV.UK and also an additional metric should also be used consisting of a list of all species to be established in consultation with Kent nature-concerned NGOs, (Kent Wildlife Trusts and others). The DEFRA metric favours the developer as it only takes into consideration protected species and habitats. In the proposed Local Plan, the Appendices give an Evidence Base.</p> <p>This predominantly deals with species and habitats protected in Law and ignores all the other species in the District which are in decline. To be sound and effective, any and all Biodiversity net gain policies must join up the living dots.</p> <p>The UK is one of the world's most nature-depleted countries, in the bottom 10% globally and last among the G7 group of nations, new data shows. It has an average of about half its biodiversity left, far below the global average of 75%, a study has found. In contrast, a figure of 90% is considered the "safe limit" to prevent the world from tipping into an "ecological meltdown", according to researchers.</p> <p>Planning policies which single out building development for "improvement" and avoid the other causes of this dramatic biodiversity loss, are inadequate and need strengthening to become effective. In a report entitled "The state of nature: 41 percent of UK species have declined since 1970s" (NHM 2019) the main drivers of decline are as follows –</p> <ul style="list-style-type: none"> • Changing agricultural management • Habitat fragmentation • Pollution • Urbanisation • Woodland management • Invasive non-native species • Fisheries degradation <p>All of these areas should be considered in any Plan including the DDC one.</p> <p>Examples of wildlife needing protection from loss of habitat around the boundaries to the north, west and south of Deal (e.g. SAP 16 sites Ground Water source protection 2 or Flood Zone 3), which is itself representative of the larger district.</p> <p>Evidence (BTO Initial Sites Review recorded as accepted) shows: Much of the area is in Flood Zone 3, farmland and has an extensive biodiversity value – briefly, to name a few, breeding Mute Swan, Moorhen, Collared Dove, Cuckoo, Skylark, Meadow Pipit, Blackbird, Cetti's, Reed and Sedge Warblers, Wren, Linnet and Reed Bunting. It is also a partial feeding area for a number of species such as Heron, Little Grebe, Grey Partridge, Kestrel, Buzzard, Black-headed and Herring Gulls, Woodpigeon, Stock Dove, Barn Owl, Swift, Swallow, House Martin, Yellow Wagtail, Dunnock, Song Thrush, Carrion Crow, Rook, Starling, House Sparrow and Chaffinch. Historically Redshank, Lapwing, Snipe and Yellow Wagtail used to nest here. Many species of native plant and habitat for invertebrates, mammals such as bats, Hedgehogs, Harvest Mice and Water Voles will also be lost. Losing these species will be a considerable biodiversity loss and contrary to the requirement for a minimum of 10% biodiversity gain. How will this loss be calculated? There are two other plots in this designation - Sholden to Betteshanger roundabout surrounding Cottington Court Farm and Betteshanger Country Park access road to Foulmead Cottages behind farm shop which are both deemed unsuitable, which is correct – they are both farmland and would create chaos on the A258 in addition to the loss of biodiversity, open space, increase in light pollution, disturbance, etc.</p> <p>The statement SP14 b must be made real and effective, and rendered sound by robust auditing and independent baseline assessments and recruitment of a much larger planning enforcement team. Then 'Every development will be required to connect to and improve the wider ecological networks'. would become effective and sound instead of token.</p> <p>SP14 3.290 Kent County Council requires 20% biodiversity net gain, and it is unsound for DDC to undermine this commitment. DDC local plan will only be sound if 20% biodiversity net gain replaces the 10% specified. The Kent Nature Partnership commits to 20% biodiversity enhancement. An addition to the Plan is therefore needed: 'Enhance biodiversity in line with Kent Nature Partnership's commitment to 20% enhancement to restore Kent's depleted natural capital and to mitigate 6th mass extinction. Natural Capital is the world's stocks of natural assets including soil,</p>

minerals, air, water and biodiversity. These provide a range of ecosystem services' that enable us all to survive and thrive. The most obvious services include the food we eat, the water we drink and timber we use for building. Less visible ecosystem services include climate regulation, carbon sequestration, natural flood defence, water filtration, species habitat, health and wellbeing. The Goodwin Sands nurture marine fauna and flora and provide a natural protection from coastal erosion. As such the Goodwin Sands are part of the district's natural capital and need protection too.

To become sound and effective and legally compliant bird boxes , bat boxes, swift bricks, street trees, garden trees should be required on all new builds.

If existing mature trees of a good size to capture carbon now, are replaced in 'urban expansion' areas (SAP 1, SAP 24, SAP 28) by young saplings that will not be able to capture a similar amount of carbon for 40 to 50 years, then the plan will not be legally compatible with Environment Act 2021. Therefore to become sound and legally compliant SP14 should require that for every 10,000m2 (roughly 50 dwellings of 200m2 per dwelling) of housing, one open space of 150m2 and another woodland area of 150m2 should be provided, these allocations to be non-transferable between 10,000m2 sections. Moreover development should only be permitted if all existing mature trees are retained (These retained trees will account for the woodland areas referred to above, and will provide pockets of mature green infrastructure of amenity value to legally binding UK Net zero strategy 2019 and to new residents at little cost or inconvenience to the developer). Trees sequester the most carbon in the last half of their lives. Any new trees planted must tended with a guarantee to ensure survival 4 years after development completed.

Moreover to become more sound and effective, we recommend adding, Retain all trees on the perimeter of large developments and pockets of existing trees within developments. Work with Kent Nature Partnership to evaluate, and match protection of all natural capital. Work to retain and enhance natural capital generally, mindful of the KCC commitment to establish the growth of 1.5 million new planted trees across the county. Similarly, this policy would become more sound if the recommendations of KCC report 'Natural Solutions to Climate Change in Kent' of March 2021 paid for from the public purse, on the need for our district's (chalk) grasslands, wetlands, and woodlands to be retained and enhanced were adopted as a planning guideline.

As with SP 13, to become sound and effective, SP 14 must be underpinned with a requirement for robust auditing, and honesty, otherwise extracting promises from developers all too often results merely in employment for public relations practitioners, and developers later apply for conditions to be removed. 'Where permission is given subject to conditions regarding tree retention, tree planting and / or biodiversity enhancement, applicants will need to agree to abide by 'robust auditing' (as Wildlife Trusts insisted was in Environmental Act 2021). This means that honest, objective because independent, before-and-after evaluations / baseline measurements must be used. Reports paid for by developer applicants are deceptive. Developers are ill-placed to self-certify their own work in this area, and DDC need a policy requiring Environmental Impact Assessments on all planning applications for developments of over 15 dwellings on greenfield or rewilded brownfield sites.'

I agree that its a good thing that every development connect to and improve the wider ecological networks in which it is located. To police this a whole team of biodiversity officers should be employed. This is too big a job for one person.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Biodiversity net gain must be increased to 20%.

Several biodiversity officers need to be employed to map and police existing biodiversity and gains made to ensure that district wide we are on track to reverse the national decline.

Developers must not be allowed to self-certify biodiversity on sites and the biodiversity officers must appoint an independent body to do surveys.

All mature trees must be retained as part of development, not just those with TPO's.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Local Plan Consultation Point	Strategic Policy 14 - Enhancing Green Infrastructure and Biodiversity
Rep ID	SDLP398
Rep Status	Processed
Consultee ID	1266669
Consultee Full Name	Mrs Susan Sullivan
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Figure 3.6 Dover District Biodiversity Assets
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I think the map of the District's biodiversity assets is unsound because it omits the priority habitat Open Mosaic Habitat on Previously Developed Land that is evident at Betteshanger Country Park. In fact the whole Park has been shown to be is a biodiversity asset through surveys and local records, and should be recognised as such. This biodiversity value was recognised when the Park was first set up when it was meant to be designated as a Local Nature Reserve under the S106 attached to the permission (02/00905) The Council failed to instigate the designation. (see 106 attached)</p> <p>I believe the map does not conform to national planning policy as the NPPF states that Local Authorities should identify, map and safeguard components of local wildlife rich habitats. Why has Betteshanger Country Park not been identified as such? There is evidence such as : it supports the second most important colony of the nationally rare and protected Lizard Orchid in the Country. The Open Mosaic habitat supports rare invertebrates of County Importance. It supports Turtle Doves the UK's fastest declining bird species.etc etc</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Suggested changes. That a new map should be produced with the clear indication that Betteshanger Country Park is included as a biodiversity asset.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Because there is a need in the Dover District to improve the protection of wildlife through the planning system.
Include files	section 106 Betteshanger CP.pdf (1)
Local Plan Consultation Point	Strategic Policy 14 - Enhancing Green Infrastructure and Biodiversity
Rep ID	SDLP305
Rep Status	Processed
Consultee ID	1331112
Consultee Full Name	Miss Emma Waller
Consultee Company / Organisation	Kent Wildlife Trust
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP14 - Enhancing Green Infrastructure and Biodiversity
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SP14 - Enhancing Green Infrastructure and Biodiversity. We welcome the inclusion of biodiversity net gain within policy SP14. Kent Wildlife Trust is currently working as part of the Kent Nature Partnership (KNP), of which it is acknowledged that Dover is a member. The KNP is developing a countywide strategic approach to Biodiversity Net Gain and Local Nature Recovery Strategies, in anticipation of the requirements of the Environment Bill. As part of these strategies, we are promoting a countywide commitment to delivering 20% measurable biodiversity net gain and commitments that any offsite biodiversity net gain is delivered strategically in order to meet the priorities and targets of existing and future landscape scale biodiversity strategies. Please refer to the Kent Nature and Partnerships statement of principles for further details. We advise that the BNG policy (NE1) aligns with these principles. The inclusion of requiring 20% net gain would be consistent within the approach being taken by other Local Authorities in Kent.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 14 - Enhancing Green Infrastructure and Biodiversity
Rep ID	SDLP349
Rep Status	Processed
Consultee ID	1331112
Consultee Full Name	Miss Emma Waller
Consultee Company / Organisation	Kent Wildlife Trust
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Strategic Policies - Introduction
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We are concerned that a Local Nature Recovery Strategy has not yet been provided, with paragraph 3.290 saying: <i>"As part of the of the Environment Act 2021 a national network of Local Nature Recovery Strategies is planned. Strategic Policy 14 provides support for the management, restoration and creation of habitats in accordance with the Kent Local Nature Recovery Strategy that will come forward"</i>. We strongly urge that a Nature Recovery Strategy is put forward as soon as possible and should include the recommendations set out in our comments.</p> <p>Kent Wildlife Trust support Dover District Council in their declaration of a climate emergency, and the goal of delivering a carbon neutral district by 2050. Further, we support the commitment for the Council to become a net zero carbon emitter by 2030 at the latest. The creation of a Climate Change Strategy and Action Plan will be essential in achieving these goals. In assessing the carbon emissions of the district, this plan must account for decisions taken by the council, including planning decisions, and on their impact to climate change. Clear policies and principles should seek to reduce emissions and increase absorption. At present we do not feel that the proposed policies will not be sufficient to meet the borough's commitments to achieve carbon neutrality.</p> <p>Regarding public health and wellbeing, Dover District Council should focus on connection with nature in the formation of all policies relating to health and communities.</p>

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 14 - Enhancing Green Infrastructure and Biodiversity
Rep ID	SDLP255
Rep Status	Processed
Consultee ID	1331383
Consultee Full Name	Mrs Katie Miller
Consultee Company / Organisation	Kent Downs AONB Unit
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP14
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	Support.

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 14 - Enhancing Green Infrastructure and Biodiversity
Rep ID	SDLP664
Rep Status	Processed
Consultee ID	1221958
Consultee Full Name	Ms Bridget Fox
Consultee Company / Organisation	The Woodland Trust
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Strategic Policy 14 - Enhancing Green Infrastructure and Biodiversity
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails	We welcome this policy, including in particular that it should be informed by the Local Nature Recovery Strategy and related plans, and that the 10% Biodiversity Net Gain requirement should be a minimum.

to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	While a statutory target of at least 10% biodiversity net gain for all development has been introduced, the Kent Nature Partnership expects at least 20% to be achieved. This higher aspiration has been noted in other Kent local plan consultations, for example the recent Kent Minerals and Waste Local Plan (KMWLP section 7.2.4) and could usefully be reference here also.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 14 - Enhancing Green Infrastructure and Biodiversity
Rep ID	SDLP1040
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Natural Environment opening of chapter
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The PRoW network should be included as part of the aim to protect the landscape, visual impact, air quality which is a significant part of user enjoyment and the wider natural environment. Historical routes are part of the rural heritage and the "landscape character and distinctiveness of the coastline". Reference within this policy should therefore be made TO THE National Trails and historic routes around the District.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Reference within this policy should therefore be made TO THE National Trails and historic routes around the District.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 14 - Enhancing Green Infrastructure and Biodiversity
Rep ID	SDLP1104
Rep Status	Processed
Consultee ID	1266669
Consultee Full Name	Mrs Susan Sullivan
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP 14 Enhancing Green infrastructure and Biodiversity Section 3.288
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>It is very concerning given the Government target of stemming species decline by 2030 that SP 14 does not even mention species. The following is a paragraph that I would like to see added to this policy</p> <p>'Planning proposals will not be supported that would damage the green infrastructure of the district and/or harm sites supporting any of the following:priority habitats, priority species, protected habitats and protected species.'</p> <p>PLEASE NOTE THERE IS A FAULT WITH THE REPRESENTATION FORM WHICH MEANS COMMENTS SUGGESTING ALTERNATIVE WORDING TO THE PLAN CANNOT EASILY BE TYPED IN THE REQUIRED BOX.</p> <p>3.288 This section appears to be suggesting that Dover District Council will only be committing to the aims of the Kent Biodiversity Strategy as they relate to BOA's. This is inadequate and shows a lack of ambition when it comes to protecting biodiversity. For example there is the issue of Turtle Doves in the Dover District, a Kent Biodiversity Strategy target species. Already we have seen permission granted for Turtle Dove territory to be removed under planning application 20/00419 and now they are under threat from planning applications 22/01152 and 22/01158. The Council needs a policy that shows that there is a clear intention to protect Turtle Doves and other target species.</p> <p>PLEASE NOTE THERE IS A FAULT WITH THE REPRESENTATION FORM WHICH MEANS COMMENTS SUGGESTING ALTERNATIVE WORDING TO THE PLAN CANNOT EASILY BE TYPED IN THE REQUIRED BOX.</p> <p>The following is a paragraph I would like to see in this section of the Local Plan</p> <p>" Dover District Council is committed to securing the aims and objectives of the Kent Biodiversity Strategy 2020-2046 and intends to protect all target species and habitats wherever they are found".</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The following is a paragraph that I would like to see added to this policy"Planning proposals will not be supported that would damage the green infrastructure of the district and/or harm sites supporting any of the following:priority habitats, priority species, protected habitats and protected species."The following is a paragraph I would like to see in this section of the Local Plan" Dover District Council is committed to securing the aims and objectives of the Kent Biodiversity Strategy 2020-2046 and intends to protect all target species and habitats wherever they are found".
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Because the Local Plan as it stands does not convincingly explain how priority habitats and species and protected habitats and species will be protected in the face of proposed developments/
Include files	
Local Plan Consultation Point	Strategic Policy 14 - Enhancing Green Infrastructure and Biodiversity
Rep ID	SDLP937
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	

Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP14
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>PRoW: The PRoW network should be included as part of the aim to protect the landscape, and against significant visual impact, and loss of air quality which is a significant part of user enjoyment and the wider natural environment. Historical routes are part of the rural heritage and the "landscape character and distinctiveness of the coastline" – reference should be made to the National Trails North Downs Way and the England Coast Path and other historic routes across the District.</p> <p>Heritage Conservation: If properly designed, green infrastructure has the potential to help new development be better integrated into the existing rural and urban landscape by ensuring that it fits into the grain of what is already there. The pattern of roads, tracks and lanes in Dover has been used for centuries to link Dover's towns, villages, hamlets and countryside. By taking advantage of these existing and historic routeways people will be able to move through the District while retaining the historic geography of the region, but also following routes more likely to be accompanied by historic hedgerows and planting. This has the potential to unite heritage and ecology to help people access and enjoy green infrastructure features more easily and naturally.</p> <p>Using historic routeways also allows Green Infrastructure (GI) designers to incorporate heritage assets to provide features of interest. In turn this will help people accessing the GI to become more aware of and value Dover's heritage which will in turn assist their conservation and re-use. For example, along the cliffs east of Dover town there is an internationally significant group of fortifications. If the GI were to feature these it would help raise their profile to assist with conservation whilst supporting tourism.</p> <p>To fully appreciate Dover's landscape character and incorporate it into green infrastructure effectively, it is first important to understand it. The main method for investigation historic landscape character is by historic landscape characterisation. This is a method of assessing the pattern of tracks, lanes, field boundaries and other features that comprise the historic character of the modern landscape.</p> <p>The Kent Historic Landscape Characterisation (2001) has identified the broad historic character of the landscape of Kent but more detailed refinement is needed to bring the baseline data for Dover up to the standard of areas such as the High Weald and the Hoo Peninsula which have more detailed and relevant data. The County Council would welcome further discussion with the District Council on this.</p> <p>The text rightly highlights the contribution of green infrastructure to health. Historic England has released research that demonstrates how heritage actively supports health and well-being through contributing to a generally more attractive environment, allowing activities that encourage participation and inclusion and by encouraging outdoors activities which could be referred to within the Local Plan.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	As set out in 6.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 14 - Enhancing Green Infrastructure and Biodiversity
Rep ID	SDLP877
Rep Status	Processed
Consultee ID	1331934
Consultee Full Name	Mr. PETER FINDLEY
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP14
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	It is not applied consistently and has sites left out.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	Betteshanger Country Park's unique habitat (Open Mosaic) should be protected by Dover District Council. It is a scarce habitat in Kent and should be valued above development.

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 14 - Enhancing Green Infrastructure and Biodiversity
Rep ID	SDLP1610
Rep Status	Processed
Consultee ID	1252100
Consultee Full Name	Mrs Amandajayne Hollobon-Baxter
Consultee Company / Organisation	Sandwich Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP14
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Monks Wall Nature Reserve, Gazen Salts and Sandwich Bay Bird Observatory should be considered for inclusion within this strategic policy. Retain all trees on the perimeter of large developments and pockets of existing trees within developments. Add protection for all existing woodland because of the value of trees in preventing speedy runoff of water in times of heavy rainfall, woodland helps prevent inland flooding. Note: DDC Green Infrastructure Strategy- Tree Strategy Reference CC8 5.56: 'as part of the Council's Green Infrastructure Strategy a Tree Strategy will be prepared to accompany this Plan and provide detailed guidance on the delivery of this Policy.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant	Monks Wall Nature Reserve, Gazen Salts and Sandwich Bay Bird Observatory should be considered for inclusion within this strategic policy. Retain all trees on the perimeter of large developments and pockets of existing trees within developments. Add protection for all existing woodland because of the value of trees in preventing speedy runoff of water in times of heavy rainfall, woodland helps prevent inland flooding. Note: DDC

and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Green Infrastructure Strategy- Tree Strategy Reference CC8 5.56: 'as part of the Council's Green Infrastructure Strategy a Tree Strategy will be prepared to accompany this Plan and provide detailed guidance on the delivery of this Policy.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 14 - Enhancing Green Infrastructure and Biodiversity
Rep ID	SDLP1102
Rep Status	Processed
Consultee ID	1266669
Consultee Full Name	Mrs Susan Sullivan
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Figure 3.6 Dover District Biodiversity assets. SP 14
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Figure 3.6 Dover Biodiversity assets SP14 197 of the NPPF states: Plans should identify, map and safeguard components of local wildlife habitats...including areas identified by national and local partnerships for habitat management, enhancement, restoration or creation. Figure 3.6 does not comply with this requirement as Betteshanger Country Park is not highlighted as a biodiversity asset despite its known biodiversity interest and the fact that it is within the Lower Stour Wetlands Biodiversity Opportunity Area as identified by Kent Nature Partnerships. The fact that it contains the second most important colony of the rare and protected (wildlife and Countryside Act) Lizard Orchid should, on its

	own, be enough for it to be listed as a biodiversity asset. That and the fact that when the Country Park was first created as Fowlmead (planning application 02/00905) an S106 attached to the application obliged the Council and owner to designate the Park as a Local Nature Reserve. It should also be noted that Plantlife and the recorders in Kent for the BSBI are both of the opinion that the Park would qualify as a SSSI.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Betteshanger Country Park should be identified on Figure 3.6 as a biodiversity asset and recognised as being part of the Lower Stour wetlands Biodiversity Opportunity Area.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Because Dover District Council has not acknowledged the biodiversity value of Betteshanger Country Park
Include files	
Local Plan Consultation Point	Strategic Policy 14 - Enhancing Green Infrastructure and Biodiversity
Rep ID	SDLP1536
Rep Status	Processed
Consultee ID	1271535
Consultee Full Name	Jean Swan
Consultee Company / Organisation	Adisham Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP14
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>Under Policy 14 we welcome the proposed Priority Habitat Inventory on the fringes of this parish and would be happy to assist if required. Adisham Parish is fortunate to have within its boundary several SSSI status woodlands. Geographically they should be considered within the context of the DDC Draft Local Plan.</p> <p><i>(DDC note - this representation is an extract of Adisham PC full representation at SDLP1535)</i></p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Not Applicable
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	Strategic Policy 14 - Enhancing Green Infrastructure and Biodiversity
<p>Rep ID</p>	SDLP1435
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1331661
<p>Consultee Full Name</p>	Chloe Rose
<p>Consultee Company / Organisation</p>	RSPB
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	SP14
<p>2 - Do you consider this part of the Plan sound?</p>	No
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	Consistent with National Policy
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	Not Applicable

<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Not Applicable</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>Thank you for consulting us on the Dover Local Plan. We unfortunately were not able to respond to the regulations 18 consultation. Please see below comments which have been focused mainly on Turtle Doves and include BNG opportunities.</p> <p>Introduction</p> <p>Turtle Dove (<i>Streptopelia turtur</i>) is a RSPB priority species due to the significant population decline both in the UK and across its breeding range. The Turtle Dove is the UK's fastest declining breeding bird and is threatened with global as well as national extinction (IUCN Red List of Endangered Species and UK Red List of Conservation Concern). Turtle Doves have declined by 98% between 1967 and 2018.</p> <p>RSPB is a lead partner on the Operation Turtle Dove partnership which seeks to offer practical evidence-based solutions to halt the decline of Turtle Doves across England. The foundation of this work is based on working with landowners and communities in areas that still support breeding populations of Turtle Doves, which are known as Turtle Dove Friendly Zones (TDFZs). There are 29 zones across England, 12 of which are in Kent and 3 of those are in Dover; Ash, Wingham and Lydden. (See figure 1) (<i>DDC note - see attachment for images</i>)</p> <p>In addition to this project, we are seeking out opportunities to work with local authorities to ensure that strong consideration is given to protecting and enhancing Turtle Dove habitat in development planning. We therefore welcome the inclusion of TDFZs within the Dover Green and Blue Infrastructure Strategy, May 2022. Dover is an extremely important area for Turtle Doves, containing a high number of TDFZs. Protecting and enhancing turtle doves through development planning is essential across their remaining range, and in key landscapes from which they have recently disappeared. Adults are known to be site faithful. Development pressures can lead to encroachment on existing breeding and foraging habitats and can restrict potential for recovering the species.</p> <p>Results of National Turtle Dove Survey</p> <p>Last year the RSPB and partners organised the first national Turtle Dove survey for England which further helps to focus our work. In Kent this was run by the Kent Ornithological Society in partnership with the RSPB. The results of the survey have further highlighted the importance of Kent for Turtle Doves, showing that Kent supports approximately a third of the total England population with approx. 700 territories recorded in Kent. Within Kent itself, East Kent is the stronghold for Turtle Doves within the county.</p> <p>While the data gives a good indication of known Turtle Dove territories it does not offer a complete picture. We would therefore advice that a breeding bird survey is carried out on any development that is proposed within a TDFZ or an area with known Turtle Doves or containing good quality Turtle Dove nesting habitat, to ensure the plan is consistent with national policy (NPPF).</p> <p>Sites in close proximity to Turtle Dove territories</p> <p>We have overlaid Turtle Dove territory data with the proposed sites in the Dover Draft Local Plan (using data from the 2021 National Turtle Dove survey and supporting data from BTO BirdTrack), to see if any developments pose a risk to known Turtle Dove territories.</p> <p>Two proposed sites for development contain recent records of Turtle Dove territories within a 1km area; SAP28 - Land between Eythorne and Elvington and Elvington and SAP52 - Prima Windows, Nonington. While we welcome the consideration of protecting trees and hedgerows within the site, further consideration needs to be provided for Turtle Doves, see below mitigation guidance.</p> <p><i>(DDC note - this section has been extracted to consultation points for both site policies mentioned above)</i></p> <p>Turtle Dove Mitigation Guidance</p> <ol style="list-style-type: none"> Detailed proposals should aim to protect areas of scrub and mature hedgerows suitable for nesting habitat. If destroyed, this habitat can take up to 20 years to establish and become suitable for nesting. Detailed proposals should aim to ensure foraging habitat is available and managed correctly (food shortage is the main factor triggering it's decline on their breeding grounds). Alongside this, fresh water sources should be retained and managed sympathetically. Where known breeding birds occur, detailed proposals should feature; nesting habitat, foraging areas and a freshwater source within 350 metres. Studies have shown that recently fledged turtle doves will rarely venture more 350 metres from the nest site (Dunn et al. 2016) and at this stage are likely to: <ol style="list-style-type: none"> be very vulnerable to predation. With increased human habitation it is possible there may be adverse effects from generalist predators (e.g. cats) that tend to congregate near to human habitat. (Dunn et al. 2016) and II. incur poor body condition if there is insufficient food nearby in the form of natural arable plant species (as opposed to anthropogenic food resources such as garden bird seed mixes and brassicas) (Dunn et al. 2018)

As well as maintaining what habitat is already present for Turtle Doves within the Dover TDFZs, we recommend looking at opportunities to further expand/create areas of suitable habitat to ensure the long-term preservation and prosperity of this species within the Dover district. Further information can be found; www.operationturtledove.org ('helping your turtle doves'). The RSPB can assist with this advice on a case-by-case basis.

Betteshanger Country Park

We would further like to highlight an important area within the Dover District that supports high biodiversity interest, Betteshanger Country Park. We have made comment and objected to recent planning applications for a Hotel and SeaHive at Betteshanger Country Park. We welcome the need for recreational space for local people but believe this should not be to the detriment of wildlife. The site is important for Turtle Dove and other priority species, and we believe it should be managed in a way that does not jeopardise the sites biodiversity. The RSPB looks forward to working with Dover DC to assist in conserving and enhancing the District's important habitat and species to ensure these assets can continue to be enjoyed and valued by all and are protected from inappropriate development.

BNG Opportunities – RSPB Lydden Valley potential BNG sites

We have been advised that you are not formally requesting BNG sites at present, but that it would be useful to include them within our representation. Please see below map detailing these sites, please let us know if you require further information. *(DDC note - see attachment to view map image).*

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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Yes

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Include files

Local Plan Consultation Point

Strategic Policy 14 - Enhancing Green Infrastructure and Biodiversity

Rep ID

SDLP1073

Rep Status

Processed

Consultee ID

1331762

Consultee Full Name

Ms Waite-Gleave
Sarah
Waite-Gleave

Consultee Company / Organisation

Dover and Deal Green Party

Agent Full Name

Agent Company / Organisation

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The Environment Act of 2021 has a legally binding 2030 species abundance target, whose professed aim is to help reverse the drastic decline in wildlife and put the nation on track to protecting 30% of land and sea for nature by 2030; also there is a new requirement for planning applications to provide Biodiversity net gain and for Local Nature Recovery Strategies to create a framework for a national system of interconnected sites for nature.</p> <p>In SP14 the words about Local Nature Recovery Strategy and the Kent Biodiversity Strategy are impressive and reassuring. But the very restricted BOAs (Biodiversity Opportunity Areas), to which they are applied renders them less than effective. Residents' local knowledge (members of Sandwich Bay Bird Observatory, Kent Wildlife Trust, local members British Trust for Ornithology, etc, etc), could increase DDC's awareness of more potential BOAs by approx. ten times at a conservative estimate.</p> <p>The UK is one of the world's most nature-depleted countries, in the bottom 10% globally and last among the G7 group of nations, new data shows. It has an average of about half its biodiversity left, far below the global average of 75%, a study has found. In contrast, a figure of 90% is considered the "safe limit" to prevent the world from tipping into an "ecological meltdown", according to researchers.</p> <p>Examples of wildlife needing protection from loss of habitat around the boundaries to the north, west and south of Deal (e.g. SAP 16 sites Ground Water source protection 2 or Flood Zone 3), which is itself representative of the larger district. Evidence (BTO Initial Sites Review recorded as accepted) shows: Much of the area is in Flood Zone 3, farmland and has an extensive biodiversity value – briefly, to name a few, breeding Mute Swan, Moorhen, Collared Dove, Cuckoo, Skylark, Meadow Pipit, Blackbird, Cetti's, Reed and Sedge Warblers, Wren, Linnet and Reed Bunting. It is also a partial feeding area for a number of species such as Heron, Little Grebe, Grey Partridge, Kestrel, Buzzard, Black-headed and Herring Gulls, Woodpigeon, Stock Dove, Barn Owl, Swift, Swallow, House Martin, Yellow Wagtail, Dunnock, Song Thrush, Carrion Crow, Rook, Starling, House Sparrow and Chaffinch. Historically Redshank, Lapwing, Snipe and Yellow Wagtail used to nest here. Many species of native plant and habitat for invertebrates, mammals such as bats, Hedgehogs, Harvest Mice and Water Voles will also be lost. Losing these species will be a considerable biodiversity loss and contrary to the requirement for a minimum of 10% biodiversity gain. How will this loss be calculated? There two other plots in this designation - Sholden to Betteshanger roundabout surrounding Cottington Court Farm and Betteshanger Country Park access road to Foulmead Cottages behind farm shop which are both deemed unsuitable, which is correct – they are both farmland and would create chaos on the A258 in addition to the loss of biodiversity, open space, increase in light pollution, disturbance, etc.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>Net Gain should be measured using the latest DEFRA measurement tool The Biodiversity Metric 3.1 - JP039 - GOV.UK and also an additional metric should also be used consisting of a list of all species to be established in consultation with Kent nature-concerned NGOs, (Kent Wildlife Trusts and others). The DEFRA metric favours the developer as it only takes into consideration protected species and habitats. In the proposed Local Plan, the Appendices give an Evidence Base. This predominantly deals with species and habitats protected in Law and ignores all the other species in the District which are in decline. To be sound and effective, any and all Biodiversity net gain policies must join up the living dots.</p> <p>Planning policies which single out building development for "improvement" and avoid the other causes of this dramatic biodiversity loss, are inadequate and need strengthening to become effective. In a report entitled "The state of nature: 41 percent of UK species have declined since 1970s" (NHM 2019) the main drivers of decline are as follows –</p> <ul style="list-style-type: none"> • Changing agricultural management

- Habitat fragmentation
- Pollution
- Urbanisation
- Woodland management
- Invasive non-native species
- Fisheries degradation

All of these areas should be considered in any Plan including the DDC one.

SP 14 Under the Hunting Act 2004 foxhunting became illegal, DDC should include in its SP14 encouragement for the rural Police to uphold the law in this respect and discourage any drag-hunting which results in the 'accidental' tearing apart of wild animals.

The statement SP14 **b** must be made real and effective, and rendered sound by robust auditing and independent baseline assessments and recruitment of a much larger planning enforcement team. Then *'Every development will be required to connect to and improve the wider ecological networks'*. would become effective and sound instead of token.

SP14 3.290 Kent County Council requires 20% biodiversity net gain, and it is unsound for DDC to undermine this commitment. DDC local plan will only be sound if 20% biodiversity net gain replaces the 10% specified. The Kent Nature Partnership commits to 20% biodiversity enhancement. An addition to the Plan is therefore needed: *'Enhance biodiversity in line with Kent Nature Partnership's commitment to 20% enhancement to restore Kent's depleted natural capital and to mitigate 6th mass extinction. Natural Capital is the world's stocks of natural assets including soil, minerals, air, water and biodiversity. These provide a range of ecosystem services' that enable us all to survive and thrive. The most obvious services include the food we eat, the water we drink and timber we use for building. Less visible ecosystem services include climate regulation, carbon sequestration, natural flood defence, water filtration, species habitat, health and wellbeing. The Goodwin Sands nurture marine fauna and flora and provide a natural protection from coastal erosion. As such the Goodwin Sands are part of the district's natural capital and need protection too.*

To become sound and effective and legally compliant bird boxes , bat boxes, swift bricks, street trees, garden trees should be required on all new builds.

If existing mature trees of a good size to capture carbon now, are replaced in 'urban expansion' areas (SAP 1, SAP 24, SAP 28) by young saplings that will not be able to capture a similar amount of carbon for 40 to 50 years, then the plan will not be legally compatible with Environment Act 2021. Therefore to become sound and legally compliant SP14 should require that *for every 10,000m2 (roughly 50 dwellings of 200m2 per dwelling) of housing, one open space of 150m2 and another woodland area of 150m2 should be provided, these allocations to be non-transferable between 10,000m2 sections. Moreover development should only be permitted if 90% of existing trees are retained (These retained trees will account for the woodland areas referred to above, and will provide pockets of mature green infrastructure of amenity value to legally binding UK Net zero strategy 2019 and to new residents at little cost or inconvenience to the developer). Any new trees planted must tended with a guarantee to ensure survival 4 years after development completed.*

Moreover to become more sound and effective, we recommend adding, *Retain all trees on the perimeter of large developments and pockets of existing trees within developments. Work with Kent Nature Partnership to evaluate, and match protection of all natural capital. Work to retain and enhance natural capital generally, mindful of the KCC commitment to establish the growth of 1.5 million new planted trees across the county. Similarly, this policy would become more sound if the recommendations of KCC report 'Natural Solutions to Climate Change in Kent' of March 2021 paid for from the public purse, on the need for our district's (chalk) grasslands, wetlands, and woodlands to be retained and enhanced were adopted as a planning guideline.*

As with SP 13, to become sound and effective, SP 14 must be underpinned with a requirement for robust auditing, and honesty, otherwise extracting promises from developers all too often results merely in employment for public relations practitioners, and developers later apply for conditions to be removed. 'Where permission is given subject to conditions regarding tree retention, tree planting and / or biodiversity enhancement, applicants will need to agree to abide by 'robust auditing' (as Wildlife Trusts insisted was in Environmental Act 2021). This means that honest, objective because independent, before-and-after evaluations / baseline measurements must be used. Sketchy, google-map-based ecology reports paid for by developer applicants are deceptive. Developers are ill-placed to self-certify their own work in this area, and DDC need a policy requiring Environmental Impact Assessments on all planning applications for developments of over 15 dwellings on greenfield or rewilded brownfield sites.'

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	Strategic Policy 14 - Enhancing Green Infrastructure and Biodiversity
Rep ID	SDLP1353
Rep Status	Processed
Consultee ID	1333128
Consultee Full Name	David Powell
Consultee Company / Organisation	
Agent Full Name	Klaire Lander
Agent Company / Organisation	Lander Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP14
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Lander Planning sent a PDF document which has been split across the relevant sections of the Plan. See Original Attachment on SDLP1346) The provision of on-site green infrastructure that connects to off-site networks is supported, in protecting the District's biodiversity, in accordance with national policy. The policy is effective' and 'justified' and therefore supported.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 14 - Enhancing Green Infrastructure and Biodiversity
Rep ID	SDLP1213
Rep Status	Processed
Consultee ID	1332924
Consultee Full Name	Amy Aldridge
Consultee Company / Organisation	Gladman Developments Ltd
Agent Full Name	Amy Aldridge
Agent Company / Organisation	Gladman Developments Ltd
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP14
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Gladman are supportive of the principle of Policy SP14, however note the reference to Policy NE1 at criterion d. Gladman's response to NE1 will be given in detail at 4.4.13 of this representation, however whilst the Environment Act 2021 introduces a mandatory requirement for development to deliver a net gain for biodiversity of at least 10%, the secondary legislation to enact this is yet to come into force. Therefore, until such time as the mandatory provisions of the Environment Act come into force, the Council cannot require developments to achieve at least a 10% net gain, and certainly could not withhold planning permission if a proposal did not achieve a 10% gain. Gladman would therefore suggest that any requirement for a 10% net gain should be tempered with to make clear the 10% target is aspirational and not an absolute target and that "a net gain" is more appropriate.</p> <p>(DDC Note - Text Extracted from Document sent from Gladman Developments Ltd. Full attachment can be found under the introduction comment reference SDLP1192)</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance	

with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
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Include files	
Local Plan Consultation Point	Strategic Policy 14 - Enhancing Green Infrastructure and Biodiversity
Rep ID	SDLP1485
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP14
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC Note <i>The text below is an extract from the original representation which is attached to SDLP1438.</i> SP14 Enhancing Green Infrastructure & Biodiversity The Environment Act of 2021 has a legally binding 2030 species abundance target, whose professed aim is to help reverse the drastic decline in wildlife and put the nation on track to protecting 30% of land and sea for nature by 2030; also, there is a new requirement for planning applications to provide Biodiversity net gain and for Local Nature Recovery Strategies to create a framework for a national system of interconnected sites for nature.

In SP14 the words about Local Nature Recovery Strategy and the Kent Biodiversity Strategy are impressive and reassuring. But the very restricted BOAs (Biodiversity Opportunity Areas), to which they are applied, render them less than effective. Residents' local knowledge (members of Sandwich Bay Bird Observatory, Kent Wildlife Trust, local members British Trust for Ornithology, etc, etc), could increase DDC's awareness of more potential BOAs by approx. ten times at a conservative estimate.

Net Gain should be measured using the latest DEFRA measurement tool The Biodiversity Metric 3.1 - JP039 - GOV.UK and also an additional metric should also be used consisting of a list of all species to be established in consultation with Kent nature concerned NGOs, (Kent Wildlife Trusts and others). The DEFRA metric favour the developer as it only takes into consideration protected species and habitats. In the proposed Local Plan, the Appendices give an Evidence Base. This predominantly deals with species and habitats protected in Law and ignores all the other species in the district which are in decline. To be sound and effective, all Biodiversity net gain policies must join up the living dots.

The UK is one of the world's most nature-depleted countries, in the bottom 10% globally and last among the G7 group of nations, new data shows. It has an average of about half its biodiversity left, far below the global average of 75%, a study has found. In contrast, a figure of 90% is considered the "safe limit" to prevent the world from tipping into an "ecological meltdown", according to researchers.

Planning policies which single out building development for "improvement" and avoid the other causes of this dramatic biodiversity loss, are inadequate and need strengthening to become effective. In a report entitled "The state of nature: 41 percent of UK species have declined since 1970s" (NHM 2019) the main drivers of decline are as follows –

Changing agricultural management , Habitat fragmentation , Pollution , Urbanisation , Woodland management , Invasive non-native species , Fisheries degradation

All of these areas should be considered in any Plan including the DDC one.

SP 14 Under the Hunting Act 2004 foxhunting became illegal, DDC should include in its SP14 encouragement for the rural Police to uphold the law in this respect and discourage any drag-hunting which results in the 'accidental' tearing apart of wild animals.

Examples of wildlife needing protection from loss of habitat around the boundaries to the north, west and south of Deal (e.g. SAP 16 sites Ground Water source protection 2 or Flood Zone 3), which is itself representative of the larger district. Evidence (BTO Initial Sites Review recorded as accepted) shows: Much of the area is in Flood Zone 3, farmland and has an extensive biodiversity value – briefly, to name a few, breeding Mute Swan, Moorhen, Collared Dove, Cuckoo, Skylark, Meadow Pipit, Blackbird, Cetti's, Reed and Sedge Warblers, Wren, Linnet and Reed Bunting. It is also a partial feeding area for a number of species such as Heron, Little Grebe, Grey Partridge, Kestrel, Buzzard, Black-headed and Herring Gulls, Woodpigeon, Stock Dove, Barn Owl, Swift, Swallow, House Martin, Yellow Wagtail, Dunnock, Song Thrush, Carrion Crow, Rook, Starling, House Sparrow and Chaffinch. Historically Redshank, Lapwing, Snipe and Yellow Wagtail used to nest here. Many species of native plant and habitat for invertebrates, mammals such as bats, Hedgehogs, Harvest Mice and Water Voles will also be lost. Losing these species will be a considerable biodiversity loss and contrary to the requirement for a minimum of 10% biodiversity gain. How will this loss be calculated? There two other plots in this designation - Sholden to Betteshanger roundabout surrounding Cottington Court Farm and Betteshanger Country Park access road to Foulmead Cottages behind farm shop which are both deemed unsuitable, which is correct – they are both farmland and would create chaos on the A258 in addition to the loss of biodiversity, open space, increase in light pollution, disturbance, etc.

The statement SP14 b must be made real and effective, and rendered sound by robust auditing and independent baseline assessments and recruitment of a much larger planning enforcement team. Only then will 'Every development will be required to connect to and improve the wider ecological networks'. would become effective and sound instead of token.

SP14 3.290 Kent County Council requires 20% biodiversity net gain, and it is unsound for DDC to undermine this commitment. DDC local plan will only be sound if 20% biodiversity net gain replaces the 10% specified. The Kent Nature Partnership commits to 20% biodiversity enhancement. An addition to the Plan is therefore needed: 'Enhance biodiversity in line with Kent Nature Partnership's commitment to 20% enhancement to restore Kent's depleted natural capital and to mitigate 6th mass extinction. Natural Capital is the world's stocks of natural assets including soil, minerals, air, water and biodiversity. These provide a range of ecosystem services' that enable us all to survive and thrive. The most obvious services include the food we eat, the water we drink and timber we use for building. Less visible ecosystem services include climate regulation, carbon sequestration, natural flood defence, water filtration, species habitat, health and wellbeing. The Goodwin Sands nurture marine fauna and flora and provide a natural protection from coastal erosion. As such the Goodwin Sands are part of the district's natural capital and need protection too.

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If existing mature trees of a good size to capture carbon now, are replaced in 'urban expansion' areas (SAP 1, SAP 24, SAP 28) by young saplings that will not be able to capture a similar amount of carbon for 40 to 50 years, then the plan will not be legally compatible with Environment Act 2021. Therefore, to become sound and legally compliant SP14 should require that for every 10,000m2 (roughly 50 dwellings of 200m2 per dwelling) of housing, one open space of 150m2 and another woodland area of 150m2 should be provided, these allocations to be non-transferable between 10,000m2 sections. Moreover, development should only be permitted if 90% of existing trees are retained (These retained trees will account for the woodland areas referred to above, and will provide pockets of mature green infrastructure of amenity value to legally binding UK Net zero strategy 2019 and to new residents at little cost or inconvenience to the developer). Any new trees planted must be tended with a guarantee to ensure survival 4 years after development completed.

Moreover, to become more sound and effective, we recommend adding, Retain all trees on the perimeter of large developments and pockets of existing trees within developments. Work with Kent Nature Partnership to evaluate, and match protection of all-natural capital. Work to retain and enhance natural capital generally, mindful of the KCC commitment to establish the growth of 1.5 million new planted trees across the county. Similarly, this policy would become sounder if the recommendations of KCC report 'Natural Solutions to Climate Change in Kent' of March 2021 paid for from the public purse, on the need for our district's (chalk) grasslands, wetlands, and woodlands to be retained and enhanced were adopted as a planning guideline.

As with SP 13, to become sound and effective, SP 14 must be underpinned with a requirement for robust auditing, and honesty, otherwise extracting promises from developers all too often results merely in employment for public relations practitioners, and developers later apply for conditions to be removed. 'Where permission is given subject to conditions regarding tree retention, tree planting and / or biodiversity enhancement, applicants will need to agree to abide by 'robust auditing' (as Wildlife Trusts insisted was in Environmental Act 2021). This means that honest, objective because independent, before-and-after evaluations / baseline measurements must be used. Sketchy, google-map-based ecology reports paid for by developer applicants are deceptive. Developers are ill-placed to self-certify their own work in this area, and DDC need a policy requiring Environmental Impact Assessments on all planning applications for developments of over 15 dwellings on greenfield or rewilded brownfield sites.'

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Include files	
Local Plan Consultation Point	Strategic Policy 14 - Enhancing Green Infrastructure and Biodiversity
Rep ID	SDLP1564
Rep Status	Processed
Consultee ID	1333349
Consultee Full Name	Nikky

	Warden
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP14
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Net Gain should be measured using the latest DEFRA measurement tool The Biodiversity Metric 3.1 - JP039 - GOV.UK and also an additional metric should also be used consisting of a list of all species to be established in consultation with Kent nature-concerned NGOs, (Kent Wildlife Trusts and others).</p> <p>The DEFRA metric favours the developer as it only takes into consideration protected species and habitats.</p> <p>In the proposed Local Plan, the Appendices give an Evidence Base.</p> <p>This predominantly deals with species and habitats protected in Law and does not cover the other species in the District which are in decline.</p> <p>SP14 3.290 Kent County Council requires 20% biodiversity net gain, and it is unsound for DDC to undermine this commitment. DDC local plan will only be sound if 20% biodiversity net gain replaces the 10% specified.</p> <ul style="list-style-type: none"> • effective and legally compliant bird boxes , bat boxes, swift bricks, street trees, garden trees should be required on all new builds. • recommend adding, Retain all trees on the perimeter of large developments and pockets of existing trees within developments • Where there are reports and evidence of pre-emptive tree felling and or habitat destruction which undermines the inadequate 10% biodiversity net gain. The applicant must be required to enhance biodiversity net gain by 30-50% as determined by the LPA
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	SDLP1561 Warden Att1.pdf
Local Plan Consultation Point	Strategic Policy 14 - Enhancing Green Infrastructure and Biodiversity
Rep ID	SDLP1496
Rep Status	Processed
Consultee ID	1333275
Consultee Full Name	Adam Harwood
Consultee Company / Organisation	Environment Agency
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP14
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The importance of ecological networks of linked habitat corridors (both within the District and linking to adjacent District) to allow the movement of species between suitable habitats, and to promote the expansion of biodiversity is defined in the NPPF and the Local Nature Recovery Strategy commitment of the government's 25-year Environment Plan and enacted by the Environment Act 2021.</p> <p>The connectivity of Local Wildlife Sites and other designated sites should not be disrupted through the allocation of sites for development and should aim to promote further connectivity of the ecological blue and green network through habitat creation and improvement. A numerical commitment to biodiversity net gain is required in order to be in line with the Environment Act 2021 and should be realised equally in both terrestrial and aquatic habitats using the Natural England Biodiversity and Rivers Metrics.</p> <p>Allocated sites should not encroach on any watercourse, and we urge a minimum 10m buffer zone to development proposals that contain or are adjacent to watercourses.</p> <p>Where there is opportunity for river restoration, such as habitat enhancement/creation, re-meandering, improved fish/Eel passage and the restoration of culverted watercourses to open channels, we would like to see a commitment to actively pursue these aims.</p> <p>Special focus could be aimed at culverted sections of any watercourse. If/where the watercourse is toe-boarded site allocations should consider opportunities for removal.</p>

	<p>With reference to Paragraph 185 of the NPPF (2021) which states that planning policies and decisions should “limit the impact of light pollution from artificial light on ... dark landscapes and nature conservation.” We would urge appropriate lighting design in line with best practice guidance set out by the Bat Conservation Trust as riparian corridors are essential for many migrating and nocturnal species.</p> <p>As an informative point, allocations should take into consideration the use of sustainable urban drainage systems (SuDS) and Natural Flood Management (NFM) measures for flow attenuation, filtration, and water conservation.</p> <p>We welcome engagement at the earliest opportunity to identify opportunities through development proposals for securing measurable gains for biodiversity.</p> <p>Local Plan to 2040 The government’s 25 year plan to improve the environment should possibly be referenced in the Local Plan (25-year-environment-plan.pdf (publishing.service.gov.uk). Although many items mentioned in the 25 year plan are covered in the Local Plan, it makes sense to align government plans with local plans.</p> <p><i>(DDC note - This is an extract from the full Environment Agency representation SDLP1458)</i></p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Not Applicable
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	

Strategic Policy 15 - Protecting the Districts Historic Environment

Local Plan Consultation Point	Strategic Policy 15 - Protecting the Districts Historic Environment
Rep ID	SDLP44
Rep Status	Processed
Consultee ID	1254085
Consultee Full Name	Mrs Sue Ward
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP15, 3.299
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The proposed Whitfield Urban expansion to the northwest not only threatens the natural environment, as commented on previously, it seriously damages the historic environment by surrounding three historic listed buildings by housing estates. These three buildings were all working farms, which had fallen into disrepair, but have in recent years been restored by their private owners at great expense. These buildings' natural environment is as it is at present, arable farmland, where their significance can be properly appreciated by residents and users of adjacent public rights of way. This will be lost by the proposal to surround them with houses and is contrary to Sections 190 and 195 of the NPPF.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Allow these buildings and the adjacent rights of way to be properly conserved and enhanced by pulling back the proposed boundaries of the Whitfield Urban expansion. This was previously covered in Section 4.50 of the 2010 Core Strategy and it is not explained why it has been deemed appropriate to go against this commitment in the current plan, contrary to Sections 190 and 195 of the NPPF.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Because the comments and arguments accepted by the Council in 2010 have now been ignored. These buildings are just as worthy of consideration now as they were then
Include files	
Local Plan Consultation Point	Strategic Policy 15 - Protecting the Districts Historic Environment
Rep ID	SDLP573
Rep Status	Processed
Consultee ID	1267584
Consultee Full Name	Jason Ransley
Consultee Company / Organisation	Dover Harbour Board
Agent Full Name	John Bowles
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Strategic Policy SP15 - Protecting the Districts Historic Environment
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Dover Harbour Board supports the objective of that the Council will work with partners to ensure that the heritage of the District can positively contribute to the character, environment and economy of the District and the quality of life of existing and future generations of residents and visitors.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	N/A

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	N/A
Include files	
Local Plan Consultation Point	Strategic Policy 15 - Protecting the Districts Historic Environment
Rep ID	SDLP512
Rep Status	Processed
Consultee ID	1331555
Consultee Full Name	Mr. Trevor Johns
Consultee Company / Organisation	Alkham Valley Society
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	3.296 / 3.297 / 3.298
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The village of Alkham is blessed with a number of listed buildings which are under threat from vibration, subsidence and pollution due to excessive traffic. Some of these buildings and historic structures are so close to the road as to be extremely vulnerable and at least 3 have suffered impacts recently.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	Redirecting unnecessary through traffic to the intended primary routes. Slowing and reducing local traffic on unclassified local roads. Restricting HGVs to access only and greatly reducing their speed.

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 15 - Protecting the Districts Historic Environment
Rep ID	SDLP940
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	3.302
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The County Council welcomes the commitment to developing a Local List which is also one of the recommendations of the Heritage Strategy. KCC would encourage the District Council to ensure that the list is eligible to the full range of heritage assets including buildings, archaeological sites and monuments, green spaces and landscapes so that all aspects of Dover's past can be recognised. This was also a recommendation of the Dover Heritage Strategy (R14). In addition to the Local List, however, the Heritage Strategy recommended that the District Council develops a Register of Heritage Assets at Risk (R15). This would complement a Local List and allow assets at most risk to be highlighted and to potentially receive more focused attention. The County Council recommends that such a register be created in addition to the Local List.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant	

and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 15 - Protecting the Districts Historic Environment
Rep ID	SDLP1611
Rep Status	Processed
Consultee ID	1252100
Consultee Full Name	Mrs Amandajayne Hollobon-Baxter
Consultee Company / Organisation	Sandwich Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP15
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	Historic Parks and Gardens Monks Wall Nature Reserve, Gazen Salts Nature Reserve and the entire original town wall should be added to Historic England's register of Parks and Gardens of Specific Interest and Kent Gardens Compendium.

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Historic Parks and Gardens Monks Wall Nature Reserve, Gazen Salts Nature Reserve and the entire original town wall should be added to Historic England's register of Parks and Gardens of Specific Interest and Kent Gardens Compendium.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 15 - Protecting the Districts Historic Environment
Rep ID	SDLP941
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP15
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible.	KCC welcomes the inclusion of an entire chapter dedicated to the Historic Environment. Dover's heritage is of an exceptional quality and has a very important part to play in the future life of the District, and it essential that it is given the recognition it deserved.

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 15 - Protecting the Districts Historic Environment
Rep ID	SDLP938
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	3.295 to 3.297
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible.	The County Council welcomes the clear explanation of why the historic environment policies in the Local Plan have been selected and broadly support these decisions. There is a case to be made for a specific policy on the Archaeology of Dover Town, but the County Council notes the commitment to develop an SPD for this.

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 15 - Protecting the Districts Historic Environment
Rep ID	SDLP939
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	3.296
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible.	It should be noted that there are currently 7 Registered Parks and Gardens (note the corrected term - not Historic Parks and Gardens) on the National Heritage List for England. The Kent Historic Environment Record now lists more than 14,000 non-designated entries for Dover (however – not all appear online).

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 15 - Protecting the Districts Historic Environment
Rep ID	SDLP1200
Rep Status	Processed
Consultee ID	1271293
Consultee Full Name	Mr Alan Byrne
Consultee Company / Organisation	Historic England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Heritage Chapter / SP15 / HE1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Heritage-At-Risk - with the exception of a specific reference in policy SAP4 for the Western Heights, there is no policy to describe how the wider district will develop and implement a positive strategy to reduce risk for its vulnerable heritage assets and sites, of which there are a number; e.g. the Grade I Listed Belvedere Springs. Our view is there should be a separate policy to ensure that proactive actions for dealing with Heritage-At-Risk cases would flow from such a policy in accordance with paragraph 190, NPPF - <i>Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.</i> <i>(DDC Note - This is an extract of the full Historic England representation which can be located at SDLP1169)</i>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Include Heritage-At-Risk Policy.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 15 - Protecting the Districts Historic Environment
Rep ID	SDLP1176
Rep Status	Processed
Consultee ID	1271293
Consultee Full Name	Mr Alan Byrne
Consultee Company / Organisation	Historic England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP15
2 - Do you consider this part of the Plan sound?	Yes

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Welcome the preamble's acknowledgement of Dover's exceptional historic environment and the role it can play in enriching the social and economic wellbeing of the district. We also welcome reference to the creation of a local list, especially because Dover has a wealth of non-designated heritage related to its important role in both World Wars and an extensive range of historic buildings and places that do not meet the criteria for statutory designation. We also think the creation of a local list can be a useful way to engage with local populations and understand what they value in their area. We therefore hope the Council can commit to the creation of a local list within the early part of the delivery of the updated local plan.</p> <p>(DDC Note - This is an extract of the full Historic England representation which can be located at SDLP1169)</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 15 - Protecting the Districts Historic Environment
Rep ID	SDLP1354
Rep Status	Processed
Consultee ID	1333128
Consultee Full Name	David Powell
Consultee Company / Organisation	
Agent Full Name	Klaire Lander
Agent Company / Organisation	Lander Planning

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP15
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Lander Planning sent a PDF document which has been split across the relevant sections of the Plan. See Original Attachment on SDLP1346) Conserving and enhancing the historic environment is consistent with national policy and thus the policy is 'effective' and 'justified' and therefore supported.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 15 - Protecting the Districts Historic Environment
Rep ID	SDLP1668
Rep Status	Processed
Consultee ID	1331868
Consultee Full Name	Ruth Marczin-Bundy (Parish Cllr)
Consultee Company / Organisation	Alkham Parish Council
Agent Full Name	
Agent Company / Organisation	

<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SP15</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>Yes</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Not Applicable</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Not Applicable</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>HERITAGE 8.1 The plan contains a whole section on heritage and references the Dover Heritage strategy but no reference is made to the village Alkham.</p> <p>8.2 The parish contains several sites of historical interest :-</p> <ul style="list-style-type: none"> • In 1990 an Iron Age burial site was discovered. As well as cremation urns this contained two rare wooden buckets covered with bronze sheeting and handle mounts in the form of human figures known locally as the Saxon Man • A previous archaeological dig uncovered part of a Roman settlement which was then re- covered for protective purposes. • As shown below the valley is criss-crossed by many ancient bridle and footpaths including a path known as the Priests walk which leads from the church in the village to the ruins of St Radigund's Abbey which was founded in 1192. • Alkham village has a number of ancient buildings including several medieval hall houses, the Church of St Anthony the Martyr, a grade 1 listed building, the Old Rectory which dates back to the 18th Century, the Marquis built in 1810, Forstal Cottage and Malmains Manor to name but a few. • In total there are seventeen Grade 11 listed buildings and the churchyard contains 25 Grade 11 listed headstones. <p>8.3 There is also great pride in the village's contribution to the First and Second World Wars, the names of the fallen appear on the village war memorial and a page of the village web site is dedicated to them</p> <p>Comment 8 Designated and Non Designated Heritage Assets (DDC Plan –HE1 - 12.1-12.8 &12.11-12.12) Conservation Areas (DDC Plan –HE2 - 12.13-12.22) (DDC note - comment assigned to SP15 as strategic policy rather than HE1 and HE2)</p> <p>If Dover District Council is working with English Heritage to develop funding bids to preserve the heritage of the district, as Alkham has a plethora of discovered and yet unearthed settlements and sites and historic buildings dating back to the bronze age and some of the artifacts are housed in the British museum archives, then the Alkham Valley wishes to be part of this process and consider how it can maximise its heritage opportunities</p> <p><i>(DDC note - The full representation from Alkham PC is attached to representation SDLP1653. However, specific comments from the full representation document have been extracted into separate consultation points/policy areas, relevant to the comments made)</i></p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Strategic Policy 15 - Protecting the Districts Historic Environment
Rep ID	SDLP1789
Rep Status	Processed
Consultee ID	1331526
Consultee Full Name	Mrs Mairi Jones
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP15
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note: Please see detailed representation (attached at 1770) which has been divided against numerous consultation points. The representation has images within the test. The text below is an extract from the detailed representation 'by an Alkham resident'.</p> <p>8 HERITAGE</p> <p>8.1 The plan contains a whole section on heritage and references the Dover Heritage strategy but no reference is made to the village Alkham.</p> <p>8.2 The parish contains several sites of historical interest :-</p> <ul style="list-style-type: none"> • In 1990 an Iron Age burial site was discovered. As well as cremation urns this contained two rare wooden buckets covered with bronze sheeting and handle mounts in the form of human figures known locally as the Saxon Man • A previous archaeological dig uncovered part of a Roman settlement which was then re- covered for protective purposes. • As shown below the valley is criss - crossed by many ancient bridle and footpaths including a path known as the Priests walk which leads from the church in the village to the ruins of St Radigund's Abbey which was founded in 1192. • <p>Alkham village has a number of ancient buildings including several medieval hall houses, the Church of St Anthony the Martyr, a grade 1 listed building, the Old Rectory which dates back to the 18th Century, the Marquis built in 1810, Forstal Cottage and Malmains Manor to name but a few .</p>

	<ul style="list-style-type: none"> • In total there are seventeen Grade 11 listed buildings and the churchyard contains 25 Grade 11 listed headstones. <p>8.3 There is also great pride in the village's contribution to the First and Second World Wars, the names of the fallen appear on the village war memorial and a page of the village web site is dedicated to them.</p> <p>If Dover District Council is working with English Heritage to develop funding bids to preserve the heritage of the district then Alkham may wish to be part of this process and consider how it can maximise its heritage opportunities</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Please see appended report
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I can speak to any of the points raised in the attached document
Include files	
Local Plan Consultation Point	Strategic Policy 15 - Protecting the Districts Historic Environment
Rep ID	SDLP1779
Rep Status	Processed
Consultee ID	1331526
Consultee Full Name	Mrs Mairi Jones
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP15
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>There has been inadequate consultation with the Alkham Valley, in particular the impact of housing growth in transport and green infrastructure, the AINB and SSSI</p> <p>DDC Note: Please see detailed representation (attached at 1770) which has been divided against numerous consultation points.</p> <p>I consider it essential that for the parish to grow more young families need to be attracted to it through more affordable accommodation and that a balance between conservation recreation and planned development is struck to ensure the heritage, the SSSI green space of the valley, and a rural community can thrive in any plans being taken forward by the District Council. As can be seen later in the report I would ask that the Parish be considered for Conservation Area Status to ensure the natural resources offered by the Green Space can be maximised for the District as a whole.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Please see appended report
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I can speak to any of the points raised in the attached document
Include files	

Housing and Employment Site Allocations

Local Plan Consultation Point	Housing and Employment Site Allocations
Rep ID	SDLP20
Rep Status	Processed
Consultee ID	1259309
Consultee Full Name	Mr Peter Jull
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Garden Village Principles
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Garden village principles is a fancy phrase for car travel dominated suburban sprawl which fails to achieve the housing densities required to maximise the use of scarce building land and avoid the further loss of green fields.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Other design principles such as New Urbanism should be promoted instead.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Housing and Employment Site Allocations
Rep ID	SDLP13
Rep Status	Processed
Consultee ID	1264821
Consultee Full Name	Mr Martin Brandon
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 14 Cross Road, SAP16 TC4S008 Bridleway Riding School, RIP001
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>RIP 001. I support the exclusion of this site from development. A development here would be entirely incongruous in this rural location. Road links to the site are very poor. The development would increase use of the nearby Coldblow user worked railway level crossing which is highly undesirable. So I support the exclusion of this site from the sites of housing allocation.</p> <p>SAP16 and TC4S008. Both represent a spread of the built up area into the surrounding countryside, the Bridleway development in particular being the first south of Cross Road on that side of the railway line. This is regrettable. I am very concerned about the increase in traffic under the railway over bridge on Cross Road. This bridge is narrow and contains wrought iron elements that are highly vulnerable to vehicle collision. I could not determine if the council has consulted the rail authority on this but some specific contact would be a responsible thing to do.</p> <p>By way of illustration attached a photo of the rail bridge at Ripple Court less than a mile from Cross Road, and of the same construction on the same rail line after collision from a modest sized vehicle in March 2020. The vulnerability of the bridge is clear to see.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Review and/or delete SAP14 and TC4S008 from housing allocation. If retained establish any specific requirements of the rail authority wrt the underline bridge and use as planning conditions.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	D7W4PGXE7GOIMIMMOL0T.jpg
Local Plan Consultation Point	Housing and Employment Site Allocations
Rep ID	SDLP347
Rep Status	Processed
Consultee ID	1259388
Consultee Full Name	Mr Mark Heath
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All areas
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	No consideration has been taken in the duty of care to current residents of the villages. No Dr, no public transport or safe footpaths or cycle paths when leaving the village .
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	A Dr's sugery is needed as is safe pathway for walkers and cyclists to traverse Barville rd and Kennel hill. Also the promised alterations to Barville rd from the A256 to Pike rd have yet to be started and they should have been completed years ago before heavy vehicles and articulated trucks were allowed to put our lives at risk.

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Housing and Employment Site Allocations
Rep ID	SDLP964
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	4.21 Movement and Highways
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The PRoW network should be included in all Transport Assessments and therefore reflected in Policy T12 as part of sustainable measures within Travel Plans.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	The PRoW network should be included in all Transport Assessments and therefore reflected in Policy T12 as part of sustainable measures within Travel Plans.

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Housing and Employment Site Allocations
Rep ID	SDLP723
Rep Status	Processed
Consultee ID	1331844
Consultee Full Name	Miss Irene Bowie
Consultee Company / Organisation	Alkham Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	4.267 SAP43 - Land at Short Lane, Alkham (ALK003)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Alkham Parish Council challenges the classification as a "Larger Village" as defined in the Local Plan. "Each of these villages has a good range of services and facilities which serve their own residents and those of nearby hamlets. Capel-le-Ferne, Lydden, Preston, Worth and East Langdon have primary schools and Capel-le-Ferne, Lydden, Worth, Alkham are served by frequent regular bus routes. Retail facilities are not as available however as at the Local Centres, with only Preston and Capel-le-Ferne having a village shop, and only East Langdon having Post Office facilities"</p> <p>Alkham does not have a frequent or regular bus service, there are no shops, no school, no GP surgery therefore we do not have a good range of facilities which serve our own residents and those of nearby hamlets. The parish council requests that Alkham is reclassified as a smaller village.</p> <p>The parish council again to raises concerns with Dover District Council's wanton disregard for the protection of the AONB. We note with interest that none of the other Non Strategic Housing Allocation sites are within the AONB. We consider it a fundamental duty of DDC to protect the AONB , not to encourage and actively promote its erosion.</p>

The parish council are astonished to see this site included in the local plan when in January 2017 outline planning permissions for six homes on this site was refused by DDC. The grounds given were:

TAKE NOTICE that Dover District Council, the Local Planning Authority, HAS REFUSED Outline Planning Permission for the proposal in accordance with the application and accompanying plans received on 21/10/2016

The reasoning underlying such refusal is as follows:-

1 The proposed development would result in an obtrusive urban form of development in the open countryside, beyond the settlement confines, which would detract from the unspoiled rural character of the area and the setting of the village of Alkham and the character and appearance of the Area of Outstanding Natural Beauty within which the site lies. In particular, the proposal would be contrary to Dover District Core Strategy Policies DM1, DM15 and DM16, paragraphs 109 and 115 of the National Planning Policy Framework and Policies SD1, SD2 and SD03 of the Kent Downs Area of Outstanding Natural Beauty Management Plan

2014-2019

In accordance with paragraphs 186 and 187 of the NPPF, Dover District Council (DDC) takes a positive and proactive approach to development proposals focused on solutions.

DDC works with applicants/agents in a positive and proactive manner by: Offering a

pre-application advice service; where possible, suggesting solutions to secure a successful outcome; and, as appropriate, updating applicants/agents of any issues that may arise in the processing of their application. In this instance:

1 The application does not accord with the development plan and no material considerations are apparent to outweigh these matters.

Alkham parish council asserts that the AONB remains unchanged and that this 'development' of 10 houses would result in an obtrusive urban form of development in the open countryside, beyond the settlement confines, which would detract from the unspoiled rural character of the area and the setting of the village of Alkham and the character and appearance of the Area of Outstanding Natural Beauty within which the site lies. In particular, the proposal would be contrary to Dover District Core Strategy Policies DM1, DM15 and DM16, paragraphs 109 and 115 of the National Planning Policy Framework and Policies SD1, SD2 and SD03 of the Kent Downs Area of Outstanding Natural Beauty Management Plan 2014-2019

A subsequent appeal to the Planning Inspectorate was unsuccessful.

Appeal Decision

Site visit made on 21 November 2017

by Grahame Gould BA MPhil MRTPI

an Inspector appointed by the Secretary of State for Communities and Local Government

Decision date: 11th December 2017

Appeal Ref: APP/X2220/W/17/3180321 Land at Short Lane, Alkham CT15 7BZ

- *The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.*
- *The appeal is made by Mr S Barnes against the decision of Dover District Council.*
- *The application Ref DOV/16/01216, dated 20 October 2016, was refused by notice dated 25 January 2017.*
- *The development proposed is the erection of up to 6 dwellings with garaging.*

1 The appeal is

1 The application was made in outline form and sought permission for up to six dwellings, with matters relating to access, appearance, landscaping, layout and scale all being reserved for future consideration.

1 The main issue is the effect of the development on the character and appearance of the Kent Downs Area of Outstanding Natural Beauty (the AONB).

1 The dwellings would occupy part of a field, currently used as grazing land, which slopes gently from north to south. To the west, on the opposite side of Short Lane, there is housing, while to the east and south there are gently rolling open fields. Immediately to the north of

the site there are four pairs of semi-detached houses, 1 to 8 Short Lane (Nos 1 to 8) granted planning permission in 1993. A little to the south of the site there is a public right of way (PROW) extending eastwards from Short Alkham is a small village mainly characterised by housing, with very few local services and facilities being available within it.

2 *Given that the site is situated in the AONB there is a general duty to have regard to the purpose of conserving and enhancing the AONB's natural beauty¹.*

Alkham parish council asserts that none of the above reasons for refusal have changed. Further that Policy DM16 of the Core Strategy states that development that would harm the character of the landscape will only be permitted if: it accords with a development plan allocation and incorporates any necessary avoidance or mitigation measures; or it can be sited to avoid or reduce the harm and/or its design would incorporate measures to mitigate the impact to an acceptable level. The parish council asserts that this development does not incorporate any necessary avoidance of mitigation measures and its siting will harm the nature of the AONB.

We would refer you to point 10 of the Inspectors response:

1 *While the site's roadside boundary is marked by an established hedgerow it would only provide limited screening for the development, not least because an opening or openings would be needed for access purposes. I recognise that there would be scope to undertake soft landscaping along the eastern boundary and immediately to the south of the site. However, it would take a considerable period of time before any new planting would provide any meaningful mitigation for the development when it was viewed from Short Lane or the PROW.*

Alkham parish council asserts that the observations of the Inspector are still valid and there will not be suitable screening of this development.

The parish council concurs and supports the inspectors decisions point 12:

1 *I consider that the development would neither conserve nor enhance the AONB's natural beauty and I therefore conclude that it would be harmful to the character and appearance of the AONB. There would therefore unacceptable conflict with Policies DM1, DM15 and DM16 of the Core Strategy and paragraphs 109 and 115 of the Framework. In relation to Policy DM15 I consider that the development would not come within any of this policy's stated exceptions. I also consider that the Kent Downs Area of Outstanding Natural Beauty Management Plan 2014 to 2019 does not provide support for this development.*

Alkham parish council fully supports all reason given by the Inspector in his refusal of the appeal for six houses on the site in November 2017.

We are therefore astounded that Dover District Council has completely ignored not only the Planning Inspectorates Decision (November 2017) but its own refusal (December 2017)for six properties and now suggests that ten houses on the same site would be acceptable.

Further DDC have identified that the site is liable to flood and that a flood risk assessment is required. The constraints of the existing infrastructure with regards sewage and flooding is insufficient for a development of this size.

The parish council would urge Dover District Council to reconsider this site and act in a manner that is both consistent and to protect the AONB.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

This development will have a significant impact on the residents of Alkham and is damaging to the AONB. The Parish Council would wish to make the voice of our residents known to the Inspector. The Parish Council is passionate in its resolve to maintain the character of the AONB.

Include files

Local Plan Consultation Point	Housing and Employment Site Allocations
Rep ID	SDLP942
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Site policies
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	There are several draft allocation sites that are relatively remote from good quality sustainable walking, cycling and public transport options. Therefore, site specific public transport and sustainable transport strategies should be considered at this stage. This will encourage a coordinated approach to public transport provision (and secured through the Infrastructure Delivery Plan), subsequently assisting strategic development planning decisions in the future
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Site specific public transport and sustainable transport strategies should be considered at this stage. This will encourage a coordinated approach to public transport provision (and secured through the Infrastructure Delivery Plan), subsequently assisting strategic development planning decisions in the future.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Housing and Employment Site Allocations
Rep ID	SDLP1398
Rep Status	Processed
Consultee ID	1272672
Consultee Full Name	Jill Cliff
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	housing and employment site allocations & SP3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Hi, the pictures you have sent out for each beautiful area just show what we are losing every time you plant houses on what was fields and woodland. The loss of habitats is shocking and the loss of agricultural land is scary. The rural village as we know it is not going to exist if we continue in this manner.</p> <p>Your local plan should show houses being built on brownfield sites only, renovating present buildings and using up land that is already ruined by concrete. A lot of small houses can be built in a small space, if we are short of homes. Yet most developments seem to be a small number of massive properties which don't house many families, but I understand make more profit.</p> <p>You should stop people having empty properties and second homes. This would cut the need for so many houses.</p> <p>Please don't ruin our land. Please.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	Your local plan should show houses being built on brownfield sites only, renovating present buildings and using up land that is already ruined by concrete. A lot of small houses can be built in a small space, if we are short of homes. Yet most developments seem to be a small number of massive properties which don't house many families, but I understand make more profit.

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Housing and Employment Site Allocations
Rep ID	SDLP943
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Garden Village Principles
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	To ensure that settlements of the 'garden village' scale do not appear to be dropped into the landscape with no real reference to what is already there, it is essential that such new development works with the grain of the existing landscape and settlements so that they appear to be a natural expansion rather than an entirely new construct. To that end, it is important that any heritage assets, in the form of historic buildings or archaeological monuments, and the historic landscape, in the form of the pattern of tracks, lanes and field boundaries, are integrated into the masterplans for the new villages. At present this is not reflected in the text and KCC would recommend that the text needs to be strengthened so that the heritage of the new settlement is fully integrated into the new design.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	KCC would recommend that the text needs to be strengthened so that the heritage of the new settlement is fully integrated into the new design.

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Housing and Employment Site Allocations
Rep ID	SDLP1454
Rep Status	Processed
Consultee ID	1330919
Consultee Full Name	Mrs Heather Twizell
Consultee Company / Organisation	Natural England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	para 4.19
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	We welcome much of the supporting text in the 'Requirements for Planning Applications' section, particularly those parts relating to Landscape and Biodiversity, Ecology, Flood Risk and Water Supply and Wastewater. However, please see our advice below regarding the need to review the requirement for wintering bird surveys. We will also be providing further advice on the requirement for all sites falling within 500m of the Thanet Coast and Sandwich Bay SPA to undergo project-level HRA. We note that a number of strategic, non-strategic and small housing site allocations currently include a policy requirement to undertake wintering bird surveys. This is linked to an overarching requirement in Strategic Policy SP13 (informed by the Local Plan HRA) and relates to concerns around the loss of undesignated land that is nonetheless important in supporting the bird populations of Habitats Sites (otherwise known as functionally-linked land). Our previous advice notwithstanding, the current approach feels quite precautionary and potentially places an unreasonable expectation on future developers of smaller or more distant sites. We are currently seeking further advice on this matter from our national ornithology specialists and will work with your Authority to ensure that the final list of site allocations containing this policy requirement strikes an appropriate balance between precaution and pragmatism. We would

	also like to explore with your Authority the evidence behind the requirement for certain site allocations to carry out “appropriate species and habitat surveys prior to determination”. We would like to better understand the rationale behind this as it is only included as a policy requirement for a minority of sites and we are concerned that a lack of this wording for other sites could be taken by future developers to mean that such surveys are not required when this may not be the case.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Review requirements for wintering bird surveys and wording requiring appropriate species and habitat surveys prior to determination.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	SDLP1454 Natural England Att1.pdf
Local Plan Consultation Point	Housing and Employment Site Allocations
Rep ID	SDLP1177
Rep Status	Processed
Consultee ID	1271293
Consultee Full Name	Mr Alan Byrne
Consultee Company / Organisation	Historic England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Chapter 4 Intro
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is ‘unsound’, on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>Historic England welcomes the purpose and intention of paragraph 4.24 and looks forward to advising the Council and developers on assessments on appropriate sites.</p> <p><i>(DDC Note - This is an extract of the full Historic England representation which can be located at SDLP1169)</i></p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Not Applicable
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	Housing and Employment Site Allocations
<p>Rep ID</p>	SDLP1501
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1333275
<p>Consultee Full Name</p>	Adam Harwood
<p>Consultee Company / Organisation</p>	Environment Agency
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	4.28
<p>2 - Do you consider this part of the Plan sound?</p>	No
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	Consistent with National Policy
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	Not Applicable
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	Not Applicable

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p><i>(DDC note - Page 96) 4.38 Where sites are identified as being on contaminated land, then a land contamination assessment will be required. Where sites are in close proximity to noise generating sources like busy road, railways or commercial uses then a noise survey and appropriate mitigation will be required. Where sites are in areas of poor air quality or close to an Air Quality Management Area then an air quality assessment will be required in accordance with Policy NE4 - Air Quality and suitable mitigation should be provided.</i></p> <p>The wording contaminated land has a legal definition under Part IIa S 78A. There are no current determined Contaminated Land sites in Dover as far as I know, the wording here needs to be changed to land affected by contamination .</p> <p><i>(DDC note - This is an extract from the full Environment Agency representation SDLP1458)</i></p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Not Applicable
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	

Local Plan Consultation Point	Dover
Rep ID	SDLP479
Rep Status	Processed
Consultee ID	1331698
Consultee Full Name	Mr G Virtue
Consultee Company / Organisation	
Agent Full Name	Danielle Dunn
Agent Company / Organisation	Goldstone Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	4. Housing and Employment Site Allocations
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Please find enclosed details of an omission site for consideration in the Local Plan.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>RE: Omission Site- Land on the South West side of Hillside Road, Dover Proposed for residential development - Indicative capacity 10-15 units. Previous Reference Numbers: DOV011; TC4S100</p> <p>I've been instructed by my client, Mr Virtue, to provide representation against the non-inclusion of a site in his ownership in the final Local Plan Regulation 19 document.</p> <p>I did not act as agent in the previous submissions of the site but following correspondence with the Planning Policy Team at Dover District Council, it is my understanding that the site was originally put forward for housing development and assessed as part of the Housing and Employment Land Availability Assessment (HELAA) under site reference DOV011. The site was also submitted for potential employment use, my client thought this to be a care home, during the 2021 Call for Sites. At this stage, the site was given the reference number TC4S100. Despite the submission of the site to the Council, the site was not included as an allocation in the Regulation 19 Local Plan or a 'reasonable alternative', and therefore, the site has not undergone a Sustainability Appraisal.</p> <p>On the basis of lack of sustainability assessment and in accurate HELAA assessment, we object to the non-inclusion of the site and request that the site is reconsidered as an omission site. It is the intention of this submission to reduce the size of the site and the housing numbers proposed to an indicative capacity of 10-15 units. The site is no longer promoted for employment use.</p> <p>1.Sustainability of the Site:</p>

	<p>The site should be reconsidered for inclusion in the Local Plan as it is sustainable.</p> <p>Firstly, the site is in one of the most sustainable locations in the built-up area of Dover. It has access to sustainable transport links, health services and community and shopping facilities all within walking distance.</p> <p>Further to this, and reflecting its sustainable location, the site previously had outline planning permission for 28 dwellings approved under application 87/00081. This scheme was for outline consent and included 8 x semi-detached, 19 x terraced and one detached dwelling with associated.</p> <p>This submission would reduce the number of proposed dwellings to an indicative number of 10-15. Any future scheme would be low-density and provide green links and access for people to enjoy the wider green spaces and the setting of the AONB and the neighbouring local wildlife site.</p> <p>2.Inaccuracies in the DDC Assessments:</p> <p>The site was dismissed as 'unsuitable' in the HELAA. This assessment has inaccuracies which should be reconsidered.</p> <p>The reasons for being deemed unsuitable are summarised below:</p> <ul style="list-style-type: none"> • The site is dense wood and scrubland. This includes the access point to the site in the northeast. Any development of the site would require the removal of this dense woodland. • Unacceptable impact on biodiversity. • The site is on a slope that raises away from the access point to the highway. • The raised position of the site would create development at a higher elevation than the existing residential to the east and would likely impact on the AONB immediately adjacent to the west AONB setting. • Potentially development of the scale proposed could have an impact on nearby roads in terms of vehicular traffic. <p>The above assessment is inaccurate as the site is only self-seeded woodland, with the historic use of the site being allotment gardens, which served the properties on Hillside Road. Discussions with long-standing residents of these properties, and historic photography, has identified that the site was still being utilised as allotment gardens as late as in the 1980s. On this basis the woodland identified on site is self-seeded with many saplings and very few mature specimens. By virtue of the habitat created in this nature, the site does not have any biodiversity of ecological designations.</p> <p>The site being on a slope should not have been a reason for non-inclusion. The town of Dover, including large areas of development, is built on a slope and the design of any future scheme could reflect the topography of the land and take into consideration the existing development on Hillside Road. For example, future design proposals could ensure that there is no impact on the residential amenity, by designing layout and the massing and scale of any new dwellings to acknowledge and respect the existing development.</p> <p>Any concern raised regarding the potential of the scheme impacting on neighbouring roads will be rectified by reducing the number of dwellings proposed on the site.</p> <p>3.Deliverability of the site:</p> <p>In accordance with the definition of the National Planning Policy Framework, the site is available for immediate delivery and would be a positive contribution to Dover District Council's Housing Land Supply, it could be delivered in the first 1-5 years of the Dover District Local Plan period. In consideration of this, the NPPF acknowledges the positive contributions that smaller sites can make to the supply of housing in the local area.</p> <p>It is for the above reasons that the site should be reconsidered for inclusion in the Local Plan. Should you require any further information do not hesitate to contact me.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>I wish to attend any future hearings relating to omission sites. Specifically regarding the potential for their inclusion in the Local Plan.</p>

Include files	Hillside Road red boundary.pdf
Local Plan Consultation Point	Dover
Rep ID	SDLP698
Rep Status	Processed
Consultee ID	1252277
Consultee Full Name	Mr Alan David Steggall
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Omission DOV001
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DOV 001 - HELAA COMMENTS</p> <p>UNSUITABLE SITE</p> <p>1: Development here would constitute the loss of PUBLIC OPEN SPACE</p> <p>2: Unacceptable LANDSCAPE IMPACT</p> <p>3: ACCESS ISSUES</p> <p>(Please see response continuation sheet)</p> <p>MY RESPONSE 1 - Public Space</p> <p>Please note this is not public open space and forms part of site 126, which includes on the east side down to Folkstone Road the old Adult Education Centre now demolished of "WESTMOUNT" which has granted permission now expired for 90 homes. Only possible due to clearing a substantial part of open space to the rear of the building</p> <p>Site number DOV 001 is not public open space and cannot be found anywhere on the Dover District Council Open Space Assessment Dec 2019 page 23. Figure 5.1: Natural and semi-natural greenspace mapped</p> <p>SITE 126 IS NOT TO BE FOUND ANYWHERE ON THAT MAP OR ANY OTHER MAP on page 38</p> <p>Assessment report/4 - Showing nowhere site 126</p> <p>7.2: Provision for children and young people, site is not on the map</p>

	<p>Figure 6.2: Page 32: Amenity greenspace mapped - South, nowhere to be found on map SURVEY CARRIED OUT BY Knight Kavanagh & Page</p> <p>2 - Unacceptable landscape impact</p> <p>Only the North of the site to be available for the benefit of well designed detached properties, with a limited height from the proposed new access road of about 7.5meters</p> <p>The site was used previously for a large number of allotments with access Valeview Road and Winchesea Terrace. See attachment allotments It is intended that the lower part of the site could be used to benefit the community with amenity land and pathways to the woodland area. See Appendix 3G Regulation 18 in support of the site</p> <p>A letter from the principle planning officer noted on site quote "I am not against development in principle, and I note that the landowner would be willing to set a maximum development figure into a legal agreement...further, to support a development proposal on this site I consider that a scheme would need to be genuinely landscape led, probably with half the number of dwellings proposed. I would expect that units would be tailored to their environment, and be of high quality design."</p> <p>3 - Access Appendix 3G KCC Highway comments</p> <p>Accessibility to this site has been earmarked for the last 80 plus years with a very detailed plan when it was originally sold to KCC in 1938 by Mr Stone with intentions for the common use of the road for all owners who have frontages to the access. Please view submitted attachments easily showing the access as being suitable in all respects</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The site is suitable for development and should be allocated for development.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	SDLP0698 Steggall Att2.jpg SDLP0698 Steggall Att1.pdf
Local Plan Consultation Point	Dover
Rep ID	SDLP961
Rep Status	Processed
Consultee ID	1266351
Consultee Full Name	Dr

	Sharon Danby
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3 Housing growth
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Due to the governments announcement 5/12/22 the plan is not positively prepared as the development needs must be reassessed. This means it is no longer justified as there now is the room without central government pressure to find reasonable alternatives. It is also not effective as the pressure put on local communities and existing infrastructure is unreasonable and means that it is not deliverable. The plan is also not consistent with NPPF 2021 as the many landscape and heritage assets in Dover District are being compromised by the level of unsustainable overdevelopment which the current plan has allowed.</p> <p>The Housing Growth statement that the aim is to , “provide a greater choice of high-quality housing to meet the needs of Dover districts’s growing population and changing demographic and address affordability issues”, does not seem internally consistent with the details provided in the plan which underestimates the evidence showing a large part of district population growth is due to aging. The details thus render SP 3 and SP 5 less effective and less sound.</p> <p>Under the current LDP developers have shied away from the badly needed regeneration of Dover and concentrated on building maximum profit, minimum affordability developments of large homes around the more desirable town of Deal and out in Whitfield. The supposed regeneration of Dover has resulted in another generic shopping centre and a more depressed high street and has not lifted the rest of Dover. The promenade area is uplifted but there seems to be little connectivity to the rest of Dover.</p> <p>The government department (DLUHC) decision that Dover needs 611 new dwellings a year and a minimum of 10,998 new homes between now and 2040 we find very incompatible with legally binding Net Zero Strategy, Climate Emergency Declaration 2019 and Climate Change Act 2008, and unsound. We should be transforming existing housing stock into zero carbon homes as is happening in East Sussex, led by Lewes DC. Combining these numbers with 3.51 and the statement ‘76.7% of the new homes are on greenfield sites, while 23.3% are on brownfield sites’ is unsound and unacceptable to the public.</p> <p>We feel that our communities are being harvested by developers and our worries are not being heard or needs met in terms of infrastructure. Thanks to certain national newspaper Sunday supplements, Deal is desired as a 2nd home location by the wealthy from London and elsewhere. Holiday homes which spend most of the year empty in Deal, Dover and coastal villages of Kingsdown and St Margarets are stopping locals from buying affordable homes in their own area from existing housing stock.</p> <p>It must also be pointed out that at least one of the sites included in the 23.3% of brownfield sites is actually a site intended by SEEDA as local nature reserve having rewilded on unstable slag (only rendered stable by tree-planting, a site which DDC forgot to make a local nature reserve in 2004, and it has become a biodiversity hotspot well known to genuine ecologists nationally; Betteshanger Park.</p> <p>Central government in London, according to Housing Today is imposing a disproportionate amount of housing growth on Kent and the SE. There is a grievous lack of democratic accountability across Kent. So the chances of protecting Kent, of achieving a Growth Strategy that creates</p>

climate-friendly jobs and suitably sized, suitably-priced zero-carbon homes for the next generation of local families, are not good. The space available for infrastructure, functions well for compact coastal towns of the size that Deal / Walmer and Sandwich were 5 years ago. The level of greenfield overdevelopment which has been disastrous under the current weak LDP is putting Deal infrastructure under strain now, so in-fill should make up the majority of the allocations for Deal and that the housing growth specified for District Centre of Deal and around its boundaries needs to be stopped or radically reduced. Either or both of SAP 15 / SAP 34 would destroy the only road access alternative for diverted traffic. (See detailed comments under SAP 15/ SAP 34 below). Housing Growth that threatens gridlock, blocking off a conurbation of 30,000 from access by emergency vehicles, commuters, school buses is not sustainable housing growth and is very unsound.

3.29 I note and welcome a degree of shift from the Reg 18 draft, in that more sites have been selected with a view to using 'existing infrastructure, facilities and services, with a greater professed purpose to ensure development contributes to the sustainability of local communities and services'.

I note with appreciation both the increase in the number of sites in Dover town SAP 6 – SAP 13, and the SAP 26 Former Snowdown Colliery, Aylesham near a rail station for example. It should be possible to state a determination to 'make best use of brownfield – non-rewilded – land) without giving developers the opt-out qualification 'wherever possible'.

On Five Year Housing Land Supply. 3.39 Having stated the Council had 6.03 years land supply plus a 5% buffer; it is not sound, effective or legally compliant to then state 'the provision of additional sites within the first 5 years of plan period is needed to ensure resilience and promote flexibility;'. Instead of ensuring resilience, it will create exactly the destructive suburbanisation of a rural district that many, many of the resident electorate are most worried about.

3.46 It is the conspicuous lack of a secondary school in Aylesham that prevents Aylesham becoming the small garden town planners aspire to. The provision of a secondary school by 2028 should be a condition of SAP 23. There seems to be a complete lack of planning in the statement that now

3.48 Many, many of the current residents of ex mining village Elvington were / are dependent on buses that have recently (2022) been cut, (following KCC cut to bus subsidies) to get to work in Canterbury, Folkestone, Sandwich, Thanet or Dover, or to get to secondary school, or to get to doctors, or to shop. These people had environmentally sustainable public transport service that has been cut. KCC is saying it is looking at potential bankruptcy in 2023, so promises of new services and facilities are met with some disbelief. The selection of this site is ONLY sound with cast-iron conditions to provide all of the services we mention below, including new drainage infrastructure. Council housing in Elvington has been subject to flooding from the sewage system, long overdue for replacement. As in Dover deprived wards, there are unhealthy EPC EFG homes in Elvington that need to be transformed into zero carbon home to lift residents out of fuel and therefore food poverty.

3.68 Windfall. Unless existing settlement boundaries are respected, there is suburban ribbon development creep from field to field to field. To render the plan sound it should contain a statement 'Previously existing settlement boundaries will be respected, until such time as town and parish councils may have agreed changes with Dover District Council, in accordance with the principles of Localism Act 2011.' In the current economic climate, it seems very naïve to hope that 'new housing in villages can help them retain existing services such as public transport, retail (many pubs are going under because lack of staff and sky high energy bills) and schools'. Indeed we have lost a large proportion of our bus services in the district.

<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Push back to central government and demand a reduction in the housing allocation of 10,998 new homes. Now possible after announcements 5/12/22 from Prime Minister.</p> <p>Regenerate Dover as a priority, retrofitting existing housing stock to provide well insulated renewable energy powered homes. Windfall development only should be allowed in Deal, Sandwich and surrounding villages. Create a self sufficient sustainable garden village at Aylesham with secondary school and green infrastructure and homes far beyond future homes standard.</p> <p>Provide better facilities and transport links for Whitfield to ensure that homeowners are not car dependent.</p> <p>Lobby central government for changes to the rules for ownership of second homes. Priority should be given to locals.</p> <p>Make the wording in the plan stronger in favour of brownfield sites eg 3.32 <i>sufficient amount and variety of land</i> should also state that brownfield must be used before greenfield as per stated in NPPF 21.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note</p>	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Dover
Rep ID	SDLP985
Rep Status	Processed
Consultee ID	1267584
Consultee Full Name	Jason Ransley
Consultee Company / Organisation	Dover Harbour Board
Agent Full Name	John Bowles
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Strategic Policy SP3 – Housing Growth
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Dover Harbour Board supports Strategic Policy SP3 – Housing Growth which seeks to focus new development where it supports regeneration and makes best use of brownfield land. Dover Harbour Board welcomes the increase in the indicative housing capacity of 263 units shown in Table 4.1.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	N/A
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	N/A
Include files	
Local Plan Consultation Point	Dover
Rep ID	SDLP945
Rep Status	Processed
Consultee ID	1331292
Consultee Full Name	Mr Robert Harley
Consultee Company / Organisation	Foster & Payne
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	4.55 SAP1 - Whitfield Urban Expansion
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I believe the local plan needs an allocation of specialist housing for older people as described in the attached letter.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I would like to make the case for an allocation within the Whitfield Urban Expansion area for specialist housing for older people to be made.
Include files	SDLP0241 Foster and Payne redacted- Att1.pdf (2)
Local Plan Consultation Point	Dover
Rep ID	SDLP1554
Rep Status	Processed
Consultee ID	1252225
Consultee Full Name	Cllr Nigel Collor
Consultee Company / Organisation	DDC WARD CLLR - Whitfield
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Dover Area Sites
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I will keep my comments short but this does not reduce my hard feelings on the matters stated.</p> <p><u>DOVER TOWN AREA</u></p> <p>Generally a difficult area to develop possibly due to the amount of historically protected and listed buildings that are costly to maintain.</p> <p>The idea to offer the main central car parks as potential development sites is ridiculous and ill thought by people who do not live in Dover or have first hand experience of some of the pressures that Dover Town has compared with other parts of the District.</p> <p>While appreciating that the Bench Street Car Park only had a restricted time as a car park through the planning process, it will still mean the loss of 48 local car parking spaces for public use.</p> <p>Add to this the utterly unacceptable and ridiculous suggestion that Stembrook Car park should be offered as a development site, the most used and popular car park in the town, would reduce the town parking capacity by a further 89 spaces. This area has already lost a number of on-street parking spaces due to the Market Square Project.</p>

	<p>There is no mention of alternative nearby parking being introduced to replace the possible loss of 137 central town parking spaces and please don't suggest a multi-story answer as we demolished one to build the St James Development – closed as it wasn't used like the multi-story in Dour Street that is hardly used – people do not like using M-S Car Parks unless they are right in the centre of the retail area – like at White Friars in Canterbury. People want to park as near as possible to where they require to go. During my 18 years of being the DDC Portfolio Holder covering parking I went to a number of seminars and courses on parking attitudes of motorists and at one the tutor said that people would take their cars to bed with them if they could to save walking down stairs in the morning. Deal Town Centre is busy and popular as the well used Middle Street Car Park is centrally located – please learn from an example in another part of our District. Summed up, and don't get me wrong, as a born and bred Doverian I fully support redevelopment and regeneration in my home town but it must be undertaken with the needs of local residents in mind, if both Bench Street and Stembrook Car Parks are swallowed up by so called Town Centre Development it may well lead to the death of Dover Town Centre.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Not Applicable
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
Include files	
Local Plan Consultation Point	Dover
Rep ID	SDLP1731
Rep Status	Processed
Consultee ID	1271717
Consultee Full Name	Quinn Estates
Consultee Company / Organisation	Quinn Estates Ltd
Agent Full Name	Nicholas Pellegram
Agent Company / Organisation	Iceni projects
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	Omission Site in Dover (LAND TO THE NORTH OF ASTLEY AVENUE)
<p>2 - Do you consider this part of the Plan sound?</p>	No

<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified Effective Consistent with National Policy</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Yes</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Yes</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>(DDC Note - Full Representation attached to SDLP1731. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1731.)</p> <p>REPRESENTATIONS TO THE DOVER DISTRICT LOCAL PLAN REGULATION 19 CONSULTATION IN RESPECT OF LAND TO THE NORTH OF ASTLEY AVENUE, DOVER</p> <p>Iceni Projects, on behalf of Quinn Homes, wishes to submit further representations to the Dover District Local Plan (Regulation 19 Consultation) in respect of land to the north of Astley Avenue, Dover (hereafter referred to as 'the Site').</p> <p>Quinn Homes, the leading provider of self and custom-build housing in the south-east, is disappointed to see that the Site has not been included as a housing allocation at this stage in the plan making process. The Site could offer Dover a unique opportunity for the provision of much-needed self-build executive housing at the town's edge, facilitated by an award-winning local developer.</p> <p>It is submitted that a modest residential scheme of circa 45 high-quality Self and Custom Build Homes would not only provide an extremely attractive addition at the border of the urban area, it would also relocate the current industrial use – a large scaffolders' yard – to a more suitable location in the Dover district. As a result, this site offers a chance to address unmet self-build housing need in the district with larger bespoke executive homes, while achieving environmental betterment in the form of reduced landscape and highways impacts associated with the current use. In short, this is a unique opportunity for Dover to secure high quality Self and Custom Build Homes, in a highly sustainable location, at a brownfield site currently accommodating an industrial use.</p> <p>Policy accordance</p> <p>The Site borders the Dover settlement boundary and includes Previously Developed Land (PDL) in active commercial/industrial use. Therefore, the development of the Site would represent an opportunity to make the best use of land in accordance with Chapter 11 and Paragraph 120 of the National Planning Policy Framework (NPPF). The Site would make a notable contribution to the District's short term housing targets and Self and Custom Build needs (discussed below), while helping to secure the achievement of annual housing targets through a broadened scope of deliverable housing sites over the plan period. The redevelopment would also significantly improve neighbouring amenity, provide economic benefits, and create an attractive and unique addition to the local development profile.</p> <p>The site represents a unique opportunity for a bespoke, high-quality development of a form and type distinctive to the housing expected to be delivered across the town and will make a meaningful contribution to housing needs. This will include new-build detached executive housing in the largest town in the District which has historically struggled to deliver housing due to viability. This aligns with the evidence set out in the SHMA (2017, and Update 2019) which identifies a considerable need for 3-bed and 4+bed homes. In particular, it is noted that for self-build housing, those that registered their interest most commonly sought to build three- and four-bedroom detached houses. The draft Local Plan makes a number of references to the provision of high-quality dwellings to meet local needs identified in DDC.</p> <p>It is Quinn Homes' view that the current suite of allocations in the draft Plan will fail to provide a sufficient level of growth in and around the main settlement of Dover, and that it is over reliant upon a single urban extension to meet local housing needs, which is considered too far from the town to create</p>

noticeable positive impacts for the settlement's existing residents. Moreover, there is a locally identified need for larger executive homes and it is considered that the plan should allocate more sites for Self and Custom Build Housing. These should be in sustainable locations, where they can make effective use of land and address the needs of those seeking to own innovative homes in an urban setting. Quinn Homes, who would be the developer, is an acclaimed builder of Self and Custom Build Housing and considers that the site would be an exemplary addition to Dover and a prime opportunity to address this need. To ensure the soundness of the plan, further Sites, such as the one advocated in this representation, should therefore be allocated to ensure that the Plan's ambitions for Dover are delivered.

a. Land North of Astley Avenue ('The Site')

The Site comprises approximately 8ha of land, which includes previously developed land in the form of warehouse buildings and storage space to the east and south of the Site currently in use by a scaffolding company and demolition company respectively.

The Site is located on the northern edge of Dover town, lying adjacent to Astley Avenue Allotments. The Site adjoins Dover town to the south and west. The Site is bound by open fields to the north and east, with Long Hill Playing Field also adjoining the Site to the north and Roman Road adjoining the Site to the east. To the south, the Site is bound by a railway line with residential properties of Dover beyond this. To the west the Site is bound by further residential properties.

The topography of the Site slopes from the north to the south of the Site, as well as in the eastern part of the Site from west to east towards Roman Road, with the lowest point of the Site in the most southerly point beyond the allotments. The Site does not contain any Public Right of Ways (PRoWs). Existing access to the Site is from a road which crosses under the trainline from Astley Avenue to the south. Dover Priory train station is c.1.5km walking distance to the south of the Site and provides regular services to Ramsgate, Sandwich, Faversham and a number of London stations including Charing Cross, Victoria and St Pancras stations. The closest bus stop is approximately 400m from the Site on Barton Road and includes services into Dover town centre, Folkestone and Aycliffe. The Site is considered to be a sustainable location for residential development.

The Site is wholly within Flood Zone 1. It is located within the Dover & Folkestone Cliffs & Downs Biodiversity Opportunity Area and a Groundwater Source Protection area. Kent Wildlife Trust mapping also identifies that the northern part of the Site is in a Local Wildlife Site. The Site is not subject to any ecological designations, although it is noted in the HELAA that the Site is partly covered by the deciduous woodland priority habitat. There are no heritage assets on or adjoining the Site, with the closest asset located to the south-west of the Site comprising the Old Charlton Cemetery Chapels (Grade II listed) separated from the Site by dwellings and the train line. It is considered that with the development, a net biodiversity gain could also be demonstrated.

b. Objection to Table 4.1, Draft Dover District Local Plan

Quinn Homes considers that the approach taken to the delivery of housing in Dover as set out within Table 4.1 of the Regulation 19 Submission Version of the Draft Local Plan is not a result of sound plan-making. It is considered that further sites, including the Site subject of this representation, should be allocated to secure steady growth in Dover town as a key regional centre, and diversify the type of housing that will be delivered across a wider range of Sites. The Site is a prime example, as it is deliverable within the short term and would help secure key societal improvements and urban renewal which the draft plan recognises that Dover is in urgent need of. It is also considered that the plan does not make sufficient provisions for Self and Custom Build Housing, particularly in urban areas where residents could utilise established services and sources of work. As outlined below, the development strategy in its current form raises several issues, the vast majority of which could be addressed through the allocation of additional sites near the centre of Dover, including the Site.

The proposed development pattern for Dover

The draft Development Strategy for Dover recognises the importance of Dover town as a key regional centre with prime positioning and excellent strategic transport connections, yet also as a settlement which is subject to high levels of multiple deprivation and poor-quality housing. The strategy in its current form seeks to address this issue by presenting growth in and around the town centre through a number of small site allocations. However, whilst opportunities for urban regeneration are identified,

the vast majority of growth for the town is planned to be delivered through the Whitfield Urban Expansion (SAP1); a significant urban extension for at least 5,750 homes in the north of the town. SAP1 is over 2 miles away from the town centre and will therefore require the employment of garden city principles and infrastructure to support the new residents. As a consequence, the draft Plan directs a disproportionate amount of growth, investment and infrastructure provision away from the areas and residents which are identified within the plan to need it the most. Due to the distance of the proposed extension from the town centre, it is unlikely to result in any societal benefits for Dover due to poor sustainable transport connections and the delivery of the Whitfield Urban Extension is therefore unlikely to due to its disconnection from Dover town centre.

The focus of the NPPF is to achieve social, economic and environmental sustainability (Paragraph 8). In terms of housing delivery, the Council should seek to encourage housing growth in the most sustainable locations, especially when they can ensure the achievement of societal improvements, economic benefits and positive environmental outcomes. In choosing sites, the Council should ensure that new residents can reach established nearby town centres using sustainable modes of transport, to limit pollution arising from motor travel and to support the vitality of the existing community and local economy, without creating environmental harm.

Given the proportion of housing that is proposed to be allocated at Whitfield, it is considered that the Council have not given due consideration towards the value of allocating Sites close to the heart of Dover, which are considered to be a more sustainable and suitable option for the expansion of settlements. It is considered that the current suite of allocations listed in Table 4.1 is not a sustainable approach to the future expansion of Dover, and therefore, is considered that it would fail the soundness test, as it does not conform with the above considerations, as set out within the NPPF.

Despite its promotion throughout the plan-making process, Land to the north of Astley Avenue is an example of a Site which is not allocated in the plan, yet, through its allocation, could positively influence the regeneration of Dover in a sustainable and logical way. The site includes previously developed land in commercial/industrial use, currently being operated scaffolding company and demolition company respectively. The Site is suited for residential development, as it neighbours residential properties to the east and an allotment to the south. The Site would also accord with the development pattern of Dover, whereby built development extends out along the valleys from the main linear development in line with the A256 towards the sea. Given the positioning of the site on the settlement boundary of Dover, the site would therefore be in accordance with Draft Policy SP4 'Residential Windfall Development' of the Local Plan, which further supports the case for the allocation of this site. The positioning of the site, overlooking the town, is considered to provide an excellent opportunity for the delivery of a high quality development in the form of Self and Custom Build Housing, which would make an exemplary addition to the town. Overall, the Site is in a sustainable location and benefits from good access to amenities in Dover and that the proposed access arrangements would be appropriate to support the development given the number of trips anticipated for the proposed dwellings. As such, it is Quinn's view that the site would be a suitable allocation in the Draft Plan. Achieving Urban Regeneration and Delivering Social Infrastructure

Another key objective of the NPPF is to 'make effective use of land'. Paragraph 120 states that this can be achieved by encouraging the redevelopment of brownfield land and avoiding the development of greenfield land. As noted in the above section, the vast majority of growth for the town is planned to be delivered through the Whitfield Urban Expansion (SAP1); a significant urban extension beyond the settlement boundary for at least 5,750 homes in the north of the town. Quinn Homes considers that a disproportionate amount of the housing proposed for Dover is on greenfield land, and that the plan does not present enough opportunities for the redevelopment of brownfield land, and as a result, the allocations proposed in Table 4.1 is not considered to comply with this objective of the NPPF.

Land north of Astley Avenue is predominantly brownfield land, and within close proximity to the centre of Dover. The Site is currently in commercial/industrial uses, is in poor condition, and occupies uses which result in pollution, noise and traffic impacts. The existing use generates HGV traffic through residential areas, which can be rectified through a sensitively designed redevelopment of the Site. The redevelopment of the Site would minimise the loss of greenfield land and bolster brownfield delivery, and is considered to be a significant opportunity for urban regeneration. The replacement of

the current uses with new dwellings will enhance the amenity of neighbouring residents to the south, as well as the users of the allotments and open space, and provide a more attractive and positive use that is more in-keeping with the surrounding residential areas. The unique characteristics of the Site would also help to create a more diverse range and type of new homes to be delivered across the town, and would also enable the provision of affordable homes.

Moreover, the high dependence upon Whitfield Urban Extension (SAP1) will reduce the benefits of development to the wider town and lead to the same type and location of housing, which reduces choice and potentially stymies delivery. Overall, it is considered that the allocations proposed in Table 4.1 are unsound in their current form, when opportunities to redevelop previously developed land are not selected, contrary to Paragraph 120 and 121 of the NPPF.

Economic Growth Distribution in Dover

In terms of the distribution of economic land allocations, we support the approach taken in the plan to distribute economic allocations at the outskirts of the settlement area and away from key residential areas. By virtue of their operation, commercial and industrial Sites constitute bad neighbour uses which produces traffic, noise, and pollution, and should therefore be in locations where they will not impact neighbouring residential amenity. Dover is recognised to be a settlement with poor transport connections and therefore HGV traffic should be diverted away from key residential areas yet within reach of key strategic routes, whilst remaining in close enough reach for locals to be able to reach their place of work in a sustainable fashion.

Ensuring the delivery of new homes

For a plan to be considered effective, the objectives and identified requirements must be deliverable and achievable. It is considered that, in its current form, the plan fails to accord with this part of the soundness test, due to over reliance on the Whitfield (SAP1) Strategic Allocation to provide the District's projected housing needs over the plan period. Therefore, to ensure the balanced and steady delivery of housing over the plan period, further Sites should be allocated to ensure that the needs of the district are met.

Whitfield Urban Extension (SAP1) is the largest allocation in the plan and it is expected to deliver over 5,750 dwellings. Of the 5,750 dwellings proposed for the Site, 3,483 dwellings are considered deliverable in the emerging Plan period. The Council acknowledges that the 2010 Core Strategy included provision for the Site to deliver 5,750 dwellings. Phase 1 of the SAP1 allocation (Dover ref. 10/01010) is underway and as of the 2020/2021 monitoring year, 185 dwellings had been completed with a delivery rate of approximately 50dpa for the past three years. Given this slow progress, it seems likely that although the existing outline planning permission should be completed over the Plan period, a more cautious approach should be taken in terms of the remaining dwellings allocated for the Site given its proven issues in delivering housing to date. Without clear evidence by way of a planning application for these additional dwellings, it is questioned whether Whitfield will ramp up to delivery of 120dpa from 2023/24 and then up to 200dpa from 2026/27 for the remainder of the Plan period. More consideration should therefore be made to the current planning position of the Site and the length of time it has taken so far to deliver housing. Paragraph 73D of the NPPF recommends the inclusion of realistic delivery rates within Local Plans, and DDC should therefore review those proposed for Whitfield and consider building more flexibility and more volume into the pipeline to be able to respond to delivery issues.

Self and Custom build

Policy H5 of the Draft Local Plan states that the Council will support Self and Custom House Building schemes on housing sites allocated in the Local Plan and on non-allocated windfall developments subject to compliance with the other Policies in the Local Plan, and where overall this would not result in an over-provision of this type of housebuilding when compared to the Council's supply/demand evidence.

The Self-Build and Custom Housebuilding Act 2015 requires relevant authorities, including District Councils, to keep a register of individuals and associations of individuals who are seeking to acquire serviced plots of land for Self-build and Custom Housebuilding. Council's are also required under

sections 2 and 2A of the Act to have regard to this and to give enough suitable development permissions to meet the identified demand. The benefits of Self and Custom Build Housing are recognised as diversifying the housing market and increasing customer choice. The NPPF supports the delivery of a variety of land coming forward to meet the needs of groups with specific housing requirements including for those wishing to commission to build their own homes.

The Self-Build and Custom House building need as identified from the Council's register is reported annually through the Authority Monitoring Report. The latest Authority Monitoring Report (2019-20) states that since the introduction of the Self-Build and Custom House Building requirements in 2015, there has been 1 plot allowed at appeal, where at appeal it was identified as Self-Build (planning ref. DOV/16/01101). There have also been 18 plots marketed as Self-Build since April 2020 by the developer from planning application 16/01026, however these were not identified as Self-Build on the planning application. On 31st October 2020, there has only been one approved planning application identified as including Self-Build and customhouse building, reference 20/00419, which is also a Quinn site, for which a reserved matters application (ref: 22/01379) is currently pending determination. The Self-Build Need Assessment submitted as part of the application (22/01379), points towards a very strong relative demand for self-build plots in Dover and also identifies Dover as being one of the authorities with the highest demand per capita in the country. Moreover, it is important to highlight that when considering demand in the context of the Local Authority's Self-build register; an Ipsos Mori poll undertaken for NaCSBA in 2016 found that only one in eight people interested in Self-Build were aware of the introduction of Right to Build Registers in England. As a result, the number of expressions of interest on a Local Authority's Self-Build register may substantially underestimate demand. Crucially, the Council's method of updating the Self and Custom Build Register, and resultant understanding of demand within the District, is flawed. The Council reviewed and updated its register in March 2020. All persons and organisations on the first (2016) version of the register were invited to re-register in February 2020, with reminders sent out in March 2020. Those who re-registered and passed the local connectivity and financial solvency tests, had their interest back dated to their original registration date and were placed on part 1 of the register. Those who did not pass the tests but still wished to register their interest in Self and Custom House Building were placed on part 2 of the register.

It is not clear from the Council's Authority Monitoring Report and evidence base for the draft Local Plan whether additional independent survey work has been undertaken to fully understand the demand for Self and Custom Build housing in the District. As mentioned previously, public knowledge and understanding of Right to Build in England is generally low. The method of the Council to understand demand has wholly relied upon people who had joined the register in 2016 and has not sought to further publicise Right to Build or develop a clearer understanding of demand in the District through additional surveys. This results in an incomplete picture of demand in the local area and resultant lack of allocations for Self-Build or Custom Build sites within the draft Local Plan. Quinn Homes are the leading provider of Self-build in Kent and have assembled their own database

of interested Self and Custom Builders. Having facilitated Self and Custom Build development in East Kent, the company is ideally positioned to understand the market requirements and best placed to assist the District in meeting its growing demand for plots. Quinn Homes propose the land subject to this representation as suitable for a Self-build site of 16 dwellings which would assist with addressing the Council's underestimated demand for this housing type. c. Conclusion

Quinn Homes wishes to support Dover in bringing forward a successful, effective and sound Local Plan that can serve the District across the Plan period. In its current form, it is considered that improvements can be made and that the allocation of land north of Astley Avenue (the land subject of this representation) for residential Self and Custom Build redevelopment will strengthen the soundness of the Plan and the sustainability of the spatial strategy in the following ways:

- Prioritising development of previously developed land to reduce the need for greenfield development;
- Enhancing the environmental quality of this part of Dover by relocating within the district an industrial use by virtue of its traffic movements through residential streets;

	<ul style="list-style-type: none"> • Realising a significant opportunity to provide for the District's unmet need of large executive homes in a highly sustainable urban location; • Improving the diversity and quality of housing at Dover by delivering Self and Custom Build homes whilst reducing the dependence upon a single location to deliver the majority of the town's growth; and • Boosting the delivery of housing at Dover and reducing the dependence upon a single location to ensure that the benefits of growth and regeneration are delivered across the town. <p>Quinn Homes would welcome the opportunity to participate in the forthcoming Examination-in-Public into the Plan and contribute to the debate to ensure that the best strategy for the District is found.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>Pellegram Icen (Quinn Astley Avenue) 1126 Att1_Redacted.pdf Pellegram Icen (Quinn Astley Avenue) 1126 Att2_Redacted.pdf</p>

SAP1 - Whitfield Urban Expansion

Local Plan Consultation Point	SAP1 - Whitfield Urban Expansion
Rep ID	SDLP46
Rep Status	Processed
Consultee ID	1254085
Consultee Full Name	Mrs Sue Ward
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	4.52, SAP1 t.iv
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	4.52 talks of the need for development and regeneration of Dover Town and Whitfield, which is incorrect as only Dover Town needs regeneration. The development of Whitfield in fact greatly hinders the regeneration of Dover Town, by encouraging both residents and businesses to move to Whitfield, leaving Dover Town ever more derelict. This is contrary to Section 86 of the NPPF. SAP1 t.iv before valid comment can be made on this section, it is essential to know at what point it is proposed to block up Singledge Lane, as this has serious implications for access by local residents, the businesses on Singledge Lane, emergency services and agricultural traffic. This lane is part of National Cycle Route 16 and also provides the only safe access via Bridleway ER128 to the PROW network west of the A2 into Temple Ewell, the Alkham Valley and beyond via the underpass under the A2 at Temple Farm.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	4.52 To properly consider the regeneration of Dover Town and reduce the development of Whitfield in order to achieve this key aim SAP1 t.iv. Clarity is required on the proposed stopping up of Singledge Lane in order to make any valid comment on this very important issue..

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	4.52 Dover Town is consistently ignored in favour of Whitfield and as a result the policies are seriously flawed. Despite this point being made by me and many others, it continues to be ignored. SAP1 t.iv. Clarity is required on the proposed stopping up of Singledge Lane in order to make any valid comment on this very important issue.
Include files	
Local Plan Consultation Point	SAP1 - Whitfield Urban Expansion
Rep ID	SDLP73
Rep Status	Processed
Consultee ID	1259297
Consultee Full Name	Mr Richard Ledgerwood
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 1 Whitfield Urban Expansion, additional land allocation to the north-west of Whitfield.
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The National Planning Policy Framework states that development will not be permitted where it will cause total loss or substantial harm to the significance of a designated heritage asset or its setting. The boundary of the proposed additional land allocation to the north-west of Whitfield wraps around the three listed buildings in the area, namely Temple Farm, Singledge Farm and Singledge Manor. Any development in this sensitive area will inevitably have a significant adverse impact on these heritage assets.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	In order to be compliant with the National Planning Policy Framework, the boundaries of the land allocation should revert to those set down within the Adopted Core Strategy 2010. This document recognised the need to protect the open setting of the listed buildings and the boundaries were carefully selected to be consistent with National Planning Policy.

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP1 - Whitfield Urban Expansion
Rep ID	SDLP47
Rep Status	Processed
Consultee ID	1254085
Consultee Full Name	Mrs Sue Ward
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	4.78
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	It is stated that the development of Whitfield should be complementary to and not in competition with Dover Town centre, as if this is a future possibility. However, Whitfield has been in direct competition with Dover for many years and is now well ahead in the race. The development of Whitfield has sent the regeneration of Dover Town into a downward spiral, with residents and businesses moving from Dover Town to Whitfield or in the case of Dover Town, businesses closing altogether. Dover Town is unattractive and unwelcoming, which is very sad to see, in view of its historic value and current wasted potential.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant	To prioritise Dover Town above Whitfield until the regeneration of Dover Town can be achieved.

and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Dover District Council are ignoring the needs of Dover Town. The fine words in the plan are just that, with no substance and they achieve nothing.
Include files	
Local Plan Consultation Point	SAP1 - Whitfield Urban Expansion
Rep ID	SDLP116
Rep Status	Processed
Consultee ID	1254085
Consultee Full Name	Mrs Sue Ward
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC6
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	The junction of Nursery Lane and Singledge Lane has regularly flooded, because the topography directs the run off from the fields to this lower lying junction. Most of the time the water run off is contained within the pit to the northeast of the junction and the long drainage ditch in the field margin to the north west. However, global warming has increased rainfall in winter to such an extent that in recent years, water has had to be

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	pumped out of the pit to prevent flooding. The large scale building of housing in this area will cause a far greater volume of surface water than currently comes from the arable field. Such building is therefore unsustainable and contrary to the requirements of NPPF Section 169.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The development at Whitfield should be scaled back to prevent surface water flooding.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP1 - Whitfield Urban Expansion
Rep ID	SDLP117
Rep Status	Processed
Consultee ID	1254085
Consultee Full Name	Mrs Sue Ward
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	8.33 and E4
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	8.33 The focus of building so many houses and large retail outlets at Whitfield has resulted in the degeneration of the historic town centre. It is unattractive and unwelcoming and the resulting footfall is much lower than it should be. E4 There are 3 Certificated Locations for touring caravans on Singledge Lane and several others to the East of the proposed Whitfield Urban Expansion. Many users of these sites merely stay overnight before travelling through the port of Dover. Others stay much longer to visit local historic sites, walking in the countryside or just to enjoy a peaceful countryside location. All will be seriously affected by the urban expansion by either the loss of easy access to the port or the loss of peaceful enjoyment of the countryside. This will result in a loss of sustainable rural tourism, contrary to Section 84 of the NPPF.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Focus the building and development on Dover Town Centre and reduce the focus of development at Whitfield.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP1 - Whitfield Urban Expansion
Rep ID	SDLP115
Rep Status	Processed
Consultee ID	1254085
Consultee Full Name	Mrs Sue Ward
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	5.33
2 - Do you consider this part of the Plan sound?	No

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The junction of Nursery Lane and Singledge Lane in Whitfield has regularly flooded, because the topography directs the surface water run off to this lower lying junction from the fields to the north. Most of the time the water run off is contained within the pit to the northeast of the junction and the long drainage ditch in the field margin to the north west. However, global warming has increased rainfall in winter to such an extent that in recent years, water has had to be pumped out of the pit to prevent flooding. The large scale building of housing in this area will cause a far greater volume of run off than currently comes from the arable field. Such building is therefore unsustainable and contrary to the requirements of NPPF Section 169.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The development should be scaled back to prevent surface water flooding.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Comments have been ignored to date and need to be challenged at the highest level.
Include files	
Local Plan Consultation Point	SAP1 - Whitfield Urban Expansion
Rep ID	SDLP74
Rep Status	Processed
Consultee ID	1259297
Consultee Full Name	Mr Richard Ledgerwood
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 1 Whitfield Urban Expansion, additional land allocation to the north-west of Whitfield.
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The National Planning Policy Framework states that planning policies and decisions should contribute to and enhance the local environment by protecting and enhancing valued landscape sites of biodiversity.</p> <p>The proposed additional land allocation to the north-west of Whitfield borders the Temple Ewell Downs Special Area of Conservation (SAC) and is likely to result in significant adverse effects on the SAC, particularly in relation to recreational and urbanisation pressures, and increased pollution.</p> <p>The proposed additional land allocation also adjoins ancient woodland, which again is likely to be significantly adversely impacted by any development in this area.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>To make the Dover Local Plan consistent with the National Planning Policy Framework, the site boundaries should revert to those set down within the Adopted Core Strategy 2010.</p> <p>The site boundaries in the Adopted Core Strategy 2010 were carefully selected to protect the SAC, the ancient woodland and to minimise the possibility of development causing visual intrusions into the wider landscape. There was a statement that the viewing corridor from Singledge Farm to the sea should be preserved.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP1 - Whitfield Urban Expansion
Rep ID	SDLP118
Rep Status	Processed
Consultee ID	1254085
Consultee Full Name	Mrs Sue Ward

Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	HE1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	It is proposed to increase the size of the development for the Whitfield Urban expansion. The development proposed to the north west of Nursery Lane will include 3 Grade 11 listed buildings, about 3 ancient woodlands and also the Historic Park and Gardens of Waldershare. The land proposed for development is high grade arable land currently used for food production. The 3 Grade II buildings were ancient farmsteads, whose setting was always and should be retained as farmland. To surround these historic assets with a housing development will harm their setting contrary to Sections 20, 190 and 195 of the NPPF.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	To reduce the scale of the Whitfield Urban expansion to protect these historic assets and comply with the NPPF.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	It was agreed in Section 4.50 of the Core Strategy 2010 that the setting of listed buildings should not be harmed (in accordance with the requirements of Section 20 of the NPPF) and the current plan countermands this. This has to be challenged at every level.
Include files	
Local Plan Consultation Point	SAP1 - Whitfield Urban Expansion
Rep ID	SDLP170
Rep Status	Processed
Consultee ID	1330996

Consultee Full Name	Mr Joe Ledgerwood
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Whitfield urban expansion - the proposal to extend the existing land allocation to the north-west of Whitfield.
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I believe the proposal to extend the existing land allocation for new housing to the north-west of Whitfield is unsound, as it is inconsistent with the National Planning Policy Framework. The proposed additional land allocation encircles three listed buildings and would inevitably have a significant adverse impact on the open setting of the historic assets. National Policy states that development should not be permitted where it would cause harm to historic assets or their setting.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The conflict with National Policy could be avoided by not extending the existing land allocation to the north-west of Whitfield.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP1 - Whitfield Urban Expansion
Rep ID	SDLP241

Rep Status	Processed
Consultee ID	1331292
Consultee Full Name	Mr Robert Harley
Consultee Company / Organisation	Foster & Payne
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	4.55 SAP1 - Whitfield Urban Expansion
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I believe the local plan needs an allocation of specialist housing for older people as described in the attached letter.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I would like to make the case for an allocation within the Whitfield Urban Expansion area for specialist housing for older people to be made.
Include files	SDLP0241 Foster and Payne redacted- Att1.pdf (2)
Local Plan Consultation Point	SAP1 - Whitfield Urban Expansion

Rep ID	SDLP354
Rep Status	Processed
Consultee ID	1330996
Consultee Full Name	Mr Joe Ledgerwood
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 1 Whitfield Urban Expansion, additional land allocation to the north-west of Whitfield.
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The proposed additional land allocation to the north-west of Whitfield borders an area of ancient woodland, which is required to be protected under the National Planning Policy Framework. Any development in this area is likely to have a significant adverse effect on the ancient woodland through increased recreational pressures and pollution. .
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Removal of the additional land allocation to the north-west of Whitfield from the Plan.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP1 - Whitfield Urban Expansion
Rep ID	SDLP256
Rep Status	Processed
Consultee ID	1331383
Consultee Full Name	Mrs Katie Miller
Consultee Company / Organisation	Kent Downs AONB Unit
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP1
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The protection afforded to the potentially diverted route of the North Downs Way in the policy wording (criterion Z) is supported by the North Downs Way Manager.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP1 - Whitfield Urban Expansion
Rep ID	SDLP672
Rep Status	Processed
Consultee ID	1221958
Consultee Full Name	Ms Bridget Fox
Consultee Company / Organisation	The Woodland Trust
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP1 - Whitfield Urban Extension
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	In our response to the Reg 18 consultation we expressed concern about the proximity of the Whitfield sites to ancient woodland at Lenancre Wood (Grid reference: TR29624552), Captains/Singledge Wood (Grid reference: TR28944634) and Waddling Wood ASNW (Grid reference: TR29434694). We are glad to see that a 30m minimum buffer for the ancient woodland is specified in para f) of policy SAP1. We generally welcome the approach to protecting the site taken in paragraphs d)-h). We reserve the right to comment on and if necessary to object to future planning guidance or applications that do not offer such protections in practice.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP1 - Whitfield Urban Expansion
Rep ID	SDLP963
Rep Status	Processed
Consultee ID	1266351
Consultee Full Name	Dr Sharon Danby
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3 Housing growth
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Due to the governments announcement 5/12/22 the plan is not positively prepared as the development needs must be reassessed. This means it is no longer justified as there now is the room without central government pressure to find reasonable alternatives. It is also not effective as the pressure put on local communities and existing infrastructure is unreasonable and means that it is not deliverable. The plan is also not consistent with NPPF 2021 as the many landscape and heritage assets in Dover District are being compromised by the level of unsustainable overdevelopment which the current plan has allowed.</p> <p>The Housing Growth statement that the aim is to , "provide a greater choice of high-quality housing to meet the needs of Dover districts's growing population and changing demographic and address affordability issues", does not seem internally consistent with the details provided in the plan which underestimates the evidence showing a large part of district population growth is due to aging. The details thus render SP 3 and SP 5 less effective and less sound.</p> <p>Under the current LDP developers have shied away from the badly needed regeneration of Dover and concentrated on building maximum profit, minimum affordability developments of large homes around the more desirable town of Deal and out in Whitfield. The supposed regeneration</p>

of Dover has resulted in another generic shopping centre and a more depressed high street and has not lifted the rest of Dover. The promenade area is uplifted but there seems to be little connectivity to the rest of Dover.

The government department (DLUHC) decision that Dover needs 611 new dwellings a year and a minimum of 10,998 new homes between now and 2040 we find very incompatible with legally binding Net Zero Strategy, Climate Emergency Declaration 2019 and Climate Change Act 2008, and unsound. We should be transforming existing housing stock into zero carbon homes as is happening in East Sussex, led by Lewes DC. Combining these numbers with 3.51 and the statement '76.7% of the new homes are on greenfield sites, while 23.3% are on brownfield sites' is unsound and unacceptable to the public.

We feel that our communities are being harvested by developers and our worries are not being heard or needs met in terms of infrastructure. Thanks to certain national newspaper Sunday supplements, Deal is desired as a 2nd home location by the wealthy from London and elsewhere. Holiday homes which spend most of the year empty in Deal, Dover and coastal villages of Kingsdown and St Margarets are stopping locals from buying affordable homes in their own area from existing housing stock.

It must also be pointed out that at least one of the sites included in the 23.3% of brownfield sites is actually a site intended by SEEDA as local nature reserve having rewilded on unstable slag (only rendered stable by tree-planting, a site which DDC forgot to make a local nature reserve in 2004, and it has become a biodiversity hotspot well known to genuine ecologists nationally; Betteshanger Park.

Central government in London, according to Housing Today is imposing a disproportionate amount of housing growth on Kent and the SE. There is a grievous lack of democratic accountability across Kent. So the chances of protecting Kent, of achieving a Growth Strategy that creates climate-friendly jobs and suitably sized, suitably-priced zero-carbon homes for the next generation of local families, are not good. The space available for infrastructure, functions well for compact coastal towns of the size that Deal / Walmer and Sandwich were 5 years ago.

The level of greenfield overdevelopment which has been disastrous under the current weak LDP is putting Deal infrastructure under strain now, so in-fill should make up the majority of the allocations for Deal and that the housing growth specified for District Centre of Deal and around its boundaries needs to be stopped or radically reduced. Either or both of SAP 15 / SAP 34 would destroy the only road access alternative for diverted traffic. (See detailed comments under SAP 15/ SAP 34 below). Housing Growth that threatens gridlock, blocking off a conurbation of 30,000 from access by emergency vehicles, commuters, school buses is not sustainable housing growth and is very unsound.

3.29 I note and welcome a degree of shift from the Reg 18 draft, in that more sites have been selected with a view to using 'existing infrastructure, facilities and services, with a greater professed purpose to ensure development contributes to the sustainability of local communities and services'.

I note with appreciation both the increase in the number of sites in Dover town SAP 6 – SAP 13, and the SAP 26 Former Snowdown Colliery, Aylesham near a rail station for example. It should be possible to state a determination to 'make best use of brownfield – non-rewilded – land) without giving developers the opt-out qualification 'wherever possible'.

On Five Year Housing Land Supply. 3.39 Having stated the Council had 6.03 years land supply plus a 5% buffer; it is not sound, effective or legally compliant to then state 'the provision of additional sites within the first 5 years of plan period is needed to ensure resilience and promote flexibility;'.! Instead of ensuring resilience, it will create exactly the

destructive suburbanisation of a rural district that many, many of the resident electorate are most worried about.

3.46 It is the conspicuous lack of a secondary school in Aylesham that prevents Aylesham becoming the small garden town planners aspire to. The provision of a secondary school by 2028 should be a condition of SAP 23. There seems to be a complete lack of planning in the statement that now

3.48 Many, many of the current residents of ex mining village Elvington were / are dependent on buses that have recently (2022) been cut, (following KCC cut to bus subsidies) to get to work in Canterbury, Folkestone, Sandwich, Thanet or Dover, or to get to secondary school, or to get to doctors, or to shop. These people had environmentally sustainable public transport service that has been cut. KCC is saying it is looking at potential bankruptcy in 2023, so promises of new services and facilities are met with some disbelief. The selection of this site is ONLY sound with cast-iron conditions to provide all of the services we mention below, including new drainage infrastructure. Council housing in Elvington has been subject to flooding from the sewage system, long overdue for replacement. As in Dover deprived wards, there are unhealthy EPC EFG homes in Elvington that need to be transformed into zero carbon home to lift residents out of fuel and therefore food poverty.

3.68 Windfall. Unless existing settlement boundaries are respected, there is suburban ribbon development creep from field to field to field. To render the plan sound it should contain a statement 'Previously existing settlement boundaries will be respected, until such time as town and parish councils may have agreed changes with Dover District Council, in

accordance with the principles of Localism Act 2011.' In the current economic climate, it seems very naïve to hope that 'new housing in villages can help them retain existing services such as public transport, retail (many pubs are going under because lack of staff and sky high energy bills) and schools'. Indeed we have lost a large proportion of our bus services in the district.

<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Push back to central government and demand a reduction in the housing allocation of 10,998 new homes. Now possible after announcements 5/12/22 from Prime Minister.</p> <p>Regenerate Dover as a priority, retrofitting existing housing stock to provide well insulated renewable energy powered homes. Windfall development only should be allowed in Deal, Sandwich and surrounding villages. Create a self sufficient sustainable garden village at Aylesham with secondary school and green infrastructure and homes far beyond future homes standard.</p> <p>Provide better facilities and transport links for Whitfield to ensure that homeowners are not car dependent.</p> <p>Lobby central government for changes to the rules for ownership of second homes. Priority should be given to locals.</p> <p>Make the wording in the plan stronger in favour of brownfield sites eg 3.32 <i>sufficient amount and variety of land</i> should also state that brownfield must be used before greenfield as per stated in NPPF 21.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP1 - Whitfield Urban Expansion</p>
<p>Rep ID</p>	<p>SDLP587</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331709</p>
<p>Consultee Full Name</p>	<p>Ben Pridgeon</p>
<p>Consultee Company / Organisation</p>	<p>Emmanuel College</p>
<p>Agent Full Name</p>	<p>Ben Pridgeon</p>
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP1, paragraph 2.214</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Justified Effective Consistent with National Policy</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>No</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Yes</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails</p>	<p>We object to an over-reliance of the Plan (including Policy SAP1) to deliver dwellings in the medium and long term parts of the Plan. There appears to be little delivery of dwellings in the early part of the Plan period and this will not make a positive contribution to the Council's housing</p>

to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	land supply. The strategic, urban extensions will take time to deliver due to the requirement for a masterplan and prolonged planning process. This will not aid 'upfront' delivery for dwellings in the district. Please see representations for further information
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The lack of housing delivery in the early part of the Plan period should be rectified by allocating new, smaller sites for development in appropriate locations in the district. This includes development at Ash, for which we have promoted a site which is cognisant with its classification as a 'Local Centre'. Please see representations for further information
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	To contribute to the assessment of housing demand and potential requirement to assess when housing across the deistrict would be delivered.
Include files	221208-Representation to Local Plan.pdf (1) 221206-Site and ownership plan.pdf (1) 221206-EAS-Access and drainage assessment.pdf (1)
Local Plan Consultation Point	SAP1 - Whitfield Urban Expansion
Rep ID	SDLP752
Rep Status	Processed
Consultee ID	1331585
Consultee Full Name	Terence Hopper
Consultee Company / Organisation	
Agent Full Name	Terence Hopper
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP1 Whitfield Urban Expansion
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	There appear to be 6,000 new homes going up in this area. I see no plan to extend Secondary School Provision, other than at Sandwich. Where will they be provided for? Surely not at Sandwich, the other end of the district?
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Provide secondary educational facilities where the need arises, rather than transporting children to the far end of the district
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP1 - Whitfield Urban Expansion
Rep ID	SDLP609
Rep Status	Processed
Consultee ID	1331790
Consultee Full Name	Julie Davies
Consultee Company / Organisation	CPRE Kent
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective

	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The site is shown on the Post Agricultural Land Classification (England) on MAGIC as grades 2 and 3a (best and most versatile) and 3B in roughly equal amounts. It will result in the loss of a significant area of best and most versatile agricultural land.</p> <p>The CPRE Dark Skies Map shows that land in WHI001 is in an area of darker skies</p> <p>Paragraph 4.5 refers to the garden village principles and sets out that development of the strategic allocations should follow these principles. However, whilst SAP1 requires a revised SPD/masterplan there is no requirement within the policy for them to adhere to garden village principles.</p> <p>This is at odds with the two other strategic allocations where garden village principles are imbedded in SAP24 (land to the South of Aylesham) and SAP28 (land between Eythorne and Elvington).</p> <p>Our concern is that too much reliance has been placed on development that is purported to be deliverable (and may not be suitably located in terms of sustainability and environmental constraints) – such that the Council's stated vision with the aim of a "spectacular and sustainable environment" may well be undermined.</p> <p>Instead, the Council should be working with landowners to bring forward development in the most sustainable locations.</p> <p>While strategic development is welcomed, in principle, at Whitfield (being a regional centre), it is not clear whether the previous delivery issues have been resolved. Allocating almost half of the required dwellings to meet housing need at Whitfield will place the Council's strategy at huge risk.</p> <p>Since Whitfield was originally allocated for development (2010 Core Strategy – 5,570 dwellings), the SPD approved (2011) and planning permissions granted, only 363 homes have been delivered to date. Carrying forward the original allocation, plus an additional 2,200 dwellings (6,350 total) in the current local plan means that Council's spatial strategy is being underpinned by a site that has a proven record of failure in terms of delivery. Issues around fragmented land ownership, ransom strips and the resolution of highways issues will need to be resolved before this strategy can be considered sound.</p> <p>As the Council is placing its housing delivery in a basket of three strategic allocations, if one fails to deliver this will impact on the strategy as a whole and place the Council at the whim of the unintended consequences of speculative development to fill the housing need gap.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	CPRE Kent would wish to participate at the examination hearings to explore these issues further.
Include files	
Local Plan Consultation Point	SAP1 - Whitfield Urban Expansion

Rep ID	SDLP730
Rep Status	Processed
Consultee ID	1331844
Consultee Full Name	Miss Irene Bowie
Consultee Company / Organisation	Alkham Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Housing and Development Site Allocations - SAP1 - Whitfield Urban Expansion
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>To ensure that Alkham is included in the KCC RaFat programme, going forward. Currently no part of the Alkham Valley Road (AVR) sits on the forwards works programme although KCC recognises that the road is a heavily used unclassified rural route that does suffer with extra wear and tear from those choosing to use it. KCC Highways Inspection Team, via their Highways Stewards, do undertake routine safety inspections of the AVR coupled with ad hoc inspections to reports from member of the public via the KCC portal. The team also work in conjunction with their Road and Footway Asset Team who commission road condition surveys which are primarily intended to identify asset deterioration, which if untreated, are likely to adversely affect long term performance, serviceably and safety of the highway.</p> <p>The planned urban development at Hawkinge and Whitfield is predicted to impact on the traffic usage of the AVR. Post pandemic has seen an increasing number of cars using the AVR at peak times, and it is estimated that the hourly flow rate will increase to 1000 vehicles per hour in each direction – the actual road capacity rising accordingly to 70% plus. Given these predictions, adequate maintenance to tackle wear and tear (low road grip or texture and structural deterioration of road) is essential to manage the potential risk of more collisions and injuries/fatalities, and decline in road conditions and defects.</p> <p>Therefore, we consider that the current status of the AVR should be elevated and included in the current Forward Works Programme 2022/23 and continue to be so going forward.</p> <p>Supplementary to the foregoing, there is a real concern that the Alkham Vallry Road (AVR) may well be near capacity during peak times from the estimated extra traffic generated by the urban development at Whitfield. This extra traffic will have an impact on all users of the AVR, as well as the local residents and public leisure facilities (Kearsney Abbey, Russell Gardens) – but more so on the village of Alkham where the AVR cuts through the centre. Residents will have difficulty exiting from hidden driveways as well as essential feeder and residential roadway junctions.</p> <p>Therefore, Under Reg 19, we request that the modelling forecast report on the easement of the Alkham Valley Road junction with London Road remit is broadened to take into consideration the predicted increased traffic, which will have a deleterious impact on the whole length of the AVR (6.5 miles). And serious consideration be given to putting in place a viable traffic management scheme, to help mitigate against this likely impact outcome on the residents/ businesses and regular users of the AVR that the extra traffic will brin</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s)	

you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Residnets of Alkham are directly impacted bvy the propsoed developemt at planned urban development at Hawkinge and Whitfield is predicted to impact on the traffic usage of the Alkham Valley Road to the detriment of the community. The Parish Council wishes to represent these views and request that Alkham is included in the KCC RaFat programme, going forward
Include files	
Local Plan Consultation Point	SAP1 - Whitfield Urban Expansion
Rep ID	SDLP900
Rep Status	Processed
Consultee ID	1331955
Consultee Full Name	Matthew Porter
Consultee Company / Organisation	Danescroft Land Ltd and Pentland Homes Ltd
Agent Full Name	Matt Porter
Agent Company / Organisation	DHA Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy SAP1 - Whitfield Urban Extension Policy SP3 - Housing Growth Policy SP4 - Windfall Development Policy SP11 - Infrastructure and Developer Contributions Policy SP12 - Strategic Transport Infrastructure
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	We consider that the plan is sound, for the reasons set out in the consultation response submitted on behalf of Danescroft Land Ltd and Pentland Homes Ltd (ref DHA/30242).

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	For the reasons set out in the consultation response submitted on behalf of Danescroft Land Ltd and Pentland Homes Ltd ref DHA/302 42, no modifications are proposed.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	On account of the scale of the allocation proposed at Whitfield, we consider it necessary for our clients to participate in the oral part of the examination. Please refer to the consultation response submitted on behalf of Danescroft Land Ltd and Pentland Homes Ltd (ref DHA/30242).
Include files	DHA_30242_DDC Regulation 19 Consultation Response.pdf
Local Plan Consultation Point	SAP1 - Whitfield Urban Expansion
Rep ID	SDLP1232
Rep Status	Processed
Consultee ID	1271189
Consultee Full Name	Halsbury Homes
Consultee Company / Organisation	
Agent Full Name	Sean Bashforth
Agent Company / Organisation	Quod
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP1 (Whitfield Urban Expansion)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

On behalf on Halsbury Homes we set out below representations to the Regulation 19 Local Plan. Halsbury Homes control a substantial landholding in the Whitfield Urban Expansion (WUE) area and have been instrumental in delivering early phases. WUE is most significant housing allocation in the District and crucial for housing delivery, with the Regulation 19 draft plan proposing to increase the Core Strategy allocation from 5,750 to 6,350 homes.

As section 9 of the Council's September 2022 Housing Topic Paper notes, guided by the WUE 2011 Supplementary Planning Document (SPD), permission to date has been granted for over 1,483 dwellings (along with a health centre, primary school and new pumping station). The Topic Paper also notes that, whilst the development has not come forward as originally envisaged, there is now significant interest from a number of local and national housebuilders with the potential to significantly increase the delivery of housing. Halsbury Homes (through agents Framptons) made representations to the Regulation 18 Local Plan (Strategic Policy 4 Whitfield Urban Expansion). Disappointingly, no substantive changes have been made to the plan to respond to the concerns raised. These representations again focus on the WUE allocation (now allocation SAP1).

Government Planning Reform

Before commenting on the detail of the WUE allocation, we note that on 7 December 2022 the Government announced that it intends to consult on removing the obligation to maintain a rolling 5 year land supply including any buffer. Furthermore, it intends to consult on transitional arrangements such that Council's who are well advanced in the producing a new plan are given a two year period to revise their plans to take into account changes to the system.

We trust the Council will carefully consider the content and timing of the Local Plan given these fundamentally important potential changes.

SAP1 Whitfield Urban Expansion

Halsbury Homes remain very concerned about the Council's approach to the WUE site allocation and specifically the requirement for a revised SPD to be prepared by the landowners. This approach is flawed and unsound for a number of reasons:

1. It fails to recognise that the delivery of WUE is underway with permissions and completions limiting the scope and effectiveness of any revised SPD. The phasing of the current development is largely fixed with, for instance, an access strategy and special areas of conservation (SAC) mitigation package which is embedded within the masterplan consistent with the current SPD.
2. A revised SPD will take significant time and resources to prepare. It will need to follow the adoption of the current draft local plan to ensure consistency with it and preparing a revised SPD is a significant undertaking in itself. Halsbury Homes were closely involved with the preparation of the 2011 SPD which took over 16 months to prepare and included a considerable body of supporting material including a Sustainability Appraisal, Habitats Regulation Assessment and Transport Assessment. Taking into account the timing of the Local Plan (which supplementary guidance must follow) it could take 3 years to prepare and adopt a revised SPD with the required robust evidence base.
3. It fails to recognise that WUE is now being delivered by a number of developers. As currently drafted the policy refers to the revised SPD being prepared by 'the landowner'. In the past Halsbury undertook this role. However, there are now multiple landowners/housebuilders and it is unclear how funding for its preparation and inputs would be co-ordinated.
4. No justification has been provided to underpin the proposed requirement for a revised SPD for the whole site. The draft supporting text to the policy makes reference to reviewing transport and community provision. However, these do not require a wholesale review of the SPD. As paragraph 4.67 of the draft supporting text notes: 'The developers/landowners should continue to liaise with the relevant service providers to ensure that sufficient provision is made for on-site facilities, or financial contributions towards off-site facilities. Provision will be secured through S106 agreement.'

Halsbury Homes consider that the current WUE 2011 SPD remains sound and notes how, in the context of more up to date national policy in respect of design and other matters, Council Officers continue to give it significant weight in the determination of applications at WUE (see for instance the officers report for the Phase 1D reserved matters application, ref. DOC/20/00718).

The adopted masterplan has informed not only completed and consented development but also delivery assumptions and investment decisions for the remainder the current WUE site allocation. Any uncertainty about the status of the masterplan and the spectre of a significant change will only serve to slow housing delivery.

Required Changes

Policy SAP1

Taking into account these fundamental concerns, policy SAP1 needs to be modified so the focus of a revised SPD is solely on the additional 600 homes proposed in the modified housing allocation. That revised SPD needs to build on the principles of the current masterplan rather than seek to modify what is already in place.

SAP1 should be redrafted so that it is clear that the 2011 SPD applies to existing phases of WUE (along with national guidance and development management policies) and the supplementary SPD will apply to the additional 600 home phase/s.

In doing so, the long list of requirements for a revised masterplan (a to aa of SAP1) must be reviewed to ensure that they are focussed on the additional 600 homes not the whole site. Additional infrastructure requirements for the 600 additional homes and other housing and employment requirements in the district should be factored in to ensure that there is a deliverable strategy.

Summary

It is disappointing that the Council has not sought to make significant changes to the overarching policy for WUE. Despite representations to the Regulation 18 plan setting out significant concerns, no changes have been made. WUE is fundamental to the delivery of Housing in Dover and momentum is building. Halsbury Homes are very concerned that the Council's approach to add more policy in the form of a new site wide SPD has not been justified with no proper consideration to practical difficulties. There is a real risk that imposing unnecessary and onerous requirements for a site wide revised SPD will slow housing delivery and deter future investment. It is vital that the Council change the approach to WUE so that policy facilitates rather than complicates delivery of much needed housing in Dover.

We trust the enclosed is clear and you will give due consideration to Halsbury Homes' representations. We would be grateful if you could keep us informed on the progress of the Local Plan.

(DDC Note - Text Extracted from Document sent from Quod. Representation has been split across relevant areas of the Local Plan. Full attachment can be found under reference SDLP1232.)

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

[Bashfourth Quod \(Halsbury Homes\) 1319 Att1_Redacted.pdf](#)

Local Plan Consultation Point

SAP1 - Whitfield Urban Expansion

Rep ID

SDLP965

Rep Status

Processed

Consultee ID

1331999

Consultee Full Name

Claire
Pamberi

Consultee Company / Organisation

Kent County Council

Agent Full Name

Agent Company / Organisation

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	4.68 SAP1 Whitfield Urban Expansion
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p><u>Development Investment:</u> The County Council welcomes the acknowledgement that the necessary community and social infrastructure including new schools and community facilities will need to be provided. Further specific comments on education, waste and community facilities at Whitfield are provided below under the Infrastructure Delivery Plan (IDP).</p> <p>The County Council ask specifically that the Whitfield SPD includes plans for cycling and walking routes to schools within the development to each of the designated school sites, as part of the necessary community and social infrastructure provision and sustainable transport measures.</p> <p>The County Council awaits the revised SPD which will set out the quantum and distribution of land uses, an updated phasing and delivery strategy.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP1 - Whitfield Urban Expansion
Rep ID	SDLP966
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP1 - Whitfield Urban Expansion
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p><u>Highways and Transportation</u>: A revised SPD document is essential to the consideration for the Whitfield Urban Expansion (WUE), however this needs to be produced as soon as possible to avoid a potential policy vacuum occurring for any emerging development proposals. There should be a clearer definition over which infrastructure and phasing requirements will be encompassed within the Local Plan Policy and which will be addressed within the future SPD, as this could have a direct impact on modelling forecasts. It is essential that a specific policy is included to secure the future route of the Fastrack service.</p> <p>It is stated that the SPD should be prepared by the landowner, however there are several stakeholders that have land interests within the WUE, therefore, it is essential that they are all involved in the process where possible. A Statement of Common Ground should be encouraged with relevant land stakeholders to ensure that a joined-up approach to the SPD review is achieved. This may require the use of equalisation agreements and mechanisms to ensure that ransom situations between development land parcels are avoided.</p> <p>Travel Plans for any portion of development should include community engagement with new residents for the Fastrack service, with service updates, opportunities for feedback and incentives for use.</p> <p><u>PRoW</u>: The County Council welcomes reference to upgrades as well as improvements to existing routes to address network fragmentation.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	

Include files	
Local Plan Consultation Point	SAP1 - Whitfield Urban Expansion
Rep ID	SDLP1552
Rep Status	Processed
Consultee ID	1252225
Consultee Full Name	Cllr Nigel Collor
Consultee Company / Organisation	DDC WARD CLLR - Whitfield
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I will keep my comments short but this does not reduce my hard feelings on the matters stated. WHITFIELD The additional proposals to the Whitfield Urban Expansion is expected by the residents but assurance is needed that community facilities play a major roll in development plans. Facilities such as school places, medical facilities, small retail outlets, etc are a must similar to those recently introduced in Aylesham
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP1 - Whitfield Urban Expansion
Rep ID	SDLP1455
Rep Status	Processed
Consultee ID	1330919
Consultee Full Name	Mrs Heather Twizell
Consultee Company / Organisation	Natural England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP1
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>SAP1 – Whitfield Urban Expansion (Existing strategic site – uplift in this Plan of 600 new homes)</p> <p>Taken as a whole this is by far your Authority's largest strategic housing allocation, making provision for a total of 6,350 new homes. However, we note that the bulk of the allocation was agreed as part of your 2010 Core Strategy with an additional uplift through this new Plan of just 600 homes. We understand that the area of land identified to support this uplift (WH1001) will see extremely limited built development being mainly used to provide additional open space, biodiversity and landscape mitigation to enable increased capacity for the rest of the site.</p> <p>Natural England will provide further, detailed advice on this site in due course due to the greater complexity of natural environment issues. This advice is likely to cover the following topics: • Air quality • Mitigation for impacts on the Lydden and Temple Ewell Special Area of Conservation (SAC) through provision of Suitable Alternative Natural Greenspace (SANGs) • Update of the 2011 Supplementary Planning Document (SPD) and Masterplan • Potential for impact on the Thanet Coast and Sandwich Bay Special Protection Area (SPA) and Ramsar site in light of the further developed Thanet Coast SAMP. • Potential for impact on the setting of the Kent Downs AONB • Potential for impacts on ancient woodland • Green Infrastructure • Access – including the North Downs Way National Trail and other Public Rights of Way</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP1 - Whitfield Urban Expansion
Rep ID	SDLP1157
Rep Status	Processed
Consultee ID	1271448
Consultee Full Name	Kevin Bown
Consultee Company / Organisation	National Highways
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP1 - Whitfield Urban Expansion
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Our previous Regulation 18 response set out that additional mitigation will need to be discussed and implemented for the later phases of the development at Whitfield and land to the north-west to ensure the performance of the A2 Duke of York roundabout and the A2 Whitfield roundabout.</p> <p>The policy supporting text now acknowledges that a new road network is required to serve the development and that, of relevance to the SRN, a new junction from the A2 is required to the west of the site. We note that transport modelling and assessment work will be required to determine the precise trigger points for the delivery of the access. The policy goes on to state that in addition to site-specific transport infrastructure, development phasing will need to be informed by the delivery of upgrades to the A2 Whitfield roundabout and the A2 Duke of York roundabout. Of note, the supporting text states that the Urban Expansion is supported by the Infrastructure Delivery Plan and Schedule.</p>

	<p>With regards to the specific SAP1 policy wording, the need for suitable new access arrangements to be provided via the A2 and the A256 is acknowledged. As above, the need for financial contributions towards upgrades to the A2 Whitfield roundabout and the A2 Duke of York roundabout in accordance with SP12 is recognised and this is welcomed.</p> <p>Representation: National Highways concurs. The need for the delivery of a new junction on the A2 should be referenced in the Infrastructure Delivery Plan and Delivery Schedule</p> <p>We see that the specific SAP1 policy wording notes that a masterplan and revised Supplementary Planning Document (SPD) will be required and should be prepared by the landowner, jointly working with the Council and key stakeholders. We require that we are consulted on this document when available.</p> <p>Representation: DDC to consult National Highways on SAP1 masterplan and SPD when available.</p> <p>With regards to sustainable transport, the SAP1 policy wording states that the travel plan for the site should include targets and policy measures to achieve a modal shift of between 10 and 20%. We would suggest that this wording needs to be more specific and outline exactly which modes will be targeted for reduction and uplift.</p> <p>Representation: SAP1 policy wording should be more specific about the modes which should be reduced and those which should increase.</p> <p><i>(Note - This is an extract of the Full National Highways representation which can be located at SDLP1152)</i></p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>SAP1 policy wording should be more specific about the modes which should be reduced and those which should increase.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP1 - Whitfield Urban Expansion</p>
<p>Rep ID</p>	<p>SDLP1814</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331237</p>
<p>Consultee Full Name</p>	<p>Oliver Ledgerwood</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	

Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The proposal to extend the land allocation to the north-west of Whitfield is inconsistent with the National Planning Policy Framework (NPPF), which requires the protection of heritage assets and their setting. The proposed boundary wraps around three listed buildings and any development in this area would cause significant harm to the open setting of these historic assets.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The conflict with the NPPF could be avoided by holding the boundaries previously agreed in the 2010 Core Strategy.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP1 - Whitfield Urban Expansion
Rep ID	SDLP1340
Rep Status	Processed
Consultee ID	1331659
Consultee Full Name	Ben Young
Consultee Company / Organisation	The Land Trust
Agent Full Name	Ben

	Young
Agent Company / Organisation	Bloomfields Chartered Town Planners
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP5 - Fort Burgoyne, Dover
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC EDIT: Detailed representation attached to SDLP0447 with figures and maps. Representation reproduced in box 7 below (as originally done by the agent).
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>1. Introduction</p> <p>1.1. Following the publication of the Dover District Council Local Plan (Regulation 18 Draft) and the Targeted Call for Sites on the 20th of January 2021, the Land Trust submitted representations in relation to the development of their own appropriate strategy for the possible future use and regeneration of Fort Burgoyne, Fort Burgoyne Road, Guston, Dover, CT15 5LP. These representations are included as Appendix A of this Statement, however, can be summarised as follows:</p> <ul style="list-style-type: none"> · The site at Fort Burgoyne extends across an area of approximately 42 hectares and includes a recreation ground, a substantial area of chalk grassland and the main buildings and immediate surrounding grounds (including the Parade Ground). Fort Burgoyne is also a designated Schedule Monument, confirming that the site is of national importance. · Fort Burgoyne was built in the 1860s to protect Dover Castle and was used to defend the South Coast of England as one of the "Palmerston Forts" built to defend against invasion. The polygonal system on which the building is built was used to defend and watch from the highest strategic point in Dover. After the First World War, Fort Burgoyne was used a military depot/store for Connaught Barracks before it ceased to be used for military purposes in 2006. In 2014 the Land Trust, a national charity, acquired the site from Homes England and since then has been considering a variety of options for the future development of Fort Burgoyne. This includes the submission of two pre-application enquiries relating to the future use of the site to DDC in July 2019 (DDC Ref: PE/19/00127) and July 2020 (DDC Ref: PE/20/00234), which serve to demonstrate that the Land Trust has a clear commitment to bringing Fort Burgoyne back into use for public benefit at the earliest opportunity. · DDC's adopted Core Strategy 2010, recognised the importance of Fort Burgoyne within the criterion vii of "Strategic Allocation" policy CP10 (Former Connaught Barracks Complex), which stated that alongside the allocation for around 500 dwellinghouses, <i>"the condition of Fort Burgoyne is stabilised, if possible new uses are accommodated, a public access strategy is agreed and a management arrangement is incorporated that secures a sustainable future for the Fort"</i>. The Dover District Local Plan Regulation 18 Draft appeared to "down-grade" of the Former Connaught Barracks site from a "Strategic Allocation" to a "Non-Strategic Housing Allocation". The Regulation 18 draft no longer made any specific reference to Fort Burgoyne with no strategic policy objective to deliver the future of the Fort, a Scheduled Monument of national historic interest that is included on the Historic England at risk register. · The representation therefore sought to raise that the Draft Local Plan needed to provide clarification as to how the regeneration of the two separate elements (being the residential development of Connaught Barracks and the regeneration of Fort Burgoyne) will be delivered to allow for proposals for Fort Burgoyne to be brought forward under a set of key objectives, independent of the Connaught Barracks housing development. It was subsequently suggested within the representation that the Fort's future is secured through other means within the new Local Plan, either through its own strategic policy in other sections of the plan (such as the Employment and the Local Economy section), or through the re-wording of Site GUS002 or through other Development Management policies.

· Finally, given that, in a “Strategic Futures” Report (included as part of **Appendix A**) prepared by WYG and commissioned by the Land Trust, it was identified that there is circa 3,000 square metres of floorspace within existing buildings at Fort Burgoyne that would be potentially suitable for a wide variety of uses. It was also suggested that in order to secure a long-term future use for Fort Burgoyne and secure its regeneration, it would be wholly appropriate for it to be allocated within Strategic Policy 9 for business and employment purposes, in order for more flexibility to be given to the types of uses that might be permissible at the site.

1.2. Dover District Council (DDC) has subsequently published the Regulation 19 Submission of the Dover District Council Local Plan which sets out the vision, strategic objectives and overarching development strategy for future growth in the district over the period to 2040. The Land Trust have therefore instructed Bloomfields Chartered Town Planners to prepare further representations in relation to the Regulation 19 submission and the regeneration and future use of the Scheduled Monument, Fort Burgoyne.

2. Regulation 19 Submission of the Dover District Council Local Plan

2.1. It is welcomed that the aforementioned representations have been taken into account within the Regulation 19 Submission of the Dover District Council Local Plan.

SAP5 - Fort Burgoyne, Dover

2.2. In particular, the Trust is pleased to see the inclusion of Fort Burgoyne for Mixed Employment Use in table 4.1 and a positive site-specific policy to support site regeneration at Fort Burgoyne within Chapter 4: Housing and Employment Site Allocations at Strategic Allocation Policy SAP5 which states the following:

Figure 1: SAP 5- Fort Burgoyne, Dover as of Regulation 19 Submission, DDC Local Plan

2.3. The Land Trust also notes the pre-amble to Policy SAP5 which, at 4.109, recognises that Fort Burgoyne has the potential to accommodate new uses, provided that they are compatible with its status as a scheduled monument. The Trust continues to explore suitable uses for the reuse of the Fort, as evidenced by the grant of planning permission 21/01000 on the 7th July 2022 for the change of use of 4no. casemates to Use Class E with associated ancillary works.

2.4. The Land Trust remains committed to attracting uses for the Fort that will fit in with the long-term sustainable vision for investment in its re-use, as required by the preamble to Policy SAP5. The uses being explored, as evidenced in the previous Regulation 18 representations, are all being considered with the aim of supporting local business growth and ensuring at the same time that any mixture of uses at the site are compatible in respect of access, servicing, general amenity and crucially with the aims of conserving the Scheduled Monument.

2.5. While the inclusion of this policy is largely supported, The Trust has a number of comments in respect of the criteria:

2.6. Criterion h sets out that a Surface Water Management strategy should be produced for the site. The Trust recognises the importance of surface water management; however, it is highlighted that the Fort already benefits from an existing surface water drainage system which was built in the 1860s as part of the construction of the site. This system has always discharged directly to the ditch of the Fort where it soaks into the ground.

2.7. Given the Scheduled Ancient Monument status of the site, establishing an alternative strategy for managing surface water may not be practical and could result in harm. As such it is suggested that this criterion should be removed.

2.8. Notwithstanding this, where relevant, any future planning applications for uses or development at the Fort can demonstrate if required how it would be compatible with the existing surface water drainage system and not require any alternative arrangements for its disposal.

2.9. In respect of criterion j which suggests that *“development within the boundary of Fort Burgoyne which would have a detrimental impact on the heritage significance, setting, views, biodiversity, character of coherence of the components and elements of the complex will not be permitted”*.

2.10. While the Trust acknowledges the need to avoid development which will have a detrimental impact on the range of criteria identified in this policy, any development within Fort Burgoyne would be restricted by the requirement for Scheduled Monument Consent approved by Historic England which is considered to negate the need for this criterion. Draft Local Plan policies in respect of landscape (NE2), ecological (SP13) and historic environment (HE1, SP15) further negate the need for this criterion.

2.11. It is therefore respectfully suggested that criteria h and j are removed from policy SAP 5.

Chapter 2 - Vision and Objectives

2.12. Chapter 2 sets out the overarching vision for Dover District, including that *“through careful stewardship of its world class landscapes, thriving natural environments and wealth of historic sites, Dover District will be a destination of choice for people of all ages to make their home, for businesses to invest in and for visitors to explore and experience.”*

2.13. It is appreciated that the vision highlights the *“Sensitive restoration of elements of its rich built heritage, will enhance the attractiveness of the town, while improved connections to its seafront will have been delivered by high quality design and investment in place making.”* Together with the strategic objective (echoed in Strategic Policy 15) to conserve and enhance heritage assets in the district *“in a manner appropriate to their significance, recognising their intrinsic value as a finite resource as well as their contribution to the character of the District and the positive role they can play in the regeneration of the District.”*

2.14. The Trust also welcomes the identification of Fort Burgoyne on the Local Plan key diagram (Figure 2 below) alongside other Regeneration Sites covered by policy SP6 as set out further over the page.

Figure 2: Figure 2.1, Local Plan Key Diagram

Chapter 3 - Strategic Policies

2.15. Chapter 3 sets out the districts strategic policies to achieve the aforementioned strategic objectives.

SP6 Economic Growth

2.16. Strategic Policy 6 seeks to grow and diversify the Dover District economy by providing additional employment floorspace through the regeneration of brownfield sites in key locations in the district, such as Fort Burgoyne, to deliver flexible employment uses, achieve a higher level of job growth, and help provide additional flexibility and choice to the market over the Plan period.

Figure 3: SP6- Economic Growth, Dover as of Regulation 19 Submission, DDC Local Plan

2.17. The Trust welcomes the inclusion of Fort Burgoyne at criterion 2 of policy SP6 as site where regeneration for a mix of uses to secure their future will be supported by Dover District Council.

2.18. It is noted that paragraph 3.117 sets out that no floorspace allowance has been included for Fort Burgoyne (and other sites allocated under criterion 2) as they are *“brownfield sites allocated for regeneration, and the mix of development and floorspace requirements will need to be determined through the planning application process in accordance with the policies in the Local Plan.”*

2.19. Given the complexities of the site we support this position but anticipate that employment floorspace will amount to circa 3,000 sqm.

Policy NE1 Biodiversity Net Gain

2.20. The Trust agrees with the requirements of Natural Environment Policy 1 for development proposals to provide a minimum of 10% biodiversity net gain above the ecological baseline within the development boundary. And notes criterion (a) which states that where it can be demonstrated that ecologically meaningful biodiversity net gain cannot be achieved within the site boundary, the Council will consider off-site alternatives in line with the mitigation hierarchy approach.

2.21. Given that a large portion of the 42 hectares at Fort Burgoyne has the potential to provide for significant biodiversity offering, in responding to this consultation The Trust wishes to record interest in working with the Council in developing its Dover District Biodiversity Net Gain Strategy with a view to Coombe Hole providing opportunity for off-site net gain whilst maximising the value of this Local Wildlife Site.

Figure 4: NE1- Biodiversity Net Gain, Dover as of Regulation 19 Submission, DDC Local Plan

2.22. In a similar vein to the BNG potential at Fort Burgoyne, the Land Trust has extensive experience of working with developers to create and provide in perpetuity management of Suitable Alternative Natural Greenspace (SANG), areas of greenspace that are of a quality and type that are suitable to divert recreational activities associated with new residential development away from protected sites (such as Special Protection Areas or Special Areas of Conservation).

2.23. In noting the requirement of Draft Policy SAP1(I) (Whitfield Urban Expansion) which requires a need for SANG to mitigate potential impacts upon the Lydden and Temple Ewell SAC, the Trust wishes to express interest in discussions with the Council and/or the developers of this site with a potential view to assisting them with meeting the policy requirements.

	<p>3. Summary</p> <p>3.1. The overall objective of the Trust remains to seek to deliver a strong, sustainable future for the Fort, that secures its long-term status as a nationally and locally important historic site that will make a vital contribution to the district. The Land Trust supports the Regulation 19 Submission Version of the Dover District Local Plan and welcomes the inclusion of Fort Burgoyne as a strategic allocation site for regeneration subject to the comments set out in this representation.</p> <p>4. Appendices</p> <p>Appendix A- Representations on the Regulation 18 Draft Dover District Local Plan 2021 and Targeted Call for Sites</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP1 - Whitfield Urban Expansion
Rep ID	SDLP1074
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	We believe that the total number of new homes is inflated to suit property developer partners of the DDC planning department and the property development lobby who donate large sums to the party currently in government, (See comments SP3 above) This is relevant to the size of SAP 1.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	As well as the SAP1 and 2 protection of the Dover Fast Track bus route and service, there need to be more measures to reinstate local bus routes cut in 2022; to make this sound measure to enable active travel are needed. To become sound, developers should contribute to a Community Infrastructure Levy so that engineered kerbed cycle routes can enhance cycle paths 1, 2,15,16,17, and new engineered cycle tracks, and pavements must be made safe in winter dark afternoons. New engineered cycle routes must link Whitfield Urban Development with Kearsney and Martin Mill rail stations (these being on different lines) and must link Whitfield with Elvington. <i>Also trains and buses on the key commuter routes must be equipped to carry (electric + cargo) bikes.</i> Cross referenced with DM policy T11
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	SAP1 - Whitfield Urban Expansion
Rep ID	SDLP1784
Rep Status	Processed
Consultee ID	1331526
Consultee Full Name	Mrs Mairi Jones
Consultee Company / Organisation	

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note: Please see detailed representation (attached at 1770) which has been divided against numerous consultation points. The representation has images within the test. The text below is an extract from the detailed representation 'by an Alkham resident'.</p> <p>5 Housing Growth</p> <p>5.1 The Green Integration Plan and the local housing plan originally identified considerable growth for Dover District with land initially to be allocated for 14,000 new homes with a target to complete 10,100 homes by 2026. This target now appears to have been reduced and the new plan identifies the broad areas where the growth of the additional homes will be located; notably sites within the Dover urban area, Whitfield, Deal, Sholden and Sandwich.</p> <p>5.2 The Dover District Council Plan justifies its housing allocation growth on the grounds of identified need in line with NPPF and the Department of Levelling Up Housing and Communities criteria and as such has identified a number of choices for housing based on supply, demand, windfall sites etc. As a result a number of small development sites have been identified throughout the District including one in Alkham as well as a plan for a major Urban expansion site at Whitfield.</p> <p>5.3 The District Plan identifies a requirement for an additional 42 traveller pitches throughout the district and identifies two such pitches in Alkham and three others elsewhere.</p> <p>Comment 5</p> <p>a) I welcome the fact that the Plan wishes to increase the types of housing built, encouraging designs to maximise climate benefits and I take no issue with the site for ten houses identified within Alkham and would welcome the development of more affordable housing to encourage more families into the village.</p> <p>b) Alkham has many traveller residents who partake in village life I but would query where the other 37 sites will be accommodated as windfall proposals sites have not been identified. Information on this would be welcome .</p> <p>c) However I must raise severe concerns re the planned development at Whitfield</p> <ul style="list-style-type: none"> • The DDC highlights the requirement for 6350 homes at Whitfield stating that this will be supported by education, primary health and social care , utility services retail and leisure provision as well as the development of the Whitecliff Business Park area at Whitfield which will not only have retail but also light industrial and haulage uses. • The Plan talks at length on the landscaping and it highlights transport networks and in particular references the upgrades required for the Whitfield and the Duke of York Roundabouts It also says that consideration must be given to the local transport links , the Alkham road , the A256 and Whitfield Hill • This matter was raised in 2014 when the Transport Plan for 2015 -2030 was adopted and no action was taken. • Since that time traffic along the Alkham Valley has hugely increased. Representations have been made to the local MP, KCC and a Highway improvement plan submitted all to no avail. • The current plan makes a flawed assumption that householders and businesses will access routes to London via the A20/M20 or A2/M2 whereas in reality they use the Alkham Valley Road , a DECLASSIFIED Road to access the M20. This matter is the subject of more detailed comment later in the report under transport

	D) As housing increases traffic will continue to expand and radical options to consider the Valley a green space in the middle of urban development with road only open for business residents leisure use and emergency vehicles offering a range of bridleways, walks, cycle routes should be explored. This type of scheme has been successfully carried out in other areas such as the Goyt Valley Derbyshire and can lead to vibrant rural community improved air quality and improved traffic management
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	As housing increases traffic will continue to expand and radical options to consider the Valley a green space in the middle of urban development with road only open for business residents leisure use and emergency vehicles offering a range of bridleways, walks, cycle routes should be explored. This type of scheme has been successfully carried out in other areas such as the Goyt Valley Derbyshire and can lead to vibrant rural community improved air quality and improved traffic management
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I can speak to any of the points raised in the attached document
Include files	
Local Plan Consultation Point	SAP1 - Whitfield Urban Expansion
Rep ID	SDLP1541
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note <i>The text below is an extract from the original representation which is attached to SDLP1438.</i></p> <p>SAP 1 & 2 Whitfield (cross referenced SAP 51 Coldred)</p> <p>We believe that the total number of new homes is inflated to suit property developer partners of the DDC planning department and the property development lobby who donate large sums to the party currently in government, (See comments SP3 above) This is relevant to the size of SAP 1.</p> <p>As well as the SAP1 and 2 protections of the Dover Fast Track bus route and service, there need to be more measures to reinstate local bus routes cut in 2022; to make this sound measure to enable active travel are needed. To become sound, developers should contribute to a Community Infrastructure Levy so that engineered kerbed cycle routes can enhance cycle paths 1, 2,15,16,17, and new engineered cycle tracks, and pavements must be made safe in winter dark afternoons.</p> <p>New engineered cycle routes must link Whitfield Urban Development with Kearsney and Martin Mill rail stations (these being on different lines) and must link Whitfield with Elvington. Also trains and buses on the key commuter routes must be equipped to carry (electric + cargo) bikes. Cross referenced with DM policy T11</p> <p>SAP 2 – 4.82. This will be sounder and more compliant with Localism Act 2011 if the following is added, 'All proposals for the development of Phase 3, with or without, by DfT or DDC or a combination, should be subject to full and early disclosure to and consultation with, Guston Parish Council'.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP1 - Whitfield Urban Expansion
Rep ID	SDLP2028
Rep Status	Processed
Consultee ID	1273694
Consultee Full Name	Margaret Kemp
Consultee Company / Organisation	

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I would like to add my comments to development of Singledge Lane. Closing date for comments 9th December. 1 Infrastructure, where are Drs Hospitals Dentist going to manage all these residents? 2 Wild life, there are many sources of wild life in ancient wood known as captain wood. 3 Safety of Horse Riders and Walkers with the increased traffic the building's would cause. 4 Flooding, Singledge Lane gets flooded now with water coming from a2, that's with fields taking some of the rain water now, what will happen when it's a concrete city!!
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP1 - Whitfield Urban Expansion
Rep ID	SDLP1732
Rep Status	Processed
Consultee ID	1271717
Consultee Full Name	Quinn Estates

Consultee Company / Organisation	Quinn Estates Ltd
Agent Full Name	Nicholas Pellegram
Agent Company / Organisation	Iceni projects
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Full Representation attached to SDLP1731. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1731.)</p> <p>Ensuring the delivery of new homes</p> <p>For a plan to be considered effective, the objectives and identified requirements must be deliverable and achievable. It is considered that, in its current form, the plan fails to accord with this part of the soundness test, due to over reliance on the Whitfield (SAP1) Strategic Allocation to provide the District's projected housing needs over the plan period. Therefore, to ensure the balanced and steady delivery of housing over the plan period, further Sites should be allocated to ensure that the needs of the district are met.</p> <p>Whitfield Urban Extension (SAP1) is the largest allocation in the plan and it is expected to deliver over 5,750 dwellings. Of the 5,750 dwellings proposed for the Site, 3,483 dwellings are considered deliverable in the emerging Plan period. The Council acknowledges that the 2010 Core Strategy included provision for the Site to deliver 5,750 dwellings. Phase 1 of the SAP1 allocation (Dover ref. 10/01010) is underway and as of the 2020/2021 monitoring year, 185 dwellings had been completed with a delivery rate of approximately 50dpa for the past three years. Given this slow progress, it seems likely that although the existing outline planning permission should be completed over the Plan period, a more cautious approach should be taken in terms of the remaining dwellings allocated for the Site given its proven issues in delivering housing to date. Without clear evidence by way of a planning application for these additional dwellings, it is questioned whether Whitfield will ramp up to delivery of 120dpa from 2023/24 and then up to 200dpa from 2026/27 for the remainder of the Plan period. More consideration should therefore be made to the current planning position of the Site and the length of time it has taken so far to deliver housing. Paragraph 73D of the NPPF recommends the inclusion of realistic delivery rates within Local Plans, and DDC should therefore review those proposed for Whitfield and consider building more flexibility and more volume into the pipeline to be able to respond to delivery issues.</p> <p>It is considered that, particularly with the deliverability issues of the Whitfield Urban Extension to date, additional Sites should be allocated for housing to ensure that there is sufficient choice and flexibility in the supply so that DDC can meet its housing requirement throughout the Plan period, as well as to meet the Government's objective to significantly boost the supply of housing as set out in</p>

	Paragraph 60 of the NPPF. Land to the north of Astley Avenue would be an appropriate allocation which would assist in ensuring a variety of housing Sites are allocated in accordance with NPPF Paragraph 68. The provision of around 45 dwellings here would be suitable for Dover as a regional centre and could support the delivery of housing to meet local needs.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP1 - Whitfield Urban Expansion
Rep ID	SDLP1742
Rep Status	Processed
Consultee ID	1271717
Consultee Full Name	Quinn Estates
Consultee Company / Organisation	Quinn Estates Ltd
Agent Full Name	Nicholas Pellegram
Agent Company / Organisation	Iceni projects
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy

4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>(DDC Note - Full Representation attached to SDLP1740. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1740.)</p> <p>Ensuring the delivery of new homes</p> <p>For a plan to be considered effective, the objectives and identified requirements must be deliverable and achievable. It is considered that, in its current form, the plan fails to accord with this part of the soundness test, due to over reliance on the Whitfield (SAP1) Strategic Allocation to provide the District's projected housing needs over the plan period. Therefore, to ensure the balanced and steady delivery of housing over the plan period, further Sites should be allocated to ensure that the needs of the district are met.</p> <p>Whitfield Urban Extension (SAP1) is the largest allocation in the plan and it is expected to deliver over 5,750 dwellings. Of the 5,750 dwellings proposed for the Site, 3,483 dwellings are considered deliverable in the emerging Plan period. The Council acknowledges that the 2010 Core Strategy included provision for the Site to deliver 5,750 dwellings. Phase 1 of the SAP1 allocation (Dover ref. 10/01010) is underway and as of the 2020/2021 monitoring year, 185 dwellings had been completed with a delivery rate of approximately 50dpa for the past three years. Given this slow progress, it seems likely that although the existing outline planning permission should be completed over the Plan period, a more cautious approach should be taken in terms of the remaining dwellings allocated for the Site given its proven issues in delivering housing to date. Without clear evidence by way of a planning application for these additional dwellings, it is questioned whether Whitfield will ramp up to delivery of 120dpa from 2023/24 and then up to 200dpa from 2026/27 for the remainder of the Plan period. More consideration should therefore be made to the current planning position of the Site and the length of time it has taken so far to deliver housing. Paragraph 73D of the NPPF recommends the inclusion of realistic delivery rates within Local Plans, and DDC should therefore review those proposed for Whitfield and consider building more flexibility and more volume into the pipeline to be able to respond to delivery issues.</p> <p>It is considered that, particularly with the deliverability issues of the Whitfield Urban Extension to date, additional Sites should be allocated for housing to ensure that there is sufficient choice and flexibility in the supply so that DDC can meet its housing requirement throughout the Plan period, as well as to meet the Government's objective to significantly boost the supply of housing as set out in Paragraph 60 of the NPPF. Land at Shooters Hill, Eythorne would be an appropriate allocation which would assist in ensuring a variety of housing Sites are allocated in accordance with NPPF Paragraph 68.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

SAP2 - White Cliffs Business Park

Local Plan Consultation Point	SAP2 - White Cliffs Business Park
Rep ID	SDLP21
Rep Status	Processed
Consultee ID	1259309
Consultee Full Name	Mr Peter Jull
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The current Local Plan includes the following iii. the integrity and setting of the North Downs Way is preserved and enhanced by retaining the existing hedgerow, strengthening by additional planting of three metres either side of the North Downs Way, and setting back development 10 metres from the new planting, or a new 'green bridge' pedestrian connection is delivered across the A2 to improve the setting and directness of the North Downs Way; No justification for removal of the bridge option is given.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	SAP2c should be amended to read: the integrity and setting of the North Downs Way is preserved and enhanced by retaining the existing hedgerow, strengthening by additional planting of three metres either side of the North Downs Way, and setting back development 10 metres from the new planting, or a new bridleway bridge is delivered across the A2 to improve the setting and directness of the North Downs Way;

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	To elaborate on the reason why the bridge option has previously been policy and answer any questions not anticipated in the written response,
Include files	
Local Plan Consultation Point	SAP2 - White Cliffs Business Park
Rep ID	SDLP257
Rep Status	Processed
Consultee ID	1331383
Consultee Full Name	Mrs Katie Miller
Consultee Company / Organisation	Kent Downs AONB Unit
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP2
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	As recognised in the policy wording and its supporting text, the location of the site, and its proposed use as a Business Park has potential to impact on the Kent Downs AONB due to intervisibility, and due to the proposed scale and form of commercial buildings that can be difficult to mitigate in views from the AONB. However, it is considered that appropriate safeguards are included in the policy wording to appropriately manage potential AONB impacts. The proposed safeguards to the North Downs Way as it passes through the site are also supported.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP2 - White Cliffs Business Park
Rep ID	SDLP592
Rep Status	Processed
Consultee ID	1331784
Consultee Full Name	Nigel James
Consultee Company / Organisation	Citycourt Developments Limited
Agent Full Name	Nigel James
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP2 Citycourt Developments Limited legally control the land proposed as phase 4 WCBP. CDL and the landowner fully support the Phase 4 expansion of WCBP and confirm the area is deliverable for further development.
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	CDL support legal compliance of proposed plan.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will	

make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP2 - White Cliffs Business Park
Rep ID	SDLP825
Rep Status	Processed
Consultee ID	1331902
Consultee Full Name	Mark Cope
Consultee Company / Organisation	Cope Property Consultants
Agent Full Name	Mark Cope
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP2
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I act for citycourt Developments and fully support the expansion of Whitecliffs as this land is now deliverable and currently there is strong commercial demand within the market place .
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP2 - White Cliffs Business Park
Rep ID	SDLP979
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The County Council would request inclusion of EB10 within this policy.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	The County Council would request inclusion of EB10 within this policy.

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP2 - White Cliffs Business Park
Rep ID	SDLP1160
Rep Status	Processed
Consultee ID	1271448
Consultee Full Name	Kevin Bown
Consultee Company / Organisation	National Highways
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP2
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The need for financial contributions towards upgrades to the A2 Whitfield roundabout and the A2 Duke of York roundabout in accordance with SP12 is stated in the SAP2 policy wording and this is welcomed.</p> <p>Representation: National Highways are content with the requirement set out in Policy SAP2.</p> <p>Our SAP1 comments on the need for modal shift targets within the Travel Plan to be much more specific are also relevant in relation to this policy.</p> <p>Recommendation: SAP2 policy wording should be more specific about the modes which should be reduced and those which should increase.</p> <p><i>(Note - This is an extract of the Full National Highways representation which can be located at SDLP1152)</i></p>

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Recommendation: SAP2 policy wording should be more specific about the modes which should be reduced and those which should increase.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP2 - White Cliffs Business Park
Rep ID	SDLP1075
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No

6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	See below
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>As well as the SAP1 and 2 protection of the Dover Fast Track bus route and service, there need to be more measures to reinstate local bus routes cut in 2022; to make this sound measure to enable active travel are needed. To become sound, developers should contribute to a Community Infrastructure Levy so that engineered kerbed cycle routes can enhance cycle paths 1, 2,15,16,17, and new engineered cycle tracks, and pavements must be made safe in winter dark afternoons. New engineered cycle routes must link Whitfield Urban Development with Kearsney and Martin Mill rail stations (these being on different lines) and must link Whitfield with Elvington. <i>Also trains and buses on the key commuter routes must be equipped to carry (electric + cargo) bikes.</i> Cross referenced with DM policy T11</p> <p>SAP 2 – 4.82. This will be more sound and compliant with Localism Act 2011 if the following is added, 'All proposals for the development of Phase 3, with or without, by DfT or DDC or a combination, should be subject to full and early disclosure to and consultation with, Guston Parish Council'.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	SAP2 - White Cliffs Business Park
Rep ID	SDLP1542
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy

4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note <i>The text below is an extract from the original representation which is attached to SDLP1438.</i></p> <p>SAP 1 & 2 Whitfield (cross referenced SAP 51 Coldred)</p> <p>We believe that the total number of new homes is inflated to suit property developer partners of the DDC planning department and the property development lobby who donate large sums to the party currently in government, (See comments SP3 above) This is relevant to the size of SAP 1.</p> <p>As well as the SAP1 and 2 protections of the Dover Fast Track bus route and service, there need to be more measures to reinstate local bus routes cut in 2022; to make this sound measure to enable active travel are needed. To become sound, developers should contribute to a Community Infrastructure Levy so that engineered kerbed cycle routes can enhance cycle paths 1, 2,15,16,17, and new engineered cycle tracks, and pavements must be made safe in winter dark afternoons.</p> <p>New engineered cycle routes must link Whitfield Urban Development with Kearsney and Martin Mill rail stations (these being on different lines) and must link Whitfield with Elvington. Also trains and buses on the key commuter routes must be equipped to carry (electric + cargo) bikes. Cross referenced with DM policy T11</p> <p>SAP 2 – 4.82. This will be sounder and more compliant with Localism Act 2011 if the following is added, ‘All proposals for the development of Phase 3, with or without, by DfT or DDC or a combination, should be subject to full and early disclosure to and consultation with, Guston Parish Council’.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP2 - White Cliffs Business Park
Rep ID	SDLP1935
Rep Status	Processed
Consultee ID	1271717
Consultee Full Name	Quinn Estates
Consultee Company / Organisation	Quinn Estates Ltd

Agent Full Name	Sarah Willson
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Iceni Projects, on behalf of Quinn Estates, welcomes the opportunity to submit representations to the Dover District Council Local Plan Regulation 19 Consultation in respect of land to the north-east of Southwall Road, Deal (the 'Site'). This representation should be considered alongside and with regard to the following appended documents which comprise:</p> <ul style="list-style-type: none"> • Appendix 1 – Site Location Plan <p>The vision for the Draft Local Plan reflects the growing importance of new challenges facing local communities in regard to climate and ecological emergency, and greater emphasis on the protection and enhancement of retail, leisure, cultural and commercial development across the district area, and promoting the health and social wellbeing of communities. The corresponding objectives strive for a more prosperous economy, as well as vibrant new communities. Quinn Estates considers that there is much to welcome in the new Plan, however, the company considers the opportunity to deliver an appropriate and badly needed quantum of growth at Deal has not been positively planned for, and that the Plan would be strengthened by promoting additional growth at Deal.</p> <p>Quinn Estates considers that the proposal at Southwall Road presents a suitable site for locating employment growth for Deal adjacent to an existing and successful employment site, which would be easily accessible by public transport and be commensurate with the size of the settlement. Given the unique characteristics of the site, it is considered that it would logically lend itself to development of approximately 130,000 sq. ft of employment uses compatible with those alongside. As such, the site would in particular suit smaller light industrial occupiers (Use Class E(g)) benefiting from the sustainable town centre location. This would provide logical and tempered expansion of the town's employment provision thereby helping address the district's needs, at a location where demand for such uses is proven.</p> <p>Quinn Estates has a proven track record of providing purpose-built employment space for wide range of end users, from smaller artisanal start-ups to larger established operators; and it is considered that this site would provide opportunities for end users from across that range.</p> <p><u>a. The site and surroundings</u></p> <p>The Site comprises approximately 3.3 acres of land lying to the north-east of Southwall Road, Deal. The Site is bound to the south-east by Minters Industrial Estate and Deal Business Park on Court Marsh Road and to the south-west by residential properties. The Southwall Industrial Estate encloses the Site to the north-west, separated by an open field; and to the north-east, Hutchings Timber lies beyond a wooded field. The land adjoins the Deal settlement boundary along its southern edge and is located on the north-western edge of the town.</p> <p>The Site does not contain any Public Right of Ways (PRoWs). Existing access to the Site is via a gate on Southwall Road. Deal train station is located approximately 0.6 miles walking/cycling distance to the east within Deal town centre.</p> <p>The Site is neither within or near a designated Conservation Area, nor are there any listed buildings or other heritage assets nearby. The land is classified as Flood Zone 2/3. The Kent Habitat Survey 2012 identifies the entirety of the Site as Neutral grassland. There are no significant ecological designations affecting the Site or in the vicinity which would restrict development at this location.</p> <p>The Site has an uncertain history with regard to assessment under previous Local Plan work. The HELAA 2020 Appendix 1 'Housing Long list' references the site; however, it does not state whether it was proposed for housing or employment as it does with other sites. Appendix 3b 'Housing Sites Highways Assessment' references the DEA049 code as the previous code for another site in Walmer. Appendix 3e 'Initial</p>

Assessment Housing Sites Eliminated' notes the site, however, states it is for employment and will be assessed separately. Appendix 3f 'Initial Assessment – Employment Sites Eliminated' has no reference to the site under the DEA049 code, the postcode, or any of the site addresses.

b. Objection to Tables 4.2 of the Draft Local Plan

Quinn Estates considers that the economic growth strategy for Dover, as detailed in Table 3.5 of the Regulation 19 Submission Version of the Draft Local Plan cannot be considered sound plan-making. In its current form, the Plan fails to positively plan for economic growth in Deal under Policies SP6 and E1. Quinn Estates considers that the Plan should proactively support employment growth in Deal through the allocation of additional sites.

Sustainable patterns of growth

Sustainability lies at the heart of good strategic planning and is a core tenet of the National Planning Policy Framework at Paragraph 8. When determining the spatial strategy for employment growth, the Council should direct employment land to the most sustainable locations, namely those which reduce the need for access via private vehicle and are near key population centres.

Deal is the second largest town within the District and is home to approximately 30,000 people. Deal is recognised in the Draft Local Plan as the second largest settlement in the District, benefitting from a vibrant town centre, which benefits from a good level of accessibility and an attractive environment. It's well used by residents and visitors and has a low vacancy rate, as a result of the diverse retail offer. In addition, the town is highly sustainable in regard to public transport accessibility, being served by mainline rail, the high-speed train service to London and numerous bus routes.

Quinn Estates posit that the amount of employment land allocated to Deal within the draft Local Plan is wholly inconsistent with relation to its position as the second most sustainable location in the District for future growth. No new employment land is allocated to the town. The Deal Business Park is offered policy protection through draft Policy E2. Employment allocations have instead been directed to Dover, Aylesham and Eastry, a principal town, rural service centre and local centre within the Settlement Hierarchy, respectively. Table 3.1 of 2021 EDNA update (copied below) succinctly summarises the spatial distribution of employment land across the district, and outlines the strange situation the District faces, where rural areas and smaller settlements hold more employment space than the second largest settlement within the District.

[See attachment]

Evidently, successive Local Plans have failed to plan proactively for employment in Deal, resulting in the picture painted above. Similar to the spatial approach to housing within the Draft Local Plan, the Council's proposed strategy looks to further cement this position, skewing economic growth away from one of the most sustainable locations in the District to areas that are far less sustainable and would require employees to largely arrive by private vehicle to work. The justification for channelling so little growth to Deal is not considered to be justified by evidence, when all the evidence points to the settlement being such a logical and sustainable location to channel growth to. The principles of sustainability and sound plan making appear to have been absent in key decision taking over spatial choices at the heart of the spatial strategy presented in the Draft Plan.

Ensuring the delivery of employment land

For a plan to be considered effective, the objectives and identified requirements must be deliverable and achievable. It is considered that, in its current form, the plan fails to accord with this part of the soundness test, in part due to over reliance on the White Cliffs Business Park to provide the majority of the District's employment land requirement across the Plan period. Therefore, to ensure the balanced and steady delivery of employment floorspace, further Sites should be allocated to meet the needs of the District, and in particular, the previously identified need of Deal.

The EDNA 2017, and the 2022 update, both highlight how the District has not been able to deliver, to date, the level of growth identified in the 2010 Core Strategy and there is a great deal of 'catching up' to do over the next ten years if there is any prospect that the overall job growth target of 6,500 is to be reached.

Policy CP2 of the existing Core Strategy (2010) seeks to provide approximately 200,000 sqm of employment floorspace and 35,000 sqm of retail floorspace between 2006-2026. The Authority Monitoring Report 2020-21 scores progress against Policy CP2 as amber – where 'progress has been made towards meeting the target however further work is required'. Over the monitoring period (2020-21), the following net-gains in employment floorspace are found:

[See attachment]

To address this difficulty with delivery of employment land, the Draft Local Plan proposed the White Cliffs Business Park to deliver the bulk of the employment floorspace requirement in the plan and is expected to deliver a total of 120,000 sqm across four phases. However, there is uncertainty regarding the availability of part of Phase 2 and Phase 3 of White Cliffs Business Park which was proposed to be used as an Inland Border Facility, subject to a Special

Development Order which is in place. In addition, the Council's own EDNA 2017 assesses the issues with the site, stating that 'the site has struggled to come forward for new B class development over recent years, in part due to viability issues limiting interest by investors to promote B class uses within the site. Retail development has started to erode the longer-term employment potential of parts of the site.' Given the uncertain nature of this site, the Council should seek to broaden the employment base through additional allocations across the District where there is an identified need, in the most sustainable settlements i.e., Deal.

Addressing Flood Zone constraint

The site lies within Flood Zone 3, as shown on the Environment Agency's flood zone map and as such, has the potential to be at risk of flooding from the sea. In partnership with the Environment Agency, the Council completed the Deal Coastal Defence Scheme, which provides a 1 in 300-year (0.33%) standard of protection to this area from coastal flooding and only at risk in the extremely unlikely event that the flood defence infrastructure was to fail (i.e. a breach).

Notwithstanding the unlikelihood of a breach, the NPPF requires a site-specific FRA to be submitted for all development located within Flood Zone 3. The NPPF states that development in areas at risk of flooding should be avoided by directing it in the first instance away from areas of highest risk. Where development within areas at risk of flooding is proposed, Para 161 of the NPPF requires that the Sequential Test is applied and, if necessary, that the Exception Test is applied (Para 163-165).

The Council's Strategic-Flood-Risk-Assessment (2019) provides an up-to-date appraisal of the flood risk in Deal, prepared in conjunction with the Environment Agency, Lead Local Flood Authority, Internal Drainage Board and Southern Water. One of the aims of this report is to provide sufficient data and information to enable the Council to apply the Sequential Test to land use allocations and to identify whether the application of the Exception Test is likely to be necessary. It is significant to note that the Site proposes to develop employment floorspace, which is considered to be a less vulnerable use.

A live application (ref: 22/00916) on an adjacent site 64-66 Southwall Road) is currently seeking permission in principle for up to 7 dwellings, along with a replacement place of worship with a community hub and nursery. The application site also lies within Flood Zone 3 and therefore faces the same constraint as the Site subject to these representations. As of 24th November 2022, the Environment Agency have responded to consultation with no objection to the scheme following clarification of residual flood risk on site. This demonstrates that the designation of land as Flood Zone 3 should not be considered as an absolute constraint affecting the principle of development in this location, and that suitable growth for Deal can be supported subject to the necessary technical work being undertaken through site specific FRA's, and the Sequential and Exception Tests in accordance with NPPF guidance.

c. Conclusion

Quinn Estates wishes to support Dover in bringing forward a successful, effective and sound Local Plan that can serve the District across the Plan period. However, Quinn Estates considers that the current approach to the spatial strategy in the Draft Local Plan requires amendment to address a significant soundness issue concerning the level of growth identified for Deal, the District's second largest settlement. It is considered that the Plan currently fails to positively plan for a commensurate level of housing and employment at the settlement, as expressed in Policy SP3 and that the available evidence does not support or justify this approach. Moreover, the evidence does support channelling a greater quantum of growth to Deal.

The Council has struggled with delivery of employment floorspace across the District within the last plan period, and there is a recognised need for additional employment in Deal within the evidence base for the Draft Local Plan. To combat the current over reliance on the White Cliffs Business Park, which is facing delivery issues, the Council should seek to explore additional avenues for employment growth, through identifying suitable sites in Deal, such as the Site subject to this representation.

We trust that the above amendments is acceptable to the Council and that these representations will be taken into account in consideration of the current consultation. We also confirm that Quinn Estates would welcome the opportunity to be involved in the forthcoming Examination-in-Public and contribute to the debate to ensure that the best strategy for the District is found.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful

Allocate land at Northwall Road for employment uses

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	SDLP1934 Willson Att1 Site Location Plan.pdf
Local Plan Consultation Point	SAP2 - White Cliffs Business Park
Rep ID	SDLP1954
Rep Status	Processed
Consultee ID	1334250
Consultee Full Name	Terry Sutton
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	My concern is expansion of WCBP will obviously lead to more people passing to and from. Most will need to access WCBP via Whitfield A2 roundabout, already congested. Other access (direct from A2 will get heavy use when the customs clearance control centre is open (near B and Q) What is required (at least informed) is taking A2 round the back of Whitfield, re-joining the existing A2 (to be re-numbered). Can anyone inform me how many are estimated to be employed at WCBP now? Last 'official' DDC estimate 3,000! Someone should know. And how many of phases 3 and 4 reach fruition. Thanks

<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Not Applicable
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	

SAP3 - Dover Waterfront

Local Plan Consultation Point	SAP3 - Dover Waterfront
Rep ID	SDLP821
Rep Status	Processed
Consultee ID	1252189
Consultee Full Name	Mr Christopher Townend
Consultee Company / Organisation	Dover District Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP3 - Dover Waterfront
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Dover District Council's Investment, Growth & Tourism Service (Place, Economic Development & Regeneration) supports 'SAP3 – Dover Waterfront'. SAP3 is in support of DDC's current Corporate Plan, Economic Growth Strategy and Tourism & Visitor Economy Strategy.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP3 - Dover Waterfront
Rep ID	SDLP563
Rep Status	Processed
Consultee ID	1267584
Consultee Full Name	Jason Ransley
Consultee Company / Organisation	Dover Harbour Board
Agent Full Name	John Bowles
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy SAP3 - Dover Waterfront
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Dover Harbour Board supports the identification of Dover Waterfront as a regeneration site and its allocation for mixed use under Policy SAP3 – Dover Waterfront subject to our request that the boundary of the allocation area is revised on the Policies Map to include the new marina and Marina Curve. We support the range of uses listed as appropriate in the policy and note the estimation of the amount of new housing that can be delivered on the site subject to this being tested and evidenced through the masterplanning process which Dover Harbour Board (supported by its development partner Bride Hall) has been developing and iterating for a number of years. We welcome the removal from the policy of the requirement previously included in Core Strategy 2010 Policy CP8 for any application for redevelopment to be preceded by, and consistent with, a masterplan for the whole site which has been agreed by the Council. In light of the considerable progress that has been made on DWDR, we support the approach adopted in the policy which allows individual applications to be brought forward as market circumstances allow.</p> <p>Dover Harbour Board welcomes the increase in the indicative housing capacity of 263 units shown in Table 4.1.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	Dover Harbour Board requests that the boundary of the allocation area is revised on the Policies Map to include the new marina and Marina Curve.

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	N/A
Include files	SDLP0563 Dover Harbour Board - Att 2.pdf Waterfront Plan - Update 2022.pdf (3)
Local Plan Consultation Point	SAP3 - Dover Waterfront
Rep ID	SDLP980
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<u>Minerals and Waste</u> : To deliver economic growth in the district, this may have an impact on mineral safeguarding facilities. Paragraph 3.117 states: <i>3.117 Furthermore, to achieve the aspirations set out in the Council's Growth Strategy and deliver a step change in the delivery of economic growth in the District, over and above the level of employment need identified in the EDNA, further allocations are required. Sites are therefore allocated at Dover Waterfront, Fort Burgoyne and the Citadel, Western Heights in Dover, in addition to the former Snowdown Colliery in Aylesham, in accordance with this strategy. These sites offer significant opportunity to regenerate brownfield sites in key locations in the District and deliver</i>

flexible employment uses, to achieve a higher level of job growth and help provide additional flexibility and choice to the market over the Plan period. No floorspace allowance has been included for The Citadel, Fort Burgoyne and Snowdown Colliery as these are brownfield sites allocated for regeneration, and the mix of development and floorspace requirements will need to be determined through the planning application process in accordance with the policies in the Local Plan.

The 'Dover Waterfront' is a major element of the Local Plan's regenerative growth area. The relevant Policy for this area being SAP3-Dover Waterfront.

The area has two safeguarded mineral facilities, in close association with each other, the Dunkirk Jetty marine aggregates importation wharf and a concrete batching plant to its immediate west. The extract from Google maps below shows the mineral importation wharf in operation and the 'Gallagher Aggregates Dover Concrete Plant'. Both are safeguarded by virtue of policies CSM:6 Safeguarded Wharves and Rail Depots and CSM 7: Safeguarding Other Mineral Plant Infrastructure of the Kent Minerals and Waste Local Plan 2013-30 (as Early Partially Reviewed and adopted in 2020).

Policy SAP3 - Dover Waterfront lists the regenerative objectives for the area, and the assessments that will be required in bringing forward these developments. Including such assessments for archaeology, air quality, noise etc but it omits any assessment of the safeguarding status of these facilities. It is assumed that they would not be retained as part of the Western Docks regeneration. This matter is also not mentioned in the policy's explanatory paragraphs 4.92 to 4.100 – however, it is assumed, in the absence of any information to the contrary, that these safeguarded mineral facilities would be threatened with direct loss by the Plan's regenerative objectives, as their retention would be incompatible with the Plan's regeneration objectives outlined in the policy.

An Infrastructure Assessment (IA) is required to assess whether the loss of these safeguarded facilities is justified against the exemption criteria of Policy DM 8 of the KMWLP. As a general matter, wharf capacity, once lost, is very unlikely to be able to be replaced at another location, of equal or superior operational capacity. Therefore, the County Council, as Minerals and Waste Planning Authority default position is to seek to retain these facilities and ensure regenerative development allows for this. The IA's should demonstrate that the proposed development will meet the requirements of Policy DM 8 and allow the lawful and viable operation of these facilities to be able to be continued.

PRoW: It is requested that this development does not affect the route of the National Trail.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Local Plan Consultation Point

SAP3 - Dover Waterfront

Rep ID	SDLP1178
Rep Status	Processed
Consultee ID	1271293
Consultee Full Name	Mr Alan Byrne
Consultee Company / Organisation	Historic England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	We welcome acknowledgement of heritage, including the setting of the Western Heights, Dover Castle and the site's archaeological potential in the preamble to the policy and within the policy itself. However, we note the policy is for 263 units which on this site could mean higher buildings. We therefore stress again the need for detailed proposals to be genuinely character led and informed by a detailed assessment of the contribution of setting to the significance of designated heritage, so that the response actively seeks to avoid and minimise harm and where possible enhances significance.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	We note the policy itself does not reference the need for high quality design and this might be a useful addition given the site's general sensitivity and visible location. As with other town centre sites, this site would also benefit from a detailed design brief to provide a greater level of certainty to developers and as a way for the Council to be clear about what is achievable on the site without causing unacceptable levels of harm to important heritage.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP3 - Dover Waterfront
Rep ID	SDLP1076
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(see comments in SP5 re affordable housing) The brownfield sites added since Reg 18 consultation render the Plan more sound and effective.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	See above

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	SAP3 - Dover Waterfront
Rep ID	SDLP1543
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438. SAP 3 – 13 Dover (see comments in SP5 re affordable housing) The brownfield sites added since Reg 18 consultation render the Plan more sound and effective. DDC note (2) - extract from SP5 comment Text: We believe it is both unsound and possibly not legally compliant for DDC dept of Planning to say 'for Dover urban area it is not viable to require affordable housing including the minimum requirement in the NPPF 2021 for 10% affordable homeownership.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness	

matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

SAP4 - Dover Western Heights (The Citadel)

Local Plan Consultation Point	SAP4 - Dover Western Heights (The Citadel)
Rep ID	SDLP259
Rep Status	Processed
Consultee ID	1331383
Consultee Full Name	Mrs Katie Miller
Consultee Company / Organisation	Kent Downs AONB Unit
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP4
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The south western edge of the site adjoins the boundary of the Kent Downs AONB and due to the site's prominent position on top of a ridge of chalk, there is intervisibility between parts of the site and the adjacent AONB and the site is therefore considered to lie in the setting of the AONB. While there is no specific requirement proposed within the policy wording for mitigation of potential AONB impacts, it is considered that other criterion within the policy wording including that proposed within criterion (a) in combination with safeguards for AONB setting included within policy NE2, provide appropriate measures to address potential AONB impacts.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP4 - Dover Western Heights (The Citadel)
Rep ID	SDLP824
Rep Status	Processed
Consultee ID	1252189
Consultee Full Name	Mr Christopher Townend
Consultee Company / Organisation	Dover District Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP4 - Dover Western Heights
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Dover District Council's Investment, Growth & Tourism Service (Place, Economic Development & Regeneration) supports 'SAP4 – Dover Western Heights'. SAP4 is in support of DDC's current Corporate Plan, Economic Growth Strategy and Tourism & Visitor Economy Strategy.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP4 - Dover Western Heights (The Citadel)
Rep ID	SDLP981
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP4 And para 4.104
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<u>Heritage Conservation:</u> As the text notes, a master plan for the Western Heights was adopted into policy by Dover District Council in 2015. An action plan was contained in the document but almost no progress has been made since that time. In the discussions that took place during the preparation of the master plan, it was understood that the action plan needs to be resourced if it is to be delivered and that a designated officer would need to be given responsibility for delivery. The County Council would urge the District Council to re-engage with the action plan so that it can be taken forward and the future of the monument be secured. The County Council recommends the policy includes reference to PROW network and sustainable access improvements as outlined in ROWIP The County Council supports this policy in respect of heritage conservation matters.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	Recommend reference to PROW network.

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP4 - Dover Western Heights (The Citadel)
Rep ID	SDLP1180
Rep Status	Processed
Consultee ID	1271293
Consultee Full Name	Mr Alan Byrne
Consultee Company / Organisation	Historic England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP4
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We question if there is a need for 'Citadel' in the policy title given the clear focus of the policy on the Western Heights as a whole.</p> <p>We welcome the Council's considered approach to the policy for the Western Heights and agree that this important site could and should be one of Dover's key regeneration sites (para 4.101).</p> <p>We also agree that solutions which provide for the long-term sustainable use of the site are likely to involve a degree of harm to the monument and we think it is right that this is acknowledged within the preamble, with the clear caveat that any harm would need to be outweighed by public benefits (which could be heritage benefits for the monument).</p> <p>We support the Council's aim for development proposals to deliver benefits to the Western Heights which combine conservation works with enhanced access and enjoyment of the site. We acknowledge and accept that delivery of meaningful change to the fortunes of the site is likely</p>

	<p>to be dependent and linked to the development of parts of the site for housing, and that 100 houses is outlined for the site as a whole (not just the Citadel as may be inferred from the title).</p> <p>In reference to para 4.105 (below) we wonder whether there should be a stronger emphasis on development which provides it with a sustainable use? That might for example be in the form of better landscape management in some parts of the site, while in others it could be finding ways to introduce community facilities (e.g. a cafe and WC) which supports enhanced access to and enjoyment of the heritage asset.</p> <p>We also think the Council should consider how heritage benefits would be tied to the granting of any planning consent for housing and request that the specific mechanisms be referred to in either preamble or within the policy itself.</p> <p><i>(DDC Note - This is an extract of the full Historic England representation which can be located at SDLP1169)</i></p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>In respect of, we suggest the following minor amendments to the detailed wording of the policy (underlined):</p> <p>b. <i>Make a positive contribution to the character and distinctiveness of this significant heritage asset and capitalise on opportunities to reduce risk across the whole site <u>and opportunities to enhance the significance of the heritage asset:</u></i></p> <p>g. <i>Enhance awareness and accessibility <u>and understanding</u> of this asset for residents and visitors</i></p> <p>h. <i>Improve connectivity between the fortifications and the town, including, where possible, the delivery of links with the town centre, Dover Priory railway station and the Dover waterfront including <u>by utilising the Grand Shaft as an important connector between the waterfront and Western Heights</u></i></p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP4 - Dover Western Heights (The Citadel)</p>
<p>Rep ID</p>	<p>SDLP1077</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331762</p>
<p>Consultee Full Name</p>	<p>Ms Waite-Gleave Sarah Waite-Gleave</p>
<p>Consultee Company / Organisation</p>	<p>Dover and Deal Green Party</p>
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(see comments in SP5 re affordable housing) The brownfield sites added since Reg 18 consultation render the Plan more sound and effective.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	See above
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	SAP4 - Dover Western Heights (The Citadel)
Rep ID	SDLP1544
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP4
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438.</p> <p>SAP 3 – 13 Dover (see comments in SP5 re affordable housing) The brownfield sites added since Reg 18 consultation render the Plan more sound and effective.</p> <p>DDC note (2) - extract from SP5 comment Text: We believe it is both unsound and possibly not legally compliant for DDC dept of Planning to say 'for Dover urban area it is not viable to require affordable housing including the minimum requirement in the NPPF 2021 for 10% affordable homeownership.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

SAP5 - Fort Burgoyne, Dover

Local Plan Consultation Point	SAP5 - Fort Burgoyne, Dover
Rep ID	SDLP353
Rep Status	Processed
Consultee ID	1331112
Consultee Full Name	Miss Emma Waller
Consultee Company / Organisation	Kent Wildlife Trust
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP6 - Economic Growth
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Regarding SP6 - Economic Growth, we are concerned about the inclusion of Fort Burgoyne as a site allocation for economic growth. This is due to the importance of the site as a hibernation site for hundreds/thousands of bats, which are a protected species. The redevelopment of Fort Burgoyne could have a significant detrimental effect on Dover's local bat population, and therefore go against the Spectacular and Sustainable Environment Strategic Objective, which states "to conserve and enhance the District's biodiversity [...] priority habitats and species". There are seven species of bat listed as UK BAP Priority Species.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP5 - Fort Burgoyne, Dover
Rep ID	SDLP260
Rep Status	Processed
Consultee ID	1331383
Consultee Full Name	Mrs Katie Miller
Consultee Company / Organisation	Kent Downs AONB Unit
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP5
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The site adjoins the boundary of the Kent Downs AONB and is therefore considered to lie in the setting of the AONB. While there is no specific requirement proposed within the policy wording for mitigation of potential AONB impacts, it is considered that other criterion within the policy wording including proposed criterion (j), in combination with safeguards for AONB setting included within policy NE2, provide sufficient measures to address potential AONB impacts.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP5 - Fort Burgoyne, Dover
Rep ID	SDLP310
Rep Status	Processed
Consultee ID	1331395
Consultee Full Name	Ms Jo Edwards
Consultee Company / Organisation	Sport England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP5 Fort Burgoyne
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The allocation includes part of an adjoining recreation ground with pitches as recognised in the policy however, it should be made clearer within the policy and supporting text that any proposals affecting that space should accord with policy PM4 and Sport England's Playing Field Policy
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	As above

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	Playing Fields Policy and Guidance â Last updated December 2021.pdf
Local Plan Consultation Point	SAP5 - Fort Burgoyne, Dover
Rep ID	SDLP447
Rep Status	Processed
Consultee ID	1331659
Consultee Full Name	Ben Young
Consultee Company / Organisation	The Land Trust
Agent Full Name	Ben Young
Agent Company / Organisation	Bloomfields Chartered Town Planners
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP5 - Fort Burgoyne, Dover
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC EDIT: Detailed representation attached with figures and maps. Representation reproduced in box 7 below.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	<p>1. Introduction</p> <p>1.1. Following the publication of the Dover District Council Local Plan (Regulation 18 Draft) and the Targeted Call for Sites on the 20th of January 2021, the Land Trust submitted representations in relation to the development of their own appropriate strategy for the possible future use and regeneration of Fort Burgoyne, Fort Burgoyne Road, Guston, Dover, CT15 5LP. These representations are included as Appendix A of this Statement, however, can be summarised as follows:</p>

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

- The site at Fort Burgoyne extends across an area of approximately 42 hectares and includes a recreation ground, a substantial area of chalk grassland and the main buildings and immediate surrounding grounds (including the Parade Ground). Fort Burgoyne is also a designated Schedule Monument, confirming that the site is of national importance.

- Fort Burgoyne was built in the 1860s to protect Dover Castle and was used to defend the South Coast of England as one of the “Palmerston Forts” built to defend against invasion. The polygonal system on which the building is built was used to defend and watch from the highest strategic point in Dover. After the First World War, Fort Burgoyne was used a military depot/store for Connaught Barracks before it ceased to be used for military purposes in 2006. In 2014 the Land Trust, a national charity, acquired the site from Homes England and since then has been considering a variety of options for the future development of Fort Burgoyne. This includes the submission of two pre-application enquiries relating to the future use of the site to DDC in July 2019 (DDC Ref: PE/19/00127) and July 2020 (DDC Ref: PE/20/00234), which serve to demonstrate that the Land Trust has a clear commitment to bringing Fort Burgoyne back into use for public benefit at the earliest opportunity.

- DDC’s adopted Core Strategy 2010, recognised the importance of Fort Burgoyne within the criterion vii of “Strategic Allocation” policy CP10 (Former Connaught Barracks Complex), which stated that alongside the allocation for around 500 dwellinghouses, *“the condition of Fort Burgoyne is stabilised, if possible new uses are accommodated, a public access strategy is agreed and a management arrangement is incorporated that secures a sustainable future for the Fort”*. The Dover District Local Plan Regulation 18 Draft appeared to “down-grade” of the Former Connaught Barracks site from a “Strategic Allocation” to a “Non-Strategic Housing Allocation”. The Regulation 18 draft no longer made any specific reference to Fort Burgoyne with no strategic policy objective to deliver the future of the Fort, a Scheduled Monument of national historic interest that is included on the Historic England at risk register.

- The representation therefore sought to raise that the Draft Local Plan needed to provide clarification as to how the regeneration of the two separate elements (being the residential development of Connaught Barracks and the regeneration of Fort Burgoyne) will be delivered to allow for proposals for Fort Burgoyne to be brought forward under a set of key objectives, independent of the Connaught Barracks housing development. It was subsequently suggested within the representation that the Fort’s future is secured through other means within the new Local Plan, either through its own strategic policy in other sections of the plan (such as the Employment and the Local Economy section), or through the re-wording of Site GUS002 or through other Development Management policies.

- Finally, given that, in a “Strategic Futures” Report (included as part of **Appendix A**) prepared by WYG and commissioned by the Land Trust, it was identified that there is circa 3,000 square metres of floorspace within existing buildings at Fort Burgoyne that would be potentially suitable for a wide variety of uses. It was also suggested that in order to secure a long-term future use for Fort Burgoyne and secure its regeneration, it would be wholly appropriate for it to be allocated within Strategic Policy 9 for business and employment purposes, in order for more flexibility to be given to the types of uses that might be permissible at the site.

1.2. Dover District Council (DDC) has subsequently published the Regulation 19 Submission of the Dover District Council Local Plan which sets out the vision, strategic objectives and overarching development strategy for future growth in the district over the period to 2040. The Land Trust have therefore instructed Bloomfields Chartered Town Planners to prepare further representations in relation to the Regulation 19 submission and the regeneration and future use of the Scheduled Monument, Fort Burgoyne.

2. Regulation 19 Submission of the Dover District Council Local Plan

2.1. It is welcomed that the aforementioned representations have been taken into account within the Regulation 19 Submission of the Dover District Council Local Plan.

SAP5 - Fort Burgoyne, Dover

2.2. In particular, the Trust is pleased to see the inclusion of Fort Burgoyne for Mixed Employment Use in table 4.1 and a positive site-specific policy to support site regeneration at Fort Burgoyne within Chapter 4: Housing and Employment Site Allocations at Strategic Allocation Policy SAP5 which states the following:

Figure 1: SAP 5- Fort Burgoyne, Dover as of Regulation 19 Submission, DDC Local Plan

2.3. The Land Trust also notes the pre-amble to Policy SAP5 which, at 4.109, recognises that Fort Burgoyne has the potential to accommodate new uses, provided that they are compatible with its status as a scheduled monument. The Trust continues to explore suitable uses for the reuse of the Fort, as evidenced by the grant of planning permission 21/01000 on the 7th July 2022 for the change of use of 4no. casemates to Use Class E with associated ancillary works.

2.4. The Land Trust remains committed to attracting uses for the Fort that will fit in with the long-term sustainable vision for investment in its re-use, as required by the preamble to Policy SAP5. The uses being explored, as evidenced in the previous Regulation 18 representations,

are all being considered with the aim of supporting local business growth and ensuring at the same time that any mixture of uses at the site are compatible in respect of access, servicing, general amenity and crucially with the aims of conserving the Scheduled Monument.

2.5. While the inclusion of this policy is largely supported, The Trust has a number of comments in respect of the criteria:

2.6. Criterion h sets out that a Surface Water Management strategy should be produced for the site. The Trust recognises the importance of surface water management; however, it is highlighted that the Fort already benefits from an existing surface water drainage system which was built in the 1860s as part of the construction of the site. This system has always discharged directly to the ditch of the Fort where it soaks into the ground.

2.7. Given the Scheduled Ancient Monument status of the site, establishing an alternative strategy for managing surface water may not be practical and could result in harm. As such it is suggested that this criterion should be removed.

2.8. Notwithstanding this, where relevant, any future planning applications for uses or development at the Fort can demonstrate if required how it would be compatible with the existing surface water drainage system and not require any alternative arrangements for its disposal.

2.9. In respect of criterion j which suggests that *“development within the boundary of Fort Burgoyne which would have a detrimental impact on the heritage significance, setting, views, biodiversity, character of coherence of the components and elements of the complex will not be permitted”*.

2.10. While the Trust acknowledges the need to avoid development which will have a detrimental impact on the range of criteria identified in this policy, any development within Fort Burgoyne would be restricted by the requirement for Scheduled Monument Consent approved by Historic England which is considered to negate the need for this criterion. Draft Local Plan policies in respect of landscape (NE2), ecological (SP13) and historic environment (HE1, SP15) further negate the need for this criterion.

2.11. It is therefore respectfully suggested that criteria h and j are removed from policy SAP 5.

Chapter 2 - Vision and Objectives

2.12. Chapter 2 sets out the overarching vision for Dover District, including that *“through careful stewardship of its world class landscapes, thriving natural environments and wealth of historic sites, Dover District will be a destination of choice for people of all ages to make their home, for businesses to invest in and for visitors to explore and experience.”*

2.13. It is appreciated that the vision highlights the *“Sensitive restoration of elements of its rich built heritage, will enhance the attractiveness of the town, while improved connections to its seafront will have been delivered by high quality design and investment in place making.”* Together with the strategic objective (echoed in Strategic Policy 15) to conserve and enhance heritage assets in the district *“in a manner appropriate to their significance, recognising their intrinsic value as a finite resource as well as their contribution to the character of the District and the positive role they can play in the regeneration of the District.”*

2.14. The Trust also welcomes the identification of Fort Burgoyne on the Local Plan key diagram (Figure 2 below) alongside other Regeneration Sites covered by policy SP6 as set out further over the page.

Figure 2: Figure 2.1, Local Plan Key Diagram

Chapter 3 - Strategic Policies

2.15. Chapter 3 sets out the districts strategic policies to achieve the aforementioned strategic objectives.

SP6 Economic Growth

2.16. Strategic Policy 6 seeks to grow and diversify the Dover District economy by providing additional employment floorspace through the regeneration of brownfield sites in key locations in the district, such as Fort Burgoyne, to deliver flexible employment uses, achieve a higher level of job growth, and help provide additional flexibility and choice to the market over the Plan period.

Figure 3: SP6- Economic Growth, Dover as of Regulation 19 Submission, DDC Local Plan

2.17. The Trust welcomes the inclusion of Fort Burgoyne at criterion 2 of policy SP6 as site where regeneration for a mix of uses to secure their future will be supported by Dover District Council.

2.18. It is noted that paragraph 3.117 sets out that no floorspace allowance has been included for Fort Burgoyne (and other sites allocated under criterion 2) as they are *“brownfield sites allocated for regeneration, and the mix of development and floorspace requirements will need to be determined through the planning application process in accordance with the policies in the Local Plan.”*

2.19. Given the complexities of the site we support this position but anticipate that employment floorspace will amount to circa 3,000 sqm.

Chapter 11 - The Natural Environment

Policy NE1 Biodiversity Net Gain

2.20. The Trust agrees with the requirements of Natural Environment Policy 1 for development proposals to provide a minimum of 10% biodiversity net gain above the ecological baseline within the development boundary. And notes criterion (a) which states that where it can be demonstrated that ecologically meaningful biodiversity net gain cannot be achieved within the site boundary, the Council will consider off-site alternatives in line with the mitigation hierarchy approach.

2.21. Given that a large portion of the 42 hectares at Fort Burgoyne has the potential to provide for significant biodiversity offering, in responding to this consultation The Trust wishes to record interest in working with the Council in developing its Dover District Biodiversity Net Gain Strategy with a view to Coombe Hole providing opportunity for off-site net gain whilst maximising the value of this Local Wildlife Site.

Figure 4: NE1- Biodiversity Net Gain, Dover as of Regulation 19 Submission, DDC Local Plan

2.22. In a similar vein to the BNG potential at Fort Burgoyne, the Land Trust has extensive experience of working with developers to create and provide in perpetuity management of Suitable Alternative Natural Greenspace (SANG), areas of greenspace that are of a quality and type that are suitable to divert recreational activities associated with new residential development away from protected sites (such as Special Protection Areas or Special Areas of Conservation).

2.23. In noting the requirement of Draft Policy SAP1(I) (Whitfield Urban Expansion) which requires a need for SANG to mitigate potential impacts upon the Lydden and Temple Ewell SAC, the Trust wishes to express interest in discussions with the Council and/or the developers of this site with a potential view to assisting them with meeting the policy requirements.

3. Summary

3.1. The overall objective of the Trust remains to seek to deliver a strong, sustainable future for the Fort, that secures its long-term status as a nationally and locally important historic site that will make a vital contribution to the district. The Land Trust supports the Regulation 19 Submission Version of the Dover District Local Plan and welcomes the inclusion of Fort Burgoyne as a strategic allocation site for regeneration subject to the comments set out in this representation.

4. Appendices

Appendix A- Representations on the Regulation 18 Draft Dover District Local Plan 2021 and Targeted Call for Sites

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	N/A
Include files	Regulation 19 Representations December 2022 SUBMISSION.pdf Appendix A.pdf
Local Plan Consultation Point	SAP5 - Fort Burgoyne, Dover
Rep ID	SDLP1183
Rep Status	Processed
Consultee ID	1271293
Consultee Full Name	Mr Alan Byrne
Consultee Company / Organisation	Historic England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP5
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We welcome acknowledgement that the fort is capable of accommodating new uses and that these must be compatible with the site's significance as a scheduled monument. We also welcome the site's identification as one of Dover's four key regeneration sites.</p> <p>We suggest that the pre-amble should place greater emphasis on the desirability of delivering heritage benefits within reuse proposals, and propose that the definition of mixed uses should be wider; i.e. to include cultural activities (which have previously been tested on the site via a grant aided project and proved to be very successful).</p> <p>We also suggest that the preamble should acknowledge the inherent challenge of accommodating new uses within the scheduled structures, and that providing sufficient levels of parking to support those uses will be critical to secure the site's long-term beneficial use unless more sustainable travel options to the site can be planned for and secured.</p> <p><i>(DDC Note - This is an extract of the full Historic England representation which can be located at SDLP1169)</i></p>

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>We suggest that the pre-amble should place greater emphasis on the desirability of delivering heritage benefits within reuse proposals, and propose that the definition of mixed uses should be wider; i.e. to include cultural activities (which have previously been tested on the site via a grant aided project and proved to be very successful).</p> <p>We also suggest that the preamble should acknowledge the inherent challenge of accommodating new uses within the scheduled structures, and that providing sufficient levels of parking to support those uses will be critical to secure the site's long-term beneficial use unless more sustainable travel options to the site can be planned for and secured.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP5 - Fort Burgoyne, Dover
Rep ID	SDLP1503
Rep Status	Processed
Consultee ID	1333275
Consultee Full Name	Adam Harwood
Consultee Company / Organisation	Environment Agency
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP5 4.110
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails	<i>4.110 The site is located within Ground source Protection Zone 3; contaminated land is registered at the site and part of the site falls within the AONB. These issues need to be addressed within any proposal.</i>

to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	This section is incorrect. Land contamination may have been logged at the site and it may be on the planning brownfield register perhaps, but we have not been notified by Dover that it has been determined formally as Contaminated Land . (DDC note - This is an extract from the full Environment Agency representation SDLP1458)
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP5 - Fort Burgoyne, Dover
Rep ID	SDLP1078
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(see comments in SP5 re affordable housing) The brownfield sites added since Reg 18 consultation render the Plan more sound and effective.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	See above
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	SAP5 - Fort Burgoyne, Dover
Rep ID	SDLP1545
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP5 - Fort Burgoyne, Dover
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified

	Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438.</p> <p>SAP 3 – 13 Dover (see comments in SP5 re affordable housing) The brownfield sites added since Reg 18 consultation render the Plan more sound and effective.</p> <p>DDC note (2) - extract from SP5 comment Text: We believe it is both unsound and possibly not legally compliant for DDC dept of Planning to say "for Dover urban area it is not viable to require affordable housing including the minimum requirement in the NPPF 2021 for 10% affordable homeownership.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

SAP6 - Dover Mid Town (DOV018)

Local Plan Consultation Point	SAP6 - Dover Mid Town (DOV018)
Rep ID	SDLP311
Rep Status	Processed
Consultee ID	1331395
Consultee Full Name	Ms Jo Edwards
Consultee Company / Organisation	Sport England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP6 Dover Mid Town
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The allocation includes a bowling green however it is not clear from the policy and text if this is to be retained or affected by development. Any proposals that impact on that facility should be assessed in accordance with paragraph 99 of the NPPF and policy PM4.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP6 - Dover Mid Town (DOV018)
Rep ID	SDLP852
Rep Status	Processed
Consultee ID	1252189
Consultee Full Name	Mr Christopher Townend
Consultee Company / Organisation	Dover District Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP6 - Dover Mid Town
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Dover District Council's Investment, Growth & Tourism Service (Place, Economic Development & Regeneration) supports 'SAP6 – Dover Mid Town'. SAP6 is also in support of DDC's current Corporate Plan, Economic Growth Strategy and Tourism & Visitor Economy Strategy.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP6 - Dover Mid Town (DOV018)
Rep ID	SDLP1188
Rep Status	Processed
Consultee ID	1271293
Consultee Full Name	Mr Alan Byrne
Consultee Company / Organisation	Historic England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP6
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>This site is in a key town centre location, but its historic environment has been eroded over time; we therefore welcome in principle its identification for redevelopment. The preamble highlights the proximity of the scheduled monument and grade I listed Dover Town Hall, however, we think more should be made of the site's heritage; i.e. that part of the site is within the Dover College and Dover Town Centre Conservation Areas and that it is also within the setting of the Dover Dour Street and Dover Castle Conservation Areas.</p> <p>Understanding impacts on heritage should also include a detailed views analysis, especially where new development could, through scale, impact on heritage assets some distance from the site. We suggest reference should be made to the potential need for views analysis in the policy.</p> <p>We also think this site may benefit from a development brief, which gives greater certainty to a developer and allows the Council to explore and test different solutions for the site so that they can be confident about achieving the right balance between competing planning considerations, and set a high bar for design which will be essential in order to maximise the potential of this site.</p> <p><i>(DDC Note - This is an extract of the full Historic England representation which can be located at SDLP1169)</i></p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s)	We suggest reference should be made to the potential need for views analysis in the policy.

you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	We also think this site may benefit from a development brief, which gives greater certainty to a developer and allows the Council to explore and test different solutions for the site so that they can be confident about achieving the right balance between competing planning considerations, and set a high bar for design which will be essential in order to maximise the potential of this site.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP6 - Dover Mid Town (DOV018)
Rep ID	SDLP1079
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	(see comments in SP5 re affordable housing) The brownfield sites added since Reg 18 consultation render the Plan more sound and effective.

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	See above
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	SAP6 - Dover Mid Town (DOV018)
Rep ID	SDLP1546
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP6
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438.</p> <p>SAP 3 – 13 Dover (see comments in SP5 re affordable housing) The brownfield sites added since Reg 18 consultation render the Plan more sound and effective.</p> <p>DDC note (2) - extract from SP5 comment Text: We believe it is both unsound and possibly not legally compliant for DDC dept of Planning to say 'for Dover urban area it is not viable to require affordable housing including the minimum requirement in the NPPF 2021 for 10% affordable homeownership.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

SAP7 - Bench Street Dover (DOV017)

Local Plan Consultation Point	SAP7 - Bench Street Dover (DOV017)
Rep ID	SDLP857
Rep Status	Processed
Consultee ID	1252189
Consultee Full Name	Mr Christopher Townend
Consultee Company / Organisation	Dover District Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP7 - Bench Street Dover
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Dover District Council's Investment, Growth & Tourism Service (Place, Economic Development & Regeneration) supports 'SAP7 – Bench Street Dover'. SAP7 is in support of DDC's current Corporate Plan, Economic Growth Strategy and Tourism & Visitor Economy Strategy. SAP7 is the focus of DDC's current 'Dover Beacon' Levelling Up Fund (Round 2) application. SAP7 is also the focus area of DDC's current Future High Streets Fund projects.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP7 - Bench Street Dover (DOV017)
Rep ID	SDLP610
Rep Status	Processed
Consultee ID	1331790
Consultee Full Name	Julie Davies
Consultee Company / Organisation	CPRE Kent
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP7
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	There are a number of key considerations for the site, including Transport Assessment, assessment of air quality, noise, vibration and light pollution. There will need to evidence that the key considerations can be satisfactorily addressed before allocating the site.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP7 - Bench Street Dover (DOV017)
Rep ID	SDLP1191
Rep Status	Processed
Consultee ID	1271293
Consultee Full Name	Mr Alan Byrne
Consultee Company / Organisation	Historic England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP7
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The Bench St Site is key to Dover's regeneration, is in a prominent location and within the settings of many designated heritage assets, including conservation areas. We therefore welcome focus on this important site, but we think that the positive role that it could play by celebrating heritage within the site, be reinforcing and revealing the wider town's historic character, is underplayed in the preamble and the policy.</p> <p>For example, the site contains a number of good quality unlisted buildings of the 19th century which may be candidates for the Council's local list (ref Policy SP15). While we acknowledge many are in poor condition, we do not agree that the site as a whole is of low architectural quality as noted in paragraph 4.124.</p> <p>We very much welcome acknowledgment of the site's location in the setting of important heritage assets, including Dover castle, which forms the backdrop in views of the site from the A20 and the Western heights. We think there are other heritage assets, setting of which could be affected and should be considered within proposals to redevelop this site, and these include the grade II Unitarian Church and Vestry, directly to the west of the site, and the grade II The Market Hall directly to its north. We also note the scheduled monument Saxon Shore For Bastion lies directly to the north of the site and its setting of this asset should also be considered in proposals to redevelop the site. We also very strongly welcome the acknowledgement in the preamble of the site's high archaeological potential.</p> <p>The policy could include reference to the requirement for high quality design, and greater emphasis on retaining and converting non-designated historic buildings (unless they are in such poor condition that their nature prevents all reasonable uses).</p>

	The Bench Street Site would benefit from production of a development brief which could be informed by detailed analysis of existing buildings, opportunities and issues (including condition) and could explore archaeology within the site to inform the brief. (DDC Note - This is an extract of the full Historic England representation which can be located at SDLP1169)
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	See response to 6 for suggested modifications.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP7 - Bench Street Dover (DOV017)
Rep ID	SDLP1080
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(see comments in SP5 re affordable housing) The brownfield sites added since Reg 18 consultation render the Plan more sound and effective.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	See above
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	SAP7 - Bench Street Dover (DOV017)
Rep ID	SDLP1547
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP7
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified

	Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438.</p> <p>SAP 3 – 13 Dover (see comments in SP5 re affordable housing) The brownfield sites added since Reg 18 consultation render the Plan more sound and effective.</p> <p>DDC note (2) - extract from SP5 comment Text: We believe it is both unsound and possibly not legally compliant for DDC dept of Planning to say "for Dover urban area it is not viable to require affordable housing including the minimum requirement in the NPPF 2021 for 10% affordable homeownership.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

SAP8 - Land including the Gas Holder, Coombe Valley Road, Dover (DOV022B)

Local Plan Consultation Point	SAP8 - Land including the Gas Holder, Coombe Valley Road, Dover (DOV022B)
Rep ID	SDLP656
Rep Status	Processed
Consultee ID	1331382
Consultee Full Name	Mr The Dover Society Graham Margery
Consultee Company / Organisation	The Dover Society
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	E2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Can't comment on legal compliance
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Whilst we welcome the reuse of former employment sites for housing (particularly social housing), we are very concerned about the detrimental impact upon the existing traffic problems in Coombe Valley Road that would ensue from SAP8 (80 dwellings) and SAP9 (150 dwellings).
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP8 - Land including the Gas Holder, Coombe Valley Road, Dover (DOV022B)
Rep ID	SDLP982
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP8
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The County Council requests reference to improvements to the EBX16 link to the school within this policy.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The County Council requests reference to improvements to the EBX16 link to the school within this policy.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP8 - Land including the Gas Holder, Coombe Valley Road, Dover (DOV022B)
Rep ID	SDLP1081
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(see comments in SP5 re affordable housing) The brownfield sites added since Reg 18 consultation render the Plan more sound and effective.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	See above

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	SAP8 - Land including the Gas Holder, Coombe Valley Road, Dover (DOV022B)
Rep ID	SDLP1548
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP8
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438. SAP 3 – 13 Dover (see comments in SP5 re affordable housing) The brownfield sites added since Reg 18 consultation render the Plan more sound and effective. DDC note (2) - extract from SP5 comment Text: We believe it is both unsound and possibly not legally compliant for DDC dept of Planning to say 'for Dover urban area it is not viable to require affordable housing including the minimum requirement in the NPPF 2021 for 10% affordable homeownership.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness	

matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

SAP9 - Land at Barwick Road Industrial Estate, Dover (DOV022E)

Local Plan Consultation Point	SAP9 - Land at Barwick Road Industrial Estate, Dover (DOV022E)
Rep ID	SDLP261
Rep Status	Processed
Consultee ID	1331383
Consultee Full Name	Mrs Katie Miller
Consultee Company / Organisation	Kent Downs AONB Unit
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP9
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The site lies partially within the AONB, (western end) and the remainder of the site is in its immediate setting. Given the existing nature of the site and surrounding land use, we have no objection in principle to a sensitively designed residential scheme. It is requested however that paragraph 4.136 is amended to state the site's location relative to the AONB more accurately.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	* The area to the north of WESTERN PART OF THE SITE LIES WITHIN the Kent Downs AONB, and the rest of the site is within the setting of the Kent Down AONB.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP9 - Land at Barwick Road Industrial Estate, Dover (DOV022E)
Rep ID	SDLP659
Rep Status	Processed
Consultee ID	1331382
Consultee Full Name	Mr The Dover Society Graham Margery
Consultee Company / Organisation	The Dover Society
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	E2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Can't comment on legal compliance
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Whilst we welcome the reuse of former employment sites for housing (particularly social housing), we are very concerned about the detrimental impact upon the existing traffic problems in Coombe Valley Road that would ensue from SAP8 (80 dwellings) and SAP9 (150 dwellings).
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP9 - Land at Barwick Road Industrial Estate, Dover (DOV022E)
Rep ID	SDLP983
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP9
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The County Council requests reference to improvements to EB16 Bridleway for connectivity within this policy.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The County Council requests reference to improvements to EB16 Bridleway for connectivity within this policy.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP9 - Land at Barwick Road Industrial Estate, Dover (DOV022E)
Rep ID	SDLP1082
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(see comments in SP5 re affordable housing) The brownfield sites added since Reg 18 consultation render the Plan more sound and effective.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	See above

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	SAP9 - Land at Barwick Road Industrial Estate, Dover (DOV022E)
Rep ID	SDLP1549
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP9
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438. SAP 3 – 13 Dover (see comments in SP5 re affordable housing) The brownfield sites added since Reg 18 consultation render the Plan more sound and effective. DDC note (2) - extract from SP5 comment Text: We believe it is both unsound and possibly not legally compliant for DDC dept of Planning to say 'for Dover urban area it is not viable to require affordable housing including the minimum requirement in the NPPF 2021 for 10% affordable homeownership.

<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	

SAP10 - Buckland Paper Mill, Dover (DOV023)

Local Plan Consultation Point	SAP10 - Buckland Paper Mill, Dover (DOV023)
Rep ID	SDLP224
Rep Status	Processed
Consultee ID	1331270
Consultee Full Name	Mr Alex Meeken
Consultee Company / Organisation	Homes England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Buckland Paper Mill
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	N/a
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	N/a
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	N.a.

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP10 - Buckland Paper Mill, Dover (DOV023)
Rep ID	SDLP1083
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(see comments in SP5 re affordable housing) The brownfield sites added since Reg 18 consultation render the Plan more sound and effective.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	See above

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	SAP10 - Buckland Paper Mill, Dover (DOV023)
Rep ID	SDLP1581
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP10
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438. SAP 3 – 13 Dover (see comments in SP5 re affordable housing) The brownfield sites added since Reg 18 consultation render the Plan more sound and effective. DDC note (2) - extract from SP5 comment Text: We believe it is both unsound and possibly not legally compliant for DDC dept of Planning to say 'for Dover urban area it is not viable to require affordable housing including the minimum requirement in the NPPF 2021 for 10% affordable homeownership.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness	

matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Local Plan Consultation Point	SAP11 - Westmount College, Dover (DOV026)
Rep ID	SDLP984
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP9
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The County Council requests specific reference is made to the improvements to EBX4 within this policy.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The County Council requests specific reference is made to the improvements to EBX4 within this policy.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP11 - Westmount College, Dover (DOV026)
Rep ID	SDLP1084
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(see comments in SP5 re affordable housing) The brownfield sites added since Reg 18 consultation render the Plan more sound and effective.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	See above

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	SAP11 - Westmount College, Dover (DOV026)
Rep ID	SDLP1583
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP11
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438. SAP 3 – 13 Dover (see comments in SP5 re affordable housing) The brownfield sites added since Reg 18 consultation render the Plan more sound and effective. DDC note (2) - extract from SP5 comment Text: We believe it is both unsound and possibly not legally compliant for DDC dept of Planning to say 'for Dover urban area it is not viable to require affordable housing including the minimum requirement in the NPPF 2021 for 10% affordable homeownership.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness	

matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

SAP12 - Charlton Shopping Centre, Dover (DOV028)

Local Plan Consultation Point	SAP12 - Charlton Shopping Centre, Dover (DOV028)
Rep ID	SDLP1085
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(see comments in SP5 re affordable housing) The brownfield sites added since Reg 18 consultation render the Plan more sound and effective.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	See above
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	SAP12 - Charlton Shopping Centre, Dover (DOV028)
Rep ID	SDLP1585
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP12
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438. SAP 3 – 13 Dover (see comments in SP5 re affordable housing) The brownfield sites added since Reg 18 consultation render the Plan more sound and effective. DDC note (2) - extract from SP5 comment Text: We believe it is both unsound and possibly not legally compliant for DDC dept of Planning to say 'for Dover urban area it is not viable to require affordable housing including the minimum requirement in the NPPF 2021 for 10% affordable homeownership.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	

<p>if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	

SAP13 - Dover Small Housing sites

Local Plan Consultation Point	SAP13 - Dover Small Housing sites
Rep ID	SDLP262
Rep Status	Processed
Consultee ID	1331383
Consultee Full Name	Mrs Katie Miller
Consultee Company / Organisation	Kent Downs AONB Unit
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP13
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The site lies wholly within the AONB. We note that since the publication of the Regulation 19 Local Plan for consultation, outline planning permission has now been granted for upto 5 dwellings on the site. The proposed site specific requirements should help provide mitigation of potential AONB impacts.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP13 - Dover Small Housing sites
Rep ID	SDLP218
Rep Status	Processed
Consultee ID	1331255
Consultee Full Name	Ian JLSE Bull
Consultee Company / Organisation	Jarvis Land South East Ltd
Agent Full Name	Ian Bull
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP13 - DOV030
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	It is submitted that the plan is 'unsound' in respect of site SAP13 - DOV030, Land at Durham Hill, Dover. The site is proposed for residential development as a 'Dover Small Housing Site' with an estimated capacity of 10 dwellings. However, 'pre-application' advice, attached, relates to alternative proposals for 9 x 3 storey dwellings, 27 x 3 storey flats and 45 x 5 storey flats. The pre-application advice was positive in respect of the alternative proposals and stated that the LPA "...considers this site to be a prime location for a proposal demonstrating outstanding or innovative design." It is submitted that this site policy should reflect the pre-application advice and identify the site as being suitable for alternative residential development proposals.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	It is requested that the site policy be revised to enable residential development, comprising houses or flats, demonstrating outstanding or innovative design.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	It is submitted that attendance at the examination will assist the Inspector to assess the merits of the site and opportunities for an outstanding or innovative design for the site.
Include files	pre application advice microsoft format.pdf
Local Plan Consultation Point	SAP13 - Dover Small Housing sites
Rep ID	SDLP859
Rep Status	Processed
Consultee ID	1252189
Consultee Full Name	Mr Christopher Townend
Consultee Company / Organisation	Dover District Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP13 - Dover Small Housing Sites: DOV019 Albany Place Car Park, Dover
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Dover District Council's Investment, Growth & Tourism Service (Place, Economic Development & Regeneration) supports 'SAP13 - Dover Small Housing Sites: DOV019 Albany Place Car Park, Dover'. SAP13 is in support of DDC's current Corporate Plan and Economic Growth Strategy Strategy.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP13 - Dover Small Housing sites
Rep ID	SDLP550
Rep Status	Processed
Consultee ID	1268171
Consultee Full Name	David West
Consultee Company / Organisation	c/o Agent
Agent Full Name	Elizabeth Welch
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP13 - Dover Small Housing Sites
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SAP13 Land adjoining 455 Folkestone Road, Dover (DOV008) – Outline planning permission was granted on 18th November 2022 for the erection of up to five residential dwellings (all matters reserved except for access). The site is now being offered on the market to enable a developer to take the site forward at Reserved Matters stage and develop out. The site itself has no ownership or infrastructure constraints or extraordinary development costs, the site is considered by the current owner to be viable to develop. It is anticipated that a subsequent owner will make a Reserved Matters application within three years.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	No changes required

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Not applicable
Include files	
Local Plan Consultation Point	SAP13 - Dover Small Housing sites
Rep ID	SDLP844
Rep Status	Processed
Consultee ID	1331761
Consultee Full Name	Catherine Hoyte
Consultee Company / Organisation	Plainview Planning Ltd
Agent Full Name	Catherine Hoyte
Agent Company / Organisation	Plainview Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 13
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>See comments made by same agent in relation to SP3 which sets out the background and details of why this policy is not sound through omission of sites for allocation.</p> <p>DDC Edit: Below extracted from Rep SDLP0841</p> <p><i>Mr Moore's reg 18 representation set out that the LPA must attempt to meet a higher growth figure to ensure a robust housing supply available in the event of strategic allocation delays and to ensure that opportunities for speculative development are restricted to suitable and sustainable windfall sites. This could be achieved by utilising suitable sites identified in the HELAA, particularly those within existing settlement boundaries or immediately adjacent to them. More sites should be allocated for development.</i></p>

	<i>WHI009 is a clear example of where allocation is a suitable approach given its location. The Site has outline planning permission for up to 28 units with reserved matters currently under consideration. It is already accepted that the site is suitable for development and there is an opportunity to positively reinforce that through allocation. A suggested change is proposed to policy SAP 13 to reflect the above</i>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Add Site WHI009 to the table of allocated sites as follows: Site Estimated Dwelling Number Site-specific Issues and Requirements WHI009 Land to the rear of Archers Court Road 28 Existing boundary trees to be retained and enhanced Primary access from Archers COurt Road (number 14) Provision of formal and informal open space
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP13 - Dover Small Housing sites
Rep ID	SDLP988
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP13
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective

4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The County Council recommends that all Coombe Valley proposed sites working together can create a great pedestrian and cycle route and the Local Plan should therefore allow for the investigation and upgrading of Public Footpaths EB7, EB6 & EB17 to Bridleway to link to EB16.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The County Council recommends that all Coombe Valley proposed sites working together can create a great pedestrian and cycle route and the Local Plan should therefore allow for the investigation and upgrading of Public Footpaths EB7, EB6 & EB17 to Bridleway to link to EB16.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP13 - Dover Small Housing sites
Rep ID	SDLP1531
Rep Status	Processed
Consultee ID	1252520
Consultee Full Name	Rachel Collins Housing Development Manager
Consultee Company / Organisation	Dover District Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP13
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	

4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SAP13 Roosevelt Road Dover CT16 2BS : SAP13 Peverell Road Dover CT16 2EN : SAP13 Colton Crescent Dover CT16 2EQ : All the sites above are Council owned sites. The intention is for these to be appraised, and if appropriate, brought forward for affordable housing within the next 5 years.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP13 - Dover Small Housing sites
Rep ID	SDLP1529
Rep Status	Processed
Consultee ID	1252520
Consultee Full Name	Rachel Collins Housing Development Manager
Consultee Company / Organisation	Dover District Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP13
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	

4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SAP13 Land at Dundedin Drive (south), Dover Dover CT16 2JU All the sites above are Council owned sites. The intention is for these to be appraised, and if appropriate, brought forward for affordable housing within the next 5 years.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP13 - Dover Small Housing sites
Rep ID	SDLP1086
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(see comments in SP5 re affordable housing) The brownfield sites added since Reg 18 consultation render the Plan more sound and effective.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	See above
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	SAP13 - Dover Small Housing sites
Rep ID	SDLP1586
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP13
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438. SAP 3 – 13 Dover (see comments in SP5 re affordable housing) The brownfield sites added since Reg 18 consultation render the Plan more sound and effective. DDC note (2) - extract from SP5 comment Text: We believe it is both unsound and possibly not legally compliant for DDC dept of Planning to say 'for Dover urban area it is not viable to require affordable housing including the minimum requirement in the NPPF 2021 for 10% affordable homeownership.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

Deal

Local Plan Consultation Point	Deal
Rep ID	SDLP444
Rep Status	Processed
Consultee ID	1259309
Consultee Full Name	Mr Peter Jull
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP14
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>This site is wide open to views from public footpaths across the valley and will cause severe adverse landscape impact. At the moment Deal is mainly seen as a line of building on the top of the ridge from up to 2 miles away. Development here will be seen as urban sprawl down an open slope for which no adequate mitigation is possible.</p> <p>Access is proposed from a single track road with passing places which connects to other single track roads with passing places leading to junctions at Station Road/Dover Road or Manor Road London Road which are operating at or above capacity with minimal or no mitigation possible.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>In the valuable views of this side of the valley are to be foregone, development needs to be in line with a masterplan that would provide a new access to Dover Road without using Station Road. That would require a spine road through this site which would be prejudiced by development of it now.</p> <p>This site should be substituted with DEA009 which was rejected at the HELA stage because of landscape impact, accessibility. DEA009 is hidden from the long views that SAP14 is exposed to and can be made more accessible if developed in conjunction with TC4S008.</p>

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	To answer questions not anticipated by the written response and provide additional explanations and clarifications.
Include files	
Local Plan Consultation Point	Deal
Rep ID	SDLP731
Rep Status	Processed
Consultee ID	1268340
Consultee Full Name	Nick Banks
Consultee Company / Organisation	Richborough Estates Limited
Agent Full Name	Mike O'Brien
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Chapter 4
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Table 4.2 within the Regulation 19 Local Development Plan (LDP) identifies the Site Allocations for Deal which will contribute to meeting the overall housing requirement.</p> <p>The Regulation 18 LDP included Site 'SHO002 - Land at South West of Sandwich Road' as a draft allocation with an estimated capacity of 100 dwellings. An outline application (Ref: 21/00402) was subsequently approved for up to 110 dwellings in March 2022. The Regulation 19 LDP has removed draft allocations that have subsequently been granted planning permission, including this site (hereafter referred to as 'Phase 1'). The Phase 1 site is listed in the HELAA Main Report with an amended capacity of 110 dwellings. A reserved matters application (Ref: 22/01409) submitted by David Wilson Homes is currently pending determination.</p> <p>However, as noted within representation on Housing Supply (Regulation 19 LDP paragraphs 3.36 to 3.40), the delivery of the overall housing requirement is reliant on the Extant Supply, as noted in Table 3.2. The sites which make up the extant supply are not listed anywhere within the evidence base and isn't broken down sufficiently within the Housing Trajectory provided at Appendix D of the Regulation 19 LDP. This should be sufficiently evidenced. Furthermore, where these sites comprised former allocations within the Regulation 18 LDP, the draft Policies Map should indicate that the Settlement Confines of the Urban Boundary include these extant sites. It is also noted that the Settlement Confines do not include the proposed emerging allocations listed in Chapter 4 of the Regulation 19 LDP. Richborough is of the view that the Settlement Confines should be amended to include proposed allocations and extant sites which are relied upon to meet the overall housing requirement.</p>

This is a common approach adopted most recently through the Site Allocations and Development Policies Document for Cheshire East Council (CEC). Settlement boundaries were also reviewed through the preparation of Part 2 of the Waverly Local Plan and a Topic Paper was produced, similar to CEC, which set certain criteria, including the following:

“A settlement boundary should... Include planning permissions and site allocations which physically relate to the settlement boundary.”

Land South West of Sandwich Road

Richborough consider it necessary to include additional land to the south (hereafter referred to as ‘Phase 2’) as a Housing Site Allocation which can be accessed through Phase 1 in order that there is a deliverable supply of land that accords with the proposed settlement hierarchy. The parcel of land being promoted as a suitable residential allocation adjoins the rear of properties on London Road and Sandwich Road to the north east and Mongeham Road to the south east.

Richborough submitted an outline application for the Phase 2 site in May 2022 (Ref: 22/00652) which is currently pending determination. The application seeks outline permission for 155 dwellings with associated parking and means of access.

The Site extends to approximately 11.48 hectares (28.36 acres) and comprises an arable field bounded by hedgerows and some improved grassland. Excluding the land required for access through Phase 1, the Site extends to 8.52 hectares (21.05 acres).

Topographically, the majority of the Site occupies a local plateau of 23m AOD, which is typical of the character of the area. There is a more evident break from ridge to brow at 18m AOD, where the land slopes west towards North Stream.

The northern boundary adjoins the consented development for up to 110 dwellings (21/00402), for which David Wilson Homes have erected boundary hoardings now that a reserved matters application has been submitted.

The eastern boundary of the Site includes the rear of existing residential development fronting the A528, including Sholden C of E Primary School and Hall Crescent. The Site’s southern boundary adjoins semi-detached and terraced properties along Mongeham Road, with post-war housing estates of Upper Deal beyond this, as well as Hornbeam Primary School. The Site’s western boundary adjoins other arable fields.

The relatively recent residential development of Sholden Fields is located on the eastern side of the A258, with further residential properties plus the Hull Park Sports grounds forming the remainder of Sholden to the east.

The DDC Core Strategy was adopted in 2010, followed by the Land Allocation LP in 2015. A Strategic Housing Land Availability Assessment (SHLAA) was prepared in 2009 by GVA Grimley to quantify the potential housing capacity and to identify individual sites for a 5, 10 and 15 year supply of housing in order to aid policy decisions.

The land north of Mongeham Road forms part of a wider parcel (PHS011) and is identified as being deliverable in the 0-5 year period.

The SHLAA assessment concluded that the parcel was deliverable within 0-10 years and in a location with good access to local services, children’s play space, education and that there are “no obvious physical constraints”.

As highlighted elsewhere in these representations, the HELAA was initially published in 2020 and updated in 2022 and seeks to identify a future supply of land which is suitable, available and achievable up to 2040.

The HELAA 2020 assessed both phases of the site promoted by Richborough as a single parcel (SHO002) and the assessment concluded that it was ‘part suitable / part unsuitable’. The suitability assessment in the HELAA 2020 included the following comments:

Suitable site (in part):

- To be taken forward with SHO004
- The development of the part of the site that fronts the Sandwich Road would be appropriate, to mirror the recent development opposite, however the development of the whole site would have an adverse impact on the wider landscape.
- Development here should be sensitively designed and a generous landscaping scheme should be agreed to screen the development.
- Access likely to be achievable from Sandwich Road, however this would lead to the loss of a number of established highway trees which should be balanced when considering the merits of the potential allocation.
- There is concern over the ability of the local road network (particularly at Manor Road and Mongeham Road) to cope with increases in traffic resulting from Local Plan allocations. It is suggested that these junctions/links are assessed in more detail to ascertain the potential for positive mitigation in these locations, which will largely dictate the level of growth that can be accommodated from this or other sites in the locality.
- A Transport Assessment will be required.

The site was re-assessed prior to the publication of the Regulation 18 LDP and the requirement to provide a ‘contaminated land survey’ was also added.

The site assessment in the HELAA 2022 confirmed that a further assessment of the Parcel was undertaken following the Regulation 18 consultation and Richborough's submission of a Vision Document showing a scheme of 250 dwellings. The conclusion remains that the parcel without planning permission is *"still considered to be unsuitable due to landscape impact, potential coalescence with Great Mongeham and highways impact. Here, especially there is concern over the ability of the local road network (particularly at Manor Road and Mongeham Road) to cope with increases in traffic resulting from Local Plan allocations, due to the limited potential for mitigation."*

Whilst it is accepted that the HELAA has considered SHO002 as two parcels and at a reduced capacity of 250 dwellings, there are no maps associated with the 2022 HELAA and therefore it is unclear what development boundaries were used in the assessment.

A finer grained assessment where the southern half of SHO002 was broken into two and the overall yield reduced from 300-400 should have been considered. The submitted application for the Phase 2 site (Ref: 22/00652) shows how a reduced development envelope for the site would include only the eastern portion of the southern half of SHO002 and this in turn eliminates any risk of coalescence with Great Mongeham and reduces potential landscape impacts.

The outstanding issues in regard to highways and landscape are addressed in turn in the context of a scheme for 155 dwellings on the Phase 2 site.

Highways

The application was supported by a TA prepared by Hub Transport Planning. The TA confirmed that strategic traffic modelling has been provided by WSP on behalf of DDC using the Dover and Deal Strategic Traffic Model Do-Minimum Scenario. These forecasts were used to provide strategic traffic impact forecasts for the development proposal. They are supplemented within the TA by traffic turning count data used to consider the operation of junctions on the local network.

The overall traffic generation forecast for the additional (up to) 155 dwellings is 80 two-way trips in the AM peak hour and 81 trips in the PM peak hour - no more than 1.35 additional vehicle trips per minute on the network in any peak hour. Combining the approved development to the north would mean 136 two-way additional trips on the network in the AM peak hour and 138 in the PM peak hour. This is no more than 2.3 additional vehicles per minute in any peak hour which represents a minimal or modest increase given the level of traffic currently carried on the network at these times.

The Dover and Deal Strategic Traffic Model outputs confirm the minimal or modest impacts by junction indicating an AM traffic impact of the Phase 2 development against the Do-Minimum plus Phase 1 scenario at the nearby London Road/Mongeham Road junction of just 2.3% on forecast 2040 traffic flows, and a PM impact of just 2.1%. The Phase 2 traffic impact at the London Road/Manor Road junction is forecast at 2.9% in the AM peak hour and 1.7% in the PM peak hour. The heavy vehicle content of residential traffic movements is typically very low at less than 1% and must be regarded as negligible. The analysis within the TA, which has also considered the strategic traffic modelling study undertaken to support the Local Plan, concluded that a development of 155 dwellings on the application site would have a negligible transport impact and certainly no worse than a minimal transport impact.

Any suggestion of an unacceptable or severe traffic impact resulting from the Phase 2 development should be viewed in the context of previous permissions. Phase 1 of the Whitfield Urban Extension has been the subject of consents to date totalling 1483 dwellings. The Dover and Deal Traffic Model, as set out in WSP Regulation 19 Transport Modelling Forecasting Report, provides details of the forecast operation of the 'Do-Minimum' scenario that includes the Phase 1 Whitfield Urban Extension development and any associated network improvements associated with that phase. The Whitfield roundabout was indicated as an area of concern that required more detailed junction modelling. The results of the forecast 2040 'Do-Minimum' analysis indicated residual delays for traffic on the A256 Whitfield Hill arm of over 19 minutes in the PM peak hour, with nearly seven minutes delay on this arm in the AM peak hour. Such levels of delay are not forecast for junctions in Sholden/Deal with Phase 2 Sholden development in place.

Sholden forms part of the settlement of Deal; a secondary focus for development within the District. As such, Sholden clearly ranks highly in terms of available facilities and active/sustainable travel opportunities, including education facilities close to the proposal site. The planning application is supported by a Travel Plan as well as a Transport Assessment, and the Travel Plan sets out a series of measures that would work towards reducing peak car travel. The dwellings will all be equipped with high-speed broadband connections and the necessity of home working during the COVID19 pandemic appears to have accelerated a shift towards home working and online shopping which will reduce the need to travel by car and thereby reduce traffic impacts on the highway network.

Landscape and Biodiversity Gain

The outline application submitted for the Phase 2 site is supported by a Landscape and Visual Impact Assessment (LVIA) prepared by Tyler Grange. The assessment established the current baseline conditions and considered the sensitivity of the landscape as well as visual receptors to understand the nature of the changes that will arise as a result of the proposed development.

The assessment confirms that the established settlement edge of Sholden is open in nature (through the lack of evident features) and not of recognised quality. The site overall contains no rare, notable or unique landscape features and would not be considered to represent a 'Valued Landscape' in terms of paragraph 174 of the NPPF. Neither is it covered by any local or national qualitative landscape designations. Consistent with the judgements for the adjoining Phase 1 development, which was endorsed by DDC, the effects upon the landscape are considered to be minor adverse. The proposals would not introduce uncharacteristic features, nor would they change the perception and understanding of the wider character area.

The LVIA confirms that the visual receptors affected by the development would be localised and limited principally to the local footpaths. The visual context would remain intact, where the proposed development would sit as a narrow band adjacent to the Phase 1 development site within the local context of scattered settlements occupying plateau locations. The change will not introduce elements that are prominent, visually uncharacteristic nor does it result in the loss of identified important views or vistas. The effects are also experienced over comparatively short distances and the change represents a small component of a much wider view.

In response to the opportunities and constraints that have been identified through the assessment work, a landscape strategy has been developed which has incorporated a substantial landscaped buffer, which can function as open space and provide linkages to the established footpaths. Richborough consider there to be clear opportunities to improve the structure, condition, variety and the contribution that the site makes to the local landscape.

As confirmed in the submitted Ecological Assessment, a Bio-diversity Net Gain calculation using the DEFRA Biodiversity Metric 2.0 was undertaken to assess the measurable gains and losses for biodiversity for the proposed development. The metric returned a significant gain of 11.72% habitat units and a gain of 175.75% hedgerow units post-development.

It is also important to note that the Council published an updated Landscape Character Assessment in October 2022 (produced by LUC). It described the wider landscape as being rural and tranquil, but clearly acknowledged that there is some light pollution, urban influence and reduced tranquillity to the east towards Sholden and by the A258 Sandwich Road. That is relevant to the consideration of this site and its suitability for development.

At the time of writing these representations to the Regulation 19 LDP consultation, an independent review of the submitted LVIA had been completed on behalf of DDC. The independent review by HDA Landscape Architecture has not undertaken its own assessment but has concluded that the Illustrative Layout would result in visual harm and the layout is not considered to respond positively to the sensitivity of the site. It also asserts that the proposed development would breach the local ridgeline and encroach unacceptably down slope.

The response included a number of suggested amendments to reduce the visual harm, including an increased landscape buffer, pulling built development north so it aligns with the boundary for phase 1 and some additional mitigation planting on the western boundary.

Whilst Richborough disagree with the general conclusions of the independent review, in particularly the accuracy of the comments regarding the breach of the local ridgeline, it is still pursuing dialogue with the Council to discuss alternative development parameters.

Other Matters

There has been no objection, subject to financial contributions and/or suggested conditions, from other technical consultees as part of the application process, this includes the following matters:

- Flood risk and drainage from Lead Local Flood Authority (Kent County Council)
- Ecology from Natural England and Environment Agency
- Confirmation that foul water can be disposed of from Southern Water.
- Contaminated land, air quality and noise from DDC Environmental Health Officer
- Public Rights of Way, Education and Minerals and Waste from Kent County Council
- Contribution to secondary education requested by Education Authority
- Contribution to GP services requested from NHS Kent and Medway Group
- Designing out crime by Kent Constabulary.

Richborough are committed to bringing this sustainable site forward and have demonstrated the site's suitability and deliverability through the preparation and submission of an outline planning application, as well as through these representations. The site can deliver 155 dwellings and contribute to DDC's five year housing land supply to ensure needs are met. Representations made to Policy SP3 have demonstrated that Spatial Option C, which seeks to direct more development towards Deal is the most sustainable way of distributing development across the District. Significantly more development should be directed towards Deal where it can be accommodated sustainably.

The detail provided on the capacity of the local highway network and the landscape strategy devised for the Phase 2 site have demonstrated that the issues highlighted in the HELAA are capable of being overcome. Richborough is of the view that the HELAA should be amended to

	<p>acknowledge that a larger area of HELAA Parcel SHO002 is suitable for development and the Phase 2 site should be allocated within Table 2 of the Regulation 19 LDP for 155 dwellings.</p> <p>Benefits arising from the development of land can be summarised as:</p> <ul style="list-style-type: none"> • The provision of new high quality market housing in a sustainable location; • The provision of a policy compliant level of affordable housing in an area where there is unmet need; • The scheme would deliver formal/informal greenspace and play space for use by new and existing residents with its long-term management secured; • The development will improve connectivity and access to PRoWs; • The ecology of the site will be improved through the provision of new green infrastructure which will achieve a net gain in biodiversity; • Creation of employment opportunities through the construction phase of the development; • The proposed development will significantly increase the number of economically active residents, boosting income and local expenditure; • Increase in revenue for DDC through the New Homes Bonus and increased Council Tax receipts.
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The HELAA should be amended to acknowledge that a larger area of HELAA Parcel SHO002 is suitable for development and the Phase 2 site should be allocated within Table 4.2 of the Regulation 19 LDP for 155 dwellings.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>Richborough have a strong track record of promoting sites through the local plan system and believe they can assist the Inspector in exploring the issues with the most up to date information and therefore wish to participate orally in the EiP.</p>
<p>Include files</p>	<p>359_P01-Illustrative Masterplan-LR_compressed.pdf (2) 359_L01-Location Plan.pdf (4)</p>
<p>Local Plan Consultation Point</p>	<p>Deal</p>
<p>Rep ID</p>	<p>SDLP947</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331495</p>
<p>Consultee Full Name</p>	<p>Peter Jull</p>
<p>Consultee Company / Organisation</p>	<p>Deal & Walmer Chamber of Trade</p>
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SP12</p>

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	In response to the updated traffic figures in the evidence base Kent Highways have accepted at last that the London Road/Manor Road operates well above capacity during peak hours and no further development can be considered that would add to traffic flows though that junction. It is accepted that there is no possible mitigation to increase capacity at that junction. That judgement indicates that there can be no more economic development in Deal during the plan period at least. KCC's Growth Without Gridlock document supports a north Deal access road which would resolve the issue but there is no indication that there has been any co-operation between DDC & KCC to pursue this issue.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	SP12 requires an additional clause committing to pursue a north Deal access road in co-operation with KCC and supporting development that would contribute to the cost of its construction including employment land, none of which has been allocated to Deal in this plan
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	To clarify what is required if there is any uncertainty from the written response and to rebut any argument against its inclusion.
Include files	
Local Plan Consultation Point	Deal
Rep ID	SDLP822
Rep Status	Processed
Consultee ID	1331903
Consultee Full Name	Philip Rawle
Consultee Company / Organisation	PDR Planning Limited
Agent Full Name	Philip Rawle

Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Deal Site Allocations - Paragraphs 4.147 - 4.163, and Policies SAP14 - SAP16
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>An extant planning permission exists on the site known as Churchfield Farm, Sholden.</p> <p>The site clearly comprises a commitment within the new Plan period (2022-204), and therefore should be included within the New Dover District Local Plan, as a housing allocation, and one that will be delivered within the first five-years of the Plan period.</p> <p>On this basis, the question then falls to, how many houses should the site be allocated for? The extant planning permission is for 48 dwellings and a 64-bedroom care home. However, following work undertaken by the consultant team for the project, the development extents of the site have been reviewed.</p> <p>The design principles of the appeal scheme have been retained.</p> <p>The new development manages to deliver 100 dwellings, by-way of three key changes to the appeal scheme:</p> <ol style="list-style-type: none"> 1. The omission of the care home site, enabling the introduction of additional housing. 2. Increasing housing numbers elsewhere, within the existing development extents. 3. "Flexing" the extent of the development boundaries. <p>As such, it is believed that the work undertaken and presented in the Vision Document (attached to this submission), demonstrates the site should be allocated for circa 100 dwellings in the New Dover District Local Plan.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Site at Churchfield Farm, Sholden, (an existing commitment), is allocated for circa 100 dwellings in the New Dover District Local Plan.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	The proposed modification is considered to be of strategic importance to the emerging Local Plan.

Include files	22-50-CR03 RevA - Land at Churchfield Farm Sholden - Vision Document Reduced 144dpi[1].pdf
Local Plan Consultation Point	Deal
Rep ID	SDLP1382
Rep Status	Processed
Consultee ID	1274023
Consultee Full Name	Nicholas Kingsley-Smith
Consultee Company / Organisation	
Agent Full Name	Kingsley Smith Solitors LLP Kingsley Smith Solitors LLP
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	4 Housing and Employment Site Allocations Housing Site WAL002 Ray's Bottom Site
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3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Housing Site WAL002 Ray's Bottom Site</p> <p><i>DDC Note: Names and addresses (10) redacted from representation, including the name and address of the local Hawkesdown person who instructed Kingsley Smith Solicitors, and 9 neighbours who have all seen and previously approved the letter. The list will be available for the Inspector to view.</i></p> <p><u>Introduction</u></p> <p>Our client's made representations in 2021. The Regulation 22 report ['R22OR'] was devoid of any engagement with their analysis or concerns.</p> <p>The R22OR nevertheless proposed the allocation WAL002 claiming it is 'suitable', with 75 units. It is impossible to find any proper reasoning justifying that conclusion, despite it running to 2557 pages.</p> <p>This is to be contrasted with the deletion of far more appropriate alternative sites with fewer restrictions, GTM008 DEA017 DEA010 DEA011 DEA002 at Ellens Road ['Ellens Road'], which at the first consultation stage, the council had identified.</p> <p>The council's approach is unsound because it has not been positively prepared, it is unjustified and lacks consistency. To conclude that WAL002 is now "suitable" when it was concluded to be the opposite in 2013 raises further concerns. In 2013 there was express concern from environmental and highway safety perspectives. It is irrational to conclude that the previous highways and environmental harm is solved by dint of reducing</p>

the number of theoretical units, slightly. Such would not make any measurable difference to either of those highly material considerations that weighed against it in 2013.

When one compares the above with the Ellens Road sites (see attached map), where there is a notable lack of environmental or highway safety harm, the motive of the council and its reasoning must be political (at best), not based on sound planning assessment required by NPPF.

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The Site also performs a key **environmental** function separating Deal (of which Walmer is part) from Kingsdown, which if eroded, on the council's current approach, would signal the council is encouraging intrusion into this beautiful landscape. NPPF until 2019 from its inception, and PPG

	<p>prior to that, gave significant weight to protection of the countryside for its own sake (see for example paragraph 170b NPPF 2019). The Ministerial error of its omission is being addressed now, with the Ministry consulting upon, and set to introduce, a far higher policy test than existed up to 2019, thanks to the January 2020 Building Better, Building Beautiful Commission “<i>Living with Beauty</i>” report. This tells us to “<i>ask for beauty</i>” and “<i>refuse ugliness</i>”. Our clients ask that now. It not merely chimes with the findings of the Walmer Design Statement of 2006, nor is Beauty being merely reinstated from the previous NPPF position - it will be fundamental to sustainable development as defined before the Plan is adopted.</p> <p>The KWT comment underestimated the ornithological foraging value of the Site in contrast to the low value of the farmland to the south. The previously submitted reports were ignored in the R22OR. In this narrow valley the tree covered hillside of The Freedown provides protective cover for foraging birds on the Site that are absent from the more open farmland to the South of the Site. This confirms it is irreplaceable ecological value in planning terms, functionally linked to the adjoining SPA, copper-bottoming its importance in NPPF terms. The unexplained serious flooding of the adjacent homes north of the Site is believed to be sourced to it being the edge of a dry riverbed from Guston to Walmer Castle water meadow.</p> <p>Accordingly, the Site must not be allocated, but protected from development, the discounted Ellens Road sites reallocated. DEA010 had been previously deemed suitable with no logical difference. It has the same highway demarcation, similar distance to St Richards Road, all that area lying between them partly built up already and be consistent with what is now site SAP14 on the R22OR map and in the text. It and Ellens Road would bring a comparable, indeed larger supply of homes compared to the WAL002/Site, without any material harm - no heritage harm, no ecological harm, limited landscape harm (see past analysis, extract attached). Moreover, it can be phased, resulting in a logical urban extension rather than the current piecemeal position shown on the consultation map and avoid the ‘floodgate’ risk presented by releasing the Site.</p> <p>Accordingly, in terms of the remaining Framework dimension, the economic case firmly tips against the Site as less harmful and much better alternatives exists. It would be “Unsound” to leave the Site shown as an allocation – it is as clear as that in ‘place’ and ‘plan’ making terms, Ellens Road should be substituted.</p>
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<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
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<p>Include files</p>	<p>AU00331 extract.pdf Ellens Road sites.docx</p>
<p>Local Plan Consultation Point</p>	<p>Deal</p>

Rep ID	SDLP1379
Rep Status	Processed
Consultee ID	1274023
Consultee Full Name	Nicholas Kingsley-Smith
Consultee Company / Organisation	
Agent Full Name	Kingsley Smith Solitors LLP Kingsley Smith Solitors LLP
Agent Company / Organisation	
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4 - Do you consider the Local Plan is Legally Compliant?*	No
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<p>Include files</p>	<p>AU00331 extract.pdf Ellens Road sites.docx</p>
<p>Local Plan Consultation Point</p>	<p>Deal</p>
<p>Rep ID</p>	<p>SDLP1383</p>
<p>Rep Status</p>	<p>Processed</p>

Consultee ID	1274023
Consultee Full Name	Nicholas Kingsley-Smith
Consultee Company / Organisation	
Agent Full Name	Kingsley Smith Solitors LLP Kingsley Smith Solitors LLP
Agent Company / Organisation	
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<p>Include files</p>	<p>AU00331 extract.pdf Ellens Road sites.docx</p>
<p>Local Plan Consultation Point</p>	<p>Deal</p>
<p>Rep ID</p>	<p>SDLP1381</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1274023</p>
<p>Consultee Full Name</p>	<p>Nicholas Kingsley-Smith</p>

Consultee Company / Organisation	
Agent Full Name	Kingsley Smith Solitors LLP Kingsley Smith Solitors LLP
Agent Company / Organisation	
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From any public standpoint, it is a crucial part of a "green wedge". The Freedown on the opposite side of Liverpool Road is well used open space, designated on the town map, plus it is a non-designated heritage asset. The council recognises The Freedown's importance to public amenity. Its setting is crucial to its significance.

The Freedown forms the East side of this narrow Down valley, the Site forming the West side.

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<p>Consultee ID</p>	<p>1331875</p>
<p>Consultee Full Name</p>	<p>Alice Beeken</p>
<p>Consultee Company / Organisation</p>	<p>Kent Planning Consultancy</p>
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The site subject to this submission is located on the corner of The Street and Broad Street, Finglesham.

The site is located at the southern village entrance to Finglesham, on The Street, although it is considered to be outside of the village envelop in its current form.

Broad Lane, heading east-west, is accessed by the Sandwich Road to the north, and heads west towards the settlement of Betteshanger.

The site forms, therefore, a potential entrance point for both settlements, most substantially Finglesham.

The site was once the site of a local Beer House, likely used by miners and villagers. The Beer House was destroyed by fire in 1982, and the site has remained in a vacant state ever since.

The site currently contains a large area of handstanding, overgrowth, and a handful of trees.

4.0 DEVELOPMENT POTENTIAL

Kent Planning Consultancy have made this submission with a view to promoting the site for residential development.

The site has an area of approximately 0.4ha, and Kent Planning Consultancy are of the view that the site could accommodate in the region of **8-10 dwellings (~20dph)**, open space, and landscape buffers.

Alongside this submission a plan has been developed to identify key aspects of any future allocation including a guide on the provision of open space, building densities, parcels and heights.

Any future proposal would seek to provide well spaced dwellings at an appropriate density to reflect their relatively rural location, and enable a greater sense of place and arrival at the junction.

Prior to, or alongside, any future application there could be a Landscape Visual Impact Assessment produced to identify the suitability of key views into and out of the site, and detail levels of additional planting required to soften any perceived visual impact where necessary.

5.0 PLANNING REVIEW

Key Planning Constraints

The site is located partially within Flood Zones 2 and 3 within its north-western edge, whilst the remainder of the site is situated outside of these designations.

The site is however raised above the surrounding land and road level, and as such, it is considered unlikely to flood. Further evidence could be provided in the future.

Otherwise, the site is outside of the existing defined settlements boundaries of Finglesham and Betteshanger.

Site History

The site is currently an area of mixed shrub and scrub planting, with the remnants of an existing building, bar a few foundations and the driveway, largely removed or reclaimed.

Reviewing the information available, it would appear that the building on the site was a Beer

House, known as the White House:

<http://www.dover-kent.com/2015-project/White-Horse-Broad-Lane-Finglesham.html> which closed in 1982, following a disastrous fire. Imagery from Google Earth provides evidence of the sites historic built form. Aerial Images

are provided below:

Image unavailable please see attachment.

1940 Google Earth (KCC)

Image unavailable please see attachment.

1960 Google Earth (KCC)

Image unavailable please see attachment.

The below map from between 1929 and 1952 identifies the building:

Image unavailable please see attachment.

1929-1955 (KCC Heritage)

Aerial imagery also identifies that the building had been removed towards the end of the Century, and by 1990 the site was entirely cleared:

Image unavailable please see attachment.

1990 Google Earth (KCC)

Since then, the site has been through a series of overgrowth and clearance, although no development has taken place since.

The site now contains a number of trees, although they appear to be of little value. Otherwise, hardstanding remains.

The below Google Street View imagery shows the site remains a picture of abandonment:

Image unavailable please see attachment.

Google Street View 2016

Principle of Development

The site is currently located outside of a defined settlement boundary, and thus would likely be considered countryside.

The new Draft Local Plan Reg 19 identifies Finglesham as:
Small settlements with few facilities where windfall infill development would be acceptable in principle.

The Local Plan also accepts that Finglesham has few local services.

Part 3 of the Draft policy SP4 reads:

1 *New dwellings (both isolated and non-isolated) elsewhere in the countryside outside of settlement boundaries will only be permitted in exceptional circumstances under one or more of the criteria i) to v), and subject to meeting criteria a) to k) above (Not included by KPC):*

1 *i) there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside;*

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1 ii) the development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets;
iii) the development would re-use redundant or disused buildings and enhance its immediate setting;

1 iv) the development would involve the subdivision of an existing residential building;
or

1 v) the design is of exceptional quality, in that it: - is truly outstanding, reflecting the highest standards in architecture, and would help to raise standards of design more generally in rural areas; and - would significantly enhance its immediate setting, and be sensitive to the defining characteristics of the local area.

This is broadly in line with the NPPF, which permits development in the countryside in these circumstances.

It is our view that the site represents a brownfield site which still acts as a source of visual detraction from the local environment, and is prominently located at the entrance to Finglesham.

Reviewing the other initial tests of draft policy SP4, the site is considered as being broadly in accordance with the policy, in the following ways:

1 a) It is of a scale that is appropriate to the size of the settlement and the range of services and community facilities that serve it, taking account of the cumulative impact of any allocated sites and committed development;

A ten unit development in this location would be proportionate to the settlement on Finglesham.

1 b) It is compatible with the layout, density, fabric and appearance of the existing settlement and individually or cumulatively, would not result in the coalescence or merging of two (or more) separate settlements, or the significant erosion of a gap between settlements, so as to result in the loss of individual settlement identity or character;

The site would not. The site could act as a feature entrance to Finglesham, whilst retaining a substantial gap between Finglesham and Betteshanger.

1 c) In the case of settlements in, adjoining or surrounded by, the Kent Downs AONB or Heritage Coasts, that the proposal complies in the first instance with the primary requirement of conserving and enhancing landscape and scenic beauty, and, where this is demonstrated, that the scale and extent of development is limited, sensitively located and designed to avoid or minimise adverse impacts on these designated landscapes;

The site is not considered to be within a sensitive landscape.

1 d) It would conserve and enhance landscape character and biodiversity and not result in an unacceptable intrusion into the open countryside or the loss of, important green spaces within the confines that contribute positively to the existing character of that

settlement;

Any development on the site would not be of a detriment to the overall character of the area, which is to act as the entrance to Finglesham village. The site does not contribute significantly to a broader sense of openness within the area. Any new development on the site could act to enhance sense of place.

- 1 e) It would preserve or enhance any heritage assets within its setting; No heritage assets would be impacted.
- 2 f) It would not result in the significant loss of best and most versatile agricultural land

currently used for agriculture;

It would not.

- 1 g) Where the site adjoins open countryside, an appropriately designed landscape buffer is included;

Existing trees on the southern and western boundaries could screen the site from the more open landscape; these could be substantially reinforced.

- 1 h) It would not have an adverse impact on the living conditions of existing adjoining residents;

Suitable design could avoid this.

- 1 i) Where development would result in the loss of active employment, open space, sport or community facilities within the settlement that such development is consistent with the requirements of policies EN2, PM5 and PM6 of this Plan;

The proposal would not.

- 1 j) Traffic movements generated from the development do not result in severe impacts to the highway network that cannot be mitigated. This should be considered through transport assessments carried out in accordance with Policy T12 which must take account of the cumulative impact of sites allocated for development. Proposals must not prejudice the ability of sites allocated for development to come forward due to limited highway capacity; and

The addition of ten units in this area would not have an impact on any known highway traffic spots. However, of substantial benefit is the sites location next to the Bus Route 81 and 81X stop at the junction of Broad Lane and The Street (Ref. 68MX+7P Deal).

- 1 k) It would be in accordance with all other relevant policies in the Plan

It is considered there the proposal would be in accordance with other aspects of the plan, or could be designed so as to be, in matters such as landscape impact, biodiversity, highways, parking, etc.

Given that the site is considered to meet the tests of the proposed local policy, Kent Planning Consultancy advance that the site could assist the Council in meeting local housing need in a sustainable manner, through a minor expansion of an existing settlement.

6.0 POLICY REVIEW

SP4 - Residential Windfall Development

Kent Planning Consultancy broadly support the provision of policy SP4 'Residential Windfall

Development' with regards to windfall development, but consider that the policy should also include a broader provision for brownfield, or previously developed land where this may not fall inside existing settlement boundaries.

Dover District, particularly around Deal and its hinterlands, have a number of small, brownfield sites, often associated with historic mining activity, that should not be excluded from the opportunity to re-development on the basis of their location within the countryside.

There will, on occasion, be sites suitable for redevelopment that may not always have substantial remnants of development, such as the one subject to this submission, but where their redevelopment would represent a benefit to the wider sense of place, and, where they are of little other value to the countryside (in that they are not agricultural land), and offer little to a sense of place, or even a detraction.

Given such examples, we recommend that policy be amended to be sufficiently flexible to allow for the delivery of historically developed sites outside of development boundaries, where this would not otherwise conflict with the aims of the preservation of the countryside. We believe our site represents a perfect example of this.

To aid, we consider that the most appropriate amendment should be to SP4 3iii) to read:

*iii) the development would re-use redundant, disused buildings, **previously developed land, or land subject to historic development** and enhance its immediate setting;*

7.0 CONCLUSION

This submission has been prepared and made by Kent Planning Consultancy with a view to highlighting and promoting the development potential for a residential development at **'Land at The Street/Broad Street, Finglesham, Kent, CT14 0LZ'**

The site is considered to be in a sustainable location, offers the opportunity to re-utilise an existing area of brownfield land, and crucially, offers the potential benefit of enhancing and strengthening the village entrance to Finglesham.

The site is broadly in accordance with the requirements of emerging policy SP4, identifying clear that the site follows the broad plans and parameters for growth the Council has identified.

With an estimated capacity, with good quality design, to provide **8-10 units**, Kent Planning Consultancy recommend that the site provides a good opportunity for the Council to re-enforce its proposed housing supply with a small, sustainable site allocation.

Kent Planning Consultancy thus request that the Council consider this late submission for the Local Plan as a potential opportunity to provide a small, sustainable, site within the Local Plan.

Further, KPC believe that, in light of sites such as that subject to this submission, policy SP4 should be amended to include a greater flexibility, particularly with regards to land subject to a historic use, and previously developed land, where this is outside of the defined settlement boundaries but would not undermine the general aims of protecting the

	countryside.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	Beeken Kent Planning Consultancy (Broad Lane) 0831 Att1.pdf
Local Plan Consultation Point	Deal
Rep ID	SDLP1162
Rep Status	Processed
Consultee ID	1331449
Consultee Full Name	Mr Lance Austin
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP15 SITE WAL002
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>See attached detailed Objection</p> <p>Note: DDC Extract from rep below</p> <p>The Eastern side of Ellens Road offers far greater opportunity for development to conform to NPPF requirements of suitability; more especially access to the wider road network.</p> <p>Site DEA010 was excluded from consideration as being “unsuitable” namely because:</p> <p><u>*Detrimental impact on the landscape</u></p> <p>Whereas:- WAL002 landscape exceeds this. It has a wooded boundary and open countryside.</p> <p><u>*Limited accessibility</u></p> <p>Whereas:-DEA010 has access to two roads, compared to WAL002 DDC’s 2013 description, which has only a “narrow country lane”.</p> <p><u>*Highways concern over cumulative impact of development in this location</u></p> <p>Ref:- WAL002 2013 see Appendix B, DDC conclusion “..without the relevant transports assessments and plans it would not be possible to allocate this land.” This statement of fact far outweighs DEA010 “concern “</p> <p><u>*Heritage concerns</u></p> <p>Likewise, the WAL002 site borders Henry V111 Castle land and the Freedown, significantly outweighing the undefined “concern” for that of DEA010.</p> <p>Insufficient comparison has been given in allocating WAL002 and not DEAL010</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>See Conclusions on page 4 of attached detailed Objection</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>SDLP1162 Austin - Att1 Redacted.pdf</p>
<p>Local Plan Consultation Point</p>	<p>Deal</p>
<p>Rep ID</p>	<p>SDLP1215</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1332924</p>
<p>Consultee Full Name</p>	<p>Amy Aldridge</p>

Consultee Company / Organisation	Gladman Developments Ltd
Agent Full Name	Amy Aldridge
Agent Company / Organisation	Gladman Developments Ltd
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Deal
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>1.1.4 Gladman Developments have land interests in Dover and support the inclusion of SAP 14 - Land off Cross Road (DEA008) and Policy SAP46 - Land adjacent Langdon Court Bungalow, The Street, East Langdon (LAN003) as allocations for residential development. This representation provides additional information regarding the suitability and deliverability of these sites to support their continued inclusion.</p> <p>1.1.5 However, Land at Cross Road (DEA020) has been removed from the plan, with the only explanation offered being that the site already has permission (Dover DC Application reference: 20/01125). Gladman disagree with this approach and consider that the site should be recognised in the Local Plan as either an allocation or committed development. The site is not currently included on the Policies Map as either committed or future development, nor through the redrawing of the settlement boundary.</p> <p>Land off Cross Road, Deal (DEA020)</p> <p>4.3.12 Land off Cross Road, Deal (DEA020) has been removed from the draft Local Plan as it already has outline planning permission. The site was granted outline planning permission on the 17th February 2021 under application number 20/01125 for the erection of up to 100 dwellings (with landscaping, appearance, layout, and scale to be reserved).</p> <p>4.3.13 While Gladman welcome the acknowledgement of the site's planning status, we consider that the site should still be included as an allocation or referenced clearly as a committed development site. The Policies Map as drafted does not identify that any development in this area is permitted, committed, or allocated and this is misleading. The settlement boundary has also not been amended to reflect this planning permission.</p> <p>4.3.14 Gladman contend that the site should be included as an allocation to safeguard the site's ability to deliver sustainable development. At minimum, the committed development sites should be clearly listed within the Local Plan and illustrated on the Policies Map so that the spatial strategy and locations for development are robust, clear and provide an accurate portrayal of expected land use.</p> <p>(DDC Note - Text Extracted from Document sent from Gladman Developments Ltd. Full attachment can be found under the introduction comment reference SDLP1192)</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will	

make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Deal
Rep ID	SDLP1227
Rep Status	Processed
Consultee ID	1332924
Consultee Full Name	Amy Aldridge
Consultee Company / Organisation	Gladman Developments Ltd
Agent Full Name	Amy Aldridge
Agent Company / Organisation	Gladman Developments Ltd
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Deal
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	5.2 Land East of Cross Road, Deal (DEA020) Land east of Cross Road was granted permission on the 17th of February 2021 under application number 20/01125: Outline application for the erection of up to 100 dwellings (with landscaping, appearance, layout, and scale to be reserved). Gladman recommend that this site remain to be included as an allocation in the Dover District Local Plan

	(DDC Note - Text Extracted from Document sent from Gladman Developments Ltd. Full attachment can be found under the introduction comment reference SDLP1192)
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
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9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Deal
Rep ID	SDLP1334
Rep Status	Processed
Consultee ID	1333104
Consultee Full Name	The SEAHIVE
Consultee Company / Organisation	The SEAHIVE
Agent Full Name	Alexander Hamlet
Agent Company / Organisation	Iceni Projects
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Deal Omission Site - Betteshanger.
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes

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(DDC Note: Comment Duplicated from Comment on E4 as site has been Omitted for Allocation in the plan)

REPRESENTATIONS TO THE DOVER DISTRICT LOCAL PLAN REGULATION 19

CONSULTATION IN RESPECT OF BETTESHANGER COUNTRY PARK: THE SEAHIVE, DEAL

This representation to the Dover District Local Plan (Regulation 19 Consultation) is made on behalf of our client, The SEAHIVE, who have submitted a planning application for The SEAHIVE, Holiday Pods and Hub at Betteshanger Country Park, Deal, (hereafter referred to as 'the site') validated 28th September 2022 and at the time of this submitted representation, awaiting decision from the Council (LPA Application Ref: 22/01158). A location plan is provided at Appendices 1 of this representation accordingly.

The SEAHIVE are delighted that the Draft Local Plan supports the tourism and visitor economy with proposed Policy E4 – Tourist Accommodation and Attractions. Support for visitor attractions across the District should be strongly supported, particularly of the high quality and unique nature of the SEAHIVE proposal, which would boost visitors to both the local and wider area and help to boost the number of overnight stays in the District, which is very low in relation to the numbers of people passing through the District. SEAHIVE considers that the Local Plan should be even more proactive than the position outlined in the draft Plan, through a corresponding development allocation for a visitor attraction on the Betteshanger Country Park.

The submitted planning application for this proposal (LPA Ref: 22/01158) sets out how the proposal is in total compliance and sync with the tourism objectives of the 'Destination White Cliffs Country – A Growth Strategy for Tourism and the Visitor Economy 2020 to 2030' as well as the Dover District Economic Growth Strategy. There is a clear demonstrated need for a unique tourism offering in Dover that can improve and diversify existing attractions in the District, support longer stays, dwell time and spending. Betteshanger Country Park is designated as Open Space and has already established itself as a destination offering visitor amenities and attractions in the form of a café/restaurant, Mining Museum, meeting space, cycle and pedestrian paths as well as holding large entertainment events throughout the year. The SEAHIVE would enable the site's community value, as well as tourism value, to be realised.

a. The SEAHIVE, Holiday Pods and Hub ('The site')

The SEAHIVE submitted a planning application for The SEAHIVE, Holiday Pods and Hub at Betteshanger Country Park, Deal ('the site') under the local planning authority reference 22/01158, which is currently awaiting decision from the Council. The application was submitted in 'full' and seeks permission for:

'Erection of a surfing lagoon and pools, hub building (to include café/restaurant/bar lounge, shop, hiring and changing facilities and multi-use space), 15 overnight holiday pods, learning hive, yoga studio, fitness/health and wellbeing facilities, bike/pumptrack and associated roads, paths, car and cycle parking, together with landscaping and necessary access works and associated site infrastructure'.

The site is located to the west of Deal at Betteshanger Country Park on the site of a former spoil tip of the former Betteshanger Colliery. The site is in a well located and sustainable location, with Deal situated approximately c 3 km south of the site where Deal station provides connections into London via Ashford International or Folkestone Central. Bus services into the town centre operate twice an hour, taking 10-15 minutes.

There are footpaths and cycle paths directly from the site leading onto Sandwich Road.

The planning application was informed by a series of technical reports and assessments covering matters including air quality and noise, arboriculture, archaeology, ecology, economic benefits, flood risk and drainage, geotechnical, heritage, land contamination, landscape and visual impact, and transport.

The proposals for the design of the buildings and lagoon will be unique and set a precedent for the highest quality rural architecture for a sports and recreational facility and have been informed by contextual analysis and environmental considerations. The proposals have set out to meet the aspirations of paragraph 126 of the NPPF in achieving the creation of high quality, beautiful and sustainable development, that will be acceptable to the community and a place they will enjoy.

The Economic Benefits Statement submitted as part of the application highlights the declining number of holiday trips to the District as well as the falling value of holiday trips. Both the 'Destination White Cliffs Country – A Growth Strategy for Tourism and the Visitor Economy 2020 to 2030' and the Dover Economic Growth Strategy target growth, investment and development in the District's tourism industry so that visitor experiences are improved and longer stays and higher spend are encouraged. The development proposal offers the opportunity to significantly boost the number of visitors to Deal and Dover, supporting the growing surf community in Kent, as well as attracting visitors from further afield.

There is a unique selling point to this sporting-led tourist attraction that will allow it to compete and differentiate itself from other destinations and complement the tourism offer both in the District and wider County.

The benefits associated with the delivery of the proposed development identify with the three dimensions of sustainable development, comprising economic, social and environmental, as set out in paragraph 8 of the NPPF. The proposed development will create employment opportunities of around 153 direct and a further 194 indirect construction jobs, 100 direct jobs on site during the peak season and support of around 45 to 74 net additional jobs across the South East. Around £14.2 million will be generated in construction GVA across the construction period and at the development site itself, £6 million could be generated in visitor spending with an additional £2 million from those overnight visits at the holiday pods.

Socially, there is an opportunity to engage people in outdoor physical activity that has proven to have positive health and well-being benefits. Working with local businesses, schools and communities, particularly directing efforts at those social groups who are disadvantaged will be possible under this proposal. The proposed development would enhance the existing open space and recreational offering of Betteshanger Country Park with a high quality sport activity that should be of significant community benefit to existing residents, as well as economic benefit in providing a valuable attraction to the District to encourage greater numbers of visitors to visit and stay in the District.

b. Amendment to Draft Policy E4 – Tourist Accommodation and Attractions to include an allocation for tourist attractions at Betteshanger Country Park

The Dover District Local Plan Regulation 19 supports the provision of new, improved, upgraded or extended accommodation and attractions in the District. The SEAHIVE is therefore supportive of the Draft Local Plan's positive approach to supporting new tourism accommodation and attractions in the District. However, it is considered that the Plan could and should be more positively prepared and more specific in its support for the SEAHIVE development at Betteshanger Country Park.

A site-specific allocation for SEAHIVE at Betteshanger Country Park would provide public support to the principle of SEAHIVE being located within the District in a highly suitable, accessible and sustainable location for the infrastructure. Betteshanger Country Park is best placed to accommodate the proposed development of this scale and type within the District, not only because of its proximity to Deal, but also because the land lies in Flood Zone 1, which is rare within the coastal parts of the District. The setting of the site within a 200-acre Country Park offers an opportunity for the management and enhancement of habitats.

Betteshanger Country Park already attracts people from the local area who are looking to use the existing cycle paths, walk the many trails or visit the recently delivered Mining Museum. The Country Park has also built a reputation for hosting a variety of public events such as shows, markets, competitions and sporting events, amongst many others. The addition of the surfing lagoon with a pump track, yoga hub, education hub and holiday pods would accentuate the value of the Country Park as a visitor destination however, as well as a recreational resource of high community value.

Chapter 6 of the NPPF concerns building a strong, competitive economy and Para 81 outlines how planning policies should help build strong and competitive economies where businesses can invest. The allocation of the SEAHIVE at Betteshanger Country Park would create a more positive and proactive Plan that supports innovative and unique proposals such as SEAHIVE and increases the likelihood of important new tourism infrastructure being delivered through a Plan allocation.

c. Conclusion

The SEAHIVE supports in principle a positively prepared, justified, effective, consistent and sound Dover Local Plan and considers there to be much to commend with the existing draft Plan. While SEAHIVE supports the inclusion of a policy that directly targets tourism accommodation and attractions in the District, the Plan could and should be more positively prepared through the allocation of the subject site of Betteshanger Country Park for the SEAHIVE visitor attraction, to cement the Country Park as a unique visitor destination for the District and support the District's economy in the following ways:

- Deliver a unique, innovative and inspiring visitor attraction, setting the precedence for the highest quality rural architecture seen anywhere for a sports and recreational facility;*
- Generate significant economic benefits for the local and regional area, supporting the aspirations established in the 'Destination White Cliffs Country – A Growth Strategy for Tourism and the Visitor Economy 2020 to 2030' and the Dover District Economic Growth Strategy for longer stays, dwell time and spending;*
- Engage people in outdoor physical activity that has proven health and wellbeing benefits.*

The SEAHIVE would welcome the opportunity to participate in the forthcoming Examination-in-Public into the Plan and contribute to the debate to ensure a sound and high quality Local Plan for the District to be delivered.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant

and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
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9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	The SEAHIVE is a developer with land interest in the District, who has an important role in delivering the Plan strategy
Include files	Hamlet Icen projects (SEAHIVE) 1657_email_Redacted.pdf
Local Plan Consultation Point	Deal
Rep ID	SDLP1376
Rep Status	Processed
Consultee ID	1331449
Consultee Full Name	Mr Lance Austin
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Deal
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

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Background and Main Issue

The land was rejected by DDC in 2013 as “unsuitable for housing development,”

This being principally due to the lack of “...transports assessments and Plans..,” as required by NPPF (National Planning Policy Framework) 2012 regulations, prior to Allocation status being considered.

Consequently the site was not carried through to the 2014 Draft Plan

This stipulation is repeated in the NPPF July 2021 version.

Notwithstanding the same environmental issues remain as those of 2013, DDC intentions in 2022

are to forward this land into the Draft Local Plan. This rejects the NPPF policies for assessments and reports being available, prior to consideration being given to the classification of suitable development land.

The contradiction and/or an omission of a previously established doubt of suitable development status, is of significant material consideration within the NPPF criteria for defining land availability.

Reasons for Objection

Material supporting facts

*The 2012 March version of the NPPF, Item 17 Core Planning Proposals required that:- “Plans shouldset out a clear strategy for allocating sufficient land which is suitable for development...”

*The 2021 July version of the NPPF in “Identifying land for homes” –item 68 requires that:-

“Strategic policy-making authorities should have a clear understanding of the land available

and

, “...planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely viability.....”

Submission 1

1.1 The similarity and purpose of the two NPPF versions is unquestionable.

Environmental assessment reports and plans have to be available to Local Authorities before consideration of allocation for suitable development.

1

DDC SAP15 requirements for development gives clear indication that none exist at the present time.

1.2 Without these assessment reports and plans, DDC SAP 15 proposals are speculative.

1.3 There is an undeniable doubt that this site may not be suitable for development.

There is no “...clear understanding of the land being available,” nor of its “... suitability or viability.” .

1.4 In 2021 WAL002 was, with caution, classified as being “potentially suitable” for development, but none the less in 2022 “available” without evidence of assessments or plans

NPPF policies do not permit DDC to speculate for the purpose of meeting development targets.

Submission 2

Traffic impacts –matters of fact

The DDC conformed with the 2012 NPPF requirements for assessments and plans to be available before consideration being given to allocation.

DDC Allocation report 2013, page 129 Appendix A

The DDC categorised this site in the unequivocal statements whereby “The site analysis form demonstrates that in principle, the site is not suitable for residential development due to the possible traffic impacts on the wider road network”

And

“The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan”

And

DDC Allocation report 2013 page 192 conclusion Appendix B

“Without the relevant transports assessments and plans it would not be possible to allocate this land”

*SAP 15 Item (d)Road wideningshould be providedto Liverpool Road.....and where possible to Grams Road”

This uncertainty is unacceptable in terms of the NPPF requirement for “the need of a clear strategy”, “...a clear understanding, or “suitability or viability”..

DDC'S proposals are short on issues of implementation:-

a)A site visit reveals that no footpaths exist along this single track road.

For the road to be widened, to provide pedestrian and cycle interests, to the east there will be conflict with the established environmental restraints surrounding the castle, while that to the west may well involve compulsory appropriation of private property.

b)It is unacceptable to ignore, as does SAP15 (d):-

That whether traffic proceeds up the single track roads of Grams Road for 150m, or continues along Liverpool Road for 400m; road widening will either involve environmental issues to the east or those of compulsory purchase to the west.

2.1 DDC's compliance with NPPF 2012 item 17, negated development due to lack of Assessments and Plans

2.2 DDC is “Putting the cart before the horse”!

Without Assessments and Plans, DDC proposal SAP 15 does not comply with NPPF 2021 item 68.

Environmental status

Submission 3

No evidence of environmental difference, to that which existed in 2013, has been defined within the site’s location, or surrounding environs. While the environment may remain the same, the 40% increase in traffic over the last ten years, has inevitably increased the detrimental impact on the wider road network.

2

Housing density

Submission 4

Reference Appendix C, DDC Selection of the Site Allocation for the Regulation 19 Submission Local Plan, page 11.

The proposed reduction in housing numbers, so as to permit development:-

a)Is not a standalone issue-as is inferred.

b)Has no assessment reports and plans, as required in NPPF68, to displace the lack of “suitability” as DDC defined in 2013.

c)Ignores the necessity of the “...clear understanding of the site’s availability” as demanded of NPPF 68.

4.1 DDC may not dissemble NPPF 68 policies by the one issue of the site’s housing density.

Additionally the proposed area:-

d) Does not reflect the character of the surrounding area.

i)By overlaying the proposed area of development over that to the west, it will be seen that the comparable housing density of the latter is 25 units to that of the proposed 75 housing units.

ii)The character of the “surrounding area” is predominately one of open country.

4.2 The accredited impact of the proposed development is incorrect and misleading

Alternative sites

Submission 5

The Eastern side of Ellens Road offers far greater opportunity for development to conform to NPPF requirements of suitability; more especially access to the wider road network.

Site DEA010 was excluded from consideration as being “unsuitable” namely because:-

***Detrimental impact on the landscape**

Whereas:- WAL002 landscape exceeds this. It has a wooded boundary and open countryside.

***Limited accessibility**

Whereas:-DEA010 has access to two roads, compared to WAL002 DDC’s 2013 description, which has only a “narrow country lane”.

***Highways concern over cumulative impact of development in this location**

Ref:- WAL002 2013 see Appendix B, DDC conclusion “..without the relevant transports assessments and plans it would not be possible to allocate this land.”

This statement of fact far outweighs DEA010 “concern “

***Heritage concerns**

Likewise, the WAL002 site borders Henry V111 Castle land and the Freedown, significantly outweighing the undefined “concern” for that of DEA010.

Insufficient comparison has been given in allocating WAL002 and not DEAL010

Legal obligation

Submission6

Version 2021 NPPF Section 5 defines the legal obligation of Planning Authorities delivering a sufficient supply of suitable and sustainable housing.

This poses considerable pressure on those Authorities where suitable housing land targets are virtually unattainable.

Be that as it may, it does not excuse or permit DDC to breach NPPF policies in order to meet Government targets within the Draft Local Plan .

3

*Appendix A is evidence of the absence of assessments and plans in 2013.

*Appendix B details the 2013 existence of the unacceptable use of the road for further housing in the absence of such plans.

*Appendix D details the DDC meeting of 3rd January 2013 with Mr & Mrs Ellis of (DDC note - address redacted), whereby DDC “...no longer favoured..” this site’s development due to the “...narrow country lane...” and withdrew it prior to the Examination of the Local Plan in August 2013.(Mr Ellis died in 2020 and Mrs Ellis has moved away)

	<p>The exclusion/absence of the above and significant, negative information in SAP15, SA Objective 4 is indicative of a breach of DDC's legal obligation to provide purposeful consideration and comparison with other sites.</p> <p>Other matters Public objections It should be noted that in March 2021, 260 people submitted individual objections to this site being passed through to the Draft phase of the Local Plan.</p> <p>Conclusions 1)The DDC of 2022 has reneged on the commitment of 2013, which was not to consider a planning allocation of this site without the necessary Assessments and Plans. 2)The SAP15 conditions of approving the proposed development are fundamentally flawed by the 2013 DDC established restraint on development approval. 3) The 2021 NPPF item 68 requirement of "... a clear understanding of available land" is not achieved by DDC's speculation as to "possibilities". 4) DDS's SAP 15 reliance on speculation contravenes NPPF Section 5 which cites the Planning Obligations of "..... being able to deliver a sufficient supply of homes" within the period of the immerging Plan. 5)SAP 15 items d) and e) lack the realty of the financial restraints in achieving implementation and resolution of environmental issues. 6) The relevant legal obligation for factual information as to site comparisons in SA Objective 4(e-Transport assessments)has not been registered.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	Deal
<p>Rep ID</p>	SDLP1291
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1331942
<p>Consultee Full Name</p>	Matt Porter
<p>Consultee Company / Organisation</p>	Persimmon Homes South East
<p>Agent Full Name</p>	Matt Porter
<p>Agent Company / Organisation</p>	DHA Planning

<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>Policy SAP16 - Deal Small Housing Sites Policy SP3 - Housing Growth Policy SP4 - Windfall Development</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Effective</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Yes</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Yes</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>*This is the omission site rep, SDLP1290 contains comments on SP4 and SDLP886 contains comments on SP3*</p> <p>Our client supports DDC's new Local Plan in principle, however our client objects to a component of the Plan, such that the Plan should be considered 'unsound'. It is put forward that a minor modification to the growth strategy is required in order for the Plan to be found 'sound'. These objections are set out in the consultation response submitted on behalf of Persimmon Homes South East (ref DHA/30289)</p> <p>1 Introduction</p> <p>1.1 Context</p> <p>1.1.1 This representation has been prepared by DHA Planning on behalf of Persimmon Homes South East in response to the Dover District Council 'DDC' Local Plan (Regulation 19) consultation which runs until 9th December 2022.</p> <p>1.1.2 We understand that DDC is in the process of preparing a new Local Plan to set out a strategy for development for the period to 2040 and that the Council are presently seeking comments on the pre-submission Plan prior to its submission for examination in early 2023.</p> <p>1.1.3 The new Local Plan will set out the vision, strategic objectives and overarching development strategy for the growth of the District over the period to 2040. It provides the planning policy framework to guide the future development of the area, addressing needs and opportunities for housing, the economy, community facilities and infrastructure, as well as the basis for conserving and enhancing the natural and historic environments, mitigating and adapting to climate change, and achieving well designed places.</p> <p>1.1.4 The new Local Plan will be examined by an Inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is 'sound'. This submission will comment with reference to the above, highlighting where we believe any areas of concern lie or where modifications may be required.</p> <p>1.2 Purpose of this Representation</p> <p>1.2.1 Our client controls 'Land Golf Road, Deal' (hereafter referred to as 'Land at Golf Road' or 'the Site') and is promoting the residential allocation of the Site as part of the new Dover District Local Plan preparation process. The Site was submitted as an available, suitable and deliverable location for residential development with capacity for approximately 60 dwellings as part of the new Local Plan preparation, however the Site has not been taken forward within the Regulation 19 Pre- submission Plan.</p> <p>1.2.2 The purpose of this representation is to support DDC's new Local Plan in principle, however our client objects to a component of the Plan, such that the Plan should be considered 'unsound'. It is put forward that a minor modification to the growth strategy is required in order for the Plan to be found 'sound', in which the quantum of Plan-led housing delivery within Deal should be increased to accurately reflect its second tier settlement status. Our client considers that given historic strategic under delivery in the district and wider uncertainties in the planning system, the Council should sensibly demonstrate an oversupply of reliable, deliverable sites early in the Plan period to ensure sufficient flexibility in housing delivery, should extant permissions or larger allocated sites not come forward or deliver as anticipated.</p> <p>1.2.3 To be clear, Persimmon Homes South East support the premise of DDC's growth strategy, which includes further Plan-led development within Deal in line with its higher-order settlement status. However, we are concerned that DDC have planned at a significantly reduced level of growth in Deal, citing a dwindling supply of available land within and around the settlement. Consequently, the Plan fails to appropriately maximise the sustainable credentials of Deal and has resulted in a marginal supply of</p>

available, deliverable small and medium sites, insufficient to provide the flexibility in housing delivery that is required in accordance with national planning policy.

1.2.4 The Plan is predicated on the delivery of a major urban extension at Whitfield, Dover comprising a new community and a minimum of 2,200 homes within the Plan period. It is anticipated that Whitfield will deliver a significant quantum of new homes primarily towards the latter half of the forthcoming Plan period. Consequently, DDC must demonstrate a sufficient supply of reliable small and medium sizes sites capable of delivery early in the Plan period to ensure consistent housing delivery in accordance with national planning policy and Plan-making guidance.

1.2.5 This representation provides comment on the consistency of our client's proposed allocation site with the proposed strategy, draft policies and sets out our client's position in respect of the 'soundness' of the Plan. To reiterate, whilst our client is supportive of DDC's new Local Plan in principle, Persimmon Homes South East object to a component of the Plan, such that the Plan is considered 'unsound'. Our client is concerned that the growth strategy as drafted fails to fully maximise available sites within the higher order settlement of Deal and by extension, our client objects to the exclusion of Land at Golf Road within the Regulation 19 Local Plan.

1.2.6 Our client is also concerned that given the recent constraints to housing delivery associated with nutrient neutrality in East Kent, the historic under delivery previously experienced at Whitfield and the wider uncertainty within the planning system more generally, the growth strategy as drafted may not include sufficient small and medium sites to demonstrate the necessary flexibility should allocated sites not come forward or deliver as anticipated.

1.2.7 In this regard, our client remains wholly supportive of the premise of further residential development within Deal and agree that it represents a logical and sustainable location to direct growth consistent with the growth strategy of the Plan as a whole. However, it is submitted that Deal is capable of making a far greater contribution to the delivery of new homes within the forthcoming Plan period than drafted. In line with its higher-order status within the settlement hierarchy and excellent access to day-to-day services and amenities, it is put forward that Deal is wholly capable of delivery significantly greater than the 223 dwellings allocated.

1.2.8 For the reasons set out within this representation, we say that available and suitable sites do exist, including that of our client's Land at Golf Road, Deal capable of delivering logically located, highly sustainable new homes in accessible location early in the Plan period, sufficient to provide greater flexibility and assurance of steady and sustained housing delivery across the Plan period, balance the scale of delivery from strategic urban extensions and further assist in reducing the need to develop into more rural, typically less accessible and more sensitive locations within the district to otherwise deliver the growth that is required.

1.2.9 The inclusion of Golf Road, Deal would provide a medium sized site for the Council that could come forward quickly, complying with the Framework's requirement to provide a mix of sites and include specific sites for years 1-5 of the Plan period. Accordingly, we say that Land at Golf Road, Deal can further assist the Council in meeting the growing need for new homes in the district and is necessary to ensure the Council can have greater confidence in meeting its market and affordable housing targets in full as well as delivering wider public benefits to the local community within Deal.

1.2.10 Based on the current national and local planning context, we consider the Site to be a highly suitable edge-of-settlement location to allocate land for housing to help meet the need for new homes in the district. Its effective use should therefore be appropriately maximised in accordance with national policy objectives.

1.2.11 Further details regarding the Site and commentary on the consistency of the Site with the proposed strategy, draft policies and our client's position in respect of the 'soundness' of the Plan are set out in the following sections of this document.

1.3 About Persimmon Homes

1.3.1 Building over 13,500 beautifully-designed new homes a year in more than 350 prime locations nationwide, Persimmon is proud to be one of the UK's most successful housebuilders, committed to the highest standards of design, construction and service. As a reflection of their commitment to delivering excellence always and delivering great customer care, the Home Builder's Federation (HBF) have awarded Persimmon 5 stars. Persimmon have a track record of delivery, and have been building new homes for over 50 years. Local Authorities up and down the country rely on national-scale housebuilders to deliver significant quantities of new homes each year, to meet the ever growing demand for new housing. Persimmon Homes remains committed to building new houses in the Dover District area and has over the last few years been developing two sites in the district, one in Aylesham which is a joint venture with Barratt Homes and one in Deal.

1.3.2 Persimmon's approach is to work positively and proactively with local planning authorities (LPAs), both during the preparation of local plans and at planning application stage. Persimmon Homes South East are fully committed to engaging with Dover District Council in the preparation of its Local Plan, and firmly subscribe to the national policy approach set out in paragraphs 15 and 16 c) of the NPPF that "the planning system should be genuinely plan-led" and should be shaped by early, proportionate and effective engagement between LPAs and

others, including businesses and developers. Accordingly, Persimmon Homes South East would welcome the opportunity to discuss the matters contained in this representation, including the availability, suitability, deliverability and capacity of Land at Golf Road, Deal directly with Dover District Council members and officers, ahead of the submission of the Local Plan for examination.

1.4 Representation Structure

1.4.1 The representation structure is outlined below for ease of reference:

Chapter 2 (Housing Need) - Consideration of market and affordable housing need and assessment of proposed housing allocations and supply sources.

Chapter 3 (Assessment of Suitability) - Re-introduces our client's Site and provides a summary of planning constraints and opportunities, including the quantum of development that could be accommodated, why the Site is suitable for development and why the principle of the draft allocation for residential development is both justified and consistent with the Council's strategy for growth in the district. It also sets out why we consider there is scope for a higher number of dwellings at the site. This consideration amounts to an objection to one element of the strategy – namely that those sites around the most sustainable settlements should be maximised.

Chapter 4 (Conclusion) - Summarises the key points raised throughout the representation and re-affirms our client's support for the Site's allocation and proposed strategy ahead of the submission of the Plan for examination.

2 Housing Need

2.1 Context

2.1.1 Paragraph 11 of the NPPF is explicit in its requirement for strategic policy-making authorities to promote a sustainable pattern of development that seeks to meet the need in full.

2.1.2 Paragraph 20 of the Framework is equally clear that strategic policies should set out an overall strategy for the pattern, scale and design quality of places. Policies should make sufficient provision for the development that is required as well as associated infrastructure, community facilities and should set out a strategy for the conservation and enhancement of the natural, built and historic environment.

2.1.3 Given this national planning context, the emerging Local Plan should provide a comprehensive and cohesive approach to future development in Dover district, capable of making sufficient provision for the identified needs, whilst balancing the conservation and enhancement of the natural, built and historic environment.

2.1.4 National guidance states that strategic policy-making authorities will need to calculate their local housing need figure at the start of the plan-making process. This number should be kept under review and revised where appropriate.

2.1.5 In calculating the local housing need, paragraph 61 of the NPPF states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance - unless exceptional circumstances justify an alternative approach.

2.1.6 Paragraph 68 is clear in its requirement that strategic policy-making authorities should have a clear understanding of the land available in their area and should ensure that planning policies identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

a) specific, deliverable sites for years one to five of the plan period

b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.

2.1.7 In this vein, paragraph 69 of the Framework goes on to stress that small and medium sized sites (such as that of our client's land at Golf Road) can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly.

2.1.8 Further, in addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

2.2 DDC's Housing Need

2.2.1 The Standard Method for assessing housing need, issued alongside the Ministerial Statement on 16 December 2020, sets an indicative housing need figure for Dover

District of 596 dwellings per annum. However, the affordability ratio which factors into the local housing need assessment is updated annually. For Dover District the latest housing need calculation is 611 dwellings per annum (dpa), equating to a total minimum housing need of 10,998 dwellings for the Plan period to 2040. We understand that the Regulation 19 Local Plan seeks to meet this need in full and in addition to the minimum figures, DDC have a set a contingency buffer of 926 dwellings for the Plan period, equating to 8.4% of the total Plan period figure.

2.2.2 For context, the current adopted CS requirement is 700 dwellings per annum. This followed the adoption of a high-growth strategy in 2010 of 14,000 homes to 2026 based around the recommendations of the Dover Regeneration Strategy and above the minimum 10,100 requirement across the same period, as set out in the emerging (at the time) Regional Spatial Strategy.

2.2.3 For the avoidance of doubt, accounting for the Committed Supply Total of 5,282 dwellings, the new Local Plan will be required to allocate sufficient land to accommodate a minimum of 6,642 new homes over the remaining plan period to 2040. It is understood that this will be derived from the following sources:

- Whitfield Urban Expansion Allocation: 2,200 dwellings
- Local Plan Allocations (excluding Whitfield): 3,392 dwellings
- Windfall Allowance (70 a year from year 4): 1,050 dwellings

2.2.4 On this basis, it is evident that a substantial quantum of Plan-led housing delivery will be required in order to meet the new Local Plan's housing target. Due to the nature and dwindling supply of available urban land in Dover town and the remaining higher order settlements of Deal and Sandwich, the restrictive effect of the coast, the Kent Downs AONB, environmental constraints and the limited capacity of the district's remaining mid- and lower order settlements to accommodate significant levels of growth, meeting Dover's housing needs inevitably will require the release of significant greenfield land.

2.2.5 In our view, sustainable and accessible sites logically located adjacent to existing urban areas, including Deal, represent the most sustainable and reliable sources of growth for the Plan period, consistent with the overarching strategic objectives of draft policy SP3 within the emerging Plan.

2.2.6 Such sites are best placed to deliver the significant number of new homes that are required and are most capable of making meaningful contributions to the associated public infrastructure, affordable housing and mix of new homes that is urgently needed in the District as well as further balancing the role of strategic- scale development at Whitfield within the emerging Plan's proposed growth pattern in the event that Whitfield or indeed any of the major allocations upon which DDC seek to rely to not come forward or do not deliver as anticipated.

2.2.7 On this basis, we set out below why our client's site Land at Golf Road, Deal is suitable to be included within the submission Dover Local Plan and is necessary for inclusion in order for DDC to demonstrate sufficient supply and flexibility within the early phase of the housing trajectory as required by national planning policy, such that the Plan may be considered 'sound'.

3 Site Specific Assessment

3.1 Overview

3.1.1 The previous chapters of this representation outline our client's position relating to the soundness of the Plan in which our client is confirmed to be supportive in principle of the Local Plan as a strategy for the growth of the district to 2040, however our client objects to a component of the Plan, such that the Plan should be considered 'unsound'. It is put forward that a minor modification to the growth strategy is required in order for the Plan to be found 'sound', in which the quantum of Plan-led housing delivery within Deal should be increased to accurately reflect its second tier settlement status.

3.1.2 Paragraph 4.146 of the Local Plan states that the urban area of Deal encompasses the built-up areas of the parishes of Walmer and Sholden. Deal is identified in the Settlement Hierarchy and Confines Topic Paper (2022) as a 'District Centre', where there is a secondary focus for development.

3.1.3 It is clear that Deal must continue to form a principal location for focusing sustainable housing delivery in Dover district and will assist in ensuring an appropriate balance of sites are identified, capable of supporting the strategic role of Whitfield within the forthcoming Plan Period and minimising the need for housing growth in typically less accessible and more sensitive rural settlement with limited development capacity.

3.1.4 As introduced in the preceding sections, our client controls 'Land Golf Road, Deal' and is promoting the residential allocation of the Site as part of the new Dover District Local Plan preparation process. The Site was submitted for residential development with capacity for approximately 60 units as part of the new Local Plan preparation, however the Site has not been taken forward within the Regulation 19 Pre-submission Plan.

3.1.5 Land at Golf Road represents an excellent opportunity for the delivery of approximately 60 high-quality new homes in a logical, highly accessible location in north Deal with capability to deliver a policy compliant quantum of much- needed affordable housing, a mix of house types, sizes and tenures and ability to make a significant contribution to wider public infrastructure through developer contributions. The land itself is of no particular ecological value and is in private ownership, offering limited public benefit. The Site is capable of delivering strong biodiversity net gain, attractive internal and boundary landscaping, open space, play facilities and a development pattern which facilitates pedestrian permeability and encourages active travel in north Deal.

3.1.6 Given the dwindling supply of available sites within the District and the growing housing need, it is imperative that the sustainable credentials of these higher- order settlement sites are appropriately maximised to deliver the housing that is required in accordance with the underlying

objectives of draft policy SP3, and wider policies seeking to otherwise conserve and enhance the district's natural and historic environment and national planning policy objectives. We are concerned that this has not been fully undertaken and our client objects solely on the basis that the growth strategy component of the Plan as drafted is 'unsound'.

3.1.7 Consequently, our clients object to policy SP3 as drafted. On the basis that there is a clear need to maximise the delivery of housing sites within Deal, our clients consider the Plan 'unsound'. Our site, Land at Golf Road, Deal, has been excluded from the Plan primarily on flood risk grounds, without further consideration or detailed evidence; without acknowledging the presence of high-quality 1 in 200 year flood defences and without any regard to the prevalence of recent residential developments permitted nearby (having passed the Sequential and Exception test with Environment Agency support on flood risk). Additionally, we submit that the Site is capable of providing a residential development which would be safe for its lifetime, owing to the high-quality flood defences and on site mitigation measures.

3.1.8 The consequent omission of potentially circa 60 units, in our view fails to make effective use of Dover's second tier settlement and will otherwise require further new homes to be delivered elsewhere in the district, in potentially less accessible and more sensitive locations.

3.1.9 Without prejudice to our client's support to the premise of the growth strategy, which primarily directs growth at higher order settlements, we would urge the Council to re-visit its growth strategy and proposed allocations to allow a greater quantum of development within Deal, by including suitable sites such as Land at Golf Road to fully reflect its excellent sustainability credentials and provide a pragmatic oversupply of reliable, deliverable small and medium sites capable of delivery early in the Plan period.

3.1.10 We submit that Deal is wholly capable of delivering significantly greater than the 223 dwellings allocated. We say that available and suitable sites do exist, including that of our client's Land at Golf Road, Deal which is being promoted by a national housebuilder fully committed to the Site and with an excellent track record of delivery.

3.1.11 It is put forward that Deal is capable of delivering further logically located, highly sustainable new homes in accessible locations early in the Plan period. An additional supply would; provide greater assurance of steady and sustained housing delivery across the Plan period, balance the scale of delivery from strategic urban extensions and, further assist in reducing the need to develop into more rural, less accessible and sensitive locations within the district to otherwise deliver the growth that is required.

3.1.12 We agree that Deal represents a logical and sustainable location to direct the growth required within the district and consider that the land promoted at Golf Road, Deal should be included as a future housing allocation within the Dover District emerging Local Plan. The Site is considered to be wholly consistent with the objectives of the Plan and would form part of a sound growth strategy for the district to 2040 whilst delivering policy compliant affordable homes, a mix of house types and tenures and wider ecological, landscape and public benefits.

3.1.13 Our client is firmly of the view that the allocation of additional housing sites is necessary to ensure that balanced growth strategy put forward within the Pre- submission Dover District Local Plan is 'sound', comprising an appropriate balance of small, medium and strategic-scale sites deliverable across the Plan period. The allocation of well-located, reliable, greenfield sites such as our client's at Land at Golf Road is necessary for DDC to meet the growing housing need. The Site is being promoted by Persimmon, a firmly committed national housebuilder with an excellent track record for delivery, and the inclusion of the Site would ensure that DDC can have confidence in consistently meeting its market and affordable housing targets in full throughout the life of the new Dover District Plan in the event that identified sources of housing do not come forward or fail to deliver as anticipated.

3.2 Site and Surroundings

3.2.1 The Site is situated to the west of Golf Road, north of West Lea and west of the Fairway on the north-western edge of Deal.

Figure 3.1: Approximate Site Location (courtesy of Google Earth)

3.2.2 The Site comprises an undeveloped regular parcel of land in agricultural use totalling approximately 1.9 hectares. The site is bound by residential development on three sides which detached the site from the wider open countryside to the west. The Site is consequently characterised by its edge-of-settlement location with typical suburban residential development the predominant development pattern in the area.

3.2.3 In terms of overarching planning constraints, the site is not subject to any overarching landscape or ecological designations and is not itself subject to any heritage constraints. The site is located within defended Flood Zone 3, albeit this covers the majority of this part of north Deal which is subject to coastal flood defences.

3.2.4 In terms of accessibility, the Site enjoys excellent access to a number of day-to-day facilities and services which are within a reasonable walk distance, including primary and secondary schools, local shops, healthcare, employment, and public transport links within Deal and Walmer including Deal mainline station and frequent buses along Dover Road between Dover, Deal, Sandwich and Canterbury.

Consideration of Flood Risk

3.2.5 The site is located entirely within Flood Zone 3a as defined by the Environment Agency Flood Risk mapping.

3.2.6 Owing to its strategic nature, Deal is subject to significant coastal defences. These defences provide protection from coastal erosion as much as they do flooding, and are actively maintained, as part of a 'hold the line' policy in this Shoreline Management Plan area (SMP).

3.2.7 As part of the Deal Coastal Flood Defence Scheme (completed in 2013), a recurved concrete sea wall was constructed from Sandown Castle to Deal Castle. Beach renourishment provides an additional level of protection to this frontage.

3.2.8 The NPPF requires the actual risk of flooding to a development to be appraised. The actual risk considers the likelihood of flooding under extreme conditions (e.g. the design flood event), whilst considering the influence of any defence infrastructure, or drainage systems, which may provide a level of protection to the site. Given the presence of high-quality defences at Deal, it is evident that the actual risk of flooding under the design event is reduced, leaving only the residual risk, which falls outside of the scope of the NPPF and relates to extreme circumstances in the event the defences, or drainage system were to fail (i.e. due to a breach or a blockage), or if an event greater than the design flood event was to occur and overtop the defences.

3.2.9 The Strategic Flood Risk Assessment (2019) prepared by Herringtons Consulting is included within the DDC Local Plan Evidence Base and has identified that the coastal towns of Deal and Dover are protected from sea flooding under an extreme storm event with a 1 in 200 year return period (0.5% AEP) and the construction of the defence infrastructure has significantly reduced the actual risk of flooding at these coastal locations. The risk of coastal flooding to these two towns is therefore limited to a residual risk event only, which would require a catastrophic failure of the new defence infrastructure (e.g. a failure in the seawall).

3.2.10 On account of the above, we do not consider it appropriate for the Plan-led growth of north Deal to be automatically excluded on account of flood risk. DDC acknowledge that following high-levels of windfall development within the previous (adopted) Plan period, there are limited available and suitable sites for development within Deal and consequently have sought to reduce the level of Plan-led growth within the forthcoming Plan period, with a greater reliance on strategic development at Whitfield and alternative third tier settlements in response. Our client's disagree with this approach and object to the proposed growth strategy as an unsound basis on which to reliably deliver the growth that is required in the district.

3.2.11 Our client's site, Land at Golf Road, Deal is evidence that suitable small and medium sites are available in Deal and are being promoted for delivery early in the Plan period. It is accepted that sites such as that of our client's will be subject to Flood Risk Assessment and be required to pass both the Sequential and Exception tests.

3.2.12 Taking each test in turn, the Sequential Test is a risk-based test which aims to steer development to areas at the lowest risk of flooding. DDC already acknowledge that there is a dwindling supply of available sites in Deal. Moreover, we emphasise that two small sites within Deal have been allocated for residential development under policy SAP16 'Deal Small Housing Sites' (Ethelbert Road

Garages (5 units) and 104 Northwall Road, Deal (8 units). Both sites as shown in figure 3.2 below are in close proximity to our client's site. Both sites are in Flood Zone 3a and protected by the Deal coastal defences. Land at 104 Northwall Road is plainly highly comparable to our client's site and there appears no sound justification for the exclusion of Land at Golf Road on this basis. For the purposes of the Sequential Test, the allocation of sites within Flood Zone 3a is clear acknowledgment that sequentially preferable sites do not exist in Deal and some development within the defended flood zone is required in order to deliver the growth that is required.

Figure 3.2: Extract of Reg 19 Policies Map showing our client's site (red line) and proposed residential allocations (green shading). Flood Zone 3 shown in blue.

3.2.13 In addition to the Sequential Test, the Exception Test must also be passed which requires proposals to demonstrate

- a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and
- b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

3.2.14 In this regard, the provision of the housing that is required, in addition to wider biodiversity, accessibility, open space and public infrastructure benefits is considered sufficient to outweigh the flood risk. With respect to (b), exact details would be provided as part of a detailed planning application, however in combination with the existing flood defences, it is anticipated that any future development could be subject to land level raising and all living and sleeping accommodation is proposed above the ground floor level, above the predicted design flood level. Further early flood warning systems, evacuation plans and a raised area of safe refuge could be included to ensure the development would be safe for its lifetime.

3.2.15 Further to the above, we note the following planning applications for residential development have also been permitted recently in north Deal, within Flood Zone

3a and without Environment Agency objection having passed both the Sequential and Exception tests without issue. Examples of granted planning applications within Flood Zone 3a include:

- 21/01233 – 17 Godwyn Road, Deal (1no. dwelling)
- 20/00341 – 269 Sandown Road, Deal (1no. dwelling)
- 20/00787 – Land adjacent 56 Golf Road, Deal (1no. dwelling)
- 19/00425 – Land rear of 92 & 94 Northwall Road, Deal (1no. dwelling)
- 15/00176 – Site at 90 Golf Road, Deal (2no. dwellings)
- 14/01211 – Land off Ark Lane, Deal (14no. dwellings)
- 14/00852 - 22 Harold Road, Deal (1no. dwelling)
- 13/00522 – Bede and Dunstan Houses, College Road, Deal (16no. dwellings)

3.3 Development Capacity

3.3.1 At this early stage, significant design work has not yet progressed. However, for the purposes of this representation, Land at Golf Road, Deal is submitted with capacity for approximately 60 residential dwellings (subject to detailed design and flood risk assessment) deliverable early in the Plan period.

3.3.2 The scale and nature of the Site is considered highly conducive to the delivery of a high-quality, landscape-led scheme capable of making a significant contribution to the delivery of market and affordable housing in a logically contained location that would assimilate with the existing pattern of development.

3.3.3 Land at Golf Road represents an excellent opportunity for the delivery of approximately 60 high-quality new homes in a logical, highly accessible location in north Deal with capability to deliver a policy compliant quantum of much-needed affordable housing, a mix of house types, sizes and tenures and ability to make significant developer contributions to support existing and future public infrastructure.

3.3.4 The land itself is of no particular ecological value and is in private ownership, offering limited public benefit. To the contrary, the Site is capable of delivering strong biodiversity net gain, attractive internal and boundary landscaping, opening up public access to open space, play facilities and a development pattern that facilitates pedestrian permeability and encourages active travel in north Deal.

3.3.5 Detailed proposals have not yet been advanced, however it is anticipated that any future development of the site will be of an appropriate density, reflecting the local character of development and responding to local needs for housing. Any future development will be sensitively designed to respect the existing character and materiality of the area, the topography of the site and to allow a positive transition to the rural landscape and respond to its coastal location.

3.3.6 It is acknowledged that the site is located within Flood Zone 3a, however this is true of the majority of north Deal which is nonetheless protected by coastal flood defences. Subject to detailed flood risk assessment and site layout design, for the reasons set out above, flood risk is not considered to represent an absolute constraint preventing the future development of the site.

3.3.7 Exact flood risk design details would be provided as part of a detailed planning application, however in combination with the existing flood defences, it is anticipated that any future development could be subject to land level raising and all living and sleeping accommodation is proposed above the ground floor level, above the predicted design flood level. Further early flood warning systems, evacuation plans and a raised area of safe refuge could be included to ensure the development would be safe for its lifetime.

3.3.8 Particular care will also be taken with regard to opportunities for biodiversity habitat creation and enhancement, publicly accessible open space and high-quality play space to serve the local community.

3.3.9 In terms of access, opportunities for safe, direct and convenient primary vehicular, pedestrian and cycle access are achievable onto the adopted highway. The Site will be capable of facilitating a permeable pattern of development in northwest Deal, providing convenient access for future and existing residents to a range of day-to-day facilities including grocery stores, medical facilities and Deal train station.

3.3.10 To be clear, our client agrees that Deal represents a logical and sustainable location to direct growth consistent with the growth strategy of the Plan as a whole, however we submit that more effective use of available land within Deal can be made – and therefore object to policy SP3 'housing growth strategy' and the exclusion of Land at Golf Road on this basis.

3.3.11 Accordingly, we say that Land at Golf Road is not subject to any absolute development constraints and can further assist the Council in meeting the growing need for new homes in the district and help to ensure the Council can have greater confidence in meeting its market and affordable housing targets in full.

3.4 Strategic Justification for Development

Spatial Strategy

3.4.1 The proposed Housing Distribution for the district across the Plan period is established within Policy SP3 'Housing Growth' which sets out that the distribution of housing growth in the district is primarily based on the settlement hierarchy and influenced by site availability, environmental constraints and factors of delivery.

3.4.2 Rightly, a key aim of the growth strategy is to focus development in the least sensitive areas of the district in order to conserve and enhance the Dover's rich natural and historical environment.

3.4.3 A retained theme from the adopted Plan, is that DDC's settlement strategy continues to focus on the development and regeneration of Dover Town and Whitfield (3381 dwellings). Approximately half of the district's planned housing is in this location, the majority of which again is to come forward as part of the strategic urban expansion of Whitfield 'SAP1' (2200 minimum dwellings).

3.4.4 Development will then be focused in the District Centre of Deal (223 dwellings), and the Rural Service Centres of Sandwich (227 dwellings) and Aylesham (649 dwellings). Following the settlement hierarchy rigidly would distribute housing in the preceding order, however the Plan recognises that housing delivery in Deal and Sandwich continues to be constrained by a number of factors including flood risk, ecological designations, heritage and highways. Further, Deal has experienced generally high levels of windfall development across the previous Plan period and accordingly there is now a dwindling supply of available, suitable sites in both settlements. On account of this context, DDC have sought to direct the majority of the remaining higher order settlement growth (outside of Dover & Whitfield) to Aylesham, through the strategic expansion to the town.

3.4.5 Outside of the four principal district settlements, the Rural Settlement Hierarchy (August 2022) identified that the majority of lower-order settlements in the district emerge as having a low level of facilities within the hierarchy and six settlements having none of the key indicators of sustainable services. Plainly, these settlements offer very limited opportunities for growth and it is evident that the forthcoming Plan will be reliant on the settlements of Dover (including Whitfield), Deal, Sandwich and Aylesham to deliver the housing growth that is required.

3.4.6 Given this context, it is clear that where available and suitable opportunities for residential development do exist within the district's higher order settlements, such as our client's site Land at Golf Road, which can provide a policy compliant level of affordable housing, it is imperative that the effective use of these sites are secured and appropriately maximised consistent with draft policy SP3 of the emerging Plan and national policy objectives.

3.4.7 Notwithstanding our client's in support of the premise of the proposed strategy, we are concerned that highly sustainable, edge-of-settlement sites, particularly in higher tier settlements such as Deal have been omitted to reflect their accessible location and capability to accommodate a significant quantum of high-quality development. On this basis, our client is concerned that the strategic objectives underlying draft policy SP3 'Housing Growth' may not be fully realised, to the detriment of market and affordable housing delivery and the wider policies seeking to conserve and enhance the district's natural and historic environment.

3.4.8 Consequently, our client objects to policy SP3 which is considered 'unsound' as drafted, on the basis that there is a clear need to maximise the delivery of housing at sites around Deal, and this has not been undertaken – for example at Land at Golf Road, where the Site has the site has been omitted despite clear justification for the suitability of development in Flood Zone 3a and indeed site allocations being included for residential development in the immediate vicinity. The Site has sufficient capacity to deliver approximately 60 additional units over the draft allocations for Deal, which will otherwise be required to be delivered elsewhere in the district, in potentially less accessible and more sensitive locations.

Greenfield Development and Consistency with Housing Trajectory

3.4.9 Due to the nature and dwindling supply of available urban land in Dover town and the remaining higher order settlements of Deal and Sandwich, the restrictive effect of the coast, the Kent Downs Area of Outstanding Natural Beauty, environmental constraints and the limited capacity of the district's remaining mid- and lower order settlements to accommodate significant levels of growth, release will be required if DDC is to meet its housing and development commitments moving forward.

3.4.10 In our view, sustainable and accessible sites logically located adjacent to existing urban areas, including Deal, represent the most sustainable and reliable sources of growth for the Plan period, to support the role and timescales of strategic urban extensions and to deliver the significant number of new homes that are required within the forthcoming Plan period.

3.4.11 In terms of housing delivery within Deal, just 223 new dwellings are proposed to be delivered, the fourth most number of dwellings despite Deal's secondary status within the settlement hierarchy. We understand this reflects the previously high levels of growth seen within the previous (adopted) Plan period and the reduced supply of sites now available in the town. However, our client's site is testament to the continuing availability of sites and in our view, delivery within the previous Plan period does not preclude further development within the following Plan period, particularly where a settlement has proven to provide a reliable and sustainable source of much-needed new housing in a highly accessible location.

3.4.12 Moreover, greenfield edge-of-settlement sites are, in our experience, typically most capable of making meaningful contributions to the associated public infrastructure, affordable housing and mix of new homes that is urgently needed in the district.

3.4.13 The Sustainability Appraisal Scoping Report (2018) sets out that over the course of the adopted Plan period, the key sustainability issues facing Dover District in relation to housing are as follows:

Population growth, household growth and demographic change will place additional demand on key services and facilities such as housing, health, education and social care. The Local Plan offers a new opportunity to manage these pressures, encouraging mixed communities;

There is a need for affordable housing across the District. At present, the mean price of dwellings is higher than the national average. The Local Plan will help to expedite its delivery; and,

There is the need for a mix of housing types that cater for the needs of a range of people, including the growing number of single person and elderly households. Without an up-to-date Local Plan, the required housing is less likely to be delivered.

3.4.14 It is evident that the new Dover Local Plan must allocate a mix of reliable sites capable of steadily delivering not only the quantum of housing that is required, but also the associated public infrastructure, affordable housing and a mix of unit types and tenures suitable for a wide range of future occupants.

3.4.15 The Housing Topic Paper (September 2022) provides further context and summarises under Chapter 7 'Historical Housing Delivery' that Dover has historically placed significant reliance on windfall development over the current adopted Plan period, with windfall sites accounting for 44% of all completed dwellings over the preceding 10-year period.

3.4.16 Moreover, it is highlighted that at the beginning of the 10 year period, the majority of new dwellings were being built on brownfield land. However, from the monitoring year 2013-14 onward development on greenfield land began to play a much greater part in the location for new development as shown in figure 1 below. This trend of increased housing development on greenfield land is a result of the allocations within the CS and Land Allocation DPD being built out and is associated with an approximate doubling of completions in the district. From 2013-14 onwards the average number of completed dwellings per annum has doubled to that of the early years of the CS, as the strong delivery rates of greenfield sites form the predominant source of housing. This is despite an overall declining trend of brownfield completions towards the latter half of the Plan period. This is generally not an uncommon trend in the majority of local planning authority areas, where opportunities for available and suitable sites in urban centres dwindle throughout the Plan period.

Figure 1: DDC Brownfield / Greenfield Completions 2010/11 to 2020/21 (source: Housing Topic Paper September 2022)

3.4.17 In light of the above context, it is clear that the adopted Dover Local Plan suffered from an initial under delivery of Plan-led housing growth in which windfall development sources were largely required to take up the slack in the early phases of the Plan period, as major allocated sites failed to deliver at the rates initially expected.

3.4.18 It is equally apparent that initial slow completion rates were quickly addressed once greenfield allocations commenced development, feeding into strong completions in the latter half of the Plan period. In our experience, greenfield sites are typically associated with stronger delivery rates and provide a reliable source of housing growth. The allocation of an appropriate mix of sites and scales is required in order to ensure steady and sustained Plan-led housing delivery across the Plan period and to avoid a reliance on windfall development to address the shortfall.

3.4.19 Consequently, given all of the above, it is imperative that the new Local Plan allocates a sufficient variety and scales of site capable of both ensuring steady and sustained housing completions and capable of making necessary contributions to public infrastructure and services, affordable housing and mix of unit types to address the key issues raised in the Sustainability Appraisal.

3.4.20 In our view, edge-of-settlement greenfield sites such as our client's Site, Land at Golf Road, represents one of the most reliable and sustainable source of housing delivery for the Plan period. Such sites are typically less constrained by wider factors and less affected by unforeseen delays such as land contamination. Moreover, greenfield sites typically are more capable of delivering the policy compliant affordable housing, unit mix and developer contributions that are urgently needed.

3.4.21 It is understood that the Plan is predicated on the delivery of strategic scale development at Whitfield comprising the development of circa 2,200 new homes. Consequently, in order to avoid a repetition of the previous Plan, the Council have sought to ensure that a pool of reliable greenfield allocation, including sites not dissimilar to that of our client are included within the Plan, capable of delivering the early growth that is required within the housing trajectory prior to the commencement of major allocations later in the Plan period.

3.4.22 We note that within the Housing Trajectory 'Appendix D', the Council have included allocated units from Years 4 onwards, with extant permissions (accounting for 5% non-implementation) demonstrated to be solely capable of delivering the growth required in Years 1-3. Notwithstanding our client's commitment to the Site, we support this pragmatic approach and suggest this represents a sound basis on which to set the district's housing trajectory. We note also the inclusion of an appropriate windfall allowance and the included contingency buffer to further ensure reasonably flexibility in the housing supply.

3.4.23 On account of all of the above, we submit that Land at Golf Road, Deal is required as a minor modification to form part of a sound strategy for growth in the district for the forthcoming Plan period. Land at Golf Road is capable of delivery early in the Plan period, representing a reliable source of housing growth in a highly sustainable and accessible location adjacent to the existing settlement boundary of Deal, consistent with the Council's preferred settlement strategy.

3.4.24 Our client objects to the omission of the Site and objects to policy SP3 as drafted, on the basis that there is a clear need to maximise the delivery of housing at sites within Deal, and this has not been undertaken – for example at Land at Golf Road, Deal.

3.4.25 Without prejudice to our client's support in for the premise of the proposed growth strategy which primarily directs growth at higher order settlements, we would urge the Council to re-visit its growth strategy and proposed allocations through a minor modification to allow a greater quantum of development within Deal to fully reflect its excellent sustainability credentials.

Policy SP4 'Windfall Development'

3.4.26 Separately, we note the provisions of policy SP4 windfall development. Proposals at Land at Golf Road would likely be acceptable in principle under this provision and we support the policy inclusion for appropriate, proportionate windfall development.

3.4.27 Our client is fully committed to the delivery of the Site which is available and suitable for delivery early in the Plan period. Notwithstanding the provisions of SP4, it is reiterated that our client fully supports the promotion of the Site for allocation as the most appropriate mechanism for delivery of the Site. The inclusion of Land at Golf Road would provide the opportunity for genuinely Plan- led development in Deal and the provision of associated benefits to public services and infrastructure, contribution to affordable housing supply and the delivering of a mix of house types and tenures.

Alignment with Sustainability Appraisal Findings

3.4.28 As part of the preparation of the Local Plan, the Council has identified and appraised a range of growth and spatial options through the Sustainability Appraisal (SA) which provides an assessment of how different options perform in environmental, social and economic terms, to help inform which option should be taken forward and combined with wider evidence documents, have been used to determine the growth and spatial strategy set out in the Plan.

3.4.29 Five potential distributions of growth were identified during preparation of the draft Regulation 18 Local Plan:

- Spatial Option A: Distributing growth to the District's suitable and potentially suitable housing and employment site options (as needed to deliver the scale of growth required).
- Spatial Option B: Distributing growth proportionately amongst the District's existing settlements based on their population.
- Spatial Option C: Distributing growth proportionately amongst the District's existing settlements based on the District's defined settlement hierarchy.
- Spatial Option D: Distributing growth in the same way as the adopted Local Plan, focussing most growth in and around Dover town.
- Spatial Option E: Distributing growth more equally across the District's settlements: Dover, Deal, Sandwich and Aylesham, as well as the rural villages.

3.4.30 The conclusion of the SA was that Spatial Options C (settlement hierarchy) and D (adopted Core Strategy with Dover focus) generally perform the most strongly against the SA objectives, particularly when delivering the baseline growth scenario. However, given the environmental constraints that exist around Deal and Sandwich, very few suitable and potentially suitable sites have been identified in these towns. Given this, the Council's preferred option for the distribution of housing and economic growth comprises a combination of options A (HELAA sites), C (settlement hierarchy) and D (Dover focus). The distribution of housing and economic growth in the District is therefore primarily based on the settlement hierarchy, and influenced by site availability, environmental constraints and factors of delivery.

3.4.31 On account of the above, our client agrees that the proposed growth strategy, and by extension, policy SP3 in principle represents a sound and evidence-led strategy for growth. However, given the clear acknowledgement of the dwindling supply of available sites in the higher order settlements of Deal and Sandwich, which has necessitated a minor deviation from the strongest performing spatial options, we submit that where sites are available and suitable for development in Deal and Sandwich, these must be fully maximised, reflecting their accessible location and their ability to reduce the need to develop into less accessible and more sensitive sites elsewhere in the district to accommodate the growth that is required.

3.5 Site Specific Justification for Allocation

3.5.1 Land at Golf Road is considered highly conducive to the delivery of a high-quality, landscape-led scheme capable of making a significant contribution to the delivery of market and affordable housing in a logically contained location that would assimilate with existing patterns of development and is demonstrated to be acceptable in terms of flood risk.

3.5.2 Land at Golf Road represents an excellent opportunity for the delivery of approximately 60 high-quality new homes in a logical, highly accessible location in north Deal with capability to deliver a policy compliant quantum of much-needed affordable housing, a mix of house types, sizes and tenures and ability to make significant developer contributions to support existing and future public infrastructure.

3.5.3 The land itself is of no particular ecological value and is in private ownership, offering limited public benefit. To the contrary, the Site is capable of delivering strong biodiversity net gain, attractive internal and boundary landscaping, opening up public access to open space, play facilities and a development pattern that facilitates pedestrian permeability and encourages active travel in north Deal.

3.5.4 In terms of flood risk, it is apparent that no sequentially preferable sites are available and the allocation of sites in this location is justified. We note that two other sites in north Deal have been allocated under policy SAP16 'Deal Small Housing Sites'. However, neither of these sites meet the threshold of 'major development' and are highly unlikely to deliver affordable housing or meaningful developer contributions and are not of a scale conducive to delivering a genuine mix of house types, tenures and sizes. Moreover, neither site is anticipated to deliver any further public benefit beyond housing, with no capacity for open space, play space and limited scope of significant biodiversity or landscape enhancement. To the contrary, our client's site is capable of delivering significant benefits in all of the above areas and can assist in achieving the government's objectives of creating mixed and balanced communities as set out within the Framework and is the only site capable of delivering direct benefits to existing and future residents of north Deal.

Site Specific Sustainability Appraisal

3.5.5 Land at Golf Road, Deal was removed from consideration following the 2022 HELAA assessment (ref: DEA004) which defined the site 'unsuitable' primarily due to flood risk. The Site consequently was not considered against the SA objectives, however for the purposes of this representation, we consider the Site in the context of the SA objectives below.

3.5.6 We consider that the Site would generally perform strongly, with particular positives associated with SA Objectives related to housing, accessibility, the economy, sustainable transport and climate change mitigation, in large parts due to the edge-of-settlement location and proximity of the site to key services in Deal.

3.5.7 We accept likely disbenefits associated with the development of a greenfield site, including loss of agricultural land, however this would be true of the majority of greenfield sites and it is abundantly clear that Dover's housing need cannot be met solely on brownfield sites. We suggest that potential minor negatives / uncertainty associated with biodiversity and landscape, however these could be overcome via high-quality design, biodiversity enhancement and landscape mitigation proposed under a future planning application. Irrespective, these would not be considered to outweigh the clear and tangible sustainability benefits associated with edge-of-settlement development and the site's consistency with the preferred spatial options.

Summary

3.5.8 Taking all of the above into consideration, our client is supportive of the premise of the growth strategy, however objects to the quantum of allocations within Deal, which in our view fails to fully maximise the sustainability credentials of the settlement and the capacity for growth, such that the Plan is unsound as drafted and requires minor modification to the growth strategy component. Land at Golf Road is considered wholly consistent with the objectives of the Plan and would form part of a sound evidence-led growth strategy consistent with the recommendations of the Sustainability Appraisal for the district to 2040, sufficient to ensure the Plan is found sound.

3.6 Deliverability

3.6.1 There are not considered to be any impediments to the Site being allocated for development commencing within the first five years of the Plan period. Combined with an appropriate number and scale of wider allocations in Deal and elsewhere across the district, this would ensure steady delivery of housing in Dover district across the majority of the Plan period and support the role and timescales of strategic housing delivery at Whitfield towards the latter half of the Plan period.

3.6.2 Persimmon Homes South East – a national housebuilder with a strong history and track record of delivery, together with an adopted and robust business plan for growth – has control over the site, and are committed to delivery of the site for residential development early in the Plan period.

3.6.3 For the reasons set out in this representation, the Site is considered suitable for the residential development of approximately 60 dwellings. The Site is adjacent and well contained by the urban area of Deal, one of the four higher order settlements in the district and the Council's preferred locations for Plan-led growth within the district. Development at Land at Golf Road would form a natural and logical development in Deal with excellent accessibility to day-to-day services and amenities via active travel modes within Deal itself and convenient access to public transport infrastructure (including Deal train station) for onward travel to key neighbouring settlements including Dover, Ramsgate, Canterbury and Ashford.

3.6.4 Finally, in respect of suitability, there are no physical limitations or problems such as access, infrastructure, hazardous risks, pollution, flood risk or contamination that would prevent development coming forward. It is acknowledged that the site is located within Flood Zone 3a, however this is true of the majority of north Deal which is protected by coastal flood defences. For the reasons set out within this representation, flood risk is not considered to represent an absolute constraint preventing the future development of the site, subject to detailed flood risk assessment and site layout design.

3.6.5 On behalf of our client, we submit that there are no known financial restrictions that would impact upon the viability of a future housing scheme or that would prohibit development coming forward within the early stages of the Plan period. To the contrary, we consider there to be an opportunity to deliver a high-quality, sustainably located residential development scheme consistent with the Council's proposed growth strategy comprising an appropriate mix of market and affordable housing and capable of contributing to a range of community facilities, public infrastructure and services locally.

3.6.6 At the time of writing, proposals at Land at Golf Road, Deal remain at an early stage, however our clients are firmly committed to progressing work on a future planning application in the short term and have a strong record of steady and sustained housing delivery once permission is secured.

3.6.7 The Site is in single ownership and there are no complicated legal agreements or covenants that would prohibit the ability to bring forward the Site early in the Plan period. The Site is therefore considered available and achievable for the purposes of the tests of deliverability.

4 Conclusion

4.1 Summary

4.1.1 This representation has been prepared by DHA Planning on behalf of Persimmon Homes South East in response to the Dover District Council Local Plan (Regulation 19) consultation which runs until 9th December 2022.

4.1.2 Our client controls 'Land Golf Road, Deal' and is promoting the residential allocation of the Site as part of the new Dover District Local Plan preparation process. The Site was submitted for residential development with capacity for approximately 60 units as part of the new Local Plan preparation, however the Site has not been taken forward within the Regulation 19 Pre-submission Plan.

4.1.3 Taking all of the above into consideration, we consider that the Site promoted at Land at Golf Road should have been included as a future housing allocation within the Dover District emerging Local Plan. The Site is considered, in principle, wholly consistent with the objectives of the Plan and would form part of a sound growth strategy for the district to 2040.

4.1.4 Our client is supportive of DDC's new Local Plan in principle, however our client objects to a component of the Plan, such that the Plan should be considered 'unsound'. It is put forward that a minor modification to the growth strategy is required in order for the Plan to be found 'sound', in which the quantum of Plan-led housing delivery within Deal should be increased to accurately reflect its second tier settlement status. Our client considers that given historic strategic under delivery in the district and wider uncertainties in the planning system, the Council should sensibly demonstrate an oversupply of reliable, deliverable sites early in the Plan period to ensure sufficient flexibility in housing delivery, should extant permissions or larger allocated sites not come forward or deliver as anticipated.

4.1.5 To be clear, Persimmon Homes South East support the premise of DDC's growth strategy, which includes further Plan-led development within Deal in line with its higher-order settlement status. However, we are concerned that DDC have planned at a significantly reduced level of growth in Deal, citing a dwindling supply of available land within and around the settlement. Consequently, the Plan fails to appropriately maximise the sustainable credentials of Deal and has resulted in a marginal supply of available, deliverable small and medium sites, insufficient to provide the flexibility in housing delivery that is required in accordance with national planning policy.

	<p>4.1.6 Given the dwindling supply of available sites within the District and the growing housing need, it is imperative that the sustainable credentials of these higher- order settlement sites are appropriately maximised to deliver the housing that is require in accordance with draft policy SP3 of the emerging Plan, and wider policies seeking to otherwise conserve and enhance the district's natural and historic environment and national planning policy objectives. We are concerned that this has not been fully undertaken and object solely on this basis.</p> <p>4.1.7 Consequently, our clients object to the growth strategy component as drafted, on the basis that there is a clear need to maximise the delivery of housing at sites within Deal, and this has not been undertaken – for example at Land at Golf Road, Deal, where it the Site has been excluded primarily on flood risk ground without further consideration of detailed evidence or the capability of suitable mitigation to be put in place. The consequent omission of potentially circa 60 units, will otherwise be required to be delivered elsewhere in the district, in potentially less accessible and more sensitive locations.</p> <p>4.1.8 Without prejudice to our client's support in principle of the proposed growth strategy which primarily directs growth at higher order settlements, we would urge the Council to re-visit its growth strategy and proposed allocations to allow a greater quantum of development within Deal to fully reflect its excellent sustainability credentials.</p> <p>4.1.9 We submit that Deal is wholly capable of delivery significantly greater than the 223 dwellings allocated. We say that available and suitable sites exist, including that of our client's at Land at Golf Road, Deal capable of delivering logically located, highly sustainable new homes in accessible location early in the Plan period, sufficient to provide greater assurance of steady and sustained housing delivery across the Plan period, balance the scale of delivery from strategic urban extensions and further assist in reducing the need to develop into more rural, typically less accessible and more sensitive locations within the district to otherwise deliver the growth that is required.</p> <p>4.1.10 Accordingly, we submit that the inclusion of Golf Road, Deal would provide a medium sized site for the Council that could come forward quickly, complying with the Framework's requirement to provide a mix of sites and include specific sites for years 1-5 of the Plan period. Accordingly, we say that Land at Golf Road, Deal can further assist the Council in meeting the growing need for new homes in the district and is necessary to ensure the Council can have greater confidence in meeting its market and affordable housing targets in full as well as delivering wider public benefits to the local community within Deal.</p> <p>4.1.11 In addition to being a highly sustainable and logical edge-of-settlement allocation, the Site is deliverable in a single land ownership with no viability issues, legal or third-party constraints present. Our client is fully committed to the delivery of Land at Golf Road and there are no impediments to the Site being capable of delivery within the initial 0-5 years of the Plan period.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>For the reasons set out in the consultation response submitted on behalf of Persimmon Homes South East, it is put forward that a minor modification to the growth strategy is required in order for the Plan to be found 'sound'. These suggest modifications are set out in the consultation response submitted on behalf of Persimmon Homes South East (ref DHA/30289).</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>Please refer to the consultation response submitted on behalf of Persimmon Homes South East (ref DHA/30289).</p>
<p>Include files</p>	<p>DHA_30289 DDC Reg 19 Representation - Golf Road Deal - Final.pdf</p>
<p>Local Plan Consultation Point</p>	<p>Deal</p>
<p>Rep ID</p>	<p>SDLP1587</p>
<p>Rep Status</p>	<p>Processed</p>

Consultee ID	1333364
Consultee Full Name	Sunningdale House Ltd
Consultee Company / Organisation	
Agent Full Name	Grace Martin
Agent Company / Organisation	Hume Planning Consultancy Ltd
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Omission Site - Extension to Site South of Station Road, Walmer.
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Representation submitted by Hume Planning. Full Representation attached to SDLP1587. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1587.)</p> <p>We write to you on behalf of our client, Sunningdale House Ltd ('Sunningdale'), in relation to the Dover District Council Regulation 19 consultation on its Local Plan</p> <p>Our client owns the site to the south of Station Road, Walmer. The extent of the site is shown on the plan below: Part of this site is currently being redeveloped for housing, pursuant to planning permission ref. 14/00361, to deliver 223 dwellings (including 66 affordable). This permission has been implemented, and the first homes on site are in occupation.</p> <p>This site is not included as an allocation within the Pre-Submission version of the Local Plan, we understand, due to the fact it benefits from planning permission. However, we consider the developable area of the site can be intensified and extended slightly for reasons set out below to accommodate additional housing units. We are therefore writing to highlight this for consideration in the Plan. For the reasons set out below, we consider it is a suitable and available site to help deliver housing to Walmer. Walmer forms part of Deal, a popular district centre and recognised as one of the most sustainable locations in the district which is reflected in its elevated position in the settlement hierarchy, where the spatial strategy directs that development opportunities should be maximised.</p> <p>Site Description</p> <p>The existing development site largely sits within the settlement confines of Deal. Access is provided into the site direct from Station Road. Station Road connects with Dover Road, the main route through the town linking Deal with Dover and the M2 motorway.</p> <p>The site is not located within flood zone 1 or 2, nor in an area at risk of surface water flooding. The site is not located in a conservation area, nor are there any listed buildings on or adjacent to the site. The southern part of the site is in an area of archaeological potential.</p> <p>The area to the north and northeast of the site is mainly residential in character and is undistinguished in design terms. The majority of the built development to the north of the site is two storeys in height and comprises predominantly semi-detached and terraced houses.</p> <p>To the east is a caravan park and to the south, a woodland belt with farmland beyond. The land here rises more steeply with Ripple Windmill on the skyline some distance to the south. To the west is the railway line with farmland beyond.</p> <p>Suitability of the Site</p> <p>The overall principle of residential development has been accepted on the site through the grant of planning permission for 223 houses (LPA ref. 14/00361). The originally approved site layout plan is below:</p>

The scheme which has been granted planning permission, retained the eastern and southern parts of the site as open landscaping, as required through the Site Allocations DPD Policy.

Sunningdale has implemented the northern phase of this permission but considers the southern and western phases could be intensified in terms of density and layout from that approved, to provide additional unit numbers in this location. Some additional units could also be provided to essentially round off this southern layout, whilst retaining a strong and robust landscape buffer as approved. With this combined approach of intensification within the approved development area and its moderate extension, a net increase of some 75 units could be provided at the site (beyond the originally approved 223 consented scheme), contributing significantly to the housing numbers for Deal. South Deal is far less constrained in heritage and flood risk terms and it would be appropriate to direct more development to this location in preference to the selection of new greenfield site releases to meet housing need. Deal is a popular and vibrant place and this site has the proven ability to provide affordable housing (unlike sites in Dover, as established through the Councils Plan Viability Assessment) and it is considered appropriate to maximise development opportunities where possible.

Access to the site would be as approved, and initial transport work (following engagement with KCC), has confirmed to Sunningdale that the junction from Station Road to Dover Road has sufficient capacity to accommodate the additional units in this location.

We note this site has not been considered as part of the Council's Landscape Sensitivity Assessment which underpins the Local Plan, which instead focuses only on the Council's proposed allocations. However, we note the greenfield site proposed to be allocated in Walmer, located to the west of this site on the western side of the railway track which measures as "medium sensitivity" in landscape terms and this Reg 19 allocation has progressed accordingly for around 75 units. It is considered that the intensification and moderate enlargement of the development area, whilst maintaining a strong landscaped buffer to the periphery, is a less impactful way of contributing to meeting the housing needs of Deal than the greenfield allocation identified in the Reg 19 document. We conclude that logically, and as part of a sequential approach to site selection, housing numbers should be met in part through the intensification of existing development sites in the first instance, especially where this could yield circa 75 added dwellings. The land which remains undeveloped as part of this site, lies adjacent to the settlement confines of Deal. Deal is a second-tier settlement within the borough and additional housing should be focused here. The site is comparatively unconstrained and subject to the retention of a strong landscaping buffer to the southern and western boundary (the latter already clearly defined by the elevated railway line), it is considered further units can be accommodated on this site in an appropriate manner.

SP3: Housing Growth

Whilst we welcome DDC's commitment to meeting its housing need, with Strategic Policy SP3 committing to providing at least 10,998 net additional homes over the Plan period, it is considered additional sites, if suitable and available, should be included within the Plan. A large proportion of growth is being directed towards Dover with further units at Whitfield (over 2,000) and with large strategic sites, delivery rates can easily slow down during the plan period and under-deliver. Whilst there is a buffer within the Plan, it is considered appropriate not to use this as a limit and allocate other suitable sites in sustainable locations where available.

In this respect, it is noted that Deal sits towards the top of the settlement hierarchy, as the district's only District Centre. Yet, due to the perceived constraints in Deal, only 223 units are being allocated in this settlement compared to over 600 in Aylesham, which is a settlement located lower down the settlement hierarchy.

As detailed above, land off Station Road is considered suitable for residential development for some 75 dwellings which would help to slightly rebalance the spatial strategy more toward Deal which is considered to be justified. It is also available and can be delivered by Sunningdale within the short term (as an extension to the early phases that are already under construction) and, in our view, this site should be allocated within the Plan.

Concluding Remarks

Hume Planning Consultancy welcomes the opportunity to comment on this stage of the Council's Pre-Submission Local Plan and would like to reserve the right to attend the Examination in Public in due course to discuss potential development sites in Deal.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	Martin Hume Planning (Sunningdale Station rd) 1519 Att1_Redacted.pdf Martin Hume Planning (Sunningdale Station rd) 1519 Att2 Redacted_Redacted.pdf
Local Plan Consultation Point	Deal
Rep ID	SDLP1333
Rep Status	Processed
Consultee ID	1333103
Consultee Full Name	Betteshanger Country Park
Consultee Company / Organisation	Betteshanger Country Park
Agent Full Name	Alexander Hamlet
Agent Company / Organisation	Iceni Projects
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Deal Omission Site - Betteshanger.
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails	(DDC Note: Comment Duplicated from Comment on E4 as site has been Omitted for Allocation in the plan) REPRESENTATIONS TO THE DOVER DISTRICT LOCAL PLAN REGULATION 19 CONSULTATION IN RESPECT OF BETTESHANGER COUNTRY PARK HOTEL AND SPA, DEAL This representation to the Dover District Local Plan (Regulation 19 Consultation) is made on behalf of our client, Betteshanger Country Park, who have submitted a planning application for a luxury hotel and spa at the Betteshanger Country Park site (LPA Ref: 22/01152) and is currently awaiting determination. A site location plan of the site and a layout plan are attached at Appendices 1 and 2 of this representation. Betteshanger Country Park objects to Policy E4 – Tourist Accommodation and Attractions in its current form, which seeks to boost the tourism and visitor economy of Dover District, but in respect of serviced visitor accommodation, only on sites within or adjoining existing designated settlement confines. This approach constitutes a significant deviation from the Regulation 18 Local Plan Policy E4, which

to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

supported tourism proposals where they are located within or adjacent to an existing visitor attraction or accommodation site. There has been no justified or evidenced reason for the deviation in policy between Regulation 18 and Regulation 19. Support for tourist accommodations and visitor attractions across the District should be strongly supported, particularly of the high quality and unique nature of our proposal, which would boost visitors to both the local and wider area. The District currently has a high proportion of day trips. Providing accommodation to convert these into overnight stays will significantly boost the local economy, highlighted in Paragraph 7.14 of the Regulation 18 Local Plan which stated that 'overnight trips are worth seven times more to the local economy than that of a day tripper'.

a. Betteshanger Country Park Hotel and Spa ('The site')

Betteshanger Country Park submitted a planning application for a luxury Hotel and Spa at Betteshanger Country Park, Deal ('the site') under the local planning authority reference 22/01152, which is currently awaiting decision from the Council.

The application was submitted in 'full' and seeks permission for the following development:

'Erection of a 120 bed hotel (C1) building with associated spa facilities, gym, restaurant/bar, access, landscaping and parking.'

The site is located to the west of Deal at Betteshanger Country Park on the site of a former spoil tip of the former Betteshanger Colliery. The site is in a well located and sustainable location, with Deal situated approximately c 3 km south of the site where Deal station provides connections into London via Ashford International or Folkestone Central. Bus services into the town centre operate twice an hour, taking 10-15 minutes. There are footpaths and cycle paths directly from the site leading onto Sandwich Road.

The planning application was informed by a series of technical reports and assessments covering matters including air quality and noise, arboriculture, archaeology, ecology, economic benefits, flood risk and drainage, heritage, land contamination, landscape and visual impact, a sequential test and transport.

The proposals for the design of the hotel and spa have been locally inspired, of sustainable and modern design that respectfully sits within a unique landscape environment surrounded by open green space. The proposals have set out to meet the aspirations of paragraph 126 of the NPPF in achieving the creation of high quality, beautiful and sustainable development, that will be acceptable to the community and a place of enjoyment.

A compelling planning case exists to support the planning application being approved and at the heart of this is a strong quantitative and qualitative need for additional visitor accommodation in the District, especially for a luxury hotel at the higher end of the market. This is justified by the declining number of holiday trips to the District as well as the falling value of holiday trips. Both the 'Destination White Cliffs Country – A Growth Strategy for Tourism and the Visitor Economy 2020 to 2030' and the Dover Economic Growth Strategy target growth, investment and development in the District's tourism industry so that the range of visitor accommodation stock is improved and longer stays and higher spend are encouraged. There is a demonstrated need to increase the number of high-quality 4- and 5-star visitor accommodation in Dover District. This type of accommodation has not been delivered within settlement confines, as currently supported in adopted policy, due to the absence of a signature setting within which to site a hotel of this nature. However, there is a market opportunity for a luxury hotel at Betteshanger Country Park, given the unique selling point of it being sited within a Country Park with growing recreation and leisure appeal for both visitors and existing residents.

The benefits associated with the delivery of the proposed development identify with the three dimensions of sustainable development, comprising economic, social and environmental, as set out in paragraph 8 of the NPPF. The proposed development, as set out in the Economic Benefits Statement will create employment opportunities of around 243 direct and a further 77 indirect construction jobs, 75 direct jobs on site during the peak season and support of around 111 net additional jobs across the South East. Around £22.6 million will be generated in construction GVA across the construction period. The development will significantly boost the number of visitors to Betteshanger Country Park, helping to provide the investment the Country Park needs to thrive and fulfil its potential as an education, sport and tourism destination.

There is an opportunity to improve social interaction between families and friends, connect people to nature and open space and educate visitors on the ecology and history of the Country Park. Job opportunities and training will improve livelihoods and the proposed green and blue infrastructure's connection with nature will provide positive benefits for the health and welfare of visitors. The proposed development would enhance the existing open space and recreational offering of Betteshanger Country Park and increase investment into the landscaping in and around the site to deliver a highly attractive environment that can achieve a biodiversity net gain and ensure maintenance and stewardship of the Country Park for the long-term.

Amendment to Draft Policy E4 – Tourist Accommodation and Attractions to include support for tourism proposals that are located within or adjacent to an existing visitor attraction or accommodation site

Betteshanger Country Park aspires to be able to support the Dover District Local Plan and is supportive of the Plan's objective to support new tourism accommodation and attractions in the District. However, an objection is raised to the policy deviation made from the last Draft Local Plan iteration, which supported tourism proposals located within or adjacent to existing visitor attractions or accommodation sites. The proposed retrogressive policy removes positive policy support for visitor accommodation at existing visitor attractions that happen to lie outside of settlement confines. This policy change is considered to result in significant harm to the tourism strategy for the District, by creating a policy conflict to proposals for luxury hotels, which can only come forward at a signature setting site such as Betteshanger Country Park, which happens to lie beyond a settlement boundary.

To be able to deliver the much-needed high quality tourist accommodation, it is recommended that Policy E4 – Tourist Accommodation and Attractions be amended back to the Regulation 18 draft, which supported visitor accommodation proposals that are located within or adjacent to an existing visitor attraction or accommodation site. For clarity, the policy has reduced the ability to deliver serviced visitor accommodation from its previous text which stated 'within or adjacent to an existing visitor attraction or accommodation site' to the revised text which only states 'within or adjoining designated settlement confines'.

The 'Destination White Cliffs Country – A Growth Strategy for Tourism and the Visitor Economy 2020 to 2030' published in May 2021 and the 'Dover District Economic Growth Strategy' published in November 2021 make it clear that despite NPPF policy support, there has not been enough high-quality visitor accommodation delivered in the District to support its tourism objectives. It is therefore vital to allow for serviced visitor accommodation in appropriate locations such as adjacent to visitor attractions to enhance and diversify the visitor economy and harness the potential of the District to grow the economy. Not doing so would be disastrous for the District's visitor economy.

There is no evidence to justify the deviation from the Regulation 18 Plan, but there are considerable real-world implications associated with this change in policy wording. The planning application that is awaiting determination by the Council is unnecessarily brought into conflict with the proposed new policy, despite the clear direction of the Regulation 18 Plan and the supporting evidence for the Local Plan clearly highlighting the need for high quality visitor accommodation at existing visitor attractions.

Betteshanger Country Park already attracts people from the local area who are looking to use the existing cycle paths, walk the many trails or visit the recently delivered Visitor Centre, including The Lamp Room restaurant and The Kent Mining Museum. The Country Park has also built a reputation for hosting a variety of public events such as shows, markets, competitions and sporting events, amongst others. A separate Application for a surfing lagoon with a pump track, yoga hub, education hub and holiday pods (LPA Ref: 22/01158) is also awaiting a decision from the Authority that would enhance the role of the Country Park as a unique visitor destination with direct and indirect economic benefits for the District and wider County. The sister applications complement each other and would deliver for Dover District an exciting and distinctive tourism destination unlike anything that currently exists in the District, County or wider Region.

In order to remedy the soundness deficiency with Policy E4, which is considered unsound on the basis of it being ineffective and not positively prepared, the following amendment is requested to section 1 b), which if agreed, would render the policy sound:

"1 Provision of new, improved, upgraded or extended accommodation and attractions

a Proposals for visitor attractions will be supported in appropriate locations across the District where it increases the range and/or quality of tourist facilities and accords with criteria i) to x) below.

b Proposals for serviced visitor accommodation (hotels and B&B development) will be supported within and adjoining designated settlement confines (as defined in Policy SP4) and within or adjacent to an existing visitor attraction or accommodation site subject to criteria i) to x) below..."

c. Conclusion

Betteshanger Country Park aspires to support the District in delivering a sound, justified and effective Local Plan. However, Betteshanger Country Park objects to Policy E4 in its current form, which in respect of serviced visitor accommodation, only supports developments on sites within or adjoining existing designated settlement confines. This approach constitutes a significant deviation from the Regulation 18 Local Plan Policy E4, which supported tourism proposals where they are located within or adjacent to an existing visitor attraction or accommodation site. There has been no justified or evidenced reason for the deviation in policy between Regulation 18 and Regulation 19. Support for tourist accommodation and visitor attractions across the District should be strongly supported, particularly of the high quality and unique nature of our proposal, which would boost visitors to both the local and wider area and make the average overnight visitor worth seven times more to the local economy compared to that of a day tripper. Not amending the policy wording will make it incredibly difficult for the District to meet its tourism and economic objectives for the future, as top-of-the-market hotels cannot be delivered within settlement boundaries, as evidenced through their longstanding non-delivery in the District. However, a luxury hotel can be delivered at the Betteshanger Park existing visitor attraction, due to its signature setting, and the resultant effects of a policy that enables this form of development are as follows:

- Deliver a unique, locally inspired, sustainably designed modern hotel of the highest quality;
- Generate significant direct and indirect economic benefits for the local and regional area, supporting the aspirations established in the 'Destination White Cliffs Country – A Growth Strategy for Tourism and the Visitor Economy 2020 to 2030' and the Dover District Economic Growth Strategy for longer stays, dwell time and spending;

	<ul style="list-style-type: none"> • Connect people with nature, open space and allow the opportunity to educate visitors on the ecology and history of Betteshanger Country Park while enjoying the recreational amenities that are currently provided. <p>In addition to amending Policy E4 as requested, Betteshanger Country Park also respectfully requests that the Plan formally allocates Betteshanger Country Park for a luxury hotel.</p> <p>Betteshanger Country Park would welcome the opportunity to participate in the forthcoming Examination-in-Public into the plan and contribute to the debate to ensure the best strategy for the District is found.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Betteshanger Country Park has land interests in the District and has an important role in delivering the Plan strategy
Include files	Hamlet Icen projects (Tourist Accomodations - Betteshanger 1654 Att1_Redacted.pdf
Local Plan Consultation Point	Deal
Rep ID	SDLP1977
Rep Status	Processed
Consultee ID	1273818
Consultee Full Name	Neil Oldfield
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Walmer
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy

4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Comments refer to the whole plan but I have particular concerns about the Walmer area plans When new housing is built it requires infrastructure: more and new roads, GP surgeries, schools, sewers, shops, etc. Dover District Council is not effectively seeking contributions from developers under section 106 agreements and the community infrastructure levy. DDC and local councilors are too cosy with the local developers and not setting the right level of infrastructure developed.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Proper cost contributions from developers and proper investments in existing and new infrastructure, legally enforceable obligations between DDC and developers. More supervision and inspection of developments and infrastructure by DDC
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I expect councillors and planners to do their job and enforce the obligations of developers to develop safely and to upgrade and future proof infrastructure.
Include files	
Local Plan Consultation Point	Deal
Rep ID	SDLP1924
Rep Status	Processed
Consultee ID	1271717
Consultee Full Name	Quinn Estates
Consultee Company / Organisation	Quinn Estates Ltd
Agent Full Name	Sarah Willson
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Deal
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified

	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Iceni Projects, on behalf of Quinn Estates, welcomes the opportunity to submit representations to the Dover District Council Local Plan Regulation 19 Consultation in respect of land at St Edmunds Road, Deal. These representations should be considered alongside the following documents appended to this letter:</p> <ul style="list-style-type: none"> • Appendix 1 – Site Layout Plan <p>The land subject to this representation was previously assessed through the Call for Sites process as part of a significantly larger land parcel (GTM008 – Land North of Ellens Hill). Quinn Estates consider that the revised, smaller site makes a logical extension to Deal in this area, and that site specific constraints can be overcome to deliver housing in Deal. The Site borders the Deal settlement boundary and presents a logical extension to the town in this area. Quinn Estates considers that the land should be allocated for residential development of approximately 16 self-build and 7 affordable homes with associated access and parking, within a landscaped setting. It is considered that the scheme presents an opportunity to provide high-quality family homes, in a highly sustainable location and that the resultant effect of this redevelopment will lead to societal benefits for the local community and a more sustainable development strategy</p> <p>It is Quinn Estate's view that the current suite of allocations in the draft Plan will fail to provide a sufficient level of growth in and around Deal, and that it is over reliant upon a single urban extension to Dover to meet local housing needs, which does nothing to address local affordability issues in Deal. To ensure the soundness of the plan, further Sites, such as the one advocated in this representation, should be allocated to ensure that the Plan's ambitions for the District are delivered.</p> <p>a. Land at St Edmunds Road, Deal (the 'Site')</p> <p>The Site comprises approximately 1.83ha of land adjoining the Deal settlement boundary. The Site is located on the south-western edge of Deal, bound to the north-east and north-west by residential properties, and to the south-east and south-west by open farmland. The southern boundaries of the site comprise existing hedge and trees. The site is currently in use as grazing land for horses.</p> <p>A public right of way (ref: 0340/ED38/12) bisects the north-eastern corner of the site from northwest to south-east. Access to the site is via an existing gate in the hedgerow joining St Edmunds Road. The closest bus stop is approximately 180m from the Site on St Richards Road and includes services to Deal town centre, Walmer, Sandwich, and Kingsdown. St Richard's Road GP Surgery, Payden Pharmacy, St Mary's primary School and the Betteshanger Sports and Social Club are also within approximately 500m of the Site on St Richards Road. The Site is considered to be a sustainable location for residential development.</p> <p>The north-western boundary of the Site adjoins the southern edge of the Mongeham Road Conservation Area. Within the Conservation area are several Grade II listed buildings including 110 and 112 Mongeham Road, Manor Farmhouse and Brewer's Farmhouse. The Site is within Flood Zone 1. Wildlife Trust mapping identifies the Lower Stour Wetlands to the north-west of the Site beyond Mongeham Road, overlain with the Sandwich Bay to Hacklinge Marshes SSSI. There are no other wildlife designations either in the Site or in proximity.</p> <p>b. Objection to Tables 3.3 and 4.2 (under the auspices of Policy SP3)</p> <p>Quinn Estates suggest that the emerging spatial strategy for the District, as detailed in Tables 3.3 and 4.2 of the Regulation 19 Submission Version of the Draft Local Plan is not based on sound plan-making. The current approach does not acknowledge the sustainability of the town nor its position within the settlement hierarchy. As such, additional sites should be allocated to the town in Table 4.2. Quinn considers that the Site subject to this representation presents an ideal housing site within Deal which is able to overcome the identified constraints to contribute to sustainable housing growth within the settlement.</p> <p>Sustainable distribution of growth</p> <p>Sustainable development is a key aim of the National Planning Policy Framework at Paragraph 8. In terms of housing delivery, the Council should seek to encourage housing growth in the most sustainable locations, especially when they can ensure the achievement of societal improvements, economic benefits and positive environmental outcomes. In choosing sites, the Council should ensure that new residents can reach established nearby town centres using sustainable modes of transport, to limit pollution arising from motor travel and to support the vitality of the existing community and local economy, without creating environmental harm.</p>

Deal is vibrant coastal town which benefits from access to a wide range of local services within a relatively contained urban environment. The vast majority of the town's facilities lie within walk, cycle and public transport distances. Services include a range of education provision, including primary, secondary and tertiary education. The town benefits from ample leisure opportunities at the sports centre and swimming pool, along with less formal outdoor activities on the seafront and at the Betteshanger Country Park. In addition, the town is highly sustainable in regard to public transport accessibility, being served by mainline rail, the high-speed train service to London and numerous bus routes.

Throughout the evolution of the draft Local Plan, Deal has failed to be allocated sufficient levels of growth commensurate with the sustainable nature of the town. The justification for channelling so little growth to Deal is not considered to be justified by evidence, when all the evidence points to the settlement being such a logical and sustainable location to channel growth to. The principles of sustainability and sound plan making appear to have been absent in key decision taking over spatial choices at the heart of the spatial strategy presented in the draft Plan.

Market and affordable housing delivery

Paragraph 35 of the NPPF outlines how plans are effective where they are found to be deliverable over the plan period. The disproportionately high dependence on Whitfield Strategic Allocation (SAP1) results in a plan which raises considerably uncertainty as to this key soundness test.

Quinn Estates has no objection to large-scale housing development at strategic sites playing an important role in meeting housing need. However, what looks good on paper needs to deliver in practice. However, in a District like Dover where there is a need for the benefits of growth to translate across the District, the spatial strategy should be seeking to unlock growth and inward investment at other key settlements, such as Deal, and this is a significant weakness of the Plan in its current form.

Spatial strategies should reflect that building homes is a complex and risky business. Stronger local markets have higher annual delivery rates, and where there are variations within districts, this should be factored into spatial strategy choices. Further, although large sites can deliver more homes per year over a longer time period, they also have longer lead-in times. Research by Lichfield¹ found the average lead in time for large sites prior to the submission of the first planning application is 3.9 years

This issue with delivery is found to be the case with Whitfield. Of the 5,750 dwellings proposed for the allocation, 3,483 dwellings are considered deliverable in the emerging Plan period. The Council acknowledges that the 2010 Core Strategy included provision for the Site to deliver 5,750 dwellings. Phase 1 of the SAP1 allocation (Dover ref. 10/01010) is underway and as of the 2020/2021 monitoring year, 185 dwellings had been completed with a delivery rate of approximately 50dpa for the past three years. Given this slow progress, it seems likely that although the existing outline planning permission should be completed over the Plan period, a more cautious approach should be taken in terms of the remaining dwellings allocated for the site given its proven issues in delivering housing to date.

Without clear evidence by way of a planning application for these additional dwellings, it is questioned whether Whitfield will ramp up to delivery of 120dpa from 2023/24 and then up to 200dpa from 2026/27 for the remainder of the Plan period. More consideration should therefore be made to the current planning position of the Site and the length of time it has taken so far to deliver housing. Paragraph 73D of the NPPF recommends the inclusion of realistic delivery rates within Local Plans, and the Council should therefore review those proposed for Whitfield and consider building more flexibility and more volume into the pipeline to be able to respond to delivery issues.

It is considered that, particularly with the deliverability issues of the Whitfield Urban Extension to date, additional sites should be allocated for housing to ensure that there is sufficient choice and flexibility in the supply so that the Council can meet its housing requirement throughout the Plan period, as well as to meet the Government's objective to significantly boost the supply of housing as set out in Paragraph 60 of the NPPF.

The delivery of affordable housing also paints a bleak picture within the District. The Council's existing policy on affordable housing, DM5 of the Core Strategy (2010), requires residential development of 15 or more dwellings to provide 30% of the total homes as affordable homes and the Council's affordable housing strategy remains unchanged, save for reducing the requirement to deliver affordable housing within Dover town.

The latest Authority Monitoring Report (2020-2021) profiles how the affordable housing policy has consistently struggled to deliver sufficient levels of affordable housing, with the average being 20%. The failure to deliver sufficient affordable housing is set against a backdrop of worsening affordability in the District. Affordability ratios for Deal show a continued trend of worsening to 9.25 in 2021, with year-on-year worsening from 2012-2018. For the lowest earners, this reaches 9.62 in 2021. The District is less affordable than the national average of 9.05. Median house prices in the District have soared to £285,000, compared to the UK average of £278,000.² In addition, statutory homelessness within the District sits at 137 people and 136 households, 68 with children, are in temporary accommodation within the District as of 2021.³ Whilst there may be a number of factors contributing to these outcomes, a new spatial strategy that identifies limited housing at Deal is going to deliver limited affordable housing at Deal and the absence of housing will only exacerbate local affordability pressures.

The proposed allocation at Land at St Edmunds Road would therefore assist with relieving local affordability pressures with the proposed 7 affordable units.

Self and custom build

Policy H5 of the Draft Local Plan states that the Council will support self-build and custom house building schemes on housing sites allocated in the Local Plan and on non-allocated windfall developments subject to compliance with the other Policies in the Local Plan, and where overall this would not result in an over-provision of this type of housebuilding when compared to the Council's supply/demand evidence.

The Self-Build and Custom Housebuilding Act 2015 requires relevant authorities, including District Councils, to keep a register of individuals and associations of individuals who are seeking to acquire serviced plots of land for self-build and custom housebuilding. Councils are also required under sections 2 and 2A of the Act to have regard to this and to give enough suitable development permissions to meet the identified demand. The benefits of self and custom build housing are recognised as diversifying the housing market and increasing customer choice. The NPPF supports the delivery of a variety of land coming forward to meet the needs of groups with specific housing requirements including for those wishing to commission to build their own homes.

The Self-Build and Custom House building need as identified from the Council's register is reported annually through the Authority Monitoring Report. The latest Authority Monitoring Report (2019-20) states that since the introduction of the self-build and custom house building requirements in 2015, there has been 1 plot allowed at appeal, where at appeal it was identified as self-build (planning reference 16/01101). There have also been 18 plots marketed as self-build since April 2020 by the developer from planning application 16/01026, however these were not identified as self-build on the planning application. On 31st October 2020, there has only been one planning application identified as including self-build and customhouse building, reference 20/00419, which is also a Quinn site, for which a reserved matters application (ref: 22/01379) is currently pending determination.

The Self-Build Need Assessment submitted as part of the application (22/01379), points towards a very strong relative demand for self-build plots in Dover and also identifies Dover as being one of the authorities with the highest demand per capita in the country. Moreover, it is important to highlight that when considering demand in the context of the Local Authority's self-build register; an Ipsos Mori poll undertaken for NaCSBA in 2016 found that only one in eight people interested in self-build were aware of the introduction of Right to Build Registers in England. As a result, the number of expressions of interest on a Local Authority's self-build register may substantially underestimate demand.

Crucially, the Council's method of updating the self and custom build register, and resultant understanding of demand within the District, is flawed. The Council reviewed and updated its register in March 2020. All persons and organisations on the first (2016) version of the register were invited to re-register in February 2020, with reminders sent out in March 2020. Those who re-registered and passed the local connectivity and financial solvency tests, had their interest back dated to their original registration date and were placed on part 1 of the register. Those who did not pass the tests but still wished to register their interest in self-build customhouse building were placed on part 2 of the register.

It is not clear from the Council's Authority Monitoring Report and evidence base for the draft Local Plan whether additional independent survey work has been undertaken to fully understand the demand for self and custom build housing in the District. As mentioned previously, public knowledge and understanding of Right to Build in England is generally low. The method of the Council to understand demand has wholly relied upon people who had joined the register in 2016 and has not sought to further publicise Right to Build or develop a clearer understanding of demand in the District through additional surveys. This results in an incomplete picture of demand in the local area and resultant lack of allocations for self-build sites within the draft Local Plan.

Quinn Estates are the leading provider of self-build in Kent and have assembled their own database of interested self-builders. Having facilitated self-build development in East Kent, the company is ideally positioned to understand the market requirements and best placed to assist the District in meeting its growing demand for plots. Quinn Estates propose the land subject to this representation as suitable for a self-build site of 16 dwellings which would assist with addressing the Council's underestimated demand for this housing type.

Land at St Edmunds Road

The land subject to this representation was previously assessed through the Call for Sites process as part of a significantly larger land parcel (GTM008 – Land North of Ellens Hill). The Call for Sites Submission proposed 450 dwellings across a 10.74ha land parcel, and was assessed to be unsuitable due to heritage and landscape impact.

Quinn Estates are pleased to submit for consideration a revised proposal for the smaller land parcel which would deliver much needed new homes, including self-build and affordable homes, for Deal, whilst respecting and responding to the site constraints, namely the sensitive historic setting of the surrounding area to the north-west.

Vehicular and pedestrian access to the Site is proposed from the end of St Edmunds Road, utilising the existing gap in the hedgerow serving the field. The indicative site layout plan submitted with this representation details the proposed scheme which would comprise 16 self and custom build plots and 7 affordable units, set within a landscaped setting. The public right of way to the eastern edge of the site is retained, forming part of the landscaped, spacious entrance to the Site. In addition, the existing hedgerows are retained and enhanced, along with an enhanced tree buffer to the north-western boundary of the site where it adjoins the Mongeham Road Conservation Area. Overall, the proposal represents a

	<p>c. Conclusion</p> <p>On behalf of Quinn Estates, we thank you for the opportunity to contribute to the Dover District Local Plan Regulation 19 Consultation.</p> <p>The current approach to the spatial strategy in the Draft Local Plan requires amendment to address a significant soundness issue concerning the level of growth identified for Deal, the District's second largest settlement. It is considered that the Plan currently fails to positively plan for a commensurate level of housing and employment at the settlement, as expressed in Policy SP3 and that the available evidence does not support or justify this approach. Moreover, the evidence does support channelling a greater quantum of growth to Deal.</p> <p>Quinn's proposal at the Land at St Edmunds Road presents a sustainable location for growth due to its existing connections to the public transport network and close proximity to a range of services on St Richards Road. The small nature of the site would provide early and accelerated delivery and would assist with reducing the current over reliance on the Whitfield Urban Expansion to provide housing growth for the District. In addition, the site would deliver self-build and affordable housing to address local affordability issues, which the current Plan fails to address.</p> <p>I trust that these comments are of assistance and that these representations will be taken into account in consideration of the current consultation. Quinn would also welcome the opportunity to participate in the forthcoming Examination-in-Public into the Plan and contribute to the debate to ensure that the best strategy for the District is found.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Include GTM008 in the Local Plan for approx 16 self-build and 7 affordable dwellings</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>SDLP1924 Willson Att1 Original Rep.pdf SDLP1924 Willson Att2 Site Layout Plan.pdf</p>
<p>Local Plan Consultation Point</p>	<p>Deal</p>
<p>Rep ID</p>	<p>SDLP2014</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1262466</p>
<p>Consultee Full Name</p>	<p>Mr Paul Dawkins</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	

Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Deal and Walmer
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Please plan a beach access for all with paths on the beaches between Deal Castle and Walmer Castle. On beach unbreached by tides
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Deal
Rep ID	SDLP1702
Rep Status	Processed
Consultee ID	1273247
Consultee Full Name	Paul Gamble

Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Deal
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I note from your local plan submission that you are hoping to protect both the character and the commercial; activity in central Deal. This is commendable. The major problem that faces residents in Deal now is the effective collapse of the local bus services between the "outlying" parts of the town such as Walmer, Deal town centre and Dover. Available bus service do not become available until nearly 09:45 each day - if they are running. There are fewer at weekends. 3 services per hour from the town centre to Walmer are now reduced to 1 sporadic bus that starts late and finishes early. The useful 83 circular route has been cancelled. There are every few buses to St Magraet's or Kingsdown. I imagine the problem is financial. A different approach is needed. The service should be provided as social infrastructure not as a commercial enterprise. Mini buses or even people carriers could be used to cut costs. As it stands, inhabitants are being forced into their cars which can only be bad for the environment. Worse still, many elderly people now find it difficult to get out and about. Trips into town for shopping require a car. Trips to hospitals at Dover and Canterbury are no longer possible by public transport. Perhaps you could give some consideration to this serious social problem?
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

Local Plan Consultation Point	Deal
Rep ID	SDLP1786
Rep Status	Processed
Consultee ID	1270787
Consultee Full Name	Kent Salads Ltd
Consultee Company / Organisation	
Agent Full Name	Christopher Sherlock-Scougall
Agent Company / Organisation	Clague Architects
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Omission Site in Deal (Kent Salads)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes

6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

REPRESENTATIONS TO THE DOVER DISTRICT LOCAL PLAN REGULATION 19 CONSULTATION
IN RESPECT OF LAND FORMERLY KNOWN AS KENT SALADS

Clague Architects welcomes the opportunity to submit further representations to the Dover District Local Plan (Regulation 19 Consultation) in respect of Land formerly known as Kent Salads (hereafter referred to as 'the Site'). A Site location plan showing the extent of the Site is contained at Appendix 1 of this representation.

Clague is disappointed to see that the Site has not been included as a housing allocation at this stage in the plan making process. The company believes that the Site presents an excellent opportunity to deliver sustainable residential development of significant value to the District in accordance with national planning policy. For the reasons set out as follows, we believe that this site should be allocated for a residential development of approximately 30 units in the new Local Plan, thereby contributing towards meeting Dover District's housing needs over the Local Plan period to 2040. The Site would therefore make a notable contribution to the District's short term housing targets, while helping to secure the achievement of annual housing targets through a broadened scope of deliverable housing Sites over the plan period.

It is Clague Architects' view that the current suite of allocations in the draft Plan would fail to provide a sufficient level of growth in and around the main settlements within the Dover district, and that the draft plan is over reliant upon a single urban extension to meet local housing needs. To ensure the soundness of the plan, further Sites, such as the one advocated in this representation, should be allocated to enable the Plan's ambitions for Dover to be delivered.

a. Land formerly known as Kent Salads ('The Site')

The site comprises approximately 1.5ha of land formerly used by a commercial operator, Kent Salads Ltd. The site is previously developed land and is therefore a brownfield site. In principle, national planning policy supports the re-use of brownfield sites subject to other planning considerations.

The Land formerly known as Kent Salads site is located to the west of Deal, off the south-western tip of the former Betteshanger Colliery site. To the north of the colliery site is a small residential cluster of former colliery workers' dwellings at Circular Road, and adjacent to this residential cluster is a large agri-employment site consisting of greenhouses, processing facilities, offices and agricultural buildings. The land is accessed off The Drove, which leads east to a junction with Northbourne Road and Deal Road which in turn provides access into Deal to the south, and to the A256 to the north, which runs into Sandwich. To the east of the site, beyond the former Betteshanger Colliery site, is Betteshanger Country Park. The park was approved through SEEDA's 2002 planning application for the regeneration of the former colliery lands. It provides a variety of activities including walking, cycling and orienteering, as well as a play area, partially completed visitor centre and road and mountain biking circuits. The park is readily accessible from the proposed application site. The site is not located within the Green Belt, nor is it located within the AONB or local landscaping designation. The southern portion of the site is a designated Historic Park, though it is not proposed to develop on this element. The site is not in a Flood Zone.

b. Objection to Table 4.1, Draft Dover District Local Plan

Clague Architects considers that the approach taken to the delivery of housing in the Dover district as set out within Table 4.1 of the Regulation 19 Submission Version of the Draft Local Plan is not a result of sound plan-making. It is considered that further Sites, including the Site subject of this representation, should be allocated to secure steady growth in the district, and diversify the type of housing that will be delivered across a wider range of Sites. The Site subject of this representation is a prime example of that, as it is deliverable within the short term, and would help secure key societal improvements and urban renewal, which the draft plan recognises that Dover is in urgent need of. As outlined below, the development strategy in its current form raises several issues, the vast majority of which could be addressed through the allocation of additional Sites across the district, including the Site.

Reg 19 Response

An earlier Call for Sites submission for 60 units on the site was considered by Dover District Council during its initial HELAA process. The site [HELAA105] was considered a potentially suitable site, but DDC concluded that the trip generations from 60 dwellings would be likely to be significantly above that which could be generated by the permitted use of the site. However, DDC noted that a smaller scheme may be acceptable in highways terms.

Clague Architects considers that a revised and scaled down scheme on the site could therefore deliver sustainable development of benefit to the wider district without impacting unacceptably on the local road network. We would therefore endorse allocation of the Land formerly known

as Kent Salads for sustainable residential development for approximately 30 dwellings. This would make best use of a brownfield site and reduce residual pressure for the release of greenfield sites to meet the District's housing need.

The site is considered to be in a sustainable location for the proposed development. Deal is situated approximately 3km south of the site. The town provides a wide variety of services, leisure facilities and infrastructure including Deal railway station which offers train services to London St Pancras via Folkestone Central or Ashford; three trains every hour during peak times, and two trains every hour off-peak, taking only 1.5 hours to 2 hours. The Historic town of Sandwich is located approximately 5km to the north, which offers further services, leisure facilities and infrastructure.

Sandwich station is one train station stop north of Deal railway station. There are a number of further facilities of relevance to the site in close proximity. These include Northbourne CEP School (located approximately 1.25 km west of the site), Sholden C of E School (located approximately 2.5 km south of the site), a sports pitch to the north of the former Betteshanger colliery site, and Betteshanger Country Park to the east.

The site can be easily accessed by bus. The Stagecoach no.81 bus offers services from Deal through to Sandwich and stops along Broad Lane which is approximately five mins walk to the north of the site; the site is directly connected to Broad Lane by Public Right of Way EE367; while the Stagecoach no.80 bus stops along Sandwich Road approximately 7 mins walk to the east of the site. The no.80 and no.81 operate twice an hour, taking only 10-15 minutes from Deal town centre. Deal can be accessed from the site by both foot and bicycle. Beyond the former colliery site adjacent to this site, there are footpaths and cycle paths extending east along Betteshanger Road, joining to Sandwich Road (A258), and also linking directly to Betteshanger Country Park.

The site is also directly linked to the A258 and onward connections by PRoW EE368 and EE369 (see Appendix 1). Foot and cycle paths also extend north along Sandwich Road (A258). The footpath network extends through to Sandwich and beyond, connecting the site to other nearby settlements. The network of footpaths and cycle paths are considered to be safe for users, as they are mostly separate from the road and are also separate from each other allowing cyclists and walkers to avoid conflict/collision. Access to the wider road network is also easily achievable. The site is well connected to the motorways (M20 and M2) and the local road network (A2 and A256) which provides access to many of Kent's main town centres for example Canterbury, Sandwich, Ramsgate and Deal.

In short, the site's location between Deal and Sandwich means it is in close proximity to two significant town centres providing an excellent range of services, facilities and employment opportunities, as well as having good connections to day-to-day services nearby; while also being in commuting distance of London.

Land formerly known as Kent Salads therefore presents an opportunity to deliver development in accordance with the Council's spatial strategy which is deliverable and can accommodate around 30 dwellings, which is proportionate to Deal's status in the settlement hierarchy. We would therefore endorse allocation for residential development in the emerging Local Plan to meet DDC's housing needs.

Achieving Urban Regeneration and Delivering Social Infrastructure

Another key objective of the NPPF is to 'make effective use of land'. Paragraph 120 states that this can be achieved by encouraging the redevelopment of brownfield land and avoiding the development of greenfield land. As noted in the above section, the vast majority of growth for the town is planned to be delivered through the Whitfield Urban Expansion (SAP1); a significant urban extension beyond the settlement boundary for at least 5,750 homes in the north of the town. Clague Architects considers that the draft plan does not present enough opportunities for the redevelopment of brownfield land. Land formerly known as Kent Salads is predominantly brownfield land. The redevelopment of the Site would minimise the loss of greenfield land and bolster brownfield delivery, and is considered to be a significant opportunity for urban regeneration.

Ensuring the delivery of new homes

For a plan to be considered effective, the objectives and identified requirements must be deliverable and achievable. It is considered that, in its current form, the plan fails to accord with this part of the soundness test, due to over reliance on the Whitfield (SAP1) Strategic Allocation to provide the District's projected housing needs over the plan period. Therefore, to ensure the balanced and steady delivery of housing over the plan period, further Sites should be allocated to ensure that the needs of the district are met.

Whitfield Urban Extension (SAP1) is the largest allocation in the plan and it is expected to deliver over 5,750 dwellings. Of the 5,750 dwellings proposed for the Site, 3,483 dwellings are considered deliverable in the emerging Plan period. The Council acknowledges that the 2010 Core Strategy included provision for the Site to deliver 5,750 dwellings. Phase 1 of the SAP1 allocation (Dover ref. 10/01010) is underway and as of the 2020/2021 monitoring year, 185 dwellings had been completed with a delivery rate of approximately 50dpa for the past three years. Given this slow progress, it seems likely that although the existing outline planning permission should be completed over the Plan period, a more cautious approach should be taken in terms of the remaining dwellings allocated for the Site given its proven issues in delivering housing to date. Without clear evidence by way of a planning application for these additional dwellings, it is questioned whether Whitfield will ramp up to delivery of 120dpa from 2023/24 and then up to 200dpa from 2026/27 for the remainder of the Plan period. More consideration should therefore be made to the current planning position of the Site and the length of time it has taken so far to deliver housing. Paragraph 73D of the NPPF recommends the inclusion of realistic delivery rates within Local Plans, and DDC should therefore review those proposed for Whitfield and consider building more flexibility and more volume into the pipeline to be able to respond to delivery issues.

	<p>It is considered that, particularly with the deliverability issues of the Whitfield Urban Extension to date, additional Sites should be allocated for housing to ensure that there is sufficient choice and flexibility in the supply so that DDC can meet its housing requirement throughout the Plan period, as well as to meet the Government's objective to significantly boost the supply of housing as set out in Paragraph 60 of the NPPF. Land formerly known as Kent Salads would be an appropriate allocation which would assist in ensuring a variety of housing Sites are allocated in accordance with NPPF Paragraph 68. The provision of around 30 dwellings here would be suitable for the Dover district could support the delivery of housing to meet local needs.</p> <p>c. Conclusion</p> <p>Clague Architects wishes to support Dover District Council in bringing forward a successful, effective and sound Local Plan that can serve the District across the Plan period. In its current form, it is considered that the allocation of land formerly known as Kent Salads (the land subject of this representation) for residential redevelopment will strengthen the soundness of the Plan and the sustainability of the spatial strategy in the following ways:</p> <ul style="list-style-type: none"> • Making effective use of a brownfield site and thereby reducing reliance on greenfield site delivery • Improving the diversity and quality of housing in the Dover district by reducing the dependence upon a single location to deliver the majority of the town's growth; and • Boosting the delivery of housing in the Dover district and reducing the dependence upon a single location to ensure that the benefits of growth and regeneration are delivered across the town. <p>The site provides a unique opportunity to do so with the provision of around 30 dwellings. The site should therefore considered for allocation for residential development.</p> <p>There are no significant constraints to the use coming forward.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>Sherlock-Scougall Clague (Kent Salads) 0946 Att1_Redacted.pdf Sherlock-Scougall Clague (Kent Salads) 0946 Att2.pdf</p>
<p>Local Plan Consultation Point</p>	Deal
<p>Rep ID</p>	SDLP1886
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1272184
<p>Consultee Full Name</p>	Tony and Valerie Armitage
<p>Consultee Company / Organisation</p>	

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP9
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The Deal/Walmer road system will not cope if permission is given for anymore developments; SAP14, SAP15, SAP34 are unsound Congestion caused by over-development along the Dover Road from Ringwould into Deal will result in traffic queues more frequently than at present making walking and cycling irresistible. June 2020 Deal Town Council report requires pavements, cycle lanes, wide roads and detailed junction plans. Traffic in Kingsdown would be gridlocked winter and summer
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	In an ideal world- Ringwould Road in and out of Kingsdown to have cycle lanes and walking paths. Park and pedal scheme I Borrowpit Carpark to be activated Glen Road / Liverpool Road to have cycle lanes and walking paths St James Road / Upper Street junction to be redesigned and made safe to take all the construction traffic. Alexander Road / Upper Street junction to be redesigned and made safe to take construction / extra traffic
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Deal
Rep ID	SDLP1782
Rep Status	Processed
Consultee ID	1271717
Consultee Full Name	Quinn Estates
Consultee Company / Organisation	Quinn Estates Ltd

Agent Full Name	Christopher Sherlock-Scougall
Agent Company / Organisation	Clague Architects
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Omission Site In Deal (Kennels Farm)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>REPRESENTATIONS TO THE DOVER DISTRICT LOCAL PLAN REGULATION 19 CONSULTATION IN RESPECT OF LAND NORTH AND SOUTH OF KENNELS FARM, DEAL</p> <p>Clague Architects, on behalf of Quinn Estates, welcomes the opportunity to submit further representations to the Dover District Local Plan (Regulation 19 Consultation) in respect of Land South of Kennels Farm, Deal (hereafter referred to as 'the Site'). A Site location plan showing the extent of the Site is contained at Appendix 1 of this representation.</p> <p>Quinn Estates is disappointed to see that the Site has not been included as a housing allocation at this stage in the plan making process. The company believes that the Site offers an excellent opportunity for tempered expansion of the northern part of Deal town. The site lends itself to a housing scheme that can dovetail with the existing pattern of development without resulting in sporadic encroachment of the built form into the countryside. The result would be measured and contained expansion of the urban area providing much-needed family housing of significant value to the district in accordance with national planning policy. As such, a proposal of around 120 dwellings, if allocated in the new Local Plan, could be contributing towards meeting Dover District's housing need over the Local Plan period to 2040. The Site would therefore make a notable contribution to the District's short term housing targets, while helping to secure the achievement of annual housing targets through a broadened scope of deliverable housing Sites over the plan period.</p> <p>It is Quinn Estate's view that the current suite of allocations in the draft Plan would fail to provide a sufficient level of growth in and around the main settlements within the Dover district, and that the draft plan is over reliant upon a single urban extension to meet local housing needs. To ensure the soundness of the plan, further Sites, such as the one advocated in this representation, should be allocated to enable the Plan's ambitions for Dover to be delivered.</p> <p>a. Land South of Kennels Farm, Deal ('The Site')</p> <p>The site comprises approximately 3.3ha of land accessed via a track off Golf Road. It is located to the west of existing housing accommodation comprising Vlissingen Drive. It is within walking distance of Deal seafront and town centre. The site is not located within the Green Belt, nor is it located within the AONB or local landscaping designation. The site is located in Flood Zones 2 and 3.</p> <p>Deal sea front is situated less than 1km to the east of the site, with the town centre providing a wide variety of infrastructure including Deal railway station which offers train services to St Pancras via Folkestone Central or Ashford; three trains every hour during peak times, and two trains every hour off-peak taking only 1.5 hours to 2 hours. Historic Sandwich town is one train station stop north of Deal railway station.</p> <p>The site can be easily accessed by bus. It is approximately 250m from the Courtenay Rd bus stop on Golf Road which provides a no84 service between Deal and Sandown. Deal can be accessed from the site by both foot and bicycle. Access to the wider road network is also easily achievable. The site is well connected to the motorways (M20 and M2) and the local road network (A2 and A256) which provides access to many of Kent's main town centres for example Canterbury, Sandwich, Ramsgate and Deal.</p> <p>The public transport connectivity in the locality and easy access by a range of modes to local centres, villages and beyond adds to the attractiveness of this location and presents an opportunity to meet housing need identified in the District's Core Strategy.</p> <p>b. Reg 19 response</p>

Quinn Estates considers that the approach taken to the delivery of housing in the Dover district as set out within Table 4.1 of the Regulation 19 Submission Version of the Draft Local Plan is not a result of sound plan-making. It is considered that further Sites, including the Site subject of this representation, should be allocated to secure steady growth in the district, and diversify the type of housing that will be delivered across a wider range of Sites. The Site subject of this representation is a prime example of that, as it is deliverable within the short term, and would help secure key societal improvements and urban renewal, which the draft plan recognises that Dover is in urgent need of. As outlined below, the development strategy in its current form raises several issues, the vast majority of which could be addressed through the allocation of additional Sites across the district, including the Site.

Sustainability

The site is located partly within 'Land between the A256 and North Deal' (site ref. DEA012) as assessed in the HELAA (2020). The HELAA deems this wider site unsuitable primarily due to highways and access, but also identifies a number of other constraints including flooding, drainage, ecology, heritage and archaeology. It should be noted that the site would comprise a significantly smaller area of development than that originally put forward in the HELAA.

Notwithstanding the earlier HELAA assessment, Quinn Estates considers that this small element of DEA012 presents a unique opportunity for the provision of dwellings that could contribute to the district's housing needs. Draft Strategic Policy 2 (Housing Growth) projects a need of at least 11,920 net additional dwellings between 2020 and 2040. These are to be met through a combination of committed schemes, site allocations and windfall sites. The inclusion of this housing need figure in the draft Local Plan, alongside a 10% buffer, is accepted. It is crucial that the housing supply that is identified to meet and exceed this requirement in the emerging Local Plan is suitably varied in size and location, and is clearly supported with technical evidence that the allocated sites are deliverable and developable over the Plan period.

Draft Strategic Policy 2 sets out that the majority of development will be focused in Dover, then in Deal, followed by Sandwich and Aylesham. Development in remaining areas will be of a scale consistent with its position in the settlement hierarchy. The draft LP sets out further detail on the growth proposed for each settlement, with Dover identified as a Secondary Regional Centre that will accommodate 47.82% (3,592 dwellings) of the proposed housing allocations in the draft Plan (a total of 7,511 dwellings) with Deal (District Centre) following this, accommodating 7.38% (554 dwellings).

Land to the north and south of Kennels Farm, Deal therefore presents an opportunity to deliver development in accordance with the Council's spatial strategy which is deliverable and can accommodate around 120 dwellings, which is proportionate to Deal's status in the settlement hierarchy. It should therefore be allocated for residential development in the emerging Local Plan to meet DDC's housing needs.

Flood Risk

While the site is located in Flood zones 2 and 3, it is considered that in light of its locational benefits, the site would be at a sequentially preferable location for the nature and scale of development proposed as there will be no reasonably available sites of the same or similar capacity at lower risk of flooding that could provide the same benefits. As such, the proposal could meet the requirements of the Sequential Test as set out in Planning Practice Guidance.

The proposed residential scheme would be designed to be flood resilient with living accommodation at first floor level, and would incorporate a sustainable drainage scheme. As such the scheme would be designed such that it would be safe for its lifetime to both life and property and without increasing flood risk elsewhere. In light of this, Quinn Estates believes the proposal would provide wider sustainability.

benefits to the community that would outweigh the flood risk. The scheme could therefore meet the requirements of the Exception Test as set out in Planning Practice Guidance.

Ensuring the delivery of new homes

For a plan to be considered effective, the objectives and identified requirements must be deliverable and achievable. It is considered that, in its current form, the plan fails to accord with this part of the soundness test, due to over reliance on the Whitfield (SAP1) Strategic Allocation to provide the District's projected housing needs over the plan period. Therefore, to ensure the balanced and steady delivery of housing over the plan period, further Sites should be allocated to ensure that the needs of the district are met.

Whitfield Urban Extension (SAP1) is the largest allocation in the plan and it is expected to deliver over 5,750 dwellings. Of the 5,750 dwellings proposed for the Site, 3,483 dwellings are considered deliverable in the emerging Plan period. The Council acknowledges that the 2010 Core Strategy included provision for the Site to deliver 5,750 dwellings. Phase 1 of the SAP1 allocation (Dover ref. 10/01010) is underway and as of the 2020/2021 monitoring year, 185 dwellings had been completed with a delivery rate of approximately 50dpa for the past three years. Given this slow progress, it seems likely that although the existing outline planning permission should be completed over the Plan period, a more cautious approach should be taken in terms of the remaining dwellings allocated for the Site given its proven issues in delivering housing to date. Without clear evidence by way of a planning application for these additional dwellings, it is questioned whether Whitfield will ramp up to delivery of 120dpa from 2023/24 and then up to 200dpa from 2026/27 for the remainder of the Plan period. More consideration should therefore be made to the current planning position of the Site and the length of time it has taken so far to deliver housing. Paragraph 73D of the NPPF recommends the inclusion of realistic delivery rates within Local Plans, and DDC should therefore review those proposed for Whitfield and consider building more flexibility and more volume into the pipeline to be able to respond to delivery issues.

	<p>It is considered that, particularly with the deliverability issues of the Whitfield Urban Extension to date, additional Sites should be allocated for housing to ensure that there is sufficient choice and flexibility in the supply so that DDC can meet its housing requirement throughout the Plan period, as well as to meet the Government's objective to significantly boost the supply of housing as set out in Paragraph 60 of the NPPF. Land south of Kennels Farm, Deal would be an appropriate allocation which would assist in ensuring a variety of housing Sites are allocated in accordance with NPPF Paragraph 68. The provision of around 50 dwellings here would be suitable for the Dover district could support the delivery of housing to meet local needs.</p> <p>c. Conclusion</p> <p>Quinn Estates wishes to support Dover District Council in bringing forward a successful, effective and sound Local Plan that can serve the District across the Plan period. In its current form, it is considered that improvements can be made and that the allocation of land south of Kennels Farm, Deal (the land subject of this representation) for residential redevelopment will strengthen the soundness of the Plan and the sustainability of the spatial strategy in the following ways:</p> <ul style="list-style-type: none"> • Providing measured and contained expansion of the northern part of Deal town at a highly sustainable location • Creating a logical expansion of the urban area without resulting in unchecked encroachment of the built form into the countryside • Improving the diversity and quality of housing in the Dover district by reducing the dependence upon a single location to deliver the majority of the town's growth; and • Boosting the delivery of housing in the Dover district and reducing the dependence upon a single location to ensure that the benefits of growth and regeneration are delivered across the town. <p>The site provides a unique opportunity to do so with the provision of up to 120 dwellings. The site therefore should be allocated for the use proposed. Quinn Estates is the south east's foremost mixed-use developer with numerous development interests within Dover District, Kent and the wider South East area. The company has delivered both successful community extension schemes and stand-alone development sites both within rural and urban locations within the District. In addition, they are the largest provider of self and custom-build serviced plots in Kent. There are no significant constraints to the use coming forward. As such the site should be re-assessed against the new development proposal. Quinn Estates would welcome the opportunity to participate in the forthcoming Examination-in-Public into the Plan and to contribute to the debate to ensure that the best strategy for the District is found.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>Sherlock-Scougall Clague (Kennels Farm) 0945 Att1_Redacted.pdf Sherlock-Scougall Clague (Kennels Farm) 0945 Att2.pdf</p>
<p>Local Plan Consultation Point</p>	Deal
<p>Rep ID</p>	SDLP1915
<p>Rep Status</p>	Processed

Consultee ID	1271717
Consultee Full Name	Quinn Estates
Consultee Company / Organisation	Quinn Estates Ltd
Agent Full Name	Sarah Willson
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Deal
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Iceni Projects, on behalf of Quinn Estates, welcomes the opportunity to submit representations to the Dover District Council Local Plan Regulation 19 Consultation in respect of a strategic proposal at Cottington (herein referenced as 'the Site'). This representation should be considered alongside and with regard to supporting technical appendices to this letter which comprise:</p> <ul style="list-style-type: none"> • Appendix 1 – Sketch Site Plan • Appendix 2 – Local Connectivity Plan • Appendix 3 – Transport Appraisal • Appendix 4 – Actual and Residual Flood Risk Plans <p>Collectively, these documents demonstrate that high quality growth of a scale commensurate to Deal's position within the settlement hierarchy can be suitably and successfully delivered at Deal. The proposals are a revision of the site previously put forward as part of the original Call for Sites and subsequent Regulation 18 Consultation, which included land within Flood Zone 3. The revised Masterplan is for a reduced level of growth that could be delivered in a way that successfully adapts to and mitigates against environmental issues at Deal. The scale of the proposal has been revised significantly throughout the Local Plan process, initially proposing 975 dwellings, the current submission now proposes up to 585 dwellings and addresses all constraints previously identified, including flood risk, wildlife designations and transport.</p> <p>The vision for the Draft Local Plan reflects the growing importance of new challenges facing local communities in regard to climate and ecological emergency, and greater emphasis on the protection and enhancement of retail, leisure, cultural and commercial development across the district area, and promoting the health and social wellbeing of communities. The corresponding objectives strive for a more prosperous economy, as well as vibrant new communities. Quinn Estates considers that there is much to welcome in the new Plan, however, the company considers the opportunity to deliver an appropriate and badly needed quantum of growth at Deal has not been positively planned for, and that the Plan would be strengthened by promoting additional growth at Deal.</p> <p>Quinn Estates considers that its proposal at Cottington presents a unique opportunity to deliver a transformative development of value to the District and that it should accordingly be allocated within the new Local Plan for residential led mixed-use development to contribute towards meeting Dover District's housing and employment needs over the Local Plan period to 2040.</p> <p><u>a. The Site and Surroundings</u></p> <p>The wider Site comprises approximately 200ha of land in various uses including agricultural fields, and fishing lakes and a country park (Betteshanger Park). The Site adjoins Sholden and Deal to the south, beyond the settlement boundary. The Site is bound by Sandwich Road (A258) and agricultural fields to the west and by agricultural fields and Fowlmead Farm to the north, with further fields</p>

and the HS1 rail line also located further to the east. To the south it is bound by the existing residential dwellings at Sholden and Deal. The land immediately to the south-east of the Site is currently being constructed for 230 dwellings by Persimmon Homes (planning permission ref. DOV/10/1012 and DOV/13/00945).

The Site is relatively flat, with the exception of Betteshanger Country Park which includes undulating landscaped areas of the former colliery spoil tip. The Site boundary excludes Cottington Court Farm and its curtilage. A Public Right of Way (PRoW) cuts across the Site from west to east around the edge of the residential dwellings at Sholden and along the bottom of the fishing lakes. The Country Park also includes a number of walking routes alongside mountain biking trails and a road cycling track. Existing access to the Site is from Sandwich Road to the west of the Site. Deal train station is located 1.5km walking/cycling distance to the east of the Site.

Most of Betteshanger Country Park and the fields fronting onto Sandwich Road are in Flood Zone 1. Whilst the land to the rear of Cottington Court Farm and the fishing lakes across to South Wall are located within Flood Zone 2 and 3, this land is mostly benefitting from flood defences. The Site is wholly within the Lower Stour Wetlands Biodiversity Opportunity Area, whilst the fishing lakes are located within the Sandwich Bay to Hacklinge Marshes SSSI and the Thanet Coast & Sandwich Bay Ramsar. These designations also incorporate land to the north-east and north-west beyond the site boundaries. The Thanet Coast & Sandwich Bay SPA is also located to the north-east of the site

b. The refined Site proposal

The Site was previously promoted in a different and larger form in the earlier stages of the Local Plan development but was not progressed due to matters of flood risk and drainage. Detailed work has been undertaken to demonstrate that Cottington is deliverable and that the potential constraints identified can be overcome.

The refined Masterplan for Cottington proposes the delivery of up to 585 new homes for Deal, and 2,030sqm of commercial floorspace in the northernmost parcel of the scheme. Cottington will also provide new premises to support the work of The Dover Outreach Centre charity to help rough sleepers, the homeless and those threatened with homelessness. Securing premises will be a crucial step for the charity to support their existing work. Cottington would also deliver new facilities for Deal and Betteshanger Rugby Club and secure funding for new facilities for Deal Town Football Club at their current location ensuring that both clubs can grow and expand their sporting offer, community use and outreach programmes. In addition, the Cottington proposal would also fund improvements for Deal Rowing Club at their current premises on Deal seafont.

Crucially, Cottington will have a fully independent drainage network adopted by a statutory undertaker to the point of discharge including environmental permits. Quinn Estates are in advanced discussions with Severn Trent Connect on this deliverable solution which would enable housing growth around Deal town to be unlocked without increasing the flow and burden on the Southern Water network in Deal and relieving residual pressure for higher levels of development in close proximity to smaller settlements within the district. It is also proposed that the Site delivers a primary school, complimentary commercial floorspace and an electric bus park and ride facility alongside a network of pedestrian and cycle infrastructure to stimulate sustainable travel patterns and strengthen connectivity between the settlement of Deal and the natural environment that adjoins it, including an expanded Betteshanger Country Park. The concept of creating a new community on the subject land is an intrinsic component of a wider strategy to establish Betteshanger Country Park as a thriving and successful health and community asset for the District.

c. Objection to Tables 3.3 and 4.2 (under the auspices of Policy SP3)

Quinn Estates considers that the spatial approach to the allocation of housing in Deal, as detailed in Tables 3.3 and 4.2 of the Regulation 19 Submission Version of the Draft Local Plan is not a result of sound plan-making. Quinn Estates consider that additional growth should be directed to Deal to reflect its position in the settlement hierarchy, deliver badly needed growth at the settlement and a more sustainable pattern of development. Accordingly, additional sites must be allocated to Deal in Table

4.2. The current approach to the development strategy raises several issues which can be addressed through the allocation of additional housing and employment growth to Deal, including the Site subject to this representation.

Sustainable distribution of growth

Sustainability is defined as 'meeting the needs of the present without compromising the ability of future generations to meet their own needs', and functions as a confluence of social, economic, and environmental factors. The vision for the District outlined in Paragraph 3.29 requires new development to be focused at accessible and sustainable locations which can utilise existing infrastructure, facilities, and services and to ensure that development contributes to the sustainability of local communities and services. When translating sustainability into site allocations, the Council should therefore ensure that new residents can reach established nearby town centres using sustainable modes of transport, to limit pollution arising from motor travel and to support the vitality of the existing community and local economy, without creating environmental harm.

Deal is recognised in the Draft Local Plan as the second largest settlement in the District, benefitting from a vibrant town centre, which benefits from a good level of accessibility and an attractive environment. It's well used by residents and visitors and has a low vacancy rate, as a result of the diverse retail offer. In addition, the town is highly sustainable in regard to public transport accessibility, being served by mainline rail, the high-speed train service to London and numerous bus routes. As the Transport Assessment appended to this letter notes, Deal has good connectivity within the town, as well as with wider areas in Kent and London.

Despite the sustainability of Deal, the Draft Local Plan approaches development for the town with caution. A total of 7 sites are allocated for development with a combined housing number of just 218 dwellings. This growth quantum is completely inconsistent with Deal's position in the settlement hierarchy and constitutes a disproportionately small increase in the town's size, given its population of circa 30,000. Moreover, the growth quantum assigned is more akin to that of a rural settlement with limited services, population and potential to achieve sustainable development.

It is our contention that the level of growth identified for Deal is insufficient for its position as the second most sustainable location in the District, and that the Council's strategy has skewed large amounts of growth away from one of the most sustainable locations to areas that are far less sustainable, with rural areas with lesser sustainability taking a higher housing number than the second largest settlement. The justification for channelling so little growth to Deal is not considered to be justified by evidence, when all the evidence points to the settlement being such a logical and sustainable location to channel growth to. The principles of sustainability and sound plan making appear to have been absent in key decision taking over spatial choices at the heart of the spatial strategy presented in the draft Plan.

Deal's connectivity to public transport and strategic highway infrastructure means that the settlement clearly offers greater scope to sustainably accommodate growth than has been identified in the Plan.

Quinn Estates recognises that there is land with environmental constraints at Deal, but the land at Cottington represents a significant strategic site that can sustainably and successfully deliver a vibrant mixed-use community in a manner that respects and mitigates environmental constraints and this opportunity has been overlooked in the preparation of the Plan.

Addressing identified constraints

Paragraph 4.153 of the Draft Local Plan states that 'limited site allocations have been identified in Deal due to the constraints that exist including: flood risk, wildlife sites, heritage and highways. In accordance with SP3, development in Deal should be compatible with the level and range of job opportunities, shops, services and other facilities available.' We contend that the constraints identified by the Council as the cause for the lack of site allocations to Deal are typical constraints facing any seaside town, namely flood risk, wildlife sites, heritage and highways. These constraints should not be considered insurmountable as to rule out housing growth for Deal.

The suite of technical assessments submitted with this representation letter outline how constraints at Cottington can be appropriately addressed to deliver a sustainable mixed-use scheme. The proposals for the Site have been refined to remove land from areas of residual flood risk, as detailed in the plans appended to this letter. The Transport Appraisal outlines how highways and traffic do not represent a significant constraint for Deal, stating:-

The modelling confirms earlier assertions that the traffic network in Deal is not currently, nor is forecast in the future, to be subject to significant capacity constraints. Furthermore, it is anticipated that the current and reduced development quantum on the site would result in a slight improvement in the operation of the surrounding network compared with the higher quantum incorporated within the model assessment. Although the development proposal focuses on supporting and encouraging a wide- spread shift of travel patterns to sustainable modes, it will also seek to have a minimal impact on the highway network.'

Moreover, the Transport Appraisal finds that the proposed development would not result in severe impact on the local highway network. The development would deliver an extensive and innovative package of sustainable travel measures, including a car-free Sustainable Movement Corridor linking the development directly to the centre of Deal, prioritising movement for walking, cycling and by electric bus, supporting a wider shift in transport patterns to active modes, as well as relieving pressure on the A258 movement corridor into and out of Deal town as stated in the extract from the Transport Appraisal below:-

'The development would deliver an extensive and innovative package of sustainable travel measures, including a car-free Sustainable Movement Corridor linking the development directly to the centre of Deal, prioritising movement for walking, cycling and by bus. This will be supported by a Sustainable Movement Hub allowing the benefits of the new corridor to be used by others travelling to the centre of Deal and allow such trips to be intercepted and mode shifted before entering the town – reducing car travel and improving connectivity on the A258 corridor.'

The scheme proposes substantial open space and ecology habitat provision, including new semi- natural open space within existing arable land whilst securing long-term ecological management of the existing Betteshanger Country Park and Cottington Lakes.

Approximately 13ha of natural open space is proposed in association with the residential development parcels, forming areas for new habitat creation including wildflower grassland, mixed scrub and woodland planting and pond creation. Based on habitat creation within these areas, it is considered that a biodiversity net gain of up to 20% can be achieved within the development parcels alone. Cottington Lakes, totalling around 50ha, is to be established as a dedicated area for wildlife and ecological enhancement, with measures such as naturalising existing fishing lakes and sensitive grassland and woodland management providing substantial wildlife benefits. The development would enable enhanced management of the existing Betteshanger Country Park in accordance with its various open space, cultural and wildlife interests, allowing for a site-wide ecological management plan, additional wardening and habitat enhancement projects.

Together, these measures will provide in the region of 150ha of open space, forming a substantial green infrastructure resource linking to existing wildlife habitats within the surrounding Sandwich Bay ecological designations.

The key site constraints referenced by the Council when discounting the site at Regulation 18 stage have therefore been addressed, and we respectfully request that the reduced and revised scheme is re-assessed.

The Council's assessment of land at Cottington

As part of the preparation of the Local Plan the Council identified and appraised a range of growth and spatial options through the Sustainability Appraisal (SA), which provides an assessment of how different options perform in environmental, social, and economic terms, to help inform which option should be taken forward. The Council's Sustainability Appraisal scores the principle of housing at the wider proposal for this site positively across effects on housing, access to services and facilities, economy, sustainable transport and climate change mitigation (site ref: DEA012A). The employment proposals for the Site similarly score well.

The sustainability of the Site is clearly demonstrated in the Transport Appraisal submitted with this representation, which concludes that development of the Site represents a 'forward-thinking proposal, bound into a strong sustainable ethos with the inclusion of a package of sustainable transport measures.' The sustainable movement corridor proposed for walkers, cyclists and buses will provide an attractive, purpose built, shorter alternative route to Deal town centre. This will benefit both new and existing residents at Deal, as well as opening up options for current users of the A258, potentially relieving pressure on this corridor into the town.

Whilst the site scored poorly on flood risk, the assessment considered a land area to accommodate in the region of 1,200 homes, with no consideration given as to whether a lower level of growth could be accommodated outside of areas of actual and residual flood risk, as currently embodied by the Cottington proposal.

New market and affordable housing delivery

Paragraph 35 of the NPPF outlines how plans are effective where they are found to be deliverable over the plan period. The disproportionately high dependence on Whitfield Strategic Allocation (SAP1) results in a plan which raises considerably uncertainty as to this key soundness test.

Quinn Estates has no objection to large-scale housing development at strategic sites playing an important role in meeting housing need. However, what looks good on paper needs to deliver in practice. However, in a District like Dover where there is a need for the benefits of growth to translate across the District, the spatial strategy should be seeking to unlock growth and inward investment at other key settlements, such as Deal, and this is a significant weakness of the Plan in its current form.

Spatial strategies should reflect that building homes is a complex and risky business. Stronger local markets have higher annual delivery rates, and where there are variations within districts, this should be factored into spatial strategy choices. Further, although large sites can deliver more homes per year over a longer time period, they also have longer lead-in times. Research by Lichfield1 found the average lead in time for large sites prior to the submission of the first planning application is 3.9 years

This issue with delivery is found to be the case with Whitfield. The delivery of Whitfield is hampered by its reasonably isolated location away from existing services and facilities. The allocation of this site has not been based on a demand for houses in this area, and has resulted in slow delivery, a need for huge infrastructure investment and public intervention for the new FastTrack rapid transit bus service to facilitate the site's sustainability.

Of the 5,750 dwellings proposed for the allocation, 3,483 dwellings are considered deliverable in the emerging Plan period. The Council acknowledges that the 2010 Core Strategy included provision for the Site to deliver 5,750 dwellings. Phase 1 of the SAP1 allocation (Dover ref. 10/01010) is underway and as of the 2020/2021 monitoring year, 185 dwellings had been completed with a delivery rate of approximately 50dpa for the past three years. Given this slow progress, it seems likely that although the existing outline planning permission should be completed over the Plan period, a more cautious approach should be taken in terms of the remaining dwellings allocated for the site given its proven issues in delivering housing to date.

Without clear evidence by way of a planning application for these additional dwellings, it is questioned whether Whitfield will ramp up to delivery of 120dpa from 2023/24 and then up to 200dpa from 2026/27 for the remainder of the Plan period. More consideration should therefore be made to the current planning position of the Site and the length of time it has taken so far to deliver housing. Paragraph 73D of the NPPF recommends the inclusion of realistic delivery rates within Local Plans, and the Council should therefore review those proposed for Whitfield and consider building more flexibility and more volume into the pipeline to be able to respond to delivery issues.

It is considered that, particularly with the deliverability issues of the Whitfield Urban Extension to date, additional sites should be allocated for housing to ensure that there is sufficient choice and flexibility in the supply so that the Council can meet its housing requirement throughout the Plan period, as well as to meet the Government's objective to significantly boost the supply of housing as set out in Paragraph 60 of the NPPF.

The delivery of affordable housing also paints a bleak picture within the District. The Council's existing policy on affordable housing, DM5 of the Core Strategy (2010), requires residential development of 15 or more dwellings to provide 30% of the total homes as affordable homes and the Council's affordable housing strategy remains unchanged, save for reducing the requirement to deliver affordable housing within Dover town. The latest Authority Monitoring Report (2020-2021) profiles how the affordable housing policy has consistently struggled to deliver sufficient levels of affordable housing, with the average being 20%. The failure to deliver sufficient affordable housing is set against a backdrop of worsening affordability in the District. Affordability ratios for Deal show a continued trend of worsening to 9.25 in 2021, with year-on-year worsening from 2012-2018. For the lowest earners, this reaches 9.62 in 2021. The District is less affordable than the national average of 9.05. Median house prices in the District have soared to £285,000, compared to the UK average of £278,000.2 In addition, statutory homelessness within the District sits at 137 people and 136 households, 68 with children, are in temporary accommodation within the District as of 2021.3 Whilst there may be a number of factors contributing to these outcomes, a new spatial strategy that identifies limited housing at Deal is going to deliver limited affordable housing at Deal and the absence of housing will only exacerbate local affordability pressures.

A compelling case can therefore be made for additional sites to be allocated for housing both at Deal and in the wider District to assist with alleviating the affordability issues facing the town and wider District. The development of Cottington would assist in ensuring a variety of housing sites are allocated in accordance with Paragraph 68 of the NPPF, the provision of circa 585 homes would be proportionate to the size of the town, and the provision of circa 176 affordable homes at Deal would likely have a significant beneficial effect in addressing local affordability needs.

d. Conclusion

On behalf of Quinn Estates, we thank you for the opportunity to contribute to the Dover District Local Plan Regulation 19 Consultation.

The current approach to the spatial strategy in the Draft Local Plan requires amendment to address a significant soundness issue concerning the level of growth identified for Deal, the District's second largest settlement. It is considered that the Plan currently fails to positively plan for a commensurate level of housing and employment at the settlement, as expressed in Policy SP3 and that the available evidence does not support or justify this approach. Moreover, the evidence does support channelling greater quantum of growth to Deal.

Quinn's proposal at Cottington constitutes a sustainable location for growth owing to its existing connections to public transport, proposed electric bus route, mixed use village centre, network of pedestrian and cycle infrastructure, relocated primary school and commercial floorspace to deliver a truly mixed-use scheme which would bring economic, social and environmental benefits to existing and future residents. The latest Masterplan can deliver a holistic development of significant benefit that addresses and sufficiently mitigates identified environmental issues at the settlement and the evidence profiling this opportunity enables the authority to evolve the Plan to provide a more commensurate level of growth to this important town.

Cottington represents the only sustainable and deliverable option at Deal to reflect the settlement's position in the hierarchy and for the settlement to play its proportionate role in meeting the District's growth requirement. The proposed development would provide early and accelerated delivery through multiple outlets, including affordable housing to address local affordability pressures, which the current draft Plan fails to address.

Finally, as set out above and detailed in the appended documents, there are no significant constraints to the development coming forward as proposed. As such the site should be re-assessed against the new development proposal and using the updated evidence base provided. It is considered that if the Council undertake this work and consider the potential of Cottington to help Deal play a more proportionate role in meeting the District's growth in line with its position in the settlement hierarchy and status as a main town, a compelling case will exist for allocating the land for development in the emerging Local Plan.

I trust that these comments are of assistance and that these representations will be taken into account in consideration of the current consultation. Quinn would also welcome the opportunity to participate in the forthcoming Examination-in-Public into the Plan and contribute to the debate to ensure that the best strategy for the District is found.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Include Cottington, Deal site in the Local Plan
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	SDLP1915 Willson Att2 Local Connectivity Diagram.pdf SDLP1915 Willson Att3 Sketch Site Plan.pdf SDLP1915 Willson Att4 Flood Zones Actual.pdf SDLP1915 Willson Att5 Flood Zones Residual.pdf SDLP1915 Willson Att6 Transport Appraisal part 1.pdf SDLP1915 Willson Att8 Transport Appraisal part 3.pdf SDLP1915 Willson Att7 Transport Appraisal part 2.pdf SDLP1915 Willson Att9 Pedestrian and Cycle Plans.pdf SDLP1915 Willson Att10 Sustainable Travel proposals.pdf SDLP1915 Willson Att11 Indicative Site Layout.pdf
Local Plan Consultation Point	Deal
Rep ID	SDLP1730
Rep Status	Processed
Consultee ID	1333487
Consultee Full Name	Private Landowner
Consultee Company / Organisation	
Agent Full Name	Nicholas Pellegram
Agent Company / Organisation	Iceni projects
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Omission Site - Land North of Betteshanger Country Park (Part of DEA012)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective

	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes

6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

REPRESENTATIONS TO THE DOVER DISTRICT LOCAL PLAN REGULATION 19 CONSULTATION IN RESPECT OF LAND NORTH OF BETTESHANGER COUNTRY PARK

Iceni Projects welcomes the opportunity to submit further representations to the Dover District Local Plan (Regulation 19 Consultation) on behalf of the landowner in respect of land to the north of Betteshanger Country Park (hereafter referred to as 'the Site'). A Site location plan showing the extent of the Site is contained at Appendix 1 of this representation.

We were disappointed to see that the Site has not been included as a housing allocation at this stage in the plan making process. We consider that the Land to the north of Betteshanger Country Park site presents a unique opportunity to deliver a sustainable development of rural holiday accommodation which would be of significant value to the district in accordance with national planning policy. We believe the site should be allocated within the new Local Plan for approximately 68 holiday units to contribute towards meeting Dover District's tourism accommodation need over the Local Plan period to 2040.

The current suite of allocations in the draft Plan would fail to provide a sufficient level of growth in and around the main settlements within the Dover district, and that the draft plan is over reliant upon a single urban extension to meet local housing needs. To ensure the soundness of the plan, further Sites, such as the one advocated in this representation, should be allocated to enable the Plan's ambitions for Dover to be delivered.

a. Land North of Betteshanger Country Park ('The Site')

The site comprises approximately 7.8ha of land. It is located to the north-west of Deal, bordering the northern fringe of Betteshanger Country Park. Creation of the country park was approved through SEEDA's 2002 planning application for the regeneration of the former colliery lands. The country park provides a variety of activities including walking, cycling and orienteering, as well as a play area, partially completed visitor centre and road and mountain biking circuits.

It is envisaged that access would be provided through the country park. It lies immediately north of the car parking area and visitor centre serving the country park. South west of the country park is the A258 Sandwich Road running roughly north to south, beyond which lies the former Betteshanger Colliery site. Betteshanger Country Park site is accessed via a lane which has excellent access links to the A258. The A258 in turn provides access into Deal to the south and Sandwich to the north.

The site is not located within the Green Belt, nor is it located within the AONB or local landscaping designation. The site is located in Flood Zones 2 and 3. b. Reg 19 Response

Dover's Adopted Core Strategy acknowledges that the tourism sector in the district is underdeveloped, and that the rural area has an important role to play in providing choice in the housing and business markets. It sets out that opportunities to improve tourism revolve around making better use of historic and natural assets such as Betteshanger Country Park and Sandwich and Deal town centres. The strategy notes that many of these assets are spread apart and new ways of connecting them to encourage visits to a network of attractions rather than a single one, as at present, need to be developed.

The National Planning Policy Framework (NPPF) promotes the supporting of a prosperous rural economy. It states that planning policies should enable sustainable growth and expansion of all types of businesses in rural areas through conversion of existing buildings and well-designed new buildings; and should enable sustainable rural tourism and leisure developments which respect the character of the countryside.

The site is located partly within 'Land between the A256 and North Deal' (site ref. DEA012) as assessed in the HELAA (2020). The HELAA deems this wider site unsuitable primarily due to highways and access, but also identifies a number of other constraints including flooding, drainage, ecology, heritage and archaeology. It should be noted that the site would comprise a significantly smaller area of development than that originally put forward in the HELAA.

Notwithstanding the earlier HELAA assessment, Iceni Projects considers that this small element of DEA012 presents a unique opportunity for the provision of a scheme of appropriately-designed and landscaped rural holiday accommodation that could complement the leisure offering of the neighbouring Betteshanger Country Park. The scheme would afford visitors to this part of the district

the opportunity to benefit directly from the facilities of the country park – popular in particular with cyclists, hikers and families – as well as excellent access to the many attractions of Deal, Sandwich and the surrounding villages.

The site is considered to be located sustainably for the nature and scale of development proposed. Deal is situated approximately 2.7km south of the site, which provides a wide variety of infrastructure including Deal railway station which offers train services to St Pancras via Folkestone Central or Ashford; three trains every hour during peak times, and two trains every hour off-peak taking only 1.5 hours to 2 hours. Historic Sandwich town is located approximately 4km to the north. Sandwich station is also located to the north of the site which is one train station stop north of Deal railway station. The site can be easily accessed by bus. The Stagecoach no. 80 bus stops along Sandwich Road 7mins walk to the east of the site. The no.80 operates twice an hour taking only 10-15 minutes from Deal town centre. Deal can be accessed from the site by both foot and bicycle. There are footpaths and cycle-paths extending west along the country park access roads, joining to Sandwich Road (A258), which has foot and cycle paths extending north. The footpath network extends through to Sandwich and beyond, connecting the site to other nearby settlements. The extensive network of footpaths and cycle-paths are considered to be safe for users, as they are mostly separate from the road and are also separate from each other allowing cyclists and walkers to avoid conflict/collision. Access to the wider road network is also easily achievable. The site is well connected to the motorways (M20 and M2) and the local road network (A2 and A256) which provides access to many of Kent's main town centres for example Canterbury, Sandwich, Ramsgate and Deal. The site's unique location between Deal and Sandwich means it is in close proximity to two significant town centres providing an excellent range of services and facilities, as well as having good connections to London via Deal or Sandwich railway stations.

The public transport connectivity in the locality and easy access by a range of modes to local centres, villages and beyond adds to the attractiveness of this location for a bespoke rural tourism offer and presents an opportunity to meet under-provision identified in the District's Core Strategy.

Flood Risk

As set out above, the site has direct access to the visitor centre and the wider Betteshanger Country Park. It also has excellent access to the A258 which, in turn, provides access to Deal and Sandwich. While the site is located in Flood zones 2 and 3, it is considered that in light of its locational benefits, the site would be at a sequentially preferable location for the nature and scale of development proposed as there will be no reasonably available sites at lower risk of flooding that could provide the same benefits. As such, the proposal could meet the requirements of the Sequential Test as set out in Planning Practice Guidance.

The proposed holiday homes would be designed to be flood resilient with living accommodation at first floor level and above, and would incorporate a sustainable drainage scheme. As such the scheme would be designed such that it would be safe for its lifetime to both life and property and without increasing flood risk elsewhere. In light of this, Icen Projects believes the proposal would provide wider sustainability benefits to the community that would outweigh the flood risk. The scheme could therefore meet the requirements of the Exception Test as set out in Planning Practice Guidance.

c. Conclusion

In order to ensure that a sound Local Plan can be adopted, it is key that Dover District Council identifies sufficient sites to meet its housing needs throughout the entire Plan period, while promoting its underdeveloped tourism sector. Its emerging policy should enable sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings; and should encourage sustainable rural tourism and leisure developments which respect the character of the countryside.

Land to the north of Betteshanger Country Park provides a unique opportunity to do so with delivery of approximately 68 holiday homes adjacent to the existing tourism facility and with excellent access to both Deal and Sandwich town centres. The site therefore should be allocated for the development proposed. Icen Projects has extensive experience in bringing forward sustainable and high-quality schemes in the District and would seek to bring forward an application at the earliest opportunity to

	<p>assist in meeting an undersupply of tourism accommodation as identified in the District Core Strategy. There are no significant constraints to the development coming forward. As such the site should be re-assessed against the new development proposal. Icen projects would therefore urge Dover District Council to undertake this work and consider the potential of Land north of Betteshanger Country Park to help contribute to the district's under-developed tourism provision.</p> <p>We hope that these comments are of assistance and that these representations will be taken into account in consideration of the current consultation. We also confirm that we would like to be involved in future stages of the plan-making process.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Please refer to the attached correspondence which outlines the requested modification in full.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>Land to the north of Betteshanger Country Park provides a unique opportunity to provide holiday homes adjacent to the existing betteshanger tourism facility and it is considered that the site should be allocated to support the undersupply of tourism accommodation, as identified in the District Core Strategy</p>
<p>Include files</p>	<p>Pellegram Icen (Betteshanger Park) 1719 Att1_Redacted.pdf Pellegram Icen (Betteshanger Park) 1719 Att2.pdf</p>
<p>Local Plan Consultation Point</p>	<p>Deal</p>
<p>Rep ID</p>	<p>SDLP1725</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1333481</p>
<p>Consultee Full Name</p>	<p>Kate Swinerd /Susie Simpson</p>
<p>Consultee Company / Organisation</p>	<p>Ripple Farms Ltd</p>
<p>Agent Full Name</p>	<p>John Peall</p>
<p>Agent Company / Organisation</p>	<p>EnergyArk Developments Limited</p>
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>Omission Site in Deal (DEA009)</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified</p>

4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Extracted from Rep form)</p> <p>HELAA site DEA009 has been omitted whilst SAP16 has been included. No objection to SAP16. Analysis and representations on attached sheets as to why DEA009 should be included.</p> <p>(DDC Note - Extracted form Attachment. This representation may include maps and images which have not been copied across and can be seen in the attachment)</p> <p>1. Introduction.</p> <p>1.1 EnergyArk Development Limited act on behalf of Ripple Farms Ltd the owners of the land subject to this submission.</p> <p>1.2 The land at Coldblow, identified on the plan below, is to the south of the junction of Station Road and Coldblow Lane leading south from the crossroads to the level crossing. It is bounded on the eastern side by Bridleway Riding School and the Deal-London high speed railway line. At the southern end is a Network Rail transformer installation in an area of woodland. It is open agricultural land of two connected parts. The northern section has an area of 0.9ha (2.23acres) and the southern triangle is 1.58ha (3.9 acres).</p> <p>1.3 Following the call for land through the Local Plan process a HELAA form was submitted putting the land forward for housing development. It was identified in the "DDC Housing & Economic Land Availability Assessment December 2020" in Appendix 1 as site DEA 009.</p> <p>1.4 In Appendix 2 of that document, it was excluded from further consideration for the reasons that there was "unacceptable landscape impact, limited accessibility, poorly related to Deal".</p> <p>1.5 We considered that the assessment did not take into account wider issues that impacted on the site and the area. These included the proposal for 100 houses granted under reference DOV/20/01125 to the north of Station Road, which did not raise objections on landscape impact, although being a higher, elevated and more open site.</p> <p>1.6 Consequently, we submitted a comprehensive Pre-Application Enquiry, which is Appendix 1, your reference PE/21/00011. The enquiry was being dealt with by Benazir but appeared to have been taken over by Lucinda Roach. We held a meeting with Lucinda which highlighted several issues which we responded to by letter dated 22/02/2020, Appendix 2.</p> <p>1.7 During this period, we had informal talks with the owner of Bridleway Riding Stables as it appeared good planning to look at a comprehensive solution to the access issues of Station Road. These were not however fruitful.</p> <p>1.8 An exchange of e-mails took place with Stewart Watson regarding both the inclusion of Coldblow in the Regulation 18 document and holding a site meeting, which could have occurred as part of the Pre-Application procedure. Neither of these happened.</p> <p>2. Regulation 19.</p> <p>2.1 The publication of the Regulation 19 Submission includes two sites in the vicinity of Coldblow one of which had not been identified in the Regulation 18 submission, these are sites SAP14 and SAP16.</p> <p>2.2 SAP14 comprises land off Cross Road/Ellens Road, with an estimated capacity for 100 dwellings. It is recognised in Policy SAP14 that it would have a landscape impact and would significantly extend the built-up area of Deal, and that significant highway improvements would be required to both Cross Road and Station Road.</p> <p>2.3 SAP 16 includes Bridleway Riding School at TC4S008 with an indicative capacity of 25 dwellings. It is recognised that a Traffic Assessment would be required and that a pedestrian footway would be required along the Station Road frontage.</p> <p>3. Analysis.</p> <p>3.1 As set out in 1.4 above, the Coldblow site was excluded from consideration for the three reasons of landscape impact, limited accessibility and being poorly related to Deal. Taking these three issues individually, the potential landscape impact must be seen in the context of SAP 14 and the Bridleway Riding School (BRS) and their potential landscape impact. SAP 14 is an extremely open site which will require extensive mitigation to reduce landscape to an acceptable level. BRS largely relies on the Coldblow site protection. The pre-application documentation contained an extensive Landscape Strategy which included owned land to the west of the lane to provide intensive tree planting. This would also be to the benefit of BRS site.</p> <p>3.2 Limited Accessibility. It is recognised in the Regulation 19 submission that both identified sites have access issues which require comprehensive solutions. This is no different to Coldblow which can deliver both pedestrian and cycle access along the northern frontage. A combined solution to the Station Road frontage would be good planning.</p> <p>3.3 Relationship with Deal. It is hard to give substantial credence to this objection when the urban boundary is proposed to be extended for the first time to the west of Cross Road. Coldblow as a site is constrained by the railway line and level crossing and both Station Road and Coldblow lane. It could not lead to further leakage of urban growth into the countryside. SAP14 opens the door for further growth to the west.</p>

	<p>4. Conclusions and Submissions.</p> <p>4.1 The Regulation 19 Submission has taken forward future development in this part of Walmer. In doing so it has demonstrated that the previous objections to the proposed development of Coldblow, as set out in the pre-application documents, not only can be overcome but have been demonstrated that they have been overcome.</p> <p>4.2 It is an appropriate time for the site to be formally recognised as being able to make a significant contribution to affordable housing in Deal and Walmer for which reference to the pre-application documentation should be made.</p> <p>4.3 It is submitted therefore that the land at Coldblow, originally identified as site DEA 009 be included as a formal allocation in the Plan before it is placed before an Inspector.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>addition of the land at Coldblow DA009 as an allocated residential site.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>to examine why the site has not been included</p>
<p>Include files</p>	<p>Peall Energy Ark (Ripple Farms) 1141 Att2.pdf</p>

SAP14 - Land off Cross Road, Deal (DEA008)

Local Plan Consultation Point	SAP14 - Land off Cross Road, Deal (DEA008)
Rep ID	SDLP9
Rep Status	Processed
Consultee ID	1329632
Consultee Full Name	Mr David Hawkes
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP14 DEA008
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I believe the local plan regarding SAP14 and the area designated for development as DEA008 as non compliant given the previous applications for development and the consistent refusal
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	DEA008 should be removed from the plan and designated as protected open space in conjunction with an area that it abutts at it's northern end and off of Marlborough Road The previous refusal for this area are as follows 16/01441 1) Refusal on the grounds that it would seriously harm the visual landscape and character of the countryside contrary to policy DD21 and policies DM15 and DM16 and the NPPF para109 2) would cause harm to the safe and efficient operation of the highway contrary to NPPF Para 32 17/00505 1) Refusal on the grounds it is contrary to policy CP1 and DM1 and paragraphs 12,12,17,29,49,55,56,58 and 112 of the NPPF (2012) 2) fails to protect the character an appearance of the countryside by causing visual harm contrary to policies CP1, DM1,DM15,and DM16 and paragrahpd 17,29,55,56,58,61,and64 of the NPPF (2012) Plus reasons 3,4 and 5 within the decision notice to refuse. 19/00642 1) Refusal on the grounds when taken cumulatively the applicant has not demonstrated cklearly it would not result in detriment to local air quality and 2) The propped development of the site with the quantum of housing proposed will adversely affect the visual amenity contry to policy DM15 of the DDc core strategy 2010 and para 170 of the NPPF (2019)

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP14 - Land off Cross Road, Deal (DEA008)
Rep ID	SDLP22
Rep Status	Processed
Consultee ID	1259309
Consultee Full Name	Mr Peter Jull
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP14
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	This site is wide open to views from public footpaths across the valley and will cause severe adverse landscape impact. At the moment Deal is mainly seen as a line of building on the top of the ridge from up to 2 miles away. Development here will be seen as urban sprawl down an open slope for which no adequate mitigation is possible. Acces is proposed from a single track road with passing places which connects to other single track roads with passing places leading to junctions at Station Road/Dover Road or Manor Road London Road which are operating at or above capacity with minimal or no mitigation possible.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness	In the valuable views of this side of the valley are to be foregone, development needs to be in line with a masterplan that would provide a new access to Dover Road without using Station Road. That would require a spine road through this site which would be prejudiced by development of it now.

matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	This site should be substituted with DEA009 which was rejected at the HELA stage because of landscape impact, accessibility. DEA009 is hidden from the long views that SAP14 is exposed to and can be made more accessible if developed in conjunction with TC4S008.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	To answer questions not anticipated by the written response and provide additional explanations and clarifications.
Include files	
Local Plan Consultation Point	SAP14 - Land off Cross Road, Deal (DEA008)
Rep ID	SDLP48
Rep Status	Processed
Consultee ID	1265314
Consultee Full Name	Mr Jeremy Swallow
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Ray's Bottom SAP15 (WAL002)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	This site was rejected for building purposes in 2012 on the grounds of the current discharge system quickly over flows and the proposed Development would have an impact on local properties. Road is subject to flooding by storm water. See file #1. This site was deemed in 2012, see (SHL072), unsuitable for residential development due to traffic impacts on the wider road network. The road is single track with high verges not permitting construction of pavements, and inadequate highway access in all directions to this site. Local amenities could not be accessed safely on foot by school children, pushchairs, or users of mobility vehicles.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	A complete overhaul of the drainage system from Ray's bottom down to Beach Road Deal. Widen the single tracked road for two lanes, this would mean purchase of farm land and considerable construction from Ray's Bottom to Osborne Road, Kingsdown.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	20221104_164929.jpg
Local Plan Consultation Point	SAP14 - Land off Cross Road, Deal (DEA008)
Rep ID	SDLP611
Rep Status	Processed
Consultee ID	1331790
Consultee Full Name	Julie Davies
Consultee Company / Organisation	CPRE Kent
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP14
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	.We object to the inclusion of the site: <ul style="list-style-type: none"> The Agricultural Land Classification Map indicates that the site is likely to be grades 1 and 2, best and most versatile agricultural land. The approach to site is along narrow urban roads or country lanes.

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<ul style="list-style-type: none"> Allocating the site for housing will introduce urban development into a very rural environment. HELAA Appendix 3B: The site is given orange status as 'Highways concerns have been identified in relation to access and/or highway impact and further assessment is required to demonstrate whether this can be mitigated.'
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	CPRE Kent would wish to participate at the examination hearings to explore these issues further.
Include files	
Local Plan Consultation Point	SAP14 - Land off Cross Road, Deal (DEA008)
Rep ID	SDLP1087
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Developments at SAP 14 and 15 Walmer and Sholden will impact on surface water management and flood risk in North Deal, and Walmer.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	See above
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	SAP14 - Land off Cross Road, Deal (DEA008)
Rep ID	SDLP1225
Rep Status	Processed
Consultee ID	1332924
Consultee Full Name	Amy Aldridge
Consultee Company / Organisation	Gladman Developments Ltd
Agent Full Name	Amy Aldridge
Agent Company / Organisation	Gladman Developments Ltd
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP14 - Land off Cross Road Deal (DEA008)
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	

4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>Gladman is promoting land west of Cross Road, Deal (DEA008) for residential development. The site measures 8.6ha and is currently subject to planning application 21/01822: "Outline planning application for the erection of up to 140 dwellings including affordable housing, with public open space, landscaping, and vehicular access (all matters reserved except for access)." The site can be sustainably developed without any unacceptable impacts on the natural or built environment. Any proposals will be set within a comprehensive framework of new and retained green infrastructure, helping to assimilate the new built development into its setting.</p> <p>Landscape</p> <p>Landscape The site is not subject to any landscape quality designations and lies outside of the National Park, AONB and locally designated landscape areas. The site, nor the immediate landscape contains any rare or unusual landscape features and the LVIA submitted as part of the planning application confirms that the site and local landscape have the capacity to accommodate the development proposed. The scheme will be suitably designed to compliment the settlement's edge and will not give rise to any unacceptable landscape and/or visual harm.</p> <p>Ecology</p> <p>The ecological appraisal prepared by FPCR and submitted with the planning application confirms that the proposal will not lead to a likely significant effect on the integrity of the nearby SPA, SAC and Ramsar sites, subject to the provision of on-site green infrastructure including drainage swales, tree and hedgerow planting and a dedicated habitat area. The scheme will also be developed to secure an overall net gain in biodiversity.</p> <p>Heritage</p> <p>The Heritage Assessment undertaken by Pegasus confirms that there are no archaeological remains of concern within the site and that no harm will be caused to any heritage assets within the vicinity of the proposed development.</p> <p>Flooding and Drainage</p> <p>The site falls within the EA Flood Risk Zone 1 (i.e. land assessed as having a less than 1 in 1,000 annual probability, or <0.1% chance of flooding). The FRA submitted in support of the application details how the scheme incorporates SUDS that will manage to outfall of water from the site to the 1 in 100 year flood event with additional allowance for climate change.</p> <p>Benefits</p> <p>The proposal offers the opportunity to deliver multiple benefits to the area. It will deliver much needed, new, quality family homes in a community where people wish to live, in a sustainable location close to a variety of services and facilities. The site will also provide new areas of public open space and a children's play area. The provision of 30% affordable housing in an area where there is an existing unmet need that is unlikely to be delivered through alternative means is also a significant benefit of this scheme. The build cost of the development is expected to be around £13,325,935, and the build phase of the development is expected to support 311 full time equivalent jobs. Longer term, expenditure of the new residents is estimated to be upwards of £5 million per year to support local services and facilities. The new residents will increase demand for, and use of local services and businesses and increased spending will help to protect and maintain their vitality. A range of environmental impacts will result from development at this location as the scheme will provide a 10% net gain in biodiversity through the creation of a specific wildlife habitat area, on site mitigation strategies and enhancements including additional planting of native species and hedgerows. On site SuDS will improve the surface water flood risk whilst contributing to biodiversity enhancements.</p> <p>(DDC Note - Text Extracted from Document sent from Gladman Developments Ltd. Full attachment can be found under the introduction comment reference SDLP1192)</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful</p>	<p>for clarity and to acknowledge the permitted development to the east of Cross Road, Gladman consider Land West of Cross Road, Deal a more suitable allocation title.</p>

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Gladman are actively promoting land to the west of Cross Road, Deal and would therefore request a seat at the table to have detailed discussions regarding the suitability of the sites allocation.
Include files	
Local Plan Consultation Point	SAP14 - Land off Cross Road, Deal (DEA008)
Rep ID	SDLP1185
Rep Status	Processed
Consultee ID	1332924
Consultee Full Name	Amy Aldridge
Consultee Company / Organisation	Gladman Developments Ltd
Agent Full Name	Amy Aldridge
Agent Company / Organisation	Gladman Developments Ltd
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP14 - Land off Cross Road Deal (DEA008)
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Gladman strongly support the inclusion of Land off Cross Road, Deal as an allocation for residential development. Gladman consider this is a suitable and deliverable location for development.</p> <p>The site is subject to a current application: 21/01822. Many of the technical considerations for the site are evidenced in the accompanying suite of reports and Gladman are working proactively with the Council, County Council and other statutory consultees to resolve any outstanding issues.</p> <p>Gladman have previously discussed the site with the Council and identified a number of issues that would need to be addressed, as far as possible, before this consultation. These issues are centred around land contamination, flood risk and highways and are also being addressed with the planning officer as the application progresses.</p> <p>Land Contamination</p>

	<p>Land Contamination A report by RSK has confirmed that there is a moderate/low risk of potential contamination across the site. The report noted that standard investigation works should be undertaken as part of a Phase II intrusive ground investigation to address the potential contaminant linkages identified within the desk study and to provide further geotechnical information.</p> <p>Flood Risk</p> <p>consultants RSK have been commissioned to undertake a Flood Risk Assessment and Outline Drainage Strategy for proposed residential development at this site. The report (October 2021) concludes that the developable area of the site is wholly within Flood Zone 1 and therefore the proposed development passes the Sequential Test and does not require the Exception Test. In general the developable areas of the site are at low risk of flooding from all sources of flooding and will not increase the risk of flooding elsewhere as a result of development. The SuDS strategy for the site includes the use of a SuDS treatment train. Run off from impermeable surfaces will be directed to swales within the site which will carry water to an attenuation pond. When the pond is at capacity, surface water runoff will discharge to an infiltration basin. With these mechanisms in place, Gladman consider that the allocation west of Cross Road is acceptable with regard to flooding and drainage.</p> <p>Highways</p> <p>Gladman previously submitted comments regarding highways at this location and secured highways improvement schemes through the consented application to the east of Cross Road, Deal. The site access junction will be similar to that of the consented vehicular access point on the permitted site east of Cross Road. This will accord with current design guidance, and it was concluded that the vehicular access strategy was appropriate. The traffic generated by the site can be accommodated on the local highway network and will have minimal impact on the safety and operation of the network. With regard to pedestrian routes from the site, the report outlines that safe and suitable routes are provided for pedestrians to access the site. These routes are fully addressed in the application associated with this site. Gladman are working closely with the Council and Kent County Highways to resolve any outstanding highways concerns and negotiate appropriate contributions towards any required highways works.</p> <p>(DDC Note - Text Extracted from Document sent from Gladman Developments Ltd. Full attachment can be found under the introduction comment reference SDLP1192)</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>for clarity and to acknowledge the permitted development to the east of Cross Road, Gladman consider Land West of Cross Road, Deal a more suitable allocation title.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>Gladman are actively promoting land to the west of Cross Road, Deal and would therefore request a seat at the table to have detailed discussions regarding the suitability of the sites allocation.</p>
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP14 - Land off Cross Road, Deal (DEA008)</p>
<p>Rep ID</p>	<p>SDLP1590</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1333265</p>

Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP14
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<i>DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438.</i> SAP 14 – 16 Deal (SAP 15 cross referenced to SAP 34/35 Kingsdown) Developments at SAP 14 and 15 Walmer and Sholden will impact on surface water management and flood risk in North Deal, and Walmer.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP14 - Land off Cross Road, Deal (DEA008)
Rep ID	SDLP1889

Rep Status	Processed
Consultee ID	1333838
Consultee Full Name	mrs rosemary anne Holmes
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP14
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The Deal/Walmer road system will not cope if permission is given for anymore developments, SAP14, SAP15, SAP34 are unsound. Congestion caused by overdevelopment along the Dover Road from Ringwould into Deal will result in traffic queues more frequently than at present, making walking and cycling irresistible. June 2020 Deal Town Council report requires pavements, cycle lanes wide roads and detailed junction plans. Traffic in Kingsdown would be gridlocked winter and summer.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	In an ideal world – Ringwould Road in and out of Kingsdown to have cycle lanes and walking paths. Park and pedal scheme in Borrowpit Car park to be activated. Glen Road/Liverpool Road to have cycle lanes and walking paths. St James Road/Upper Street junction to be redesigned and made safe to take all the construction traffic. Alexandra Road/Upper Street to be redesigned and made safe to take construction traffic/extra traffic.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP14 - Land off Cross Road, Deal (DEA008)

Rep ID	SDLP1878
Rep Status	Processed
Consultee ID	1272184
Consultee Full Name	Tony and Valerie Armitage
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP14
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The Deal/Walmer road system will not cope if permission is given for anymore developments; SAP14, SAP15, SAP34 are unsound Congestion caused by over-development along the Dover Road from Ringwoud into Deal will result in traffic queues more frequently than at present making walking and cycling irresistible. June 2020 Deal Town Council report requires pavements, cycle lanes, wide roads and detailed junction plans. Traffic in Kingsdown would be gridlocked winter and summer
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	In an ideal world- Ringwoud Road in and out of Kingsdown to have cycle lanes and walking paths. Park and pedal scheme I Borrowpit Carpark to be activated Glen Road / Liverpool Road to have cycle lanes and walking paths St James Road / Upper Street junction to be redesigned and made safe to take all the construction traffic. Alexander Road / Upper Street junction to be redesigned and made safe to take construction / extra traffic
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

SAP15 - Land at Rays Bottom, Walmer (WAL002)

Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP57
Rep Status	Processed
Consultee ID	1265314
Consultee Full Name	Mr Jeremy Swallow
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	WAL002
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	There have been no changes to the site between this site as SAP15 in the 2012 version and the current one. The 2012 version was rejected on the grounds of drainage and road access and therefore DDC is deying thier own categorisation of the site unsuitability and contradictory to the NPPF.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	DDC must properly reconsider the recommendations made in 2012 which deem this site unsuitable.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP69
Rep Status	Processed
Consultee ID	1330704
Consultee Full Name	Mrs Elizabeth ZDZIEBKO
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP15 WAL002 Land at Rays Bottom
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The plan is not in accordance with maintaining biodiversity
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Not at all happy about the further destruction of an arable field. This is an area of outstanding beauty and will be totally ruined by 75 dwellings. This is precious arable land. The area is biologically diverse, with badgers, foxes all having their homes here. Nature lovers and dog walkers enjoy the quietness of this area ruined for ever by 75 new houses s.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Would be willing to attend hearing
Include files	
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP445
Rep Status	Processed
Consultee ID	1261332
Consultee Full Name	Mrs Sally Colligan
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP15 Land at Rays Bottom (WAL002)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	It is incompatible with SP4;S371 Separation of Settlements and the need to prevent villages coalescing to protect landscape character. Secondly it is unsound as its selection is incompatible with the statements in SP14 relating to biodiversity connectivity as this valley bottom is already functioning as a vital point of biodiversity connectivity as referred to in SAP15, the northern and western boundaries, close to BOA Hawkshill Freedown, are key to biodiversity connectivity. 4.158 mis-names Hawkshill Freedown, which in fact it is an SSSI because it is globally rare, chalk-downland habitat (not just the open field in the DDC text). For decades volunteers with Walmer Council have lovingly protected this rare habitat, its justification as a BOA totally justified. Also it is very valuable as a flood sponge, so SAP15 is unsound. Thirdly due to this Ray's Bottom drains in a northerly direction to the whole area immediately north of Walmer Castle which is well-known to flooding. Lastly, the Highways assesment of this site is unsound because S4.160 fails to note that Liverpool Road is a single lane road (changing its name to Glen Road) with passing places which become gridlocked with traffic from Kingsdown Primary School twice a day.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	As noted above, I am totally opposed to this proposal so would not wish to suggest any modifications.

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP441
Rep Status	Processed
Consultee ID	1273325
Consultee Full Name	Tony Stickels
Consultee Company / Organisation	Hawksdown Estate (Walmer) Limited
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Site SAP 15 - Land at Ray's Bottom between Liverpool Road and Hawksdown, Walmer (WAL002)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>To treat this site as being suitable for housing is not consistent with the Council's decision in 2012/13 that it was not suitable when nothing has changed since then. There is no explanation of this despite objections to the first draft of the Plan. Other objections of "unsoundness" are set out in the attached letter.</p> <p>DDC Note: Mr Stickles supports Kingsley Smith Solicitors Comments (SDLP 3321379, 1380, 1381, 1382, 1383). He attached a letter stating the following:</p> <p><i>After consulting our 55 neighbours on the estate we have been asked to oppose the inclusion of land at Ray's Bottom as suitable for housing development and we wish to make it clear that we fully endorse the objections put to the Council by the neighbours most directly affected in the letters dated 9 th March 2021 and 1 st December 2022 from Kingsley Smith, Solicitors. We simply do not understand how this farmland can be regarded as a brownfield site or how the land is now considered suitable for residential development when the Council declared otherwise 12 years ago and nothing has changed. Flooding along that part of Liverpool Road is a cause for concern and the roads and junctions to and from the site are completely inadequate for development on such a scale. We are also concerned about the damaging environmental impact of such development, in ecological, scenic and heritage terms,</i></p>

	<i>given the site's proximity to Hawkshill Freedown and the inter-related importance of the Freedown and the woodland hanger and farmland along the valley below. We are not persuaded that this is a suitable site for housing by reducing the number of properties to 75 and requiring various impact assessments.</i>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Removal of the site from the Plan.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	SDLP0441 Hawkesdown Estate - Att 1_Redacted.pdf
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP418
Rep Status	Processed
Consultee ID	1267693
Consultee Full Name	Mr Andrew Lawrence
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	DM4, DM7, DM9, DM39, SP1, SP9, SP17
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Has not applied fairness and logic. See attachment
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	SDLP418 Lawrence Att1 - Redacted.pdf
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP332
Rep Status	Processed
Consultee ID	1274023
Consultee Full Name	Nicholas Kingsley-Smith
Consultee Company / Organisation	
Agent Full Name	Kingsley Smith Solitors LLP Kingsley Smith Solitors LLP
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	4 Housing and Employment Site Allocations Housing Site WAL002 Ray's Bottom Site
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified

	Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Housing Site WAL002 Ray's Bottom Site</p> <p><i>DDC Note: Names and addresses (10) redacted from representation, including the name and address of the local Hawkesdown person who instructed Kingsley Smith Solicitors, and 9 neighbours who have all seen and previously approved the letter. The list will be available for the Inspector to view.</i></p> <p><u>Introduction</u></p> <p>Our client's made representations in 2021. The Regulation 22 report ['R22OR'] was devoid of any engagement with their analysis or concerns.</p> <p>The R22OR nevertheless proposed the allocation WAL002 claiming it is 'suitable', with 75 units. It is impossible to find any proper reasoning justifying that conclusion, despite it running to 2557 pages.</p> <p>This is to be contrasted with the deletion of far more appropriate alternative sites with fewer restrictions, GTM008 DEA017 DEA010 DEA011 DEA002 at Ellens Road ['Ellens Road'], which at the first consultation stage, the council had identified.</p> <p>The council's approach is unsound because it has not been positively prepared, it is unjustified and lacks consistency. To conclude that WAL002 is now "suitable" when it was concluded to be the opposite in 2013 raises further concerns. In 2013 there was express concern from environmental and highway safety perspectives. It is irrational to conclude that the previous highways and environmental harm is solved by dint of reducing the number of theoretical units, slightly. Such would not make any measurable difference to either of those highly material considerations that weighed against it in 2013.</p> <p>When one compares the above with the Ellens Road sites (see attached map), where there is a notable lack of environmental or highway safety harm, the motive of the council and its reasoning must be political (at best), not based on sound planning assessment required by NPPF.</p> <p>The essential requirements for soundness remained unchanged throughout the period described above, 2013-2022. The facts and circumstances on the ground for both sites are unchanged.</p> <p>Our clients wish to take part in the hearing (oral) session(s) because they wish the inspector to hear their case why there must be investigation/reconsideration regarding the above concerns. They will instruct an expert to attend those sessions to assist the inspector and put their case.</p> <p>-</p> <p>As matters stand, the assertion that WAL002 is suitable is unjustified, impossible to square with what the public see or have read in the past analysis from the council. They would not consider it plausible for the council to say it is "brown field". It cannot be described as that; the Site is part of a very large arable field in this beautiful rolling Down landscape, with nothing but an imaginary line on a map to demark it from/within that wide open landscape.</p> <p>However, there is far more to this Site in planning terms which discounts it from being a new housing allocation than the flawed Brown Field Register.</p> <p><u>Site function/NPPF key aims</u></p>

From any public standpoint, it is a crucial part of a “green wedge”. The Freedown on the opposite side of Liverpool Road is well used open space, designated on the town map, plus it is a non-designated heritage asset. The council recognises The Freedown’s importance to public amenity. Its setting is crucial to its significance.

The Freedown forms the East side of this narrow Down valley, the Site forming the West side.

To compromise The Freedown will cause serious heritage, ecological and landscape harm as follows:

In heritage terms The Freedown incorporates the WW1 Walmer airfield. The Council commemorates the fallen here, a marvellous elevated place with commanding views not just over the Channel, but with Walmer Castle below and the Down to the West principally formed by the Site.

Visually the Site is also an integral part of a beautiful rolling Down landscape, in marked contrast to the urban confines that are found to its North and West. The homes to the West are beyond the ridge, not within this unspoilt small Down valley, with Liverpool Road at the bottom, rising up to the WW1 Walmer airfield on The Freedown to the East. The narrowness of this Down valley at this point is acute. It demarks a gateway to Walmer/Deal. Its qualities delight the senses. Its **beauty** must be protected, key to the **social objectives** of the planning system and “**fundamental**” to what the planning and development process should achieve (see NPPF consultation draft).

The Site also performs a key **environmental** function separating Deal (of which Walmer is part) from Kingsdown, which if eroded, on the council’s current approach, would signal the council is encouraging intrusion into this beautiful landscape. NPPF until 2019 from its inception, and PPG prior to that, gave significant weight to protection of the countryside for its own sake (see for example paragraph 170b NPPF 2019). The Ministerial error of its omission is being addressed now, with the Ministry consulting upon, and set to introduce, a far higher policy test than existed up to 2019, thanks to the January 2020 Building Better, Building Beautiful Commission “*Living with Beauty*” report. This tells us to “*ask for beauty*” and “*refuse ugliness*”. Our clients ask that now. It not merely chimes with the findings of the Walmer Design Statement of 2006, nor is Beauty being merely reinstated from the previous NPPF position - it will be fundamental to sustainable development as defined before the Plan is adopted.

The KWT comment underestimated the ornithological foraging value of the Site in contrast to the low value of the farmland to the south. The previously submitted reports were ignored in the R22OR. In this narrow valley the tree covered hillside of The Freedown provides protective cover for foraging birds on the Site that are absent from the more open farmland to the South of the Site. This confirms it is irreplaceable ecological value in planning terms, functionally linked to the adjoining SPA, copper-bottoming its importance in NPPF terms. The unexplained serious flooding of the adjacent homes north of the Site is believed to be sourced to it being the edge of a dry riverbed from Guston to Walmer Castle water meadow.

Accordingly, the Site must not be allocated, but protected from development, the discounted Ellens Road sites reallocated. DEA010 had been previously deemed suitable with no logical difference. It has the same highway demarcation, similar distance to St Richards Road, all that area lying between them partly built up already and be consistent with what is now site SAP14 on the R22OR map and in the text. It and Ellens Road would bring a comparable, indeed larger supply of homes compared to the WAL002/Site, without any material harm - no heritage harm, no ecological harm, limited landscape harm (see past analysis, extract attached). Moreover, it can be phased, resulting in a logical urban extension rather than the current piecemeal position shown on the consultation map and avoid the ‘floodgate’ risk presented by releasing the Site.

Accordingly, in terms of the remaining Framework dimension, the **economic** case firmly tips against the Site as less harmful and much better alternatives exists. It would be “**Unsound**” to leave the Site shown as an allocation – it is as clear as that in ‘place’ and ‘plan’ making terms, Ellens Road should be substituted.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Housing Site WAL002 Ray's Bottom Site should not be allocated and instead GTM008 DEA017 DEA010 DEA011 DEA002 at Ellens Road should be substituted.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Our clients wish to take part in the hearing (oral) session(s) because they wish the inspector to hear their case why there must be investigation/reconsideration regarding the above concerns. They will instruct an expert to attend those sessions to assist the inspector and put their case.
Include files	AU00331 extract.pdf Ellens Road sites.docx
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP488
Rep Status	Processed
Consultee ID	1331290
Consultee Full Name	Mrs Helen Williams
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP15
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	SAP15. Rays bottom

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

Sustainability Concerns.

Transport. This site is on a bus route into Deal. But this site is not well served by public transport into and from Deal. The service is limited, infrequent, does not operate throughout the day, and Stagecoach recently threatened to cut the service completely, as it is not profitable, but then has ended up reducing the service, and may reduce it further. It is a slow service as well, visiting many roads around Deal.

There is a poor bus service for children going to secondary schools, and many parents from this area drive their children there, adding to the road congestion in the narrow country lanes. E.g. to get to Walmer station, to catch a train to Sandwich schools, have to cross the busy junction at station road/A258, which is currently undergoing road works to improve access. No traffic lights there, so there will be long waits to cross the road. The nearest secondary school, Goodwin Academy, is likely to be full as there are many hundreds of houses being planned in this and the Mill Hill area. If it is full, what then? There is a general lack of infrastructure, with local schools being nearly full, and GP surgeries with closed waiting lists, and no local NHS dentists.

The Kingsdown primary school is fairly nearby, but it is far too dangerous to walk along the single lane Glen road to get to the school. No footpath. Glen road is very busy at school start and end. (I happened to go along here at school close times and had to wait for 23 cars and mini vans coming away from Kingsdown on the road). If SAP 34 is permitted and built on, it is likely that this primary school will get full, and children living at Rays Bottom would have a longer journey to school, also by car, as the next nearest primary school (if there is room) is over 1,200 m away.

The site is not within 1,200 m of an NHS GP surgery

The site is not within 2,000 m of a further/higher education facility

The site is not within 2,000 m of a strategic employment site.

The site is not within 1,200 m of a town centre.

The site has been judged by council officers to have the potential to moderately affect the district's historic environment. (a WW1 Site of an airfield)

The site is very near, and overlooks the Hawks Hill free down. An area managed for its biodiversity by Walmer Town council and is surrounded on 2 sides by trees. The trees are full of birds, some migratory, and many bats can be seen there. It is an area with low level of light disturbance at night, which would be disturbed by the light coming from an estate of 75 houses, affecting bats roosting and feeding. (bats are a protected species).

Highways Concerns

The highways assessment says that concerns have been identified in relation to access and/or highway impact and further assessment is required to demonstrate whether this can be mitigated. (Hella Appendix 3b Highways Assessments).

The main problem is that it would increase the traffic along the narrow Liverpool road, Grams Road, and single lane Glen road, which the irregular bus service uses. As already mentioned, Glen road has no space or accommodation for people on foot. Any access to the site would need localised road widening, and a reduction in the speed limit from Liverpool rd.

The residents of these proposed houses will need to have cars, (2 per family, so an extra 150 cars on local roads and they would join the stream of traffic on the overcrowded Deal to Dover road, which has problems at the Duke of York's Roundabout.

Landscape Concerns

Quoting from HELLA Appendix 2d Landscape Assessments. The development of this site would have an impact on the landscape and further assessment is required to demonstrate whether this can be mitigated.

The valley that the site is in at the bottom is subject to flooding. It drains in a northerly direction to an area north of Walmer Castle, which also floods in wet weather.

As mentioned already, the site is opposite Hawks Hill, an area of Priority habitat. The site is directly open to the neighbouring agricultural field on one side. One concern is the separation of Walmer from Kingsdown, as building here would reduce the separation of these settlements contrary to the SP4 policy.

This site is also in the LCA F3 Ripple area defined in the district *Landscape Character Assessment 2020* which defines on page 118 under Development Management that (developments should) **Conserve the rural character of the landscape ensuring that it continues to play a role in providing a rural separation between Deal and Kingsdown as well as a rural setting for the Kent Downs AONB.**

	<p><u>Environmental Concerns</u></p> <p>The Environmental Assessment notes that "on site environmental constraints are present, which would need to be suitably mitigated to enable development. See HELLA Appendix 3d Environmental Assessments</p> <p>This assessment mentions it is a brownfield site and has contaminated land. Not sure why it is being used for agricultural purposes with this. Risk of surface water flooding... already mentioned above.</p> <p>Overall, I consider this site unsuitable for building on, for the reasons above.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	No
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	SAP15 - Land at Rays Bottom, Walmer (WAL002)
<p>Rep ID</p>	SDLP282
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1331380
<p>Consultee Full Name</p>	Mr Russell Thompson
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	SAP 15
<p>2 - Do you consider this part of the Plan sound?</p>	No
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	Justified

4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I object to the development proposals reference SAP15 - Land at Rays Bottom, Walmer (WAL002).</p> <p>Strategic Policy 14 - Enhancing Green Infrastructure and Biodiversity</p> <p>3.285 states "To conserve and enhance the District's biodiversity and green infrastructure, including natural and semi-natural rural and urban green spaces, nature conservation sites, green corridors, parks and gardens, amenity green spaces, and to enhance ecological connectivity between them, delivering a net gain in biodiversity."</p> <p>in addition</p> <p>3.286 states that Recent years have seen an increased recognition of the important role that access to nature can play in improving physical and mental health, wellbeing and happiness.</p> <p>The area of SAP 15 is an important area for residents to engage in nature. There are footpaths into the countryside from urban Walmer which is an incredibly important resource for locals. The area is also adjacent to an important habitat. Hawkshill Freedown is a Site of Nature Conservation Interest designated by Kent Wildlife Trust.</p> <p>Ecological consultant work has confirmed this area is important for wildlife. In particular the area has identified the presence of many important species such as Pallid Cockroach, Rose Beetle, Lesser Stag Beetle, Slow worm, Viviparous Lizard, Spotted Flycatcher, Tree Sparrow Turtle Dove and a number of plant species typical of ancient chalk grassland.</p> <p>There is a clear "Physical Damage and Loss" potential related to increased recreational impacts that would be caused by further housing development in this area (SAP15 - Land at Rays Bottom, Walmer (WAL002)). The grassland habitat is likely to be particularly susceptible to impacts from recreational activities, such as walking and dog walking, which can result in physical disturbance through trampling and erosion and nutrient enrichment, which can alter the soil chemistry and alter the prevalence of competitive species.</p> <p>In additional noise and light pollution from the development (WAL002) and increased traffic will result in disturbance to local wildlife, particularly bats and birds.</p> <p>In addition, the plan advises of widening roads in the Liverpool Road area to accommodate increased traffic. This is not possible without removing established hedgerows and trees in the area to accommodate footpaths and a wider road.</p> <p>The increased traffic will also cause problems with traffic flow in Walmer. In particular Walmer Castle Road, a road unsuitable for large vehicles, but already subject to heavy traffic as a cut-through from Dover Road.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Reconsider SAP 15
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP432
Rep Status	Processed
Consultee ID	1331380
Consultee Full Name	Mr Russell Thompson
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	4.1 and 5.1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP407
Rep Status	Processed
Consultee ID	1331451
Consultee Full Name	Mrs Vanessa Broughton
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP15 - WAL002 RAYS BOTTOM
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SEE ATTACHED LETTER
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	REMOVE WAL002 PROPOSAL FROM THE PLAN

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	To be in attendance to answer or explain the reasoning and detail of my letter of Objection
Include files	SDLP0407 Broughton - Att 1_Redacted.pdf
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP387
Rep Status	Processed
Consultee ID	1331525
Consultee Full Name	Mrs Amanda Clarke
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP15
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The selection of this site is unsound as it is incompatible with SP\$ 3.71 - Separation of Settlements - and the need to prevent villages coalescing to protect landscape character.</p> <p>Secondly, it is unsound as its selection is incompatible with the statements in SP14 relating to biodiversity connectivity, as this valley bottom is already functioning as a vital point of biodiversity connectivity as referenced in SAP15, the northern and western boundaries of the site, close to BOA Hawkshill Freedown, are key to biodiversity connectivity.</p> <p>The valley bottom is also valuable as a flood sponge, so SAP15 is unsound for this reason too. Ray's Bottom drains in a northerly direction to the whole area immediately north of Walmer Castle, which is well-known to be subject to flooding.</p> <p>The highways assessment of this site is unsound and inadequate. SAP15 4.160 fails to note that Liverpool Road is a single lane road (which changes it's name to Glen Road) with passing places, which become gridlocked with traffic from Kingsdown Primary School twice a day. It also serves as an arterial road for diverted traffic when the A258 is blocked. So SAP15 is unsound on the ground of danger to life from road accidents. The transport assessment makes no reference to Liverpool Road becoming Glen Road at the Kingsdown parish boundary, and carrying diverted A road traffic.</p>

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Nothing would make SAP15 sound, effective, safe or compliant with Strategic Policy 12.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP364
Rep Status	Processed
Consultee ID	1331532
Consultee Full Name	Mrs Angela Shrimpton
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP15
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>Please see Green Party full 24 page submission flags up non-legal-compliance with Localism Act 2011, Environment Act 2021. NPPF 2021 version and previous version, the legally binding UK Climate Emergency declaration of 2019 (commitment to net zero 2050) and Climate Change Act 2008.</p> <p>SAP 15 Walmer Liverpool Road Ray's Bottom. The selection of this site is unsound firstly as it incompatible with SP4 ; 3.71 Separation of Settlements and the need to prevent villages coalescing to protect landscape character. Secondly it is unsound as its selection is incompatible with the statements in SP14 relating to biodiversity connectivity as this valley bottom is already functioning as vital point of biodiversity connectivity as referred to in SAP15, the northern and Western boundaries of the site, close to BOA Hawkshill Freedown, are key to biodiversity connectivity. 4.158 mis-names Hawkshill Freedown, which in fact it is an SSSI because it is globally rare, chalk-downland habitat, (not just the 'open field' in the DDC text). For decades volunteers with Walmer Council have lovingly protected this rare habitat, a very justified BOA. The geography indicates that the valley bottom is also valuable as a flood sponge, so SAP15 is unsound thirdly for this reason too. Ray's Bottom drains in a northerly direction to the whole area immediately north of Walmer Castle which is well-known to be subject to flooding.</p> <p>And fourthly the Highways assessment of this site is unsound and inadequate, SAP 15 is unsound because 4.160 fails to note that Liverpool Road is a single lane road (changing its name to Glen Rd) with passing places which is becomes gridlock with traffic from Kingsdown Primary school 2x a day. It become an arterial road attempting to provide access to 30,000 conurbation of Deal / Walmer for diverted traffic when the A258 is blocked. (Cross reference SAP 34 in Kingsdown). So the selection is unsound on the grounds of danger to life from RTAs. The Transport Assessment requirement referred to in e makes no reference whatsoever to Liverpool Road becoming Glen Road at the Kingsdown parish boundary, and carrying diverted A road traffic.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Discard this plan</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Not Applicable</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>no applicable</p>
<p>Include files</p>	<p>SAP 15 Kingsdown.docx</p>
<p>Local Plan Consultation Point</p>	<p>SAP15 - Land at Rays Bottom, Walmer (WAL002)</p>
<p>Rep ID</p>	<p>SDLP351</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331449</p>
<p>Consultee Full Name</p>	<p>Mr Lance Austin</p>
<p>Consultee Company / Organisation</p>	<p></p>

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP15 SITE WAL002
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	See attached detailed Objection
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	See Conclusions on page 4 of attached detailed Objection
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	1/. To answer any questions relating to my detailed Objection attached below. 2/. To ensure that my Objections can be justly considered
Include files	SDLP0351 Austin - Att1 Redacted.pdf
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP624
Rep Status	Processed
Consultee ID	1257483
Consultee Full Name	Catherine

	Stone
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP15 - Land at Rays Bottom, Walmer (WAL002)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I consider the inclusion of site WAL002 in the local plan to be unsound because it fails to comply with the NPPF and Dover District Council's Strategic policies. In particular:</p> <ul style="list-style-type: none"> • SP4 Separation of Settlements and the need to prevent villages coalescing to protect landscape character. • SP14 relating to biodiversity connectivity as this valley bottom is already functioning as vital point of biodiversity connectivity. The northern and Western boundaries of the site, close to BOA Hawkshill Freedown, are key to biodiverse connectivity. • Paragraph 111 of the NPPF states "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe". Development at site WAL002 is unsound because the highways are inadequate for this development, indeed struggle to cope with existing levels of traffic. The highways assessment fails to note that: Liverpool Road is a single lane road; changes its name to Glen Road at the Kingsdown parish boundary; is single lane with passing places; becomes gridlock with traffic from Kingsdown Primary school twice a day; becomes an arterial road attempting to provide access to 30,000 conurbation of Deal / Walmer for diverted traffic when the A258 is blocked. <p>So the selection of site WAL002 is unsound on the grounds of danger to life from road traffic accidents.</p> <p>I consider the Dover Local Plan fails to comply with the Duty to Cooperate because it fails to respect the safety of the community.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Removal of site WAL002 from the DLP.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP420
Rep Status	Processed
Consultee ID	1331617
Consultee Full Name	Val Swallow
Consultee Company / Organisation	
Agent Full Name	Val Swallow
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP15 - WAL002
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>SEE BELOW ATTACHED LETTER</p> <p>DDC Note: Text from letter added below, but refer to letter for photographs.</p> <p>"Specifically referring to Site WAL002 (SAP 15) Land at Rays Bottom between Liverpool Road and Hawksdown Walmer.</p> <p>IT IS IMPERATIVE THAT THE INDEPENDENT PLANNING INSPECTORATE MAKE A SITE VISIT BEFORE ANY DECISIONS ARE MADE TO DEVELOP THIS SITE 260 LOCAL WALKERS AND ROAD USERS OBJECTED TO THIS PROPOSAL.</p> <p>This site was rejected as unsuitable in the previous local plan which was drawn up in 2010. The DDC outcomes stated that; "The site analysis form demonstrates that, in principle, the site is not suitable for residential development due to the possible traffic impacts on the wider road network and should not be allocated in the pre-submission plan." There have not been any physical changes to this area which could possibly result in development now being suitable. Site WAL002 has very poor access from all directions. Local shops, amenities and schools could not be accessed safely on foot especially by school children, pushchair users, wheelchair users and users of mobility vehicles . Development at</p>

	<p>WAL002 would be inherently unsafe.(See attached photographs) Grams Road adjoining Liverpool Road with blind corner from both directions. Liverpool Road looking North Grams Road looking West towards A258- no room for pavement. SAP 15 Page 127 states that:</p> <p>d) Primary vehicular, pedestrian and cycle access to the site shall be provided to Liverpool Road along the frontage of the site and where possible to the junction with Grams Road along with an extension to the 30mph speed limit zone.</p> <p>However, Grams Road is a very narrow, steep road with no pavement between a section which has steeply banked sides which would prevent the widening of the road or the provision of a pavement. Indeed this road which is accessed from the Dover Road A258 is designated Unsuitable for Heavy Goods vehicles. This also applies to Walmer Castle Road which also feeds from the A258 down to Liverpool Road further to the North. Therefore lorries needed to serve the development would be precluded from reaching the site! The junction where Grams Road meets Liverpool Road is a blind corner. It is necessary to go beyond the white lines in order to see if the road is clear. (see photo)</p> <p>e) The Transport Assessment that is required to be carried out in accordance with Policy T12 must consider and identify mitigation (potential widening/traffic management measures/junction improvements) for the surrounding local road network, taking into account the cumulative impact of this and other sites allocated in this Plan, including (but not limited to) Liverpool Road and Grams Road up to and including the Grams Road/Dover Road junction.</p> <p>CLEARLY IF THIS TRANSPORT ASSESSMENT HAD ALREADY BEEN MADE SITE WAL002 WOULD NEVER HAVE BEEN INCLUDED IN THE CURRENT LOCAL PLAN REGULATION 19 SUBMISSION</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	N/A
Include files	SDLP0420 Swallow - Att 1_Redacted.pdf
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP873
Rep Status	Processed
Consultee ID	1260112
Consultee Full Name	Mr Daniel Couzens
Consultee Company / Organisation	
Agent Full Name	

Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP15 - Land at Rays Bottom, Walmer (WAL002)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I believe the development of 75 houses in Rays Bottom contravenes the guidance set out in: NPPF, Section 2, 11b; Section 9, para 111; Section 15, para 174, 176, 177.</p> <p>Section 2: 11b. Sustainable development: or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole</p> <p>Rays Bottom is within a unspoilt valley bounded by trees and hedge lines, It is also in close proximity to Walmer Caste and the Free Down</p> <p>Section 9: 111: The development should “be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impact on the road network would be severe”. The road to Ray’s bottom is single track and has passing places. It is unsuitable for heavy traffic that would be increased by this development’s residents and need to serve them with refuse collection etc</p> <p>Section 15: 174-177. Planning policies and decisions should contribute to and enhance the natural and local environment by:</p> <p>174a: protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan). The field is chalk downland and the construction of over 75 homes would destrioy this. It is surrounded by hedge lines and woods and this landscape would not be enhanced by this development. The biodiversity associated with these woods and this field including bats would be disturbed</p> <p>1 c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate. The 72 homes would significant urbanise the coast and absoulutely change an undeveloped combe valley</p> <p>175: Allocate land with the least environmental amenity and 176: The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas.</p> <p>177: Permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest The site is located near sensitive areas including Walmer Castle and the Free Down. Building a dense development of 75 homes on a sloping site with the resulting run-off and increase in traffic is harmful to the public good</p>

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	This an oppottunistic development that seeks to cram 75 homes into a remote part of the community with no regard for access, the environment or the landscape. It should be dismissed
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP532
Rep Status	Processed
Consultee ID	1266454
Consultee Full Name	Mr Tony Stickels
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SiteSAP 15 - Land at Ray's Bottom between Liverpool Road and Hawksdown, Walmer (WAL002)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>To treat this site as being suitable for housing is not consistent with the Council's decision in 2012/13 that it was not suitable when nothing has changed since then. There is no explanation of this despite objections to the first draft of the Plan. Other objections of "unsoundness" are set out in the attached letter.</p> <p>DDC Note: Mr Stickle supports Kingsley Smith Solicitors Comments (SDLP 3321379, 1380, 1381, 1382, 1383). He attached a detailed list of bird species and observations, and his letter states the following:</p> <p><i>"I am an experienced and enthusiastic birdwatcher and have lived about 50 metres from Ray's Bottom for 36 years. During that time I have kept the attached list of birds seen in and from the garden, giving a good indication of bird activity close to the site and the importance of this corridor in Walmer for bird migration, being as close as we are to the coast and the continent. I attach my list in full rather than a précis to underline the richness and diversity of the natural world which would be threatened by a sizeable housing development. I understand you evaluate whether the impact of planning proposals on biodiversity exceeds a threshold for it to be a major consideration, but in the case of birdlife your assessment involves a one-off wintering bird survey with the possibility of mitigation. My bird records show a much more complete picture, year-round over many years, and I fail to see how any proposed scheme of mitigation on a housing estate can adequately compensate for the loss of farmland habitat."</i></p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Removal of this site from the Plan.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>BIRD LIST DARRINGTON.pdf SDLP0532 Stickle - Att 1_Redacted.pdf</p>
<p>Local Plan Consultation Point</p>	<p>SAP15 - Land at Rays Bottom, Walmer (WAL002)</p>
<p>Rep ID</p>	<p>SDLP522</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1266351</p>
<p>Consultee Full Name</p>	<p>Dr Sharon Danby</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 15 Land at Rays Bottom Walmer
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The selection of this site is unsound:</p> <ol style="list-style-type: none"> 1. It is incompatible with SP4 ; 3.71 Separation of Settlements and the need to prevent villages coalescing to protect landscape character. A Ribbon development along this valley bottom would be disastrous for the landscape and would cause coalescence with Kingsdown. 2. it is unsound as its selection is incompatible with the statements in SP14 relating to biodiversity connectivity as this valley bottom is already functioning as a vital point of biodiversity connectivity as referred to in SAP15, the northern and Western boundaries of the site, close to BOA Hawkshill Freedown, are key to biodiversity connectivity. 4.158 mis-names Hawkshill Freedown, which is in fact globally rare, chalk-downland habitat, (not just the 'open field' in the DDC text). For decades volunteers with Walmer Council have lovingly protected this rare habitat, a very justified BOA. 3. The geography indicates that the valley bottom is also valuable as a flood sponge, so site selection of SAP15 is unsound on this basis. Ray's Bottom drains in a northerly direction to the whole area immediately north of Walmer Castle which is well-known to be subject to flooding. The NPPF 21 Section 2 - 11. presumption in favour of sustainable development <i>objectively assessed needs for housing and other uses,...</i> unless: <i>any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.</i> Building in a flood risk area is contrary to NPPF 21. Also there is a development of the Dover Rd, Walmer above this proposed site which could result in run off down to this site. 4. The Highways assessment of this site is unsound and inadequate, SAP 15 is unsound because 4.160 fails to note that Liverpool Road is a single lane road (changing its name to Glen Rd) with passing places which becomes gridlocked with traffic from Kingsdown Primary school 2x a day. It becomes an arterial road attempting to provide access to 30,000 conurbation of Deal / Walmer for diverted traffic when the A258 is blocked. (Cross reference SAP 34 in Kingsdown). So the selection is unsound on the grounds of danger to life from RTAs. The Transport Assessment requirement referred to in e makes no reference whatsoever to Liverpool Road becoming Glen Road at the Kingsdown parish boundary, and carrying diverted A road traffic. Ref SAP34 there are only 3 routes into Kingsdown, all are inadequate for lorries as Kingsdown has narrow streets and a conservation area. It would be difficult and dangerous to develop this site as lorries would struggle to gain access through Walmer. If SAP 34 and 15 were to go ahead at the same time it would create a dangerous situation where emergency vehicles may struggle to gain access to Kingsdown. 5. The selection of SAP 15 is unsound as it lies within the F3 Ripple area identified in the DDC's LCA (2020). This means it forms a landscape buffer between the conurbation of Deal and Walmer and the AONB. The situation of the plot is also important as it is highly visible as it is adjacent to open country. 6. Walmer has already been overdeveloped and has more to come under the current weak plan. I would argue that due to its inability to cope with current levels of traffic, congestion, pollution and windfall development only should be allowed. 7. Contrary to T11 the development would not be able to link up to Walmer station safely for cyclists and pedestrians as there are no footpaths along Liverpool Road, no streetlighting and the road is very narrow. Residents would be dependent on their cars contrary to SP1. 8. The site selection is also unsound and contrary to NPPF 21 as it uses agricultural land necessary for growing food - the loss of this land is unsustainable as it stops future generations from growing food.

<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>After prolonged overdevelopment in Walmer causing traffic problems, increased pollution and congestion under the current weak plan, windfall development only should be allowed.</p> <p>More attention needs to be paid to the potential flood risks of over development higher up the valley and the cumulative effect which this will have.</p> <p>Consideration needs to be paid to the landscape area and potential loss of biodiversity at neighbouring Hawkshill by the interruption of a wildlife corridor.</p> <p>The Highways assessment needs to be more thorough, taking into account the potential problems caused by lorries needing access to the site, local traffic interruption and access for emergency services.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP15 - Land at Rays Bottom, Walmer (WAL002)</p>
<p>Rep ID</p>	<p>SDLP704</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1265643</p>
<p>Consultee Full Name</p>	<p>MRS Janice Garrett</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>Summary of Site Allocations by Settlement - SAP15 - Land at Rays Bottom, Walmer</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Justified Effective</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Yes</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Yes</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as</p>	<p>Local Plan Team</p>

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

Dover District Council
DOVER, CT16 3PJ

8th December 2022

Dear Sirs

**Regulation 19 Submission – Dover District Local Plan
SAP15 - Land at Rays Bottom, Walmer (WAL002)**

We have read the revised development proposals and would like to comment on the following paragraphs published in relation to SAP15:-

Para (b) –In a recent planning application in St Margaret's, one of the reasons the officer gave for refusal of the application was that relying on screening was not satisfactory protection of the environmental amenities. It was difficult to maintain screening longterm in order to protect the visual transition. The sensitive landscaping scheme and landscape buffer to the south proposed for SAP15 is, therefore not a workable way of mitigating the impact of the development **longterm**. Any planting could not be considered as a permanent screening. The proposal is, therefore, not sound.

Neither would the proposed buffer to the south do anything to protect and preserve the visual amenity enjoyed by both residents and visitors from Hawkshill Down. The current uninterrupted view from the Common across the proposed site and to the countryside beyond would be lost and, therefore, the proposed southern buffer is not a sound way to mitigate the impact of the development on the wider countryside. This is all the more important as the proposed site is adjacent to a unique environment, comprising Hawkshill Down, WW1 and WW2 memorials, and the Grade II listed Walmer Castle Park and Gardens. Together with the historic importance of these areas, they are a haven for wildlife, which is inextricably linked to the proposed site.

Para (c) –We are pleased to see that retention and enhancement of the wooded area to the northern boundary has been recommended. However, this is only effective if it is enforced at the planning stage. Too often developers find ways round restrictions or negotiate to have them lifted. This wooded area is a valuable wildlife habitat and once lost, would be gone for ever. This proposal is, therefore, not guaranteed to be effective.

Paras (d) and (e) –The proposed road widening would only affect a small section of Liverpool Road. Together with another proposed site in Kindsdown, the increased traffic would still for the most part be using a country lane, most of which is single track, thus creating an unacceptable hazard, which cannot be justified.

Para (g) –As with my comment on Para (c), mitigation is not always enforced or effective and is therefore not a sound or effective proposal.

Para (h) –Again, these requirements seem sound but are not always enforced. On a neighbouring development, the need for an archaeological survey had been agreed but the planning officer forgot to include it when the planning permission was printed. Nothing could be done to rectify the mistake and hence any archaeology will be lost.

We are including below our original letter of 12th March 2021 submitted at the Regulation 18 stage, which covers these points in more detail.

The number of house builds required by the Government often changes and we consider that the area to the north of Ellens Road, which already has some sporadic development, is far more suited to future development. Sections of this area could be released over time to suit the number of dwellings required and would provide a continuous supply of sites over a long period as and when required.

In the Regulation 19 version of the Local Plan, some attempts have been made to mitigate the detrimental effects of building on this site but as outlined above not all of these are sound or effective and we continue to maintain that SAP15 should be designated as **not suitable** for development and should be removed from the Site Allocations list. Destroying this small but valuable part of Walmer, when there are other more suitable sites available, cannot be justified.

Yours faithfully

Janice and Roger Garrett

Please read our previous letter below:

Previous letter sent in response to Regulation 18 on 12th March 2021

District Local Plan Team
Dover District Council
White Cliffs Business Park
DOVER CT16 3PJ

12th March 2021

Dear Sirs

Draft Local Plan - WAL002 – Ray's Bottom, Walmer

We should like to submit the following arguments as to why we consider the above site unsuitable for housing development.

- 1 Ray's Bottom is a Greenfield site. The proposed development of 100/120 houses would have an unacceptable impact on the landscape.
- 2 Under the Housing & Employment Land Availability Assessment (HELAA) available online, sites WAL003 and WAL005 have been designated by the Council as "unsuitable" for development as it would have an unacceptable impact on: (a) the Heritage of the area; (b) the landscape and local wildlife sites; and (c) the character of the settlement. Together with WAL002, these three sites are adjacent to Hawkshill Freedown and the neighbouring grounds of Walmer Castle. If WAL003 and WAL005 have been rejected as unsuitable, the same should apply to WAL002 at Ray's Bottom, as they are all inextricably linked.
- 3 Ray's Bottom is an area frequented by walkers and in the absence of any pavements, there is a well-worn path along the edge of the field for those walking to Kingsdown. All those using the area currently enjoy the open views towards Kingsdown and Ringwould, as well as to the neighbouring Hawkshill Freedown. The Freedown is a conservation area managed by Walmer Parish Council and has been designated a Site of Nature Conservation Interest (SNCI). It is an area of chalk grassland of national importance for flora and fauna, and views from the Freedown include Ray's Bottom and beyond. The Freedown was a World War I aerodrome and is now the site of two memorials to the pilots who flew from there and were killed fighting in France. Extensive views overlook open farmland and across the sea to the distant French coast. The proposed development at Ray's Bottom would be immediately adjacent to this SNCI and would have an immense impact on the views currently enjoyed by the huge numbers of local residents and tourists who visit the Freedown for its wildlife, its tranquillity, its heritage and its beautiful views. It would also have a damaging impact on the wildlife which shares both the Freedown and the neighbouring farmland at Ray's Bottom, including the area of fallow land. In so many ways, any development in this area would have a detrimental impact on the amenities of the area.
- 4 The exit for vehicles from WAL002 would be onto a country lane, the majority of which is single-track with no pavements, and therefore totally unsuitable for the amount of traffic that would be generated. Most modern developments under-estimate the number of parking spaces that would be required. It is, therefore, likely that visitors and/or residents will at times park on Liverpool Road. As stated, this is a narrow lane that is also a bus route and even if efforts were made to widen the road adjacent to the proposed site, any parking would still present serious problems. The small car park at the foot of Hawkshill Camp Road is already used to capacity.

Liverpool Road/Glen Road is also used by the children who attend Kingsdown Primary School. Any increase in traffic along this country lane would have a serious impact on the safety of these children.

Any development at WAL002 would, therefore, have an unacceptable impact on highway safety and severe impact on the single-track road. (Please see photograph and note attached of recent incident on the road.)

- 1 If you look at the lie of the land, it all drains down from both Kingsdown and the Dover Road into the valley, which was formed by a river that originally flowed down across the fields and into the valley bottom (now Liverpool Road). This river went underground many years

ago but still flows at depth and when the water table is high enough can be seen at its end where it emerges and flows across Walmer Castle Paddock towards the sea. Southern Water have a monitoring point outside the Walmer Centre in Liverpool Road which constantly monitors the levels of water underground along the course of the old river.

Serious surface water flooding has affected the area in the past when heavy rain washed the topsoil from the farmland and swamped the neighbouring houses. Since this flooding, an area of land has been left fallow at the northern end of Ray's Bottom to try to absorb any run-off from the farmland and so protect the houses in Liverpool Road. Any new houses built on WAL002 would simply move the problem further up the valley, as they would be next to the remaining farmland and vulnerable to flooding from the fields, just as the houses were in 1981.

- 1 From the investigations we have made, it would appear that the current sewer serving Grams Road and Liverpool Road is already at capacity. In all probability, any new development at Ray's Bottom would require the building of a complete new sewer run.
- 2 The following are excerpts from the Walmer Design Statement (WDS) published in 2006. Dover District Council agreed to adopt the WDS as a material planning consideration in the assessment and determination of planning applications.
 - Under the section on the history of Liverpool Road area (Page 20) it states: "*At the beginning of the 20th century, development began on the perimeter of these estates reflecting the gradual change to manageable sized properties in reasonable grounds. These developments were sensitively sited to retain the spacious character and appearance of the area, using the landscape features to their full advantage.*" The same cannot be said for the proposed building of 100/120 houses on WAL002.
 - On Page 35 of the WDS it states: "*The southern boundary of the parish marks the transition to open countryside, much of which lies within the North Downs Special Landscape Area (SLA). This rural edge is an important element of the visual character and setting of Walmer and the community therefore supports policy CO3 of the Local Plan (2002) in seeking to ensure that priority is given to the conservation and enhancement of the natural beauty of the landscape over other planning considerations in this SLA.*"

This led to the creation of Design Principle WDS8 – "*The layout and design of any development affecting the southern edge of Walmer should demonstrate a suitable, carefully landscaped transition with the adjacent open countryside and the North Downs Special Landscape Area. **Development that would have an adverse effect on the rural setting of the parish and the landscape character of the North Downs Special Landscape Area should not be permitted.** Development on or adjacent to the southern boundary of Walmer parish must be appropriate in location, and incorporate design and associated features and measures to minimise visual impact.*"

- 1 At a Planning Committee meeting on 25th February 2021, consideration was given to planning application DOV20/00541, which was for the erection of four detached dwellings, car ports, new vehicular access and associated parking on land on the west Side of Station Road, St Margaret's at Cliffe. The application was refused on the following grounds:

"The proposed development would result in an unjustified intrusion of built development into an undeveloped countryside location, which would harm the prevailing rural character at this point and result in significant and demonstrable harm to the character and appearance of the AONB and the setting of St Margaret's within its rural context. The proposal would therefore conflict with policies DM15 and DM16 of Dover District Local Plan that seeks to protect the character of the countryside and paragraphs 170 and 172 of the NPPF as well as policies SD1, SD2, SD3 and SD9 of the Kent Downs AONB Management Plan."

We appreciate that this site is designated as being in an Area of Outstanding Natural Beauty (AONB) but we would suggest that the settings are very similar to WAL002, ie on the edge of the settlement and forming the transition between the settlement and the rural character of the countryside. In giving his report at the meeting, the Planning Officer made comments such as:

- It is an inappropriate development and would damage the sylvan character of the countryside as you approach the settlement confines.
- Relying on screening is not satisfactory protection of the environmental amenities. It is difficult to maintain screening longterm in order to protect the visual transition.
- Sensitivity of the landscape – would change the character of the countryside.
- It is outside the settlement confines.
- The farmland has a strong rural character and distinct countryside nature. The visual transition from settlement to countryside would be damaged.

ALL OF THE ABOVE COMMENTS COULD EQUALLY APPLY TO RAY'S BOTTOM. The St Margaret's application was for only 4 houses; how much more damage would be caused by 100/120 houses on WAL002? Any development in this sensitive area would result in significant and demonstrable harm to the character and appearance of the setting adjacent to Hawkshill Freedown and the approaches to Walmer along the country lane from Kingsdown.

- 1 Development sites obviously need to be found but we feel that there are more suitable sites in the District and ones which would provide a longer term solution to the problem. Planning permission has already been given to some of the land on the north side of Ellens Road. This area could provide a supply of suitable sites for some considerable time. There is already housing on both sides of this area of

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34 KIN002
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The selection of SAP 34 is totally unsound, The Highways Assessment of Ringwoud Road is inadequate. The facts are that Ringwoud Road is signposted as unsuitable for long vehicles, unsuitable for vehicles over 7.5tonnes and unsuitable for wide vehicles, the road is painted SLOW in 3 places despite the 50mph signs, and there are Dover and Deal Green Party: submission to Reg 19 consultation on Dover DC new Local Plan, deadline 9 Dec 2022. 14 4 sections where the road narrows to single lane passing. The 1400 voters in Kingsdown village (population 2000 + 500? more in summer months due to holiday village + campsite) are all dependent on the Ringwoud road traffic flowing freely. We have seen an RTA fatality on the road, and many near misses. It is a disgrace that KCC for years have refused to listen to requests to reduce the speed limit on this road and refused also to put in a kerbed pavement on the northern side of Ringwoud Road. The economy of the village depends on visitors walking, cycling and horse-riding on the Ringwoud Road and any development of SAP 34 would increase the likelihood of fatalities exponentially. The inclusion of SAP 34 is not legally compliant with NPPF 2021 item 11. (b)ii 'SPs should provide for objectively assessed needs for housing & other uses, . . . unless(ii) any adverse impacts of doing so would significantly & demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole'. Any development at SAP 34 is unsound firstly on the grounds of highways inadequacy. Any development would cause dangerous gridlock, involving the cars of current residents, parents of children of the village primary school, construction vehicles and new residents' cars. Secondly The selection of SAP 34 is unsound on the grounds that the Deal / Walmer conurbation of 30,000 depends on the narrow – single lane in places - Ringwoud road, carrying diverted traffic from the A258 every time A258 is blocked by an RTA or road works. It is part of the transport infrastructure of the whole district. The A258 is the only southern entrance to the 30,000 conurbation starting in Upper Walmer. Diverted traffic is a dangerous nightmare for the village every time it happens, some diverted traffic uses Glen Rd / Liverpool road selected as site for SAP 15 Ray's Bottom in Walmer, this site too if developed is likely to mean diverted traffic cannot get in / out of Deal / Walmer 30,000 conurbation. Neighbours working for emergency services say they oppose both developments for this reason. Thirdly on the grounds of landscape character, the site is on the skyline with sea behind, an iconic view that greets all people arriving in Deal; its selection contradicts the comments in SP4 on individual village identity and character and falls within LCT F3, Open Arable Chalk farmland with woodland, needed for national food security. The selection of SAP 34 is unsound fourthly on the grounds that it borders the AONB. Moreover 4.238 needs correcting, the parish council-owned, biodiversity-rich site of the Lynch / and Freedown woods (that run into Oxney Court Woods) was the subject of a survey by Kent Wildlife Trust in 2017 commissioned by the Ringwoud w/ Kingsdown parish council and paid for by DEFRA, which provides evidence of the natural capital to be protected on the boundary of this site. The selection of SAP 34 is unsound fifthly on the grounds that any development would remove a flood sponge on the top slope of the hill, below which is the Knight's Bottom pumping station and pond which drains towards Rays' Bottom SAP 15, so development here could contribute to flooding (see CC5). (cross referenced SAP 15 Walmer Rays Bottom).</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness	

matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP954
Rep Status	Processed
Consultee ID	1331213
Consultee Full Name	Dr Anne Ballinger
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	7.11 page 268, 3.71 page 37, SAP 34 page 163
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Not Legally compliant - The local plan specifically related to Kingsdown (SAP 34 and SAP 35) and the immediate boundary area (SAP 15 and SAP 53) is not legally compliant with the new and legal Highway Code changes which came into place in January 2022 i.e. after the evidence review and call for sites. The Highway Code states that a car must allow a minimum of 1.5 metres to overtake a cyclist (car travelling at under 30 MPH) or pedestrian (2 metres) when there is no pavement. All of the access roads into Kingsdown and the main roads used within Kingsdown (Upper St, The Rise, Undercliffe) do not allow the Highway code to be followed currently but therefore In the Local plan cannot by definition follow the guidance to be legally compliant or to support sustainable infrastructure (encourage

walking and cycling) or to works towards climate neutral. The danger to cyclists and walkers will be enhanced when the A258 is blocked after an accident and traffic is diverted via the Ringwould Road.

Unsound - the local plan is unsound with reference to SAP34 as the Ringwould Road is already signposted as unsuitable for long vehicles, vehicles over 7.5 tonnes, wide vehicles, narrowing to single lane passing. The proposed SAP34 development would cause dangerous gridlock particularly with the added traffic in summer months.

The developments of SAP34, SAP35 and SAP 15 would compromise the 'individual identity of Kingsdown Village' and contradiction to Policy 4 statement.

the SAP34 development is unsound on the grounds that it would remove a flood sponge.

the Local plan is also unsound in that it has not taken into account reasonable alternatives for Kingsdown or even considered these. There is no mention or even any attempt to assess the number of 2nd (or indeed 3rd, 4th) homes in Kingsdown/Walmer/Deal which are not lived in for most of the year. There is an increasing number of AirBnBs which provide multiple occupants (and multiple cars to travel) for family houses. As there is no attempt to assess these I will provide one road number as an example - Of the 34 houses in North Road, Kingsdown only 7 are lived in as a 1st home. The last house to sell in North/South Road was in the region of £600,000 for a 2nd home. This is in direct contrast to the statement of the local plan (7.11, page 268) 'to support the delivery of rural local needs homes to enable local people to remain in the village where they live or work and not to be forced to move away because of high house prices and high rents'. The plan only allocates 30% of new homes as affordable housing and so there is no demonstration for a local need for more housing. The other 70% of houses being built on greenfield could all be bought as 2nd/3rd/4th homes or run as AirBnBs.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I suggest a review of housing need in specific areas of DDC and build houses in areas of housing need. This need has not be demonstrated in Kingsdown and surrounding areas unless DDC council want an area largely lived in by 2nd home owners.
I suggest a 20 MPH limit throughout Kingsdown and the access roads with designated pedestrian and cycling lanes.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Local Plan Consultation Point

SAP15 - Land at Rays Bottom, Walmer (WAL002)

Rep ID

SDLP542

Rep Status

Processed

Consultee ID

1331758

Consultee Full Name

Sarah
Waite-Gleave

Consultee Company / Organisation

Agent Full Name

Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 15 & SAP 34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The inclusion of SAP 15 is not legally compliant with NPPF 2021 item 11. (b)ii 'SPs should provide for objectively assessed needs for housing & other uses, . . . unless(ii) any adverse impacts of doing so would significantly & demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole'.</p> <p>DM Policies NE2 (Natural Environment) p.285: We submit that the area inland from Kingsdown, west to Ringwoud, Ripple, Sutton, Studdal and Little Mongeham is included as LFT F Open Arable Chalk Farmland with Woodland, as an extension to F3 Ripple. The designation is sound and effective, But it is unsound and contradictory and ineffective to then include this arable chalk farmland of SAP 15 as a suitable site.</p> <p>SAP 15 Walmer Liverpool Road Ray's Bottom. The selection of this site is unsound firstly as it incompatible with SP4 ; 3.71 Separation of Settlements and the need to prevent villages coalescing to protect landscape character. Secondly it is unsound as its selection is incompatible with the statements in SP14 relating to biodiversity connectivity as this valley bottom is already functioning as vital point of biodiversity connectivity as referred to in SAP15, the northern and Western boundaries of the site, close to BOA Hawkshill Freedown, are key to biodiversity connectivity. 4.158 mis-names Hawkshill Freedown, which in fact it is an SSSI because it is globally rare, chalk-downland habitat, (not just the 'open field' in the DDC text). For decades volunteers with Walmer Council have lovingly protected this rare habitat, a very justified BOA. The geography indicates that the valley bottom is also valuable as a flood sponge, so SAP15 is unsound thirdly for this reason too. Ray's Bottom drains in a northerly direction to the whole area immediately north of Walmer Castle which is well-known to be subject to flooding, being at or below sea level.</p> <p>And fourthly the Highways assessment of this site is unsound and inadequate, SAP 15 is unsound because 4.160 fails to note that Liverpool Road is a single lane road (changing its name to Glen Rd) with passing places which is becomes gridlock with traffic from Kingsdown Primary school 2x a day. It becomes an arterial road attempting to provide access to 30,000 conurbation of Deal / Walmer for diverted traffic when the A258 is blocked. (Cross reference SAP 34 in Kingsdown). So the selection is unsound on the grounds of danger to life from RTAs. The Transport Assessment requirement referred to in e makes no reference whatsoever to Liverpool Road becoming Glen Road at the Kingsdown parish boundary, and carrying diverted A258 road traffic.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Nothing can be done to mitigate putting any development on either site SAP 34 or SAP 15. They should both be excluded as sites for development.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	SAP 15 submission from Gleave's .docx
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP533
Rep Status	Processed
Consultee ID	1331547
Consultee Full Name	Mr Don Hough
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Sap15
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The Glen/Liverpool Road were not built for the proposed amount of traffic that would be generated by a large building plot of houses on Ray's Bottom. The development of houses not local to Doctor's surgery and would have a devastating effect on local traffic trying to access Kingsdown and beyond. It would also take away beautiful views on the approach to Kingsdown and cause havoc at peak times/school run/rush hour in the evening. It would also take away arable land.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP735
Rep Status	Processed
Consultee ID	1331470
Consultee Full Name	Mr Yvonne Horton
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP15
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The plan to build on this site is flawed even though there appears to be adequate provision for assessment still to be done. I will respond to assessment paragraphs by their letter:</p> <p>a. Any development here will cause harm, to suggest otherwise is false. Reducing the number of houses from 100+ in the original plan, to 75, will make no appreciable difference to impact on infrastructure, bio-diversity, traffic and noise. The term low density is used yet is not defined. 75 new dwellings doesn't sound low density.</p> <p>b/c The quantity and quality of bio-diversity that would be destroyed cannot be replaced by keeping some small wooded areas and planting a few additional trees. The brown field is in itself an important habitat for wildlife and would be completely urbanised. The need to widen roads would also cause important woodland habitat to vanish. In addition the noise pollution, chemical pollution and huge increase in human traffic would discourage wildlife from this area.</p> <p>d/e The road widening would have to include Liverpool Road either side of Grams Road rather than just the area of Liverpool Road in front of the proposed site. This would destroy a significant portion of woodland and wildlife habitat as well as encroach on land bordering current housing. Liverpool Road is the quickest route into Deal from this site, it is very narrow and would be subject to a significant increase in traffic. Even Grams road is unsuitable for such a large increase in traffic given it too, is quite narrow.</p>

	f. I understand this site has already been identified as a flood risk when assessed previously, so what has changed that another assessment is necessary?
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	See 7
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP535
Rep Status	Processed
Consultee ID	1331546
Consultee Full Name	Mrs Monica Hough
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SIP15
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No

6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The building of houses on Ray's Bottom would severely damage the already fragile transport system between Walmer & Kingsdown. The increase in traffic from the housing development would cause terrible jams particularly at peak times School run/Rush hour morning and evening. The beautiful views would disappear as one approaches Kingsdown for Walmer on Glenn Road. Much needed arable land would be lost by such a development and any AONB would be destroyed in the process. The infrastructure could not sustain the development as Kingsdown has no Doctor's surgery also.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP706
Rep Status	Processed
Consultee ID	1331548
Consultee Full Name	Mr Roger Highton
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP15
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The development of SAP15 Walmer Liverpool Road Ray's Bottom is unsound as it conflicts with National Planning Policy Framework requirements for conserving and enhancing the natural environment. It contradicts NPPF 174 due to the loss of landscape character. DDC's Dover District Landscape Character Assessment 2020 p114-9 identifies LCA F3 Ripple as a valuable landscape where development should conserve the rural character of the landscape ensuring that it continues to play a role in providing a rural separation between Deal and Kingsdown. The proposed development at Liverpool Road Ray's Bottom SAP15 is within LCA F3 area and contradicts the requirement to conserve the characteristic pattern of historic villages maintaining their tight knit enclosed built character.</p> <p>The development of SAP15 Walmer is unsound as it conflicts with NPPF requirements for promoting sustainable transport. The development does not meet the requirements on NPPF 104 and 105 as it is on the edge of Walmer with limited opportunities for walking and cycling with particular challenges of walking or cycling along Liverpool Road/Glen Road which is a busy, single-track road with passing places, with no footpath. Public transport options are limited with an infrequent bus service from Kingsdown to Deal that has recently been significantly reduced. This will result in most journeys to and from this development by car along Glen Road which is a very busy single-track road with passing places. However, improvements to Glen Road would be challenging without adverse effects on the rural character of the area. The location of a site for housing development is the key factor in the use of sustainable transport throughout the lifetime of the housing so it is critical that this accurately assessed before approving development within the local plan. The NPPF requirements for considering development proposals, NPPF 111 in my view should be refused on highways grounds because the additional estimated 110 movement of cars at peak times along the already busy Glen Road which would be unsafe to pedestrians, cyclists and motorists.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	SAP15 should be removed from the proposed housing allocation in the Dover Local Plan as it would result in the loss of landscape character and would be unsafe for pedestrian, cyclists and motorists. Sites in Walmer should be selected for housing with walking and cycling routes to key local amenities and the railway station to meet the planning requirements for sustainable transport.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP612
Rep Status	Processed
Consultee ID	1331790
Consultee Full Name	Julie Davies
Consultee Company / Organisation	CPRE Kent
Agent Full Name	

Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP15
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	We object to the allocation: <ul style="list-style-type: none"> • The site is shown on the Post Agricultural Land Classification (England) on MAGIC Grade 2 and 3b, and land west of the allocation as primarily Grade 2 and 3b. • The approach to site is along Liverpool Road a narrow country lane • HELAA Appendix 3B gives the site orange status as 'Highways concerns have been identified in relation to access and/or highway impact and further assessment is required to demonstrate whether this can be mitigated.' • In BOA: Dover and Folkestone Cliffs and Downs • The allocation has no defined western boundary. • Allocating the site for housing will introduce urban development into a very rural environment. • The CPRE Dark skies map shows the site as being in the darker category. • In the Landscape Consultants Assessment in HELAA Appendix 3A the site is given orange status and the overall landscape summary is: 'The development of this site would have an impact on the landscape and further assessment is required to demonstrate whether this can be mitigated.'
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	CPRE Kent would wish to participate at the examination hearings to explore these issues further.
Include files	

Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP743
Rep Status	Processed
Consultee ID	1331857
Consultee Full Name	Mrs Lorely Brimson
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP15
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Rays Bottom is a greenfield site not brownfield</p> <p>I strongly object to the proposal to develop land at Rays Bottom.</p> <p>It is important to note that it this is a Greenfield site, not Brownfield as now stated. This site has never had any previous development. I believe development should be limited to Brownfield/PDL land in the borough.</p> <p>Rays Bottom is also adjacent to the valuable wildlife and amenity land of Hawkshill Freedown. It provides an important wildlife corridor for fox, badgers, mice, squirrels, hedgehogs, toads, frogs, blackbirds, thrush, tits, kestrels, woodcock, linnets, firecrest, little blue butterflies and bees. Any development here would be hugely detrimental to the local ecology.</p> <p>I am also concerned by the risk of land instability and subsidence along the western boundary where there is a steep drop of approximately 15-20 feet. The vibrations of construction vehicles and digging of foundations could lead to significant land slippage.</p> <p>I am concerned by the level of pollution produced by 75 homes and the 100 (approx) cars that will be carried by the onshore breeze over existing properties to the west.</p> <p>Any potential development will also have issues with privacy given the additional height of the Hawksdown Estate that will overlook the new homes.</p> <p>There is also the issue of potential flooding in the valley, which has an underground stream flowing along its length. Since the flood of 1981 Southern Water have installed monitoring devices.</p> <p>Rays Bottom is a semi rural area, only 150m away from Walmer Castle and directly opposite Hawkshill Freedown. The existing lane is narrow, and the additional traffic will be a risk to walkers, school children and the disabled at the nearby Glendale Residential Home. In summary there is a plethora of reasons why WAL002 is not appropriate for development and I urge the council to reject this plot</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s)	Redesignate Rays Bottom as greenfield

you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	SDLP743 Brimson Att1 - Redacted.pdf
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP1014
Rep Status	Processed
Consultee ID	1331808
Consultee Full Name	Mr Robert Hogben
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	WAL002
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	The selection of this site is unsound: 1.It is incompatible with SP4 ; 3.71 Separation of Settlements and the need to prevent villages coalescing to protect landscape character. A Ribbon development along this valley bottom would be disastrous for the landscape and would cause coalescence with Kingsdown.

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

- 1 it is unsound as its selection is incompatible with the statements in SP14 relating to biodiversity connectivity as this valley bottom is already functioning as a vital point of biodiversity connectivity as referred to in SAP15, the northern and Western boundaries of the site, close to BOA Hawkshill Freedown, are key to biodiversity connectivity. **4.158 mis-names Hawkshill Freedown, which is in fact globally rare, chalk-downland habitat, (not just the 'open field' in the DDC text). For decades volunteers with Walmer Council have lovingly protected this rare habitat, a very justified BOA.**
- 2 The geography indicates that the valley bottom is also valuable as a flood sponge, so site selection of SAP15 is unsound on this basis. Ray's Bottom drains in a northerly direction to the whole area immediately north of Walmer Castle which is well-known to be subject to flooding. The NPPF 21 Section 2 - 11. presumption in favour of sustainable development objectively assessed needs for housing and other uses,... unless: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. Building in a flood risk area is contrary to NPPF 21. Also there is a development of the Dover Rd, Walmer above this proposed site which could result in run off down to this site.
- 3 The Highways assessment of this site is unsound and inadequate, SAP 15 is unsound because 4.160 fails to note that Liverpool Road is a single lane road (changing its name to Glen Rd) with passing places which becomes gridlocked with traffic from Kingsdown Primary school 2x a day. It becomes an arterial road attempting to provide access to 30,000 conurbation of Deal / Walmer for diverted traffic when the A258 is blocked. (Cross reference SAP 34 in Kingsdown). So the selection is unsound on the grounds of danger to life from RTAs. The Transport Assessment requirement referred to in e, makes no reference whatsoever to Liverpool Road becoming Glen Road at the Kingsdown parish boundary, and carrying diverted A road traffic. Ref SAP34 there are only 3 routes into Kingsdown, all are inadequate for lorries as Kingsdown has narrow streets and a conservation area. It would be difficult and dangerous to develop this site as lorries would struggle to gain access through Walmer. If SAP 34 and 15 were to go ahead at the same time it would create a dangerous situation where emergency vehicles may struggle to gain access to Kingsdown.
- 4 The selection of SAP 15 is unsound as it lies within the F3 Ripple area identified in the DDC's LCA (2020). This means it forms a landscape buffer between the conurbation of Deal and Walmer and the AONB. The situation of the plot is also important as it is highly visible as it is adjacent to open country.
- 5 Walmer has already been overdeveloped and has more to come under the current weak plan. I would argue that due to its inability to cope with current levels of traffic, congestion, pollution and windfall development only should be allowed.
- 6 Contrary to T11 the development would not be able to link up to Walmer station safely for cyclists and pedestrians as there are no footpaths along Liverpool Road, no streetlighting and the road is very narrow. Residents would be dependent on their cars contrary to SP1.
- 7 The site selection is also unsound and contrary to NPPF 21 as it uses agricultural land necessary for growing food - the loss of this land is unsustainable as it stops future generations from growing food.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

After prolonged overdevelopment in Walmer causing traffic problems, increased pollution and congestion under the current weak plan, windfall development only should be allowed.
 More attention needs to be paid to the potential flood risks of over development higher up the valley and the cumulative effect which this will have.
Consideration needs to be paid to the landscape area and potential loss of biodiversity at neighbouring Hawkshill by the interruption of a wildlife corridor.
 The Highways assessment needs to be more thorough, taking into account the potential problems caused by lorries needing access to the site, local traffic interruption and access for emergency services.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Local Plan Consultation Point

SAP15 - Land at Rays Bottom, Walmer (WAL002)

Rep ID	SDLP867
Rep Status	Processed
Consultee ID	1331808
Consultee Full Name	Mr Robert Hogben
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	WAL002
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The selection of this site is unsound:</p> <ol style="list-style-type: none"> 1. It is incompatible with SP4 ; 3.71 Separation of Settlements and the need to prevent villages coalescing to protect landscape character. A Ribbon development along this valley bottom would be disastrous for the landscape and would cause coalescence with Kingsdown. <ol style="list-style-type: none"> 1 it is unsound as its selection is incompatible with the statements in SP14 relating to biodiversity connectivity as this valley bottom is already functioning as a vital point of biodiversity connectivity as referred to in SAP15, the northern and Western boundaries of the site, close to BOA Hawkshill Freedown, are key to biodiversity connectivity. 4.158 mis-names Hawkshill Freedown, which is in fact globally rare, chalk-downland habitat, (not just the 'open field' in the DDC text). For decades volunteers with Walmer Council have lovingly protected this rare habitat, a very justified BOA. 2 The geography indicates that the valley bottom is also valuable as a flood sponge, so site selection of SAP15 is unsound on this basis. Ray's Bottom drains in a northerly direction to the whole area immediately north of Walmer Castle which is well-known to be subject to flooding. The NPPF 21 Section 2 - 11. presumption in favour of sustainable development objectively assessed needs for housing and other uses,... unless: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. Building in a flood risk area is contrary to NPPF 21. Also there is a development of the Dover Rd, Walmer above this proposed site which could result in run off down to this site. 3 The Highways assessment of this site is unsound and inadequate, SAP 15 is unsound because 4.160 fails to note that Liverpool Road is a single lane road (changing its name to Glen Rd) with passing places which becomes gridlocked with traffic from Kingsdown Primary school 2x a day. It becomes an arterial road attempting to provide access to 30,000 conurbation of Deal / Walmer for diverted traffic when the A258 is blocked. (Cross reference SAP 34 in Kingsdown). So the selection is unsound on the grounds of danger to life from RTAs. The Transport Assessment requirement referred to in e, makes no reference whatsoever to Liverpool Road becoming Glen Road at the Kingsdown parish boundary, and carrying diverted A road traffic. Ref SAP34 there are only 3 routes into Kingsdown, all are inadequate for lorries as Kingsdown has narrow streets and a conservation area. It would be difficult and dangerous to develop this site as lorries would struggle to gain access through Walmer. If SAP 34 and 15 were to go ahead at the same time it would create a dangerous situation where emergency vehicles may struggle to gain access to Kingsdown.

	<p>4 The selection of SAP 15 is unsound as it lies within the F3 Ripple area identified in the DDC's LCA (2020). This means it forms a landscape buffer between the conurbation of Deal and Walmer and the AONB. The situation of the plot is also important as it is highly visible as it is adjacent to open country.</p> <p>5 Walmer has already been overdeveloped and has more to come under the current weak plan. I would argue that due to its inability to cope with current levels of traffic, congestion, pollution and windfall development only should be allowed.</p> <p>6 Contrary to T11 the development would not be able to link up to Walmer station safely for cyclists and pedestrians as there are no footpaths along Liverpool Road, no streetlighting and the road is very narrow. Residents would be dependent on their cars contrary to SP1.</p> <p>7 The site selection is also unsound and contrary to NPPF 21 as it uses agricultural land necessary for growing food - the loss of this land is unsustainable as it stops future generations from growing food.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>After prolonged overdevelopment in Walmer causing traffic problems, increased pollution and congestion under the current weak plan, windfall development only should be allowed.</p> <p>More attention needs to be paid to the potential flood risks of over development higher up the valley and the cumulative effect which this will have.</p> <p>Consideration needs to be paid to the landscape area and potential loss of biodiversity at neighbouring Hawkshill by the interruption of a wildlife corridor.</p> <p>The Highways assessment needs to be more thorough, taking into account the potential problems caused by lorries needing access to the site, local traffic interruption and access for emergency services.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	No
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
Include files	
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP887
Rep Status	Processed
Consultee ID	1331940
Consultee Full Name	Dr Sophie Peach
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	SAP 15
<p>2 - Do you consider this part of the Plan sound?</p>	No

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Failure to protect life. The proposed development will send a dangerous amount of traffic up Glen road, particularly at school times. This road is single carrageway, in poor repair, with few passing places. This road is already very busy at peak times and known by locals to be dangerous. It is reasonable to assume familys in the proposed estate would use Kingsdown primary.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP895
Rep Status	Processed
Consultee ID	1331943
Consultee Full Name	Ms Alexa Childs
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP15
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>SAP 15 Walmer Liverpool Road Ray's Bottom. The selection of this site is unsound firstly as it incompatible with SP4 ; 3.71 Separation of Settlements and the need to prevent villages coalescing to protect landscape character. Secondly it is unsound as its selection is incompatible with the statements in SP14 relating to biodiversity connectivity as this valley bottom is already functioning as vital point of biodiversity connectivity as referred to in SAP15, the northern and Western boundaries of the site, close to BOA Hawkshill Freedown, are key to biodiversity connectivity. 4.158 mis-names Hawkshill Freedown, which in fact it is an SSSI because it is globally rare, chalk-downland habitat, (not just the 'open field' in the DDC text). For decades volunteers with Walmer Council have lovingly protected this rare habitat, a very justified BOA. The geography indicates that the valley bottom is also valuable as a flood sponge, so SAP15 is unsound thirdly for this reason too. Ray's Bottom drains in a northerly direction to the whole area immediately north of Walmer Castle which is well-known to be subject to flooding.</p> <p>And fourthly the Highways assessment of this site is unsound and inadequate, SAP 15 is unsound because 4.160 fails to note that Liverpool Road is a single lane road (changing its name to Glen Rd) with passing places which is becomes gridlock with traffic from Kingsdown Primary school 2x a day. It become an arterial road attempting to provide access to 30,000 conurbation of Deal / Walmer for diverted traffic when the A258 is blocked. (Cross reference SAP 34 in Kingsdown). So the selection is unsound on the grounds of danger to life from RTAs. The Transport Assessment requirement referred to in e makes no reference whatsoever to Liverpool Road becoming Glen Road at the Kingsdown parish boundary, and carrying diverted A road traffic.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Please please please do not allow this developement. All our wild places are being destroyed.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)

Rep ID	SDLP728
Rep Status	Processed
Consultee ID	1331832
Consultee Full Name	Mrs Suzanne De Ruyter
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP15
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>This is nonsensical, to identify the area as prone to flood risk and then to propose to develop it.</p> <p>Liverpool Road is already vulnerable to surface flooding after heavy rain. Development of this hillside will inevitably result in greater run-off and increasing flood risk.</p> <p>Liverpool Road is a frequently used road by Parents whose children are driven from Deal and Walmer to attend the Local School at Kingsdown. It is single lane with some passing points.</p> <p>The impact of those people coming into the village already is SIGNIFICANT with incidents of abuse reported due to lack of adequate parking, and cars running whilst parents wait to collect children, exacerbating pollution. There is inadequate consideration in the plan for the education of the inevitable children whilst considering the detrimental impact on existing education facilities.</p> <p>To widen the road would necessitate cutting into the upper bank, which would likely result in the loss of trees and impact the natural environment currently enjoyed. The land is adjacent to Hawkesdown hill which is a site of significant remembrance. The development would significantly impact upon the amenity from the Hawkesdown Hill highpoint and will likely create noise disturbance to those who are enjoying that space. Hawkesdown Hill is a significant area of recreation and adjoins the Walmer Castle Grounds which are of significant historical value to the area. Further development of new housing in this area is inconsistent with the existing housing styles and ages and will therefore be of significant detriment to the amenity of lower Walmer. This will also lead to slow encroachment towards Kingsdown, which will over time deprive Kingsdown of its own identity. (SP4 P37 3.71)</p> <p>This is turn will impact Kingsdown's economy (which significantly benefits from Tourism, as noted elsewhere in the Plan, see notations regarding the unsuitability of KIN06, KIN07)</p> <p>The traffic whether directed to either the Dover Road or to Liverpool Road will have a significant impact on traffic flow and on businesses which has been evidenced in the problems already observed since the creation of additional houses to Richards Road and Station Road, with Local Papers reporting of the impact upon Local Businesses resulting in loss of income and occasional closure (Walmer's Butcher). The Dover road is the main road from Deal, with only one lane per direction. Slowed or stationary cars will exacerbate pollution and increased traffic will adversely impact the occupants of Dover Road and adjoining roads even further.</p>

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP736
Rep Status	Processed
Consultee ID	1331850
Consultee Full Name	Mr Simon Darragh
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP15
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>Rays Bottom is a greenfield site not brownfield. See attached.</p> <p>I strongly object to the proposal to develop land at Rays Bottom.</p> <p>It is important to note that it this is a Greenfield site, not Brownfield as now stated. This site has never had any previous development. I believe development should be limited to Brownfield/PDL land in the borough.</p> <p>Rays Bottom is also adjacent to the valuable wildlife and amenity land of Hawkshill Freedown. It provides an important wildlife corridor for fox, badgers, mice, squirrels, hedgehogs, toads, frogs, blackbirds, thrush, tits, kestrels, woodcock, linnets, firecrest, little blue butterflies and bees. Any development here would be hugely detrimental to the local ecology.</p> <p>I am also concerned by the risk of land instability and subsidence along the western boundary where there is a steep drop of approximately 15-20 feet. The vibrations of construction vehicles and digging of foundations could lead to significant land slippage.</p> <p>I am concerned by the level of pollution produced by 75 homes and the 100 (approx) cars that will be carried by the onshore breeze over existing properties to the west.</p> <p>Any potential development will also have issues with privacy given the additional height of the Hawksdown Estate that will overlook the new homes.</p> <p>There is also the issue of potential flooding in the valley, which has an underground stream flowing along its length. Since the flood of 1981 Southern Water have installed monitoring devices.</p> <p>Rays Bottom is a semi rural area, only 150m away from Walmer Castle and directly opposite Hawkshill Freedown. The existing lane is narrow, and the additional traffic will be a risk to walkers, school children and the disabled at the nearby Glendale Residential Home. In summary there is a plethora of reasons why WAL002 is not appropriate for development and I urge the council to reject this plot</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Redesignate Rays Bottom as a greenfield site</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>See attached letter</p>
<p>Include files</p>	<p>SDLP736 Darragh Att1 - Redacted.pdf</p>
<p>Local Plan Consultation Point</p>	<p>SAP15 - Land at Rays Bottom, Walmer (WAL002)</p>
<p>Rep ID</p>	<p>SDLP737</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331854</p>
<p>Consultee Full Name</p>	<p>Mr Michael Brimson</p>

Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP15
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Rays Bottom is a greenfield site not brownfield. See attached.</p> <p>I strongly object to the proposal to develop land at Rays Bottom.</p> <p>It is important to note that it this is a Greenfield site, not Brownfield as now stated. This site has never had any previous development. I believe development should be limited to Brownfield/PDL land in the borough.</p> <p>Rays Bottom is also adjacent to the valuable wildlife and amenity land of Hawkshill Freedown. It provides an important wildlife corridor for fox, badgers, mice, squirrels, hedgehogs, toads, frogs, blackbirds, thrush, tits, kestrels, woodcock, linnets, firecrest, little blue butterflies and bees. Any development here would be hugely detrimental to the local ecology.</p> <p>I am also concerned by the risk of land instability and subsidence along the western boundary where there is a steep drop of approximately 15-20 feet. The vibrations of construction vehicles and digging of foundations could lead to significant land slippage. I am concerned by the level of pollution produced by 75 homes and the 100 (approx) cars that will be carried by the onshore breeze over existing properties to the west.</p> <p>Any potential development will also have issues with privacy given the additional height of the Hawksdown Estate that will overlook the new homes.</p> <p>There is also the issue of potential flooding in the valley, which has an underground stream flowing along its length. Since the flood of 1981 Southern Water have installed monitoring devices.</p> <p>Rays Bottom is a semi rural area, only 150m away from Walmer Castle and directly opposite Hawkshill Freedown. The existing lane is narrow, and the additional traffic will be a risk to walkers, school children and the disabled at the nearby Glendale Residential Home. In summary there is a plethora of reasons why WAL002 is not appropriate for development and I urge the council to reject this plot</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Redesignate Rays Bottom as Greenfield

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	SDLP737 Brimson Att1 - Redacted.pdf
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP837
Rep Status	Processed
Consultee ID	1331916
Consultee Full Name	Dr Phil Peach
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 15, WAL002
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Regarding the traffic mitigation consideration has been made to traffic moving through Liverpool road to Grams road. There has been no reference to consideration being made to the fact that some traffic will move up Glen road, specifically towards the primary school. Glen road is single carrageway with few passing points, the traffic on this road is already excessive and dangerous, especially at school run times. It seems obvious to me that as Kingsdown primary will be the closest school to the proposed estate it would take a reasonable proportion of the resident children and traffic would significantly increase.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP897
Rep Status	Processed
Consultee ID	1331943
Consultee Full Name	Ms Alexa Childs
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 15
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>SAP 15 Walmer Liverpool Road Ray's Bottom. The selection of this site is unsound firstly as it incompatible with SP4 ; 3.71 Separation of Settlements and the need to prevent villages coalescing to protect landscape character. Secondly it is unsound as its selection is incompatible with the statements in SP14 relating to biodiversity connectivity as this valley bottom is already functioning as vital point of biodiversity connectivity as referred to in SAP15, the northern and Western boundaries of the site, close to BOA Hawkshill Freedown, are key to biodiversity connectivity. 4.158 mis-names Hawkshill Freedown, which in fact it is an SSSI because it is globally rare, chalk-downland habitat, (not just the 'open field' in the DDC text). For decades volunteers with Walmer Council have lovingly protected this rare habitat, a very justified BOA. The geography indicates that the valley bottom is also valuable as a flood sponge, so SAP15 is unsound thirdly for this reason too. Ray's Bottom drains in a northerly direction to the whole area immediately north of Walmer Castle which is well-known to be subject to flooding.</p> <p>And fourthly the Highways assessment of this site is unsound and inadequate, SAP 15 is unsound because 4.160 fails to note that Liverpool Road is a single lane road (changing its name to Glen Rd) with passing places which is becomes gridlock with traffic from Kingsdown Primary</p>

	school 2x a day. It become an arterial road attempting to provide access to 30,000 conurbation of Deal / Walmer for diverted traffic when the A258 is blocked. (Cross reference SAP 34 in Kingsdown). So the selection is unsound on the grounds of danger to life from RTAs. The Transport Assessment requirement referred to in e makes no reference whatsoever to Liverpool Road becoming Glen Road at the Kingsdown parish boundary, and carrying diverted A road traffic.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Please please do not destroy this site with housing
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP851
Rep Status	Processed
Consultee ID	1331928
Consultee Full Name	Matthew Porter
Consultee Company / Organisation	Fernham Homes Ltd
Agent Full Name	Matt Porter
Agent Company / Organisation	DHA Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy SAP15 - Land at Rays Bottom between Liverpool Road and Hawksdown, Walmer (WAL002) Policy SP3 - Housing Growth Policy SP4 - Windfall Development Policy SP11 - Infrastructure and Developer Contributions Policy SP12 - Strategic Transport Infrastructure
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes

6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

We consider that the plan is sound, but object to elements of Policy SAP15 - Land at Rays Bottom between Liverpool Road and Hawksdown, Walmer (WAL002) and Policy SP3 - Housing Growth. These objections are set out in the consultation response submitted on behalf of Fernham Homes Limited (ref DHA/30359).

1 Introduction

1.1 Purpose of this Representation

1.1.1 This representation has been prepared by DHA Planning on behalf of Fernham Homes Limited in response to the Dover District Council 'DDC' Local Plan (Regulation 19) consultation which runs until 9th December 2022.

1.1.2 We understand that DDC is in the process of preparing a new Local Plan to set out a strategy for development for the period to 2040 and that the Council are presently seeking comments on the pre-submission Plan prior to its submission for examination in early 2023.

1.1.3 Our client is promoting 'Land at Rays Bottom, Walmer, Deal' (hereafter referred to as 'Land at Rays Bottom' or 'the site') for the residential allocation of the site as part of the new Dover District Local Plan preparation process. The site is allocated for residential development in the Regulation 19 Pre-submission Plan for the provision of 75 dwellings under policy reference 'SAP15'.

1.1.4 It is highlighted that as part of the Regulation 18 Local Plan, the Site was allocated under the 'Site Allocations Policy 1 Non-Strategic Housing Allocations' for approximately 100 dwellings (reference WAL 002).

1.1.5 The purpose of the representation is to support the allocation of Land at Rays Bottom as a suitable and deliverable location for residential development and provide comment on the consistency of the allocation with the proposed strategy, draft policies and our client's position in respect of the 'soundness' of the Plan but to object to the indicative capacity set out in the policy.

1.1.6 In this regard, we remain wholly supportive of the principle of the residential allocation of Land at Rays Bottom and agree that the Site represents a logical and sustainable location to direct growth in Deal consistent with the growth strategy of the Plan as a whole.

1.1.7 Accordingly, we say that the allocation of Land at Rays Bottom is necessary in order for the Council in meeting the growing need for new homes in the district and help to ensure the DDC can have confidence in consistently meeting its market and affordable housing targets in full throughout the life of the new Dover District Plan.

1.1.8 It is submitted that the SAP15 policy wording should be amended to reflect the capability of the Site to accommodate approximately 80 dwellings, deliverable early in the Plan period.

1.1.9 Based on the current national and local planning context, we consider the Site to be a highly suitable edge-of-settlement location to allocate land for housing to help meet the need for new homes in the district and its effective use should be appropriately maximised in accordance with national policy objectives.

1.1.10 Further details regarding the Site and commentary on the consistency of the allocation with the proposed strategy, draft policies and our client's position in respect of the 'soundness' of the Plan are set out in the following sections of this document.

1.2 About Fernham Homes

1.2.1 Fernham Homes Ltd are a local award winning small and medium sized (SME) housebuilder, established in 1997 and has a strong track record of delivering high quality residential and mixed use developments in Kent over the last 25 years. This has been acknowledged through the receipt of nationally recognised awards, including the gold Evening Standard Awards best family home 2022 and 2019 bronze WhatHouse Best Small Housebuilder.

1.2.2 SME housebuilders are recognised in the National Planning Policy Framework ('NPPF') at paragraph 69 as making an important contribution to meeting the housing requirements of an area, and being able to build out relatively quickly. Similarly, this has also been recognised by the Planning Inspectorate. This is particularly the case with Fernham Homes, which is privately owned with access to significant resources. This provides significantly more flexibility than national and other regional housebuilders, and allows Fernham Homes to deliver housing rapidly and to a high quality, beautiful and sustainable standard (para 126 of the NPPF).

1.2.3 Fernham Homes has embarked on a sustained period of growth, with an adopted and robust business plan to deliver around 300 houses per year in five years time.

1.2.4 A key element of Fernham Homes' operations is to take a careful approach to site selection: a huge amount of due diligence is undertaken as part of this, and therefore Fernham Homes only invests in those sites which meet the NPPF requirements of being available, suitable, and deliverable. As set out below land at Rays Bottom, Walmer ('SAP15') is firmly considered to be such a site.

1.2.5 Similarly, a key feature of Fernham Homes' approach is to work positively and proactively with local planning authorities (LPAs), both during the preparation of local plans and at planning application stage. Fernham Homes are fully committed to engaging with DDC in the preparation of its Local Plan, and firmly subscribe to the national policy approach set out in paragraphs 15 and 16 c) of the NPPF that "the planning system should be genuinely plan-led" and should be shaped by early, proportionate and effective engagement between LPAs and others, including businesses and developers. Accordingly, Fernham Homes would welcome the opportunity to discuss the matters contained in this representation, including the availability, suitability, deliverability and capacity of land Rays Bottom, Walmer ('SAP15') directly with DDC members and officers, ahead of the submission of the Local Plan for examination.

1.3 Representation Structure

1.3.1 The representation structure is outlined below for ease of reference:

Chapter 2 (Consultation Background) – Sets out the context of the Dover District new Local Plan preparation, relevant national planning requirements and a summary of our current position.

Please refer to paragraph 52 of Appeal Decisions: APP/M2270/W/21/3283924 & APP/M2270/W/21/3288645

Chapter 3 (Legal Tests of Soundness) - Assessing whether the plan is sound, having regard to the tests of soundness outlined by paragraph 35 of the NPPF.

Chapter 4 (Duty to Co-operate) - Assessing whether the plan is sound, having regard to the duty to cooperate outlined by paragraph 24 of the NPPF.

Chapter 5 (Housing Need) - Consideration of market and affordable housing need and assessment of proposed housing allocations and supply sources.

Chapter 6 (Assessment of Suitability) - Re-introduces our client's Site and provides a summary of planning constraints and opportunities, including the quantum of development that could be accommodated, why the Site is suitable for development and why the principle of the draft allocation for residential development is both justified and consistent with the DDC's strategy for growth in the district.

Chapter 7 (Conclusion) - Summarises the key points raised throughout the representation and re-affirms our client's support for the principle of the Site's allocation and the principle of proposed strategy ahead of the submission of the Plan for examination, and the objections in terms of capacity.

2 DDC – Draft for Submission Local Plan (Regulation 19)

2.1 Consultation Background

2.1.1 DDC are required to prepare a new Local Plan, as the current suite of development plan documents were adopted in 2002, 2010 and 2015. The Core Strategy (CS) (adopted 2010) in particular has a time horizon up to 2026. The plans, and the policies contained within, pre-date current national policy, practice guidance and local evidence and consequently require updating.

2.1.2 The new Local Plan will set out the vision, strategic objectives and overarching development strategy for the growth of the District over the period to 2040. It provides the planning policy framework to guide the future development of the area, addressing needs and opportunities for housing, the economy, community facilities and infrastructure, as well as the basis for conserving and enhancing the natural and historic environments, mitigating and adapting to climate change, and achieving well designed places.

2.1.3 For the avoidance of doubt, the new Local Plan, on adoption, will replace the CS 2010 and the Land Allocations Plan 2015, as well as saved policies from the 2002 Local Plan.

2.1.4 DDC's Regulation 19 Local Plan outlines the key issues that need to be addressed between now and 2040. In particular, the Plan sets out the following key planning issues for the District:

- Ensuring that new development in the District contributes to the mitigation of, and adaptation to, climate change.
- Supporting DDC to deliver its intention to be a carbon neutral district by 2050.
- Managing flood risk and coastal change.
- Ensuring that a sufficient amount and variety of land is identified to deliver a continuous supply of housing across the Plan period and that DDC maintains a five-year housing land supply.
- Delivering growth in a way that focuses development in the least sensitive areas of the District in order to conserve and enhance the District's rich natural and historic environments.

- Supporting sustainable development in rural areas to enhance the vitality of rural communities.
- Working with partners to facilitate the delivery of the Whitfield Urban Expansion. Ensuring a range of housing tenures, types and sizes are provided across the District to meet the needs of the local community and provide choice and flexibility in the housing market.
- Promoting economic growth, tourism, and investment in the District's Town Centres in line with DDC's Economic Growth Strategy.
- To address the impact of the COVID-19 pandemic.
- Delivering strategic transport improvements, including upgrades to the Duke of York and Whitfield roundabouts to support the scale of housing and economic growth identified in the Plan.
- Promoting sustainable transport initiatives to encourage a modal shift to more sustainable forms of transport like walking and cycling.
- Ensuring that infrastructure is delivered, in the right place, at the right time, to meet the needs of the District and support the levels of development identified in the Local Plan.
- Supporting the delivery of attractive, high-quality, design led developments and the creation of healthy, inclusive and safe communities, that are well served by good quality services and facilities to support people's lives.
- Conserving and enhancing the District's rich and diverse natural landscape, including the five international sites within the district, the Kent Downs Area of Outstanding Natural Beauty (AONB), five Sites of Special Scientific Interest (SSSIs), two National Nature Reserves (NNRs), two stretches of Heritage Coasts and two Marine Conservation Zones.
- Delivering a net gain in biodiversity in the District over the plan period.
- To promote the conservation, restoration and where appropriate the enhancement of the District's heritage assets, in order to protect their significance and to ensure that they can be best appreciated and enjoyed by current and future generations.

2.1.5 The new Local Plan will be examined by an Inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is 'sound'.

2.1.6 This submission will comment on each of the above, highlighting where we believe any areas of concern lie or where modifications may be required.

2.2 DDC's Local Development Scheme

2.2.1 The District Council has a duty to review the policies contained within the development plan every five years. The 2014/2015 Authority Monitoring Report signalled the need to review key parts of DDC's adopted CS evidence base.

2.2.2 DDC's Local Development Scheme (LDS) first outlined the delivery timetable for the Local Plan Review (LPR) in the March 2017 publication. Since then, the LDS has been updated on an annual basis. The most recent September 2022 LDS summarises that following the preparation of the principal evidence base documents, the Local Plan Review Regulation 18 consultation took place for 8 weeks in January 2021. The Regulation 19 consultation was scheduled for 7 weeks during Q4 of 2022 and is the subject of this representation.

2.2.3 Moving forward, submission of the Plan is anticipated in Q1-2 2023 with the Examination in Public in Q3-4 2023. The new Local Plan is currently scheduled for adoption in 2024.

2.2.4 As planned, DDC are now undertaking the Regulation 19 Draft Local Plan Consultation, for which this submission is made

3 Legal Test of Soundness

3.1 Legislation and Guidance

3.1.1 The new Local Plan will be examined by an Inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is 'sound'. It is a statutory requirement that every development plan document must be submitted for independent examination to assess when it is "sound", as well as whether other statutory requirements have been satisfied (s.20(5) of the 2004 Act). By s.19 of the 2004 Act, in preparing a development plan document a local planning authority must have regard to several matters including national policies and advice contained in guidance issued by the Secretary of State. Such guidance currently exists in the form of the NPPF and is summarised below. This states that Plans must be:

(a) Positively Prepared: based on a strategy which seeks to meet objectively assessed development and infrastructure requirements

3.1.2 This means that the Local Plan should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. The NPPF set out principles through which the Government expects sustainable development can be achieved.

(b) Justified: an appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence

3.1.3 This sets out the requirement that the Local Plan should be based on a robust and credible evidence base involving:

I. Research/fact finding: the choices made in the plan are backed up by facts.

II. Evidence of participation of the local community and others having a stake in the area.

3.1.4 The Local Plan should demonstrate an appropriate strategy, taking into account reasonable alternatives and based on proportionate evidence. These alternatives should be realistic and subject to sustainability appraisal. The Plan should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

(c) Effective: deliverable over its period based on effective joint working on cross-boundary strategic priorities

3.1.5 This makes clear that the Local Plan should be deliverable, requiring evidence of:

- Sound infrastructure delivery planning;
- Having no regulatory or national planning barriers to delivery;
- Delivery partners who are signed up to it; and
- Coherence with the strategies of neighbouring authorities, including neighbouring marine planning authorities.
- The new Local Plan should be flexible and able to be monitored.

3.1.6 The Local Plan should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen. The plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the Local Plan should make clear that major changes may require a formal review including public consultation. Any measures which DDC has included to make sure that targets are met should be clearly linked to an Annual Monitoring Report.

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national policy.

3.1.7 This submission comments on each of the above in further detailing, highlighting areas of support and where modifications are required as appropriate.

3.2 Legal Compliance

3.2.1 In terms of legal compliance, the main requirements for the early stages of Local Plan consultation are in relation to:

- planning for community engagement;
- the sustainability appraisal (including consultation with the statutory environment consultation bodies);
- identifying significant cross boundary and inter-authority issues; and
- ensuring that the plan rests on a credible evidence base, including meeting the Act's requirement for keeping matters affecting the development of the area under review.

3.2.2 In addition to the above, the NPPF states² that: "Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:

a) All plans should promote a sustainable pattern of development that seeks to: meet the development needs of the area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effect.

b) Strategic policies should as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

(i) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or

Paragraph 11, National Planning Policy Framework 2021

(ii) Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”

3.2.3 In addition, to the above, the NPPF states³ that Plans should:

- a) be prepared with the objective of contributing to the achievement of sustainable development;
- b) be prepared positively, in a way that is aspirational but deliverable;
- c) be shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
- d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
- e) be accessible through the use of digital tools to assist public involvement and policy presentation; and
- f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

3.2.4 It is important to note that the NPPF⁴ requires strategic policies to set out an overall strategy for the pattern, scale, and design quality of places, and make sufficient provision for:

- a) housing (including affordable housing), employment, retail, leisure and other commercial development;
- b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- c) community facilities (such as health, education and cultural infrastructure); and;
- d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

3.2.5 It is clear from the above, that any local plan should set out a comprehensive and cohesive approach to future development.

Paragraph 16, NPPF 2021

Paragraph 20, NPPF 2021

4 Duty to Co-Operate

4.1 Legal and NPPF Requirements

4.1.1 Section 33A of the Planning and Compulsory Purchase Act 2004 sets out a statutory ‘Duty to Cooperate’ (DtC) – i.e. a legal obligation - to all bodies as prescribed by Regulation 4 of the Town and Country Planning (Local Planning) England Regulations 2012 (the Regulations).

4.1.2 The duty requires DDC to cooperate with other persons to ‘maximise the effectiveness’ with which named activities are undertaken. Those activities include the preparation of development plan documents (such as this local plan) and activities that support that activity ‘so far as relating to a strategic matter’.

4.1.3 A strategic matter is defined by S33A(4) in summary as: (a) ‘sustainable development or use of land that has or would have a significant impact on at least two planning areas’ (a planning area in this case is the area of a borough or district council); and (b) ‘sustainable development or use of land in a two tier area’ (as this is) ‘if the development or use (i) is a county matter, or (ii) has or would have a significant impact on a county matter’. County matters broadly relate to minerals and waste and associated developments as defined by Paragraph 1 of schedule 1 to the Town and Country Planning Act 1990 (as amended).

4.1.4 Section 33A (7) requires DDC (and persons subject to the DtC) to have regard to any guidance issued by the Secretary of State about how the duty is to be complied with. In that regard Paragraph ID 9-004-29140306 of the Government’s Planning Practice Guidance (PPG) confirms amongst other things that the DtC is not a duty to agree (albeit that local planning authorities should make every effort to secure the necessary cooperation on strategic cross border matters before they submit local plans for examination).

4.1.5 The NPPF establishes that effective and on-going joint working is an integral part of the plan making process that will, amongst other things, determine whether development needs that cannot be met wholly within a plan can be met elsewhere. The NPPF goes on to state at paragraph 27 that in order to demonstrate effective and on-going joint working strategic policy making authorities should: "... prepare and maintain one or more statements of common ground documenting the cross-boundary matters being addressed".

4.1.6 In addition to the District's own housing pressures, part of the DtC involves considering whether neighbouring authorities' unmet housing need can be accommodated. It is worth highlighting that recent amendments to the London Plan have identified that the City's housing need has become increasingly more difficult to deliver and therefore areas outside London will be faced with having to absorb more of London's housing need. Consequently, DDC has a duty to explore whether it can accommodate some of this overspill of London's unmet need.

4.2 Assessment of DDC's discharging of the Duty to Co-operate

4.2.1 It is recognised that work to discharge the DtC remains ongoing by DDC and will continue prior to submission as part of the preparation of the Local Plan evidence base.

4.2.2 Notwithstanding the above, at this stage it is understood that DDC have engaged with the members of the East Kent Regeneration Board including neighbouring East Kent planning authorities, Kent County Council (KCC) and its subsidiary departments:

- Folkestone and Hythe District Council
- Canterbury City Council
- Thanet District Council
- KCC
 - KCC Highways & Transportation
 - KCC Minerals & Waste
 - KCC Heritage Conservation
 - KCC Flood & Water Management
 - KCC Natural Environment & Coast
 - KCC Infrastructure including Education

4.2.3 In February 2016, DDC adopted a Memorandum of Understanding (MOU) in respect of the DtC between the East Kent Regeneration Board members. A review of the MOU took place and was agreed in January 2021.

4.2.4 The East Kent MOU sets out the framework in which the authorities will work together on strategic issues and will actively engage. It forms the overarching framework and context within which Statements of Common Ground (SoCG) will be agreed between individual authorities.

4.2.5 Further engagement is also confirmed to have taken place between the following prescribed bodies and other relevant bodies:

- Environment Agency
- National Highways
- Historic England
- Natural England
- Network Rail
- NHS Kent and Medway Clinical Commissioning Group (CCG) – now known as Integrated Care Board (ICB) since July 2022
- Kent Downs AONB Unit
- Other infrastructure providers

4.2.6 Whilst work remains ongoing, at this stage it is understood that SoCGs have been agreed and signed between the following parties:

- DDC and Folkestone & Hythe District Council
- DDC and Canterbury City Council
- DDC and Thanet District Council
- DDC and Kent County Council

DDC and National Highways

4.2.7 As part of the DtC Evidence Base documents, DDC prepared a detailed DtC Statement (dated September 2022) which sets out a summary of the engagement that has taken place, firstly by organisation, and then by issue. Whilst the statement focuses on strategic issues and duty to co-operate bodies it also includes information relating to engagement on non-strategic issues and co-operation with other bodies that are not prescribed by the regulations. In addition, Appendices 1, 3 and 4 identify the main meetings and other correspondence that has taken place throughout the plan making process.

4.3 Summary

4.3.1 On account of the above and the documents published within the DDC's Local Plan Evidence Base, we are satisfied that DDC as the strategic policy making authority has demonstrated effective and on-going joint working with neighbouring authorities, the county council, prescribed bodies and other relevant bodies. Further, we agree that DDC has prepared and maintained SoCG documenting the cross-boundary matters being addressed in accordance with the Framework and the DtC may be discharged by the Planning Inspector under Section 20(5) (c) of the Planning and Compulsory Purchase Act 2004.

4.3.2 Without prejudice to the above, should ongoing work by DDC result in significant changes in circumstances such that the signed SoCGs may be amended or withdrawn, our client reserves the right to alter their consultation response accordingly and be present at the examination of the Plan to discuss further.

5 Housing Need

5.1 Context

5.1.1 Paragraph 11 of the NPPF is explicit in its requirement for strategic policy-making authorities to promote a sustainable pattern of development that seeks to meet the need in full.

5.1.2 Paragraph 20 of the Framework is equally clear that strategic policies should set out an overall strategy for the pattern, scale and design quality of places. Policies should make sufficient provision for the development that is required as well as associated infrastructure, community facilities and should set out a strategy for the conservation and enhancement of the natural, built and historic environment.

5.1.3 Given this national planning context, the emerging Local Plan should provide a comprehensive and cohesive approach to future development in Dover district, capable of making sufficient provision for the identified needs, whilst balancing the conservation and enhancement of the natural, built and historic environment.

5.1.4 National guidance states that strategic policy-making authorities will need to calculate their local housing need figure at the start of the plan-making process. This number should be kept under review and revised where appropriate.

5.1.5 In calculating the local housing need, paragraph 61 of the NPPF states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance - unless exceptional circumstances justify an alternative approach.

5.1.6 Further, in addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

5.2 DDC's Housing Need

5.2.1 The Standard Method for assessing housing need, issued alongside the Ministerial Statement on 16 December 2020, sets an indicative housing need figure for Dover District of 596 dwellings per annum. However, the affordability ratio which factors into the local housing need assessment is updated annually. For Dover District the latest housing need calculation is 611 dwellings per annum (dpa), equating to a total housing need of 10,998 dwellings for the Plan period to 2040. We understand that the Regulation 19 Local Plan seeks to meet this need in full and in addition to the minimum figures, DDC have set an appropriate contingency buffer of 926 dwellings of the Plan period, equating to 8.4% of the total Plan period figure.

5.2.2 For context, the current adopted CS requirement is 700 dwellings per annum. This followed the adoption of a high-growth strategy in 2010 of 14,000 homes to 2026 based around the recommendations of the Dover Regeneration Strategy and above the minimum 10,100 requirement across the same period, as set out in the emerging (at the time) Regional Spatial Strategy.

5.2.3 For the avoidance of doubt, accounting for the Committed Supply Total of 5,282 dwellings, the new Local Plan will be required to allocate sufficient land to accommodate a minimum of 6,642 new homes over the remaining plan period to 2040. It is understood that this will be derived from the following sources:

- Whitfield Urban Expansion Allocation: 2,200 dwellings
- Local Plan Allocations (excluding Whitfield): 3,392 dwellings

- Windfall Allowance (70 a year from year 4): 1,050 dwellings

5.2.4 On this basis, it is evident that a substantial quantum of Plan-led housing delivery will be required in order to meet the new Local Plan's housing target. Due to the nature and dwindling supply of available urban land in Dover town and the remaining higher order settlements of Deal and Sandwich, the restrictive effect of the coast, the Kent Downs AONB, environmental constraints and the limited capacity of the district's remaining mid- and lower order settlements to accommodate significant levels of growth, meeting Dover's housing needs inevitably will require the release of significant greenfield land.

5.2.5 In our view, sustainable and accessible sites logically located adjacent to existing higher-order urban areas, including Deal, represent the most sustainable and reliable sources of growth for the Plan Period, to deliver the significant number of new homes that are required and are most capable of making meaningful contributions to the associated public infrastructure, affordable housing and mix of new homes that is urgently needed in the District.

6 Site Specific Assessment

6.1 Overview

6.1.1 The previous chapters of this representation (Chapter 3-5) outline our client's position relating to the soundness of the Plan in which our client is confirmed to be supportive of the Local Plan as a sound strategy for the growth of the district to 2040.

6.1.2 Paragraph 4.146 of the Local Plan states that the urban area of Deal encompasses the built-up areas of the parishes of Walmer and Sholden. Deal is identified in the Settlement Hierarchy and Confines Topic Paper (2022) as a 'District Centre', where there is a secondary focus for development. This position is reinforced by draft policy SP3 which states that development in Deal will be at a more limited scale than Dover Town, compatible with the more limited range of job opportunities, shops, services, and other facilities available in these locations.

6.1.3 As introduced in the preceding sections, Fernham Homes Limited are supporting the residential allocation of the Site 'Land at Rays Bottom, Walmer' and. The Site is allocated for residential development in the Regulation 19 Pre-submission Plan with an indicative capacity of 75 dwellings under policy reference 'SAP15' (WAL002).

6.1.4 Appendix 1a of the Housing and Economic Land Availability Assessment (HELAA) 2022 provides the following summary:

- No heritage concerns other than archaeology.
- Site will need to reflect character of surrounding area – low density, generous landscaping, well designed.
- Potential site for executive homes.
- Risk of surface water flooding.
- Transport Assessment required.

6.1.5 The Site was considered 'Green' in the red/amber/green (RAG) rating in terms of suitability, availability and achievability, with an anticipated timescale for delivery in the medium term (2027-2031). The information contained in the summary could be addressed as part of any future planning application.

6.1.6 We agree that the Site represents a logical and sustainable location to direct the growth required within Deal and consider that the land promoted at Rays Bottom, Walmer must remain included as a future housing allocation within the Dover District emerging Local Plan. The allocation is considered to be wholly consistent with the objectives of the Plan and forms part of a sound growth strategy for the district to 2040.

6.1.7 We are firmly of the view that the allocation of Land at Rays Bottom is a necessary component of the balanced growth strategy put forward within the Pre-submission

DDC Settlement hierarchy (2022): <https://www.doverdistrictlocalplan.co.uk/uploads/pdfs/settlement-hierarchy-and-confines-topic-paper-aug-2022.pdf>

Dover District Local Plan, comprising an appropriate mix of small, medium and strategic-scale sites deliverable across the Plan period. The allocation of well- located, reliable, greenfield sites such as our client's at Land at Rays Bottom is necessary in order for DDC to meet the growing need for new homes in the district and ensure that DDC can have confidence in consistently meeting its market and affordable housing targets in full throughout the life of the new Dover District Plan.

6.1.8 Notwithstanding our client's support of the draft allocation within the Regulation 19 Plan in principle, we suggest that the policy text be re-visited prior to submission, to allow a higher dwelling per hectare guide to ensure the Site is developed to its full potential. It is submitted that the SAP15 policy wording should be amended to more accurately

reflect the capability of the Site to accommodate approximately 80 dwellings deliverable early in the Plan period. Further commentary on this point is provided below in section 6.3.

6.2 Site and Surroundings

6.2.1 The Site is situated to the south of Walmer, Deal between Liverpool Road to the east and Hawksdown to the west immediately adjacent to existing residential development.

6.2.2 The Site comprises an undeveloped regular parcel of land in arable use totalling approximately 4.43 hectares, forming part of a larger arable unit to the south. The Site is bound primarily by hedgerow vegetation to the east along Liverpool Road with dense woodland and mid-storey vegetation to the north. The west boundary comprises a mix of hedgerows and trees set along the perimeter abutting residential development on Hawksdown.

Figure 6.1: Approximate Site Location (courtesy of Google Earth)

6.2.3 The wider surroundings are characterised by its edge-of-settlement location with low density existing residential development along Hawksdown to the north and west and undeveloped agricultural land to the east and south. The landscape assessment which informed the HELAA recognises that the site is:

“...relatively discrete, having housing on two sides and being located on the side of a dry valley. The sensitivity of the site is moderate as views in are limited and the flow of housing down the slope would not detract. The impact of development on the wider landscape would be minimal and this could be reduced further by providing additional buffer of landscaping along the southern boundary”.

6.2.4 The Site enjoys access to a number of day-to-day facilities and services which are within a reasonable walk distance, including primary and secondary schools, local shops, healthcare, employment, and public transport links within Walmer and Deal including Walmer mainline station and frequent buses along Dover Road between Dover, Deal, Sandwich and Canterbury.

6.2.5 In terms of overarching planning constraints, the site is not subject to any overarching landscape or ecological designations and is not itself subject to any heritage constraints.

6.2.6 To the north east of the site – with intervening land - is the grade II Registered Park and Garden of Walmer Castle which is a scheduled monument, and nearby to the east is an undesignated historic First World War Aerodrome and Second World War radar station within an area of Archaeological Potential.

6.2.7 There is a low risk of a surface water flow path through the non-wooded area of the site, and along the western boundary – both of which can be easily accommodated in a residential layout.

6.3 Development Capacity

6.3.1 As set out above, the proposed allocation is for 75 dwellings, reduced from 100 dwellings at the Regulation 18 stage. The reasoning set out in the “selection of Site Allocations” (September 2022) supporting document for the reduction in capacity is “To enable a scheme to come forward which reflects the character of the surrounding area, and enable sufficient landscaping to be provided”. Excluding the wooded area to the north of the site, the provision of 75 dwellings would equate to a density of 21 dwellings per hectare, with 100 dwellings equating to 28 dwellings per hectare. For the reasons set out subsequently, we consider that sites located in sustainable locations such as Land at Rays Bottom, adjacent to Deal, should take opportunities to maximise the potential for housing – whilst respecting the context and character of the area. For this reason we consider that the appropriate capacity is a little greater at approximately 80 dwellings, as part of a high-quality, landscape-led residential scheme capable of delivery within the early phase of the Plan period.

6.3.2 At this early stage, detailed proposals have not yet been advanced, however it is anticipated that any future development of the site – at 80 dwellings - will be of appropriate density, reflecting local patterns of development and sensitively designed to respect the existing character of the area, the topography of the site and to allow transition to the rural landscape and respond to its coastal location.

6.3.3 Particular care will be taken with regard to the low-risk surface flow route, impact on nearby heritage assets and ecologically sensitive sites with a particular emphasis on opportunities for biodiversity habitat creation and enhancement. Fernham Homes have a strong track record of delivering high quality housing whilst respecting such characteristics and constraints.

6.3.4 In terms of access, primary vehicular, pedestrian and cycle access to the site shall be provided from Liverpool Road. Road widening and traffic management should be provided to Liverpool Road along the frontage of the site and where possible up to the junction with Gram's Road; along with an extension to the 30mph speed limit zone. Appendix 1 indicates how this can be achieved, with the provision of a footway and suitable carriage width which meets relevant highways requirements. Alternatively, the footway

could not be provided, and instead a wider carriage way could be provided. Appendix 1 also clearly shows how the required visibility splays can be achieved on land either within the site, or within the public highway.

6.4 Draft Policy Allocation 'Land at Rays Bottom between Liverpool Road and Hawksdown, Walmer' (SAP15)

6.4.1 As introduced in the preceding sections, our client's Site at Land at Rays Bottom is allocated for residential development within the Dover Pre-submission (Regulation 19) Local Plan. For ease of reference, the draft policy wording is as follows:

"SAP15 - Land at Rays Bottom between Liverpool Road and Hawksdown, Walmer (WAL002)

The site, Land at Rays Bottom between Liverpool Road and Hawksdown, as shown on the policies map is allocated for an indicative capacity of 75 dwellings.

Development proposals for the site shall include the following:

- a) Development should be low density and sensitively designed to respect the existing character of the area, the topography of the site and to allow transition to the rural landscape;
- b) A sensitive landscaping scheme and appropriate landscape buffer to the south, determined by a Landscape Visual Impact Assessment is required to mitigate the impact of development on the wider countryside and to provide opportunities for biodiversity habitat creation and enhancement responding to the nearby BOA and local wildlife site;
- c) The existing wooded area to the north of the site and the tree and shrub line along the western boundary, shall be maintained and enhanced as areas for biodiversity habitat creation.
- d) Primary vehicular, pedestrian and cycle access to the site shall be provided from Liverpool Road. Road widening and traffic management should be provided to Liverpool Road along the frontage of the site and where possible up to the junction with Gram's Road; along with an extension to the 30mph speed limit zone;
- e) The Transport Assessment that is required to be carried out in accordance with Policy TI2, must consider and identify mitigation (potential widening/traffic management measures/junction improvements) for the surrounding local road network, taking into account the cumulative impact of this and other sites allocated in this Plan, including (but not limited to) Liverpool Road and Gram's Road up to and including the Gram's Road/Dover Road junction.
- f) A site-specific Flood Risk Assessment must be carried out in accordance with Policy CC5. This shall also inform the application of the Sequential Approach to the layout of the site by locating the most vulnerable elements in the lowest risk areas;
- g) In accordance with Policy SP13, a wintering bird survey must be undertaken in advance of a planning application on the site. If the bird survey identifies that the development will exceed the threshold of significance, mitigation will be required. A suitable scheme of mitigation will need to be submitted with the planning application for the site;
- h) An Archaeological Assessment for the site must be carried out in accordance with Policy HE3 Archaeology, the results of which should inform the layout and design of the development which is necessary to avoid harm to any archaeological assets identified through the assessment;
- i) A Heritage Assessment carried out in accordance with Policy HE1 is required to identify any necessary measures to avoid or minimise harm to the nearby heritage assets; and
- j) The occupation of the development should be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider. Development should provide a connection to the sewerage system at the nearest point of adequate capacity and ensure future access to the existing sewerage infrastructure for maintenance and upsizing purposes."

6.4.2 To be clear, our client remains wholly supportive of the principle of the allocation of the Site for residential development. Fernham Homes has a strong track record of swift delivery, and commits to being able to deliver the Site within the early phase of the Plan period. We agree that it represents a logical and sustainable location to direct growth consistent with the growth strategy of the Plan as a whole, however we submit that more effective use of our client's Site can be made – and therefore object to the capacity identified.

6.4.3 Accordingly, we say that the allocation of Land at Rays Bottom is necessary in order for DDC deliver proportionate and high-quality sustainable growth within Deal, meet the growing need for new homes in the district and ensure that DDC can have greater confidence in meeting its market and affordable housing targets in full.

6.4.4 It is submitted that the SAP15 policy wording is sound and appropriately reflects the capability of the site to deliver a sensitive, landscape-led residential development but the wording should be amended to reflect the capability of the Site to accommodate approximately 80 dwellings, deliverable with the early phase of the forthcoming Plan period.

6.4.5

6.5 Strategic Justification for Development

Spatial Strategy

6.5.1 The proposed Housing Distribution for the district across the Plan period is established within Policy SP3 'Housing Growth' which sets out that the distribution of housing growth in the district is primarily based on the settlement hierarchy and influenced by site availability, environmental constraints and factors of delivery.

6.5.2 Rightly, a key aim of the growth strategy is to focus development in the least sensitive areas of the district in order to conserve and enhance the Dover's rich natural and historical environment.

6.5.3 A retained theme from the adopted Plan, is that DDC's settlement strategy continues to focus on the development and regeneration of Dover Town and Whitfield (3381 dwellings). Approximately half of the district's planned housing is in this location, the majority of which again is to come forward as part of the strategic urban expansion of Whitfield 'SAP1' (2200 minimum dwellings).

6.5.4 Development will then be focused in the District Centre of Deal (223 dwellings), and the Rural Service Centres of Sandwich (227 dwellings) and Aylesham (649 dwellings). Following the settlement hierarchy rigidly would distribute housing in the preceding order, however the Plan recognises that housing delivery in Deal and Sandwich continues to be constrained by a number of factors including flood risk, ecological designations, heritage and highways. Further, Deal has experienced generally high levels of windfall development across the previous Plan period and accordingly there is now a dwindling supply of available, suitable sites in both settlements. On account of this context, DDC have sought to direct the majority of the remaining higher order settlement growth (outside of Dover & Whitfield) to Aylesham, through the strategic expansion to the town.

6.5.5 Outside of the four principal district settlements, the Rural Settlement Hierarchy (August 2022) identified that the majority of lower-order settlements in the district emerge as having a low level of facilities within the hierarchy and six settlements having none of the key indicators of sustainable services. Plainly, these settlements offer very limited opportunities for growth and it is evident that the forthcoming Plan will remain reliant on the settlements of Dover (including Whitfield), Deal, Sandwich and Aylesham to deliver the housing growth that is required.

6.5.6 Given this context, it is clear that where available and suitable opportunities for residential development do exist within the district's higher order settlements, including our client's Site at Land at Rays Bottom, Walmer which can provide a policy compliant level of much-needed affordable housing, it is imperative that the effective use of these sites are appropriately maximised in accordance with national policy objectives.

6.5.7 Notwithstanding our client's in principle support of the proposed strategy, we are concerned that highly sustainable, edge-of-settlement sites, particularly in higher tier settlements such as Deal have not been fully maximised to reflect their accessible location and capability to accommodate a greater quantum of development. On this basis, we are concerned that the strategic objectives underlying draft policy SP3 'Housing Growth' may not be fully realised, to the detriment of market and affordable housing delivery and the wider policies seeking to conserve and enhance the district's natural and historic environment.

6.5.8 Consequently, our clients object to policy SP3 as drafted, on the basis that there is a clear need to maximise the delivery of housing at sites around Deal (whilst ensuring that sensitive characteristics are reflected), and this has not been undertaken – for example at Rays Bottom, Liverpool Road. It is our view that the site has sufficient capacity to deliver approximately 5 additional units over the draft allocation, that will otherwise be required to be delivered elsewhere in the district, in potentially less accessible and more sensitive locations.

6.5.9

Greenfield Development and Consistency with Housing Trajectory

6.5.10 Due to the nature and dwindling supply of available urban land in Dover town and the remaining higher order settlements of Deal and Sandwich, the restrictive effect of the coast, the Kent Downs Area of Outstanding Natural Beauty, environmental constraints and the limited capacity of the district's remaining mid- and lower order settlements to accommodate significant levels of growth, greenfield development will inevitably be required if DDC is to meet its housing and development commitments in full moving forward.

6.5.11 In our view, sustainable and accessible unconstrained sites logically located adjacent to existing urban areas, including Deal, represent the most sustainable and reliable sources of growth for the Plan period, to support the role and timescales of strategic urban extensions and to deliver the significant number of new homes that are required within the forthcoming Plan period.

6.5.12 Within Deal itself, meaningful housing growth is inherently constrained on three sides due to the restrictive effect of the coast to the east and Flood Zone 2/3 land and ecologically sensitive sites including SSSIs to the north and west. Alongside overarching objectives to minimise the incursion of widespread development into the rural countryside, the scope for significant Plan-led development in Deal is becoming increasingly

limited. Accordingly, we firmly agree that sites to the south of Deal, including that of our clients in Walmer, represent the least sensitive and most logical locations for future Plan-led growth, making effective use of the availability of sites in close proximity to the Urban Area and key infrastructure including Walmer train station.

6.5.13 In terms of housing delivery in Deal, the development of Land at Rays Bottom (75 dwellings) is anticipated to deliver completions with Years 9-11 of the Plan period, although as detailed above our clients have a strong track record of swift delivery, and consider that it could be delivered ahead of this. When combined with extant permissions within Deal and nearby allocations at Land off Cross Road, Deal (SAP14) and Deal Small Housing Sites (SAP16) totalling 100 dwellings and 48 dwellings respectively, our client's site will assist in delivering a steady supply of new homes within Deal across the majority of the early and middle phases of the Plan period and contribute to providing genuine choice in the market.

6.5.14 Moreover, in our experience, greenfield edge-of-settlement sites are typically most capable of making meaningful contributions to the associated public infrastructure, affordable housing and mix of new homes that are urgently needed in the district.

6.5.15 The Sustainability Appraisal Scoping Report (2018) sets out that over the course of the adopted Plan period, the key sustainability issues facing Dover District in relation to housing are as follows:

Population growth, household growth and demographic change will place additional demand on key services and facilities such as housing, health, education and social care. The Local Plan offers a new opportunity to manage these pressures, encouraging mixed communities;

There is a need for affordable housing across the District. At present, the mean price of dwellings is higher than the national average. The Local Plan will help to expedite its delivery; and,

There is the need for a mix of housing types that cater for the needs of a range of people, including the growing number of single person and elderly households. Without an up-to date Local Plan, the required housing is less likely to be delivered.

6.5.16 It is evident that the new Dover Local Plan must allocate a mix of reliable sites capable of steadily delivering not only the quantum of housing that is required, but also the associated public infrastructure, affordable housing and a mix of unit types and tenures suitable for a wide range of future occupants.

6.5.17 The Housing Topic Paper (September 2022) provides further context and summarises under Chapter 7 'Historical Housing Delivery' that Dover has historically placed significant reliance on windfall development over the current adopted Plan period, with windfall sites accounting for 44% of all completed dwellings over the preceding 10-year period.

Figure 1: DDC Brownfield / Greenfield Completions 2010/11 to 2020/21
(source: Housing Topic Paper September 2022)

6.5.18 Moreover, it is highlighted that at the beginning of the 10 year period, the majority of new dwellings were being built on brownfield land. However, from the monitoring year 2013-14 onward development on greenfield land began to play a much greater part in the location for new development as show in figure 1 above. This trend of increased housing development on greenfield land is a result of the allocations within the CS and Land Allocation DPD being built out and is associated with an approximate doubling of completions in the district. From 2013-14 onwards the average number of completed dwellings per annum has doubled to that of the early years of the CS, as the strong delivery rates of greenfield sites formed the predominant source of housing. This is despite an overall declining trend of brownfield completions towards the latter half of the Plan period. This is not an uncommon trend whereby in the majority of local planning authorities areas, opportunities for available and suitable sites in urban centres typically dwindle throughout the Plan period.

6.5.19 In light of the above context, it is clear that the adopted Dover Local Plan suffered from an initial under delivery of Plan-led housing growth in which windfall development sources were largely required to take up the slack in the early phases of the Plan period, as major allocated sites failed to deliver at the rates initially expected.

6.5.20 It is equally apparent that initial slow completions rates were quickly renewed once greenfield allocations commenced development, feeding into strong completions in the latter half of the Plan period. In our experience, greenfield sites are typically associated with stronger delivery rates and provide a reliable source of housing growth. The allocation of an appropriate mix of sites and scales is required in order to ensure steady and sustained Plan-led housing delivery across the Plan period and to avoid a reliance on windfall development to address the shortfall.

6.5.21 Consequently, given all of the above, it is imperative that the new Local Plan allocates a sufficient variety and scales of site capable of both ensuring steady and sustained housing completions and capable of making necessary contributions to public infrastructure and services, affordable housing and mix of unit types to address the key issue raised in the Sustainability Appraisal.

6.5.22 In our view, edge-of-settlement greenfield sites such as our client's Site Land at Rays Bottom, Walmer represents the most reliable and sustainable source of housing delivery for the Plan period. Such sites are typically less constrained by wider factors and less affected by

unforeseen delays such as land contamination. Moreover, greenfield sites typically are more capable of delivering the policy compliant affordable housing, unit mix and developer contributions that are urgently needed.

6.5.23 It is understood that the Plan is predicated on the delivery of strategic scale development at Whitfield comprising the development of circa 2,200 new homes. Consequently, in order to avoid a repetition of the previous Plan, DDC have sought to ensure that a pool of reliable greenfield allocation, including that of our client's are included within the Plan, capable of delivering the early and middle phase growth that is required within the housing trajectory prior to the commencement of stronger delivery from major allocations later in the Plan period.

6.5.24 We note that within the Housing Trajectory 'Appendix D', DDC have included allocated units from Years 4 onwards, with extant permissions (accounting for 5% non-implementation) demonstrated to be solely capable of delivering the growth required in Years 1-3. Notwithstanding our client's considerations that it can deliver at Land at Rays Bottom early in the plan period, we support this pragmatic approach and suggest this represents a sound basis on which to set the district's housing trajectory. We note also the inclusion of an appropriate windfall allowance and the included contingency buffer to further ensure reasonably flexibility in the housing supply.

6.5.25 On account of all of the above, we submit that the allocation of Land at Rays Bottom, Walmer forms part of a sound strategy for growth in the district for the forthcoming Plan period. The Site is capable of delivery within the early phase of the Plan period. The Site represents a reliable source of housing growth in a highly sustainable and accessible location adjacent to the existing settlement boundary of Deal and Walmer mainline station, consistent with DDC's preferred settlement strategy. Proposals remain at an early stage, however the Site is unconstrained and is considered capable of providing a high-quality landscape-led residential development including a mix of unit types and tenures, a meaningful contribution to the supply of affordable housing and contributions to public services and infrastructure, benefiting both existing residents and future occupiers. However, we object on the submission that the Site is capable of making a greater contribution to the district's housing need and suggest an amended wording of the policy to allocate the Site for approximately 80 dwellings.

Policy SP4 'Windfall Development'

6.5.26 Separately, we note the provisions of policy SP4 windfall development. Proposals at Rays Bottom, Walmer would likely be acceptable in principle under this policy and we support the inclusion within the Plan for appropriate, proportionate windfall development.

6.5.27 Our client is fully committed to the delivery of the Site which is available and anticipated for delivery in the early phase of the Plan period. Notwithstanding the provisions of SP4, it is reiterated that our client fully supports the allocation of the Site under SAP15 as the most appropriate mechanism for delivery of the Site and the opportunity for genuinely Plan-led development in Deal, the provision of associated benefits to public services and infrastructure, contribution to affordable housing supply and the delivering of a mix of house types and tenures.

Infrastructure Delivery

6.5.28 Paragraph 11 of the Framework is clear that all plans should promote a sustainable pattern of development. This includes aligning growth and infrastructure. Paragraph 20 goes on to confirm that strategic policies will be expected to make sufficient provision for associated development infrastructure.

6.5.29 In this regard, draft policies SP11 'Infrastructure and Developer Contributions' and SP12 'Strategic Transport Infrastructure' of the emerging Plan form the key strategic policies for infrastructure delivery. We agree that where development would create a need, or would have an impact, or would exacerbate an existing deficiency in infrastructure provision, appropriate developer contributions may be sought.

6.5.30 It is however emphasised that in all developments, infrastructure requirements must be demonstrated to be necessary through assessment during determination of the application on a case-by-case basis. Where new development is proposed, it does not automatically follow that major infrastructure contributions are always required or contribution to strategic infrastructure proposals are appropriate. For instance, it is our client's view that any infrastructure requirements must be demonstrated through a robust and transparent assessment at application stage, taking into account the submission of detailed supporting evidence, for example following consideration of the Transport Assessment in the case of highway infrastructure contributions.

Alignment with Sustainability Appraisal Findings

6.5.31 As part of the preparation of the Local Plan, the Council has identified and appraised a range of growth and spatial options through the Sustainability Appraisal (SA) which provides an assessment of how different options perform in environmental, social and economic terms, to help inform which option should be taken forward and combined with wider evidence documents, have been used to determine the growth and spatial strategy set out in the Plan.

6.5.32 Five potential distributions of growth were identified during preparation of the draft Regulation 18 Local Plan:

- Spatial Option A: Distributing growth to the District's suitable and potentially suitable housing and employment site options (as needed to deliver the scale of growth required).

- Spatial Option B: Distributing growth proportionately amongst the District's existing settlements based on their population.
- Spatial Option C: Distributing growth proportionately amongst the District's existing settlements based on the District's defined settlement hierarchy.
- Spatial Option D: Distributing growth in the same way as the adopted Local Plan, focussing most growth in and around Dover town.
- Spatial Option E: Distributing growth more equally across the District's settlements: Dover, Deal, Sandwich and Aylesham, as well as the rural villages.

6.5.33 The conclusion of the SA was that Spatial Options C (settlement hierarchy) and D (adopted Core Strategy with Dover focus) generally perform the most strongly against the SA objectives, particularly when delivering the baseline growth scenario. However, given the environmental constraints that exist around Deal and Sandwich, very few suitable and potentially suitable sites have been identified in these towns. Given this, the Council's preferred option for the distribution of housing and economic growth comprises a combination of options A (HELAA sites), C (settlement hierarchy) and D (Dover focus). The distribution of housing and economic growth in the District is therefore primarily based on the settlement hierarchy, and influenced by site availability, environmental constraints and factors of delivery.

6.5.34 On account of the above, our client agrees that the proposed growth strategy, and by extension, policy SP3 in principle represents a sound and evidence-led strategy for growth. However, given the clear acknowledgement of the dwindling supply of available sites in the higher order settlements of Deal and Sandwich, which has necessitated a minor deviation from the strongest performing spatial options, we submit that where sites are available and suitable for development in Deal and Sandwich, these must be fully maximised, reflecting their accessible location and their ability to reduce the need to develop into less accessible and more sensitive sites elsewhere in the district to accommodate the growth that is required.

Site Specific Sustainability Appraisal

6.5.35 Land at Rays Bottom between Liverpool Road and Hawksdown is included under HELAA reference 'WAL002' within the SA Site Assessment (Appendix F). The site generally performs strongly, with particular positives identified with regards to SA Objectives related to housing and the economy.

6.5.36 We contest the assessment of 'minor negative' in regard to sustainable transport. To the contrary, the site is well-located adjacent to the settlement boundary of Deal with access to a range of high-quality day-to-day services and access to Walmer train station for convenient access to larger settlements. In what is otherwise a largely rural district, we strongly disagree with the suggestion that an edge-of-settlement site represents a less than preferable location in respect of sustainable travel and day-to-day access to amenities.

6.5.37 We also note negatives associated with the development of a greenfield site, including loss of agricultural land, however this would be true of the majority of greenfield sites and it is abundantly clear that Dover's housing need cannot be met solely on brownfield sites. We note also minor negatives / uncertain associated with biodiversity, the historic environment and landscape, however it is not clear whether these take into account the potential for high-quality design, biodiversity enhancement and landscape mitigation. Irrespective, these are not considered to outweigh the clear and tangible sustainability benefits associated with edge-of-settlement development, the site's consistency with the preferred spatial options and the wider benefits associated with reducing the need to develop into lesser accessible, more sensitive sites to otherwise deliver the housing growth that is required.

Summary

6.5.38 Taking all of the above into consideration, our client is wholly supportive of the inclusion of land promoted at Rays Bottom, Walmer as a future housing allocation within the Dover District emerging Local Plan. The allocation is considered wholly consistent with the objectives of the Plan and forms part of a sound growth strategy for the district to 2040.

6.6 Deliverability

6.6.1 Prior to the current appeal proposal, the Site has had no recent planning history of a residential nature or a history of unimplemented permissions. There are not considered to be any impediments to the Site being allocated for development commencing within the early (or mid) phase of the Plan period.

6.6.2 Fernham Homes – a local SME with a strong history and track record of delivery, together with an adopted and robust business plan for growth – is promoting the site, and are poised to commence work on its residential development promptly after the adoption of the Local Plan.

6.6.3 Combined with the delivery of extant permissions, an appropriate number and scale of wider allocations within Deal (including SAP 14 and SAP 16) and elsewhere across the district, this would ensure the steady delivery of housing both in Deal and in Dover

district across the majority of the Plan period and support the role and timescales of strategic housing delivery at Whitfield towards the latter half of the Plan period.

6.6.4 For the reasons set out in this representation, the Site is considered suitable for the residential development of approximately 80 dwellings. The Site is adjacent to the overarching urban area of Deal, one of the four higher order settlements in the district and DDC's preferred locations for Plan-led growth within the district. Development at land at Rays Bottom would form a natural and logical development south of Walmer, Deal with excellent accessibility to day-to-day services and amenities via active travel modes within Deal itself and convenient access to public transport infrastructure including Walmer train station for onward travel to key neighbouring settlements including Dover, Ramsgate, Canterbury and Ashford.

6.6.5 Finally, in respect of suitability there are no physical limitations or problems such as access, infrastructure, flood risk, hazardous risks, pollution or contamination.

6.6.6 On behalf of the landowner, we submit that there are no known financial restrictions that would impact upon the viability of a future housing scheme or that would prohibit development coming forward within the mid-stages of the Plan period. To the contrary, we consider there to be an opportunity to deliver a high-quality, sustainably located residential development scheme consistent with DDC's proposed growth strategy comprising an appropriate mix of market and affordable housing and capable of contributing to a range of community facilities, public infrastructure and services locally.

6.6.7 At the time of writing, proposals at Rays Bottom, Walmer remain at an early stage, however our clients are firmly committed to progressing the delivery of the Site on adoption of the Plan. The project team therefore does not anticipate any absolute constraints to the commencement of delivery on-site early in the plan period (potentially 2025-26) and completion by 2028/9).

6.6.8 The Site is in single ownership and there are no complicated legal agreements or covenants that would prohibit the ability to bring forward the Site in line with DDC's housing trajectory within the mid-phase of the Plan period. The Site is therefore considered available and achievable for the purposes of the tests of deliverability.

7 Conclusion

7.1 Summary

7.1.1 This representation has been prepared by DHA Planning on behalf of Fernham Homes Limited in response to the DDC Local Plan (Regulation 19) consultation which runs until 9th December 2022.

7.1.2 Our client is promoting 'Land at Rays Bottom, Walmer, Deal' for the residential allocation of the Site as part of the new Dover District Local Plan preparation process. The Site is allocated for residential development in the Regulation 19 Pre-submission Plan within an indicative capacity of 75 dwellings under policy reference 'SAP15'.

7.1.3 Taking the above representation contents into consideration, we remain wholly supportive of the principle of the allocation of Land at Rays Bottom and agree that the Site represents a logical and sustainable location to direct necessary growth within Deal.

7.1.4 Accordingly, we consider that the land promoted at Rays Bottom, Walmer must remain included as a future housing allocation within the Dover District emerging Local Plan. The allocation is considered to be wholly consistent with the objectives of the Plan and forms part of a sound growth strategy for the district to 2040. However, it is imperative that the effective use of these higher-order settlement sites are appropriately maximised in accordance with draft policy SP3 of the emerging Plan, and wider policies seeking to otherwise conserve and enhance the district's natural and historic environment and national planning policy objectives. We are concerned that this has not been fully undertaken and object solely on this basis.

7.1.5 Consequently, our clients object to policy SP3 as drafted, on the basis that there is a clear need to maximise the delivery of housing at sites around Deal, and this has not been undertaken – for example at Land at Rays Bottom, where it is considered that the site has sufficient capacity to deliver approximately 5 additional units over the draft allocation, that will otherwise be required to be delivered elsewhere in the district, in potentially less accessible and more sensitive locations.

7.1.6 Outside of the point regarding capacity, it is submitted that the SAP15 policy wording is sound and appropriately reflects the capability of the site to deliver a sensitive, landscape-led residential development with an indicative capacity of 80 dwellings, deliverable with the early phase of the forthcoming Plan period. Without prejudice to our client's support in principle of the proposed allocation, we would urge the Council to re-visit the allocation policy text and allow a higher dwelling capacity.

7.1.7 Accordingly, we say that the allocation of Land at Rays Bottom forms part of a balanced growth strategy comprising an appropriate mix of small, medium and strategic-scale sites deliverable across the Plan period. The allocation of well-located, reliable, greenfield sites such as our client's at Land at Rays Bottom is necessary in order for DDC to meet the growing need for new homes in the district and ensure that DDC can have confidence in consistently meeting its market and

	<p>affordable housing targets in full throughout the life of the new Dover District Plan.</p> <p>7.1.8 In addition to being a highly sustainable and logical edge-of-settlement allocation, the Site is deliverable in a single land ownership with no viability issues, legal or third-party constraints present. Our client is fully committed to the delivery of land at Rays Bottom Farm and there are no impediments to the Site being capable of delivery within the mid-phase of the Plan period.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>For the reasons set out in the consultation response submitted on behalf of Fernham Homes Limited (ref DHA/30359), the capacity of Land at Rays Bottom between Liverpool Road and Hawksdown, Walmer (WAL002) and Policy SP3 - Housing Growth should be increased to approximately 80 dwellings.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>Please refer to the consultation response submitted on behalf of Fernham Homes Limited (ref DHA/30359).</p>
<p>Include files</p>	<p>30359 DDC Rep_Walmer FINAL 09 12 22.pdf</p>
<p>Local Plan Consultation Point</p>	<p>SAP15 - Land at Rays Bottom, Walmer (WAL002)</p>
<p>Rep ID</p>	<p>SDLP1636</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1260418</p>
<p>Consultee Full Name</p>	<p>Aaron Snow</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP15</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified Effective Consistent with National Policy</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Not Applicable</p>

<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>No</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>Please find below listed reasons for opposing this proposed development followed by my personal impact statement. The plan identifies many various policies, but WAL002 does not seem to be subject to the policies correctly and I believe there has been clear errors in bring this land forward within the plan, this site should be protected and should have already been dismissed as it was previously.</p> <p>I also believe the sequential testing of this site has failed to deliver the correct information and an error of the area meeting requirements is incorrect.</p> <p><u>Objection to site SAP15/WAL002 Rays Bottom Walmer Deal</u></p> <ul style="list-style-type: none"> • Environmental impact, Pollution, Residents Health risk, Site location does not fit within the plan This site would increase the areas carbon footprint dramatically and have an irreversible impact on the wildlife and environment it would set a new president for further development on the Kent downs and beautiful countryside. • Emissions from cars, vans, motorcycles or mopeds and the effects of added gas, electric, noise, on any scale let alone 75 homes at 5 cars averaged per home will impact the local area, residents and wildlife and does not follow the plan policies or guidance. • Lack of Public transport and pathways this site would increase the amount of car use due to location and have substantial impact on the road, traffic emissions, noise, all having a huge impact on the quality of air for both residents and wildlife and especially the on the Freedown conservation. • Safety for the local community on the lanes and the children living within the area especially school travelling times. <p>The below comments and pictures demonstrate why I consider this site to be of a semi-rural location although Walmer forms part of Deal the location of WAL002 is clearly rural and the site itself forms part of the freedown area.</p> <p>The site lies in the countryside for policy purposes and Policies DM1 and DM15 apply which restrict new development to that which functionally requires such a location. Policy DM1 of the core strategy identifies that development on land outside rural settlement confines will not be permitted unless specifically justified by, amongst other things, other development plan policies or it functionally require such a location. The proposed number of dwellings would be located outside the confines. The proposal does not meet any of the circumstances where development outside of the settlement confines would exceptionally accord with Policy DM1 and, therefore, the development is contrary to this policy. Policy DM15 also seeks to resist development which would result in the loss of, or adversely affect the character or appearance of the countryside, except in certain circumstances. This policy reflects the NPPF's aim of, inter alia, having regard</p> <p>for the intrinsic character and beauty of the countryside and focusing development on sustainable locations.</p> <p>Policy DM11 seeks to resist development outside of the settlement confines if it would generate a need to travel unless it is justified by other development plan policies. As stated above, the site is located outside of the settlement confines in the means of public transport and is not justified by other development plan policies.</p> <p>Outlines achieving sustainable development means that the planning system has three overarching objectives which are economic, social, and environmental. Paragraph 79 sets out that in order to promote sustainable development in rural areas, housing should be located where it will enhance or maintain rural communities this proposal of WAL002 does not meet these objectives it's the complete opposite.</p> <p>The proposed development through its location and lack of access to safe walking and cycling routes or public transport to provide for day-to-day needs is therefore considered to be located in an unsustainable location, contrary to Policy DM11 of the Core Strategy, and the emerging Policy T11 (which attracts significant weight) and the aims and objectives of the National Planning Policy Framework. In addition, given the limited and lack of facilities in the vicinity, the addition of 75 dwellings in this location would neither enhance or maintain the vitality of the rural community and be contrary to the aims and objectives of the National Planning Policy Framework in particular paragraph 79. The emerging Draft Local Plan has been devised in line with up-to-date housing figures, and the objectives of the current NPPF, with the applicable policies holding significant weight in the planning balance. The proposal conflicts with Draft Policies T11 and SP4, which weighs against the proposal of such a scheme. In determining whether housing on the site would be acceptable, the social and economic benefits of the housing need to be balanced against the environmental issues, including impact upon the countryside. Character and Appearance Paragraph 130 of the National Planning Policy Framework sets out that planning decisions should ensure that developments establish or maintain a strong sense of place and development should be visually attractive because of good architecture, layout and effective landscaping and be sympathetic to local character and history,</p>

including the surrounding built and landscape setting the proposal of WAL002 going ahead in the plan drastically effects the protected Freedown connected to the history of the location.

Paragraph 174 of the NPPF seeks for development to contribute to and enhance the intrinsic character and beauty of the countryside. Policy DM15 states that any development which would result in the loss of, or adversely affect the character and appearance of the countryside will only be permitted if it is: I) in accordance with allocations made in Development Plan Documents. II) or justified by the needs of agriculture, III) or justified by a need to sustain the rural economy IV) or a rural community, it cannot be accommodated elsewhere, and it does not result in the loss of ecological habitats, provided that measures are incorporated to reduce, as far as practicable, any harmful effects on countryside character. The proposed development of WAL002 do not meet any of this exception criteria. Regard must also be had for whether the development would harm the landscape character of the area, in accordance with Policy DM16 Impact on Residential Amenity Section (f) of Paragraph 130 of the NPPF requires development to provide a high standard of amenity for existing and future users. The proposed development through its location and lack of access to safe walking and cycling routes or public transport to provide for day to day needs is therefore considered to be located in an unsustainable location, contrary to Policy DM11 of the Core

Strategy, and the emerging Policy T11 (which attracts significant weight) and the aims and objectives of the National Planning Policy Framework. In addition, given the limited and lack of facilities in the vicinity, the addition of 75 dwellings in this location would neither enhance or maintain the vitality of the rural community and be contrary to the aims and objectives of the National Planning Policy Framework in particular paragraph 79.

- The preferred approach is to include a policy on sustainable transport. WAL002 being given the go ahead to progress in the plan completely goes against this policy. The importance of the natural environment is recognised in the National Planning Policy framework but seems to be ignored for this site. The plan states that Local Planning Authorities should set out the Local Plan policies against which proposals affecting protected wildlife or geodiversity sites or landscape areas will be judged (Paragraph 113) and that great weight should be given to conserving landscape and scenic beauty. (Paragraph 115). When determining planning applications, the Local Planning Authority will aim to conserve and enhance biodiversity by applying the principles in paragraph 118 of the NPPF. WAL002 Should be one of the sites that is protected as it falls within just about every category to be put forward in the current draft seems to completely dismiss all policies and plan objectives.
- Kent Downs Area of Outstanding Natural Beauty, which has the highest status of protection in relation to landscape and scenic beauty (Paragraph 115 and 116). The NPPF requires positive planning for the creation, protection, enhancement, and management of networks of biodiversity and green infrastructure should be sought yet, WAL002 has been deemed suitable. Internationally and nationally important sites for biodiversity and geodiversity are protected from harmful development by law, while policies CP7 and DM25 in the Dover District Core Strategy protect non-statutory sites and the wider green infrastructure
- **Waste and sewage system** - Current system would not be adequate and will not sustain additional strain and pressure as is already stressed under current population and
- **Impact of wildlife settlement and the Birds** - The area has an abundant amount of wildlife and upon further inspection more than likely protected species. Tree lines from the Freedown the bee's, butterflies and birds PLUS Slow worms.
- **Flooding and Surface flooding** - The area especially leading down out of the valley to Walmer castle already has issues with flooding and surface flooding any development on this would only cause further impact.
- **Buffer zones** – WAL002 site separates Hawkshill Freedown and Hawkesdown estate, the Freedown conservation area would have no buffer zone and the conservation area would be at risk if WAL002 progresses further and sets a new president in the area allowing the protected areas of Kent to be at future risk, when will enough be enough.
- **Greenfield site** - Although the site was originally submitted by the landowners as Brownfield it is farming land and currently used as agricultural land.

- **Access and Roads** – The local road network already struggles; this site would cause further traffic and cause higher impacting emissions and carbon footprint for the local area.
- **The Visual impact for visitors, tourists, and residents** – The Rays bottom land is part of the beautiful landscape and extends to the conservation area opposite and inadvertently forms part of the beautiful Many people visit this area, it is frequented by dog walkers,

families, bird watchers and wildlife enthusiasts the view from the freedown is part of the beautiful scenery it would be dramatically affected as this land forms part of a main view points from the conservation area.

- **Privacy** – On this site, properties of any kind would be viewed upon from every angle the site forms part of a valley and would be looked upon from visitors to the conservation area and the local residents living locally that this provides buffer zones for the neighbouring properties within the community, and all would lose the privacy and scenery they have come to love.
- **Risk of creating future president and impact on the current location as a whole** - Allowing this site to progress in the DDC plan will set a new president locally that these beautiful locations can be developed the close proximity to the conservation area would be at risk from such a development and how many other local areas would then also be at the same risk there has already been a large number of large developments locally please review in detail as I hope common sense will prevail.
- **Employment** – Deal and Walmer have not had an increase in available jobs and there are already large developments like Station Road, the impact for the local community of further large development would mean more applicants applying for jobs in an already lacking area of available opportunity. The fact is more people living in this area would cause further needing to travel by car to further destinations for work outside of Deal and Walmer.
- **Water shortages in Kent** – Kent is already in the highest category for water shortage and putting pressure on sustainable resources adding further development in such a small area which has already sustained considerable development and already has further sites with planning seems to dismiss the factual figures being presented.
- **The Cross roads** – On the Dover road please see my pictures of the width of these footpaths these are a walk from the site but the closest shops, it is already a dangerous place and I fear for my daughters walking these paths especially how busy it is already.
- **Dover road developments just started** – There are a number of developments which have already obtained planning this has already impacted the traffic in the area, it does not take a lot to look at adding even further local large development will impact the Cross Roads The school kids in the morning will be at further risk especially adding more to the minimal public transport areas currently situated please note these as I hope this is on someone's conscience should the unthinkable happen, allowing this overdevelopment is putting people in danger.

Me and my family choose **(DDC Redacted)** as our forever home in July 2019 and there was no information provided on our searches that the Rays Bottom land was indicated for possible planning or being put forward in the DDC plan although DDC was aware of the land being put forward by the land owners, if we were aware we would not have purchased and used life savings on the risk of losing significant value on such a property and the loss of the beautiful location it sits on maybe its name will have to change from South Meadow a reflection of its location to, House or Estate View....

We are devastated that we have spent such a large sum of money and planned our life at this property with our children, and now it's at risk of being destroyed and could financially irradicate the years of hard work and savings we have put into this move.

We understand the need for housing, but this location is wrong on so many counts there are many better suited locations that would not have such devastating effects on people's lives or the beautiful locations as WAL002.

The Beautiful Valley View to the Hawkshill Freedown which holds significant history connections to world war memorial.

Picture demonstrating the narrow buffer zone form Hawkesdown estate and the Freedown and the thriving tree lines of wildlife in such close proximity to Rays Bottom.

You can here the owls of an evening and see the other birds of pray throughout the day this will be lost forever should development go ahead.

The area does not support such a size of development it can just about cope with the current people living within the area and the traffic the footpaths surrounding the area cannot be increased sufficiently to allow safe mobility to public areas or transport links.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant

Remove SAP15 from the Local Plan

and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	SDLP1636 Snow Att1.pdf
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP1211
Rep Status	Processed
Consultee ID	1331449
Consultee Full Name	Mr Lance Austin
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	WAL002, SAP15
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

Background and Main Issue

The land was rejected by DDC in 2013 as “unsuitable for housing development,”

This being principally due to the lack of “...transports assessments and Plans..” as required by NPPF (National Planning Policy Framework) 2012 regulations, prior to Allocation status being considered.

Consequently the site was not carried through to the 2014 Draft Plan

This stipulation is repeated in the NPPF July 2021 version.

Notwithstanding the same environmental issues remain as those of 2013, DDC intentions in 2022

are to forward this land into the Draft Local Plan. This rejects the NPPF policies for assessments and reports being available, prior to consideration being given to the classification of suitable development land.

The contradiction and/or an omission of a previously established doubt of suitable development status, is of significant material consideration within the NPPF criteria for defining land availability.

Reasons for Objection

Material supporting facts

*The 2012 March version of the NPPF, Item 17 Core Planning Proposals required that:- “Plans shouldset out a clear strategy for allocating sufficient land which is suitable for development...”

*The 2021 July version of the NPPF in “Identifying land for homes” –item 68 requires that:-

“Strategic policy-making authorities should have a clear understanding of the land available

and

, “...planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely viability.....”

Submission 1

1.1 The similarity and purpose of the two NPPF versions is unquestionable.

Environmental assessment reports and plans have to be available to Local Authorities before consideration of allocation for suitable development.

1

DDC SAP15 requirements for development gives clear indication that none exist at the present time.

1.2 Without these assessment reports and plans, DDC SAP 15 proposals are speculative.

1.3 There is an undeniable doubt that this site may not be suitable for development.

There is no “...clear understanding of the land being available,” nor of its “... suitability or viability.” .

1.4 In 2021 WAL002 was, with caution, classified as being “potentially suitable” for development, but none the less in 2022 “available” without evidence of assessments or plans

NPPF policies do not permit DDC to speculate for the purpose of meeting development targets.

Submission 2

Traffic impacts –matters of fact

The DDC conformed with the 2012 NPPF requirements for assessments and plans to be available before consideration being given to allocation.

DDC Allocation report 2013, page 129 Appendix A

The DDC categorised this site in the unequivocal statements whereby “The site analysis form demonstrates that in principle, the site is not suitable for residential development due to the possible traffic impacts on the wider road network”

And

“The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan”

And

DDC Allocation report 2013 page 192 conclusion Appendix B

“Without the relevant transports assessments and plans it would not be possible to allocate this land”

*SAP 15 Item (d)Road wideningshould be providedto Liverpool Road.....and where possible to Grams Road”

This uncertainty is unacceptable in terms of the NPPF requirement for “the need of a clear strategy”, “...a clear understanding, or “suitability or viability”..

DDC'S proposals are short on issues of implementation:-

a)A site visit reveals that no footpaths exist along this single track road.

For the road to be widened, to provide pedestrian and cycle interests, to the east there will be conflict with the established environmental restraints surrounding the castle, while that to the west may well involve compulsory appropriation of private property.

b)It is unacceptable to ignore, as does SAP15 (d):-

That whether traffic proceeds up the single track roads of Grams Road for 150m, or continues along Liverpool Road for 400m; road widening will either involve environmental issues to the east or those of compulsory purchase to the west.

2.1 DDC's compliance with NPPF 2012 item 17, negated development due to lack of Assessments and Plans

2.2 DDC is "Putting the cart before the horse"!

Without Assessments and Plans, DDC proposal SAP 15 does not comply with NPPF 2021 item 68.

Environmental status

Submission 3

No evidence of environmental difference, to that which existed in 2013, has been defined within the site's location, or surrounding environs. While the environment may remain the same, the 40% increase in traffic over the last ten years, has inevitably increased the detrimental impact on the wider road network.

2

Housing density

Submission 4

Reference Appendix C, DDC Selection of the Site Allocation for the Regulation 19 Submission Local Plan, page 11.

The proposed reduction in housing numbers, so as to permit development:-

a)Is not a standalone issue-as is inferred.

b)Has no assessment reports and plans, as required in NPPF68, to displace the lack of "suitability" as DDC defined in 2013.

c)Ignores the necessity of the "...clear understanding of the site's availability" as demanded of NPPF 68.

4.1 DDC may not dissemble NPPF 68 policies by the one issue of the site's housing density.

Additionally the proposed area:-

d) Does not reflect the character of the surrounding area.

i)By overlaying the proposed area of development over that to the west, it will be seen that the comparable housing density of the latter is 25 units to that of the proposed 75 housing units.

ii)The character of the "surrounding area" is predominately one of open country.

4.2 The accredited impact of the proposed development is incorrect and misleading

Alternative sites

Submission 5

The Eastern side of Ellens Road offers far greater opportunity for development to conform to NPPF requirements of suitability; more especially access to the wider road network.

Site DEA010 was excluded from consideration as being "unsuitable" namely because:-

*Detrimental impact on the landscape

Whereas:- WAL002 landscape exceeds this. It has a wooded boundary and open countryside.

*Limited accessibility

Whereas:-DEA010 has access to two roads, compared to WAL002 DDC's 2013 description, which has only a "narrow country lane".

*Highways concern over cumulative impact of development in this location

Ref:- WAL002 2013 see Appendix B, DDC conclusion "...without the relevant transports assessments and plans it would not be possible to allocate this land."

This statement of fact far outweighs DEA010 "concern "

*Heritage concerns

Likewise, the WAL002 site borders Henry V111 Castle land and the Freedown, significantly outweighing the undefined "concern" for that of DEA010.

Insufficient comparison has been given in allocating WAL002 and not DEAL010

Legal obligation

Submission6

Version 2021 NPPF Section 5 defines the legal obligation of Planning Authorities delivering a sufficient supply of suitable and sustainable housing.

This poses considerable pressure on those Authorities where suitable housing land targets are virtually unattainable.

Be that as it may, it does not excuse or permit DDC to breach NPPF policies in order to meet Government targets within the Draft Local Plan .

3

*Appendix A is evidence of the absence of assessments and plans in 2013.

*Appendix B details the 2013 existence of the unacceptable use of the road for further housing in the absence of such plans.

*Appendix D details the DDC meeting of 3rd January 2013 with Mr & Mrs Ellis of (DDC Redacted), Walmer, whereby DDC "...no longer favoured.." this site's development due to the "...narrow country lane..." and withdrew it prior to the Examination of the Local Plan in August 2013.(Mr Ellis died in 2020 and Mrs Ellis has moved away)

	<p>The exclusion/absence of the above and significant, negative information in SAP15, SA Objective 4 is indicative of a breach of DDC's legal obligation to provide purposeful consideration and comparison with other sites.</p> <p>Other matters</p> <p>Public objections</p> <p>It should be noted that in March 2021, 260 people submitted individual objections to this site being passed through to the Draft phase of the Local Plan.</p> <p>Conclusions</p> <p>1)The DDC of 2022 has reneged on the commitment of 2013, which was not to consider a planning allocation of this site without the necessary Assessments and Plans.</p> <p>2)The SAP15 conditions of approving the proposed development are fundamentally flawed by the 2013 DDC established restraint on development approval.</p> <p>3) The 2021 NPPF item 68 requirement of "... a clear understanding of available land" is not achieved by DDC's speculation as to "possibilities".</p> <p>4) DDS's SAP 15 reliance on speculation contravenes NPPF Section 5 which cites the Planning Obligations of "... being able to deliver a sufficient supply of homes" within the period of the immerging Plan.</p> <p>5)SAP 15 items d) and e) lack the realty of the financial restraints in achieving implementation and resolution of environmental issues.</p> <p>6) The relevant legal obligation for factual information as to site comparisons in SA Objective 4(e-Transport assessments)has not been registered.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>Austin 0921 Att2.pdf Austin 0921 Att3.pdf Austin 0921 Att4.pdf Austin 0921 Att5.pdf</p>
<p>Local Plan Consultation Point</p>	SAP15 - Land at Rays Bottom, Walmer (WAL002)
<p>Rep ID</p>	SDLP1088
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1331762
<p>Consultee Full Name</p>	Ms Waite-Gleave Sarah Waite-Gleave
<p>Consultee Company / Organisation</p>	Dover and Deal Green Party

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Developments at SAP 14 and 15 Walmer and Sholden will impact on surface water management and flood risk in North Deal, and Walmer.</p> <p>SAP 15 . The selection of this site is unsound firstly as it incompatible with SP4 ; 3.71 Separation of Settlements and the need to prevent villages coalescing to protect landscape character.</p> <p>Secondly it is unsound as its selection is incompatible with the statements in SP14 relating to biodiversity connectivity as this valley bottom is already functioning as vital point of biodiversity connectivity as referred to in SAP15, the northern and Western boundaries of the site, close to BOA Hawkshill Freedown, are key to biodiverse connectivity. 4.158 mis-names Hawkshill Freedown, which in fact is an SSSI because it is globally rare, chalk-downland habitat, (not just the 'open field' in the DDC text). For decades volunteers with Walmer council have lovingly protected this rare habitat, a very justified BOA.</p> <p>The geography indicates that the valley bottom is also valuable as a flood sponge, so SAP15 is unsound thirdly for this reason too. Ray's Bottom drains in a northerly direction to the whole area immediately north of Walmer Castle which is well-known to be subject to flooding.</p> <p>And fourthly the Highways assessment of this site is inadequate, SAP 15 is unsound because 4.160 fails to note that Liverpool Road is a single lane road (changing its name to Glen Rd) with passing places which is becomes gridlock with traffic from Kingsdown Primary school 2x a day. It become an arterial road attempting to provide access to 30,000 conurbation of Deal / Walmer for diverted traffic when the A258 is blocked. (Cross reference SAP 34 in Kingsdown). So the selection is unsound on the grounds of danger to life from RTAs. The Transport Assessment requirement referred to in e makes no reference whatsoever to Liverpool Road becoming Glen Road at the Kingsdown parish boundary, and carrying diverted A road traffic. The inclusion of SAP 15 is not legally compliant with NPPF 2021 item 11. (b)ii '<i>SPs should provide for objectively assessed needs for housing & other uses, . . unless(ii) any adverse impacts of doing so would significantly & demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole</i>'.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	See above
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP1319
Rep Status	Processed
Consultee ID	1331547
Consultee Full Name	Mr Don Hough
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Sap15
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The Glen/Liverpool Road were not built for the proposed amount of traffic that would be generated by a large building plot of houses on Ray's Bottom. The development of houses not local to Doctor's surgery and would have a devastating effect on local traffic trying to access Kingsdown and beyond. It would also take away beautiful views on the approach to Kingsdown and cause havoc at peak times/school run/rush hour in the evening. It would also take away arable land.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP1591
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP15
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438.</p> <p>SAP 14 – 16 Deal (SAP 15 cross referenced to SAP 34/35 Kingsdown)</p> <p>Developments at SAP 14 and 15 Walmer and Sholden will impact on surface water management and flood risk in North Deal, and Walmer.</p> <p>SAP 15 . The selection of this site is unsound firstly as it incompatible with SP4 ; 3.71 Separation of Settlements and the need to prevent villages coalescing to protect landscape character.</p> <p>Secondly it is unsound as its selection is incompatible with the statements in SP14 relating to biodiversity connectivity as this valley bottom is already functioning as vital point of biodiversity connectivity as referred to in SAP15, the northern and Western boundaries of the site, close to BOA Hawkshill Freedown, are key to biodiverse connectivity. 4.158 mis-names Hawkshill Freedown, which in fact is an SSSI because it is globally rare, chalk-downland habitat, (not just the 'open field' in the DDC text). For decades volunteers with Walmer council have lovingly protected this rare habitat, a very justified BOA.</p>

	<p>Geography indicates that the valley bottom is also valuable as a flood sponge, so SAP15 is unsound thirdly for this reason too. Ray's Bottom drains in a northerly direction to the whole area immediately north of Walmer Castle which is well-known to be subject to flooding.</p> <p>And fourthly the Highways assessment of this site is inadequate, SAP 15 is unsound because 4.160 fails to note that Liverpool Road is a single lane road (changing its name to Glen Rd) with passing places which is becomes gridlock with traffic from Kingsdown Primary school 2x a day. It became an arterial road attempting to provide access to 30,000 conurbation of Deal / Walmer for diverted traffic when the A258 is blocked. (Cross reference SAP 34 in Kingsdown). So the selection is unsound on the grounds of danger to life from RTAs. The Transport Assessment requirement referred to in e makes no reference whatsoever to Liverpool Road becoming Glen Road at the Kingsdown parish boundary and carrying diverted A road traffic. The inclusion of SAP 15 is not legally compliant with NPPF 2021 item 11. (b)ii 'SPs should provide for objectively assessed needs for housing & other uses, . . . unless(ii) any adverse impacts of doing so would significantly & demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole'.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP1760
Rep Status	Processed
Consultee ID	1273345
Consultee Full Name	Dennis Hill
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP15
2 - Do you consider this part of the Plan sound?	No

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>1. The format of the consultation and requirement for on line comment is overly complex for the ordinary citizen to comment. Hence this representation being made via PSF rather than on line. Many people would already have given up there comment!</p> <p>2.Representation has already been made with regard to this site by many local residents in the first round of consultation. Despite very considerable opposition from local residents I cannot see any material change in the policy for this site. What is the point of local consultation if residents comments are totally ignored?</p> <p>3.The main objections to use of this site for residential use are numerous:-</p> <p>* The land is Grade 3 agricultural land- this is defined as good/moderate quality agricultural land with moderate limitations. Food security in the UK has been highlighted articularly since the war in Ukraine and has recently been highlighted by none other than th eHead of MI5 as a matter of national security. There is no present justification for th e loss of prime agricultural land.</p> <p>*Although on the OS map the site forms a completion of a development block between Dover Road and Liverpool Road, the topograhly of the siteis such that it forms an important part of the Glen Road valley, on steep ground with areas to the bottom liable to flooding.</p> <p>*The site is devoid of any local services, the nearest being in Woolmer village which is a walk up the steep Grams Road which doe not even have a continuous pavement. The nearest Primary school at Kingsdown is over subscribed. Most of the Local GP surgeries are over subscribed and not taking on new patients. Downs Cof E School may well be within 1200m as the crow flies but more than 1.5miles by road. Note that Castle Community College is now Walmer Beacon.</p> <p>*We would question whether the site is within 1000m of Walmer Station- even as the Crow flies. The site is served by a single track road – Liverpool Rd /Glen Rd which themselves are served off a network of very narrow roads with no or limited footpaths. A walk to the main bus stop at Walmer Village is up the steep Grams Road with only partial footpathing.</p> <ul style="list-style-type: none"> • Almost without doubt all movements to and from this site will be by car – hardly Climate Change Mitigation even with electric cars whose embodied carbon is higher than conventional combustion engines. • Little mention is made of the adjacent Hawkshill Down site which is and important public open space which will be undoubtedly adversely affected by a development at Rays Bottom.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	We believe that the Rays Bottom site should be removed from the Local Plan for all the reasons stated above. We do not believe that the views of the local community have been adequately taken into account nor have the Objectives listed under this proposal been properly and adequately assessed.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I would be happy to partake in the oral part of the examination to help put across the above reasoning and the feelings of the local community.
Include files	

Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP1933
Rep Status	Processed
Consultee ID	1273883
Consultee Full Name	Deborah Moggach
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP15
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SP15 – totally unsounds as accessed by narrow lane (Glen Road) incompatible with separation of settlements vis a vis biodiversity and destroying border between Walmer and Kingsdown and liable to flooding. Most of all, it's a very precious location for biodiversity. Concreting it over would be a tragedy
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Rule out the sites SP34 and SP15 due to access issues, biodiversity issues and congestion issues. Build new houses in brownfield sites near to local services. Don't concrete over our lovely local fields
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP1821
Rep Status	Processed
Consultee ID	1274166
Consultee Full Name	Dr & Mrs Butt
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP15
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We are writing to register our objection to the above proposal for the construction of 75 houses on land known as Rays Bottom field, fronting Liverpool Road and Glen Road, Walmer. The reasons for our objection are listed below:</p> <ol style="list-style-type: none"> 1 Any development on this land would have an unacceptable impact on the landscape and be detrimental to the amenities of the area. This proposal conflicts with the pious but essentially meaningless comments in the Daft District Plan, such as quote 'these landscapes are rich in biodiversity, priority habitats and protected species and, importantly, provide significant environmental, social, and economical benefits for our district and residents'. 1 There is inadequate highways access along Liverpool Road/Glen Road. A considerable stretch of these roads is single track without pavements are, as such, is already inadequate for the traffic carried including a regular bus route. The proposed development will add at least 100 and more likely 200 cars to this route. A totally unacceptable overload. 1 The area has previously been subject to flooding. 1 Encroachment into the countryside with consequent loss of farmland and wildlife habitat

	<p>1 Close proximity to Hawkshill Common conservation land.</p> <p>1 Any proper inspection will surely demonstrate the inadequacy of services such as surface and foul water drainage, foul sewage disposal, water, gas and electricity supply;</p> <p>1 Impact on services such as local doctors' surgeries and hospitals</p> <p>1 Over development of Walmer, as there are currently 83 houses proposed opposite 423 and 459 Dover Road, Walmer; 223 houses currently being built in Station Road, Walmer and a proposal for a further housing development at Court Road/Station Road.</p> <p>1 Seven detached properties are about to start construction on the site of Tonkers in Hawksdown Road (to be renamed Apple Tree Gardens), which will increase traffic on the following roads – Grams, Liverpool and Glen.</p> <p>Overall we perceive that there appears to be a determined intent within the proposed Plan to overdevelop and completely ruin the area around Walmer.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>We respectfully request that the proposal to allow 75 house o be constructed in such a fragile environment be rejected and removed from the Dover District Council Local Plan.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP15 - Land at Rays Bottom, Walmer (WAL002)</p>
<p>Rep ID</p>	<p>SDLP1399</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1333219</p>
<p>Consultee Full Name</p>	<p>Mr James Collins</p>
<p>Consultee Company / Organisation</p>	

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP15
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Application Plan number WAL002 Proposal I wish to register with you my objection to any proposed buildings on the agricultural land know as Ray's Bottom adjoining Liverpool Road, Walmer, CT14 7PS. The reason for my objection is this land part of a very old river running from Guston to Walmer, this river is still active and flowing. I am severely concerned that any building work will increase the flooding risk to my property. As you are fully aware our property has been flooded in the past and Kent County Council have undertaken remedial work to avert future flooding as far as they can. Please be fully aware that If this proposal goes ahead and contributes to any future flooding of my grounds and property I will hold you responsible and this could result in very considerable costs.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP1667
Rep Status	Processed

Consultee ID	1331541
Consultee Full Name	Mr Simon Jefferson
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP15
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SAP15 is unsound in that: There is a need to prevent villages coalescing to protect the character of the area SAP15 is incompatible with SP4: 71 Separation of Settlements. Is incompatible with statements in SAP14 about biodiversity connectivity as referred to in SAP15 Hawkshill Freedown is a SSSI not an open field as described in DDL text The bottom of the valley acts as a sponge that helps to prevent flooding near Walmer Castle new buildings would have an adverse effect. 4.160 does not note that Liverpool/Glen road is a single lane road that is already unable to accommodate traffic during the "school run" that happens twice a day and also is a bus route for the Stagecoach and Regent Kingsdown routes. Without a profound widening of the road any increase shall cause a risk to all. Loss of agricultural land would be a blow to the need to grow food in these troubled times.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP1400
Rep Status	Processed
Consultee ID	1333221
Consultee Full Name	Mr Graham Collins
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP15
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Application Plan number WAL002 Proposal I wish to register with you my objection to any proposed buildings on the agricultural land know as Ray's Bottom adjoining Liverpool Road, Walmer, CT14 7PS. The reason for my objection is this land part of a very old river running from Guston to Walmer, this river is still active and flowing. I am severely concerned that any building work will increase the flooding risk to my property. As you are fully aware our property has been flooded in the past and Kent County Council have undertaken remedial work to advert future flooding as far as they can. Please be fully aware that If this proposal goes ahead and contributes to any future flooding of my grounds and property I will hold you responsible and this could result in very considerable costs.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP1767
Rep Status	Processed
Consultee ID	1267050
Consultee Full Name	Victoria Hughes
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP15
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	To whom it may concern, (Without prejudice) I would like to object to SAP 34 for the reasons as specified below. These reasons also apply to SAP 35, 53 and 15 . The inclusion of SAP 34 is not legally compliant with NPPF 2021 item 11. (b)ii 'SPs should provide for objectively assessed needs for housing & other uses, . . unless(ii) any adverse impacts of doing so would significantly & demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole'. SAP 34 Kingsdown p. 163: The selection of SAP 34 is totally unsound, on 5 different grounds,. Firstly the Highways Assessment of Ringwoud Road is inadequate and unsound as regards this site. The facts are that Ringwoud Road is signposted as unsuitable for long vehicles, unsuitable for vehicles over 7.5tonnes unsuitable for wide vehicles, the road is painted SLOW in 3 places despite the 50mph signs, and there are 4 sections where the road narrows to single lane passing. The 1400 voters in Kingsdown village (population 2000 + 500? more in summer months due to holiday village + campsite) are all dependent on the Ringwoud Road traffic flowing

freely. So the selection of SAP 34 for any development is unsound firstly on the grounds of highways assessment unsoundness / inadequacy. Any development would cause dangerous gridlock, involving the cars of current residents, parents of children of the village primary school, construction vehicles and new residents' cars. It is a disgrace that KCC for years have refused to listen to requests to reduce the speed limit on this road and refused also to put in a kerbed pavement on the northern side of Ringwoud Road. The economy of the village depends on visitors and residents walking, cycling and horse-riding on the Ringwoud Road and any development of SAP 34 would increase the likelihood of fatalities exponentially.

The selection of SAP 34 is unsound secondly on the grounds of landscape character, being incompatible with criteria described above in SP 4. the site is on the skyline with sea behind, an iconic view that greets all people arriving in Deal; its selection contradicts the comments in SP4 on individual village identity and character. DM Policies NE2 (Natural Environment) p.285: It is 'sound' to designate the area inland from Kingsdown, west to Ringwoud, Ripple, Sutton, Studdal and Little Mongeham, south to Guston, as LCT F Open Arable Chalk Farmland with Woodland, F3 Ripple. But it is unsound, ineffective and contradictory to then ignore the designation when selecting the dangerously located chalk farmland of SAP 34 for development.

The selection of SAP 34 is unsound thirdly on the grounds that the Deal / Walmer conurbation of 30,000 depends on the narrow – single lane in places - Ringwoud Rd, carrying diverted traffic from the A258 every time A258 is blocked by an RTA or road works. The A258 is the only southern entrance to the 30,000 conurbation starting in Upper Walmer stretching to North Deal and Sholden. Diverted traffic is a dangerous nightmare for the village every time it happens, some diverted traffic uses Glen Rd / Liverpool road selected as site for SAP 15 Ray's Bottom in Walmer. This site too, if developed is likely to mean diverted traffic cannot get in / out of Deal /Walmer 30,000 conurbation. Neighbours working for emergency services say they oppose both developments for this reason. Unsound due to being incompatible with SP12, because its lanes periodically become part of the district Strategic Transport Infrastructure. Selection of these sites is completely unsound and non-compliant with all laws / planning regs relating to the prevention of accidents and protection of human life. SAP 34 would result in 'Traffic movements from the development resulting in severe impacts to the highway network that it would not be possible to mitigate', and as such contrary to SP4 2 j within the plan, thus unsound and highly ineffective.

The selection of SAP 34 is unsound fourthly on the grounds that it borders the AONB and is valuable arable farmland, needed in times when national food security is of concern. Moreover 4.238 needs correcting, the parish council-owned, biodiversity-rich site of the Lynch / and Freedown woods (that run into Oxney Court Woods) was the subject of a survey by Kent Wildlife Trust in 2017 commissioned by the Ringwoud w/ Kingsdown parish council and paid for by DEFRA, which provides evidence of the natural capital within the boundary of the AONB to be protected on the boundary of this site.

The selection of SAP 34 is unsound fifthly on the grounds that any development would remove a flood sponge on the top slope of the hill, below which is the Knight's Bottom pumping station and pond which drains towards Rays' Bottom SAP 15, so development here could contribute to flooding (see CC5 p. Flood Risk).

Any development of SAP 34 is not legally compliant with emerging government policy, see Mr Sunak statement 5 Dec 2022 announcing dropping of compulsory housing targets for LPAs (Local Planning Authorities such as DDC)'.
I would also like to object to SAP 35, 53 and 15 for the same reasons as above.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP1817
Rep Status	Processed
Consultee ID	1333682
Consultee Full Name	Ms Carolyn Barber
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP15
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SAP15 is unsound as incompatible with statements MSP14 relating to biodiversity connectivity. The highways assessment of this site is unsound and inadequate.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP1973
Rep Status	Processed
Consultee ID	1333808
Consultee Full Name	Patricia Barrington
Consultee Company / Organisation	
Agent Full Name	Kingsdown Conservation Group
Agent Company / Organisation	Kingsdown Conservation Group
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP15
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Extracts from the 24-page submission on DDC Reg 19 Local Plan Consultation, Dover and Deal Green Party. Focused on sites affecting Ringwoud with Kingsdown Parish:</p> <p>SAP15 Walmer Liverpool Road Ray's Bottom. The selection of this site is unsound firstly as it is incompatible with SP4; 3.71 Separation of Settlements and the need to prevent villages coalescing to protect landscape character. Secondly it is unsound as its selection is incompatible with the statements in SP14 relating to biodiversity connectivity as this valley bottom is already functioning as vital point of biodiversity connectivity as referred to in SAP15, the northern and western boundaries of the site, close to BOA Hawkshill Freedown, are key to biodiversity connectivity. 4.158 mis-names Hawkshill Freedown, which in fact it is an SSSI because it is globally rare, chalk-downland habitat, (not just the 'open field' in the DDC text). For decades volunteers with Walmer Council have lovingly protected this rare habitat, a very justified BOA. The geography indicates that the valley bottom is also valuable as a flood sponge, so SAP15 is unsound thirdly for this reason too. Ray's Bottom drains in a northerly direction to the whole area immediately north of Walmer Castle which is well-known to be subject to flooding.</p>

	And fourthly the Highways Assessment of this site is unsound and inadequate, SAP15 is unsound because 4.160 fails to note that Liverpool Road is a single lane road (changing its name to Glen Road) with passing places which is becomes gridlocked with traffic from Kingsdown Primary School 2 x a day. It becomes an arterial road attempting to provide access to 30,000 conurbation of Deal/Walmer for diverted traffic when the A258 is blocked. (Cross reference SAP34 in Kingsdown). So, the selection is unsound on the grounds of danger to life from RTA's. The Transport Assessment requirement referred to in e makes no reference whatsoever to Liverpool Road becoming Glen Road at Kingsdown parish boundary and carrying diverted A Road traffic.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	I consider changes to the Plan to be the responsibility of DDC
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	to ensure the voice of residents are heard
Include files	
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP1900
Rep Status	Processed
Consultee ID	1272960
Consultee Full Name	Jenifer Wakelyn
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP15
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy

4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I consider the plan not legally compliant, is unsound and fails to comply with the duty to co-operate because there has been little or inadequate consultation with local Council's and community groups.</p> <p>I believe the plan is not complaint with the Climate Change Act 2009 regulations to protect the climate and with National Planning Policy Framework 2021 item 11 in relation to designation of the area in land for Kingsdown to Ringwoud, Ripple, Sutton, Studdal and Little Mongeham chalk farmland.</p> <p>SAP15 is also unsound because 4.160 does not state that Liverpool Road is a single lane.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	I believe it is vital that the plan should take into account and proactively protect against unplanned erosion of countryside between confines of settlements and should proactively protect the individual identity of these villages and important elements of their setting – i.e. farmland and coastal landscape of unequalled beauty in the UK. The plans in SAP34 and 15 are unsound and would significantly damage and negatively impact the village
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP1872
Rep Status	Processed
Consultee ID	1273892
Consultee Full Name	Suzanne Mulvaney
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP15
2 - Do you consider this part of the Plan sound?	No

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<ul style="list-style-type: none"> • Very obtuse and legalese which confuse most people • It appears to be fait accompli rather than seeking local opinions • Unsound because there is an existing traffic problem which these proposals will exacerbate • Very disappointing in the lack of safety considerations and lots of old people who will face difficulties
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The above question 7 appears to be designed to minimize or prevent any contributions For example how do you expect the average person to answer complex legal questions??? I cant access form with my iPad
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	It is necessary to hear and pay attention to the opinions of those who will be directly affected by plans and proposals drawn up in isolation by someone sitting at a desk and looking at paper plans.
Include files	
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP1758
Rep Status	Processed
Consultee ID	1267645
Consultee Full Name	Alan & Sarah Gleave
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP15
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note: The text below was extracted from the attached representation</p> <p>The inclusion of SAP 34 and SAP 15 especially, (but also SAP 53 and SAP 35) is not legally compliant with NPPF 2021 item 11. (b)ii 'SPs should provide for objectively assessed needs for housing & other uses, . . . unless(ii) any adverse impacts of doing so would significantly & demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole'. Also it is not compliant with the emerging govt policy announced 5 Dec 2022 by Mr Sunak on stopping compulsory housing targets on LPAs, and empowering LPAs to decide on local needs. DM Policies NE2 (Natural Environment) p.285: It is sound to designate the area inland from Kingsdown, west to Ringwould, Ripple, Sutton, Studdal and Little Mongeham, south to Guston, as LCT F Open Arable Chalk Farmland with Woodland, F3 Ripple. But it is unsound, ineffective and contradictory to then ignore the designation when selecting the dangerously located, chalk farmland of SAP 34 for development. It is unsound and ineffective to a damaging extent, to list Kingsdown as being a 'Local Centre ; a village providing services for a local rural area and a secondary focus for development in the rural area' Any development at SAP 34 would do the opposite of 'reinforcing the role of the village'; it would in fact choke off the existing parish economy, reducing its attractiveness to tourists, a key location on the Deal Welcomes Walkers initiative. The number of 2nd homes and airB&B in the village proves that dwellings outnumber homes required, so there is NOT an 'objectively assessed need for housing a la NPPF 11' within the Parish'. (Gladman did a landgrab in 2017 in the parish 17/00487 An application rejected by DDC that Gladman took to Planning Inspectorate and won. Currently being built by Taylor Wimpey on A258 as 85 executive homes on land opposition 423-459 Dover Road to the endangerment of all road users of arterial A258 with refusal to put in pavements).</p> <p>SAP 15 Walmer Liverpool Road Ray's Bottom.</p> <ol style="list-style-type: none"> 1. The Highways assessment of this site SAP 15 is unsound and inadequate, because 4.160 fails to note that Liverpool Road is a single lane road (changing its name to Glen Rd) with passing places which becomes gridlock with traffic from Kingsdown Primary school 2x a day. It becomes a diversion to arterial road A258 attempting to provide access to 30,000 population conurbation of Deal / Walmer for diverted traffic when the A258 is blocked. (Cross reference SAP 34 in Kingsdown). So the selection is unsound and not legally compliant on the grounds of danger to life from RTAs. The Transport Assessment requirement referred to in e makes no reference whatsoever to Liverpool Road becoming Glen Road at the Kingsdown parish boundary, and carrying diverted A road traffic and is thus completely inadequate. No mitigation 2. Unsound because incompatible with SP4 ; 3.71 Separation of Settlements and the need to prevent villages coalescing to protect landscape character. 3. Unsound as its selection is incompatible with the statements in SP14 relating to biodiversity connectivity as this valley bottom is already functioning as vital point of biodiversity connectivity as referred to in SAP15, the northern and Western boundaries of the site, close to BOA Hawkshill Freedown, are key to biodiversity connectivity. 4.158 mis-names Hawkshill Freedown, which is an SSSI because it is globally rare, chalk-downland habitat, (not just the 'open field' in the DDC text). For decades volunteers with Walmer Council have lovingly protected this rare habitat, a very justified BOA. 4. Unsound because the geography shows that the valley bottom is also valuable as a flood sponge, for this reason too. SAP 15 Ray's Bottom drains in a northerly direction to the whole Granville Rd area, immediately north of Walmer Castle which is well-known to be subject to flooding, Many photos exist. 5. Not compliant NPPF, or the Environment Act 2020 or the legally binding UK Climate Emergency declaration of 2019 (commitment to net zero 2050) and Climate Change Act 2008.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	SDLP1755 Gleave Redacted.pdf
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP1808
Rep Status	Processed
Consultee ID	1331598
Consultee Full Name	Alan Nash
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP15
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>Kingsdown has one primary school which is over subscribed. There is no Doctors surgery or Dentist. JUSTIFIED. These sites are unsuitable for development. Your website is not clear as to what research or solid facts you have, or from whom it has been compiled by. EFFECTIVE. These sites will be detrimental to the existing residents by causing light pollution, noise pollution, congestion and pollution. CONSISTENT. I am not certain what the national policy is, if it is to make existing residents unhappy in there existing environment, then these proposed sites would achieve that. LEGALLY compliant. I consider that most people within the village were not aware of these sites being considered, my neighbours and I were only aware when the details were noted in the November 2022 issue of Rural Roundup. Your website is over complicated and not fit for purpose. Within the village there are many elderly residents who do not have access to computers.TC4S074 was not in the Regulation 18 Consultation-there has not been adequate time for public engagement. DUTY to co-operate.Unable to find out if this was carried out.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Scheme should be scrapped.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>As a resident I have found this a very confusing and difficult process to complete and would look forward to attending an oral examination to put my questions to whoever allowed these proposals to get this far.</p>
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP15 - Land at Rays Bottom, Walmer (WAL002)</p>
<p>Rep ID</p>	<p>SDLP1796</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331774</p>
<p>Consultee Full Name</p>	<p>Mr Simon Pollard</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to?Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP15</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified</p>

	Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I am a resident of Kingsdown. My concern is with the consequences of the housing developments at Woodhill Farm (SAP 34 - 50 dwellings) and Courtlands (SAP 35 - 5 dwellings), also adjacent developments at Ringwoud Alpines (SAP 53 - 10 dwellings) and at Rays Bottom, Walmer (SAP 15 - 75 dwellings). These are connected by Ringwoud Road between Kingsdown and Ringwoud, by Glen Road between Kingsdown and Walmer (inland) and by Kingsdown Road between Kingsdown and Walmer (along the seafront). The first two, in particular, are narrow roads with inadequate width at many/most locations for passing traffic. Kingsdown Road is less restrictive. The number of dwellings will inevitably lead to increased car usage for Kingsdown village access, for school access, for work/employment access, for shopping and for general leisure access. There is no meaningful bus service to accommodate all these needs. Kingsdown Primary School will likely be the primary school of choice for the developments I have noted, putting particular strain on these roads. Children at secondary school (and those attending primary schools elsewhere) will all need to use these roads to move out of the referenced development areas. The whole village road network is generally narrow and unsuited for heavy traffic volumes. When discussing these aspects with DDC Planning representatives at the Deal open-day for the Plan, I was advised that the plan does not address these transport needs (and I have not found any text to contradict them.)</p> <p>My main comment therefore is that a full traffic analysis must be made to ensure adequate provision for the daily needs of the developments. Access for construction traffic will be an immediate concern. While not directly related to the quoted paragraphs of the Infrastructure Plan, the village primary school is probably too small to accommodate the likely increase in demand. Road access around it does fall within the reference and is similarly restrictive already.</p> <p>Additionally, for Ringwoud Road between Kingsdown and Ringwoud there should be pavement(s) (or alternative footpaths) to provide a safe pedestrian route to access the main bus route along the A258 (the Dover-Deal road). The current road is unsafe for pedestrians and cyclists. The junction of Ringwoud Road with the A258 will need to be enhanced to accommodate the increased traffic. Similar safe access will be required for Glen Road.</p> <p>It is not clear to me how the narrow road network in Kingsdown can be modified to suit an increased volume of traffic. This might in itself be good reason to object to the developments, but a more positive attitude by the planners and developers is surely required?</p> <p><i>(DDC note: This representation was originally made against the Infrastructure Delivery Plan consultation document but has been duplicated in relevant places against the Local Plan due to the specific site allocation references made)</i></p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP1870
Rep Status	Processed
Consultee ID	1272675
Consultee Full Name	Vanessa Clift
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<ol style="list-style-type: none"> 1 Very obtuse and confusing for people to understand 2 Appears to be a fait accompli rather than seeking local opinion. Also new government guidelines show cutting back on unsuitable developments 3 Unsound due to a very already congested village with poor road structure. Primary school in the middle 4 Very disappointing due to lack of safety issue especially with an elderly local population 5 The Dover-Deal A258 is constantly challenged blocked with traffic diversions through Kingsdown. It can't cope with more traffic. 6 There is no potential for a pavement/cycle path for the local residents, both elderly and young.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	As a move elderly resident I feel the local plan and how it is structured make it very difficult for my age ground to properly represent our opinions. It is designed to be battling to make the development plans SAP35 and 15 more sound I strongly suggest it is an over intense treatment of an already congested area. Inadequate narrow lanes, a busy primary school and elderly population and young families and overwhelmed by an ever-growing holiday population. The various limited approaches to the village are unable to cope with the traffic burden.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP1879
Rep Status	Processed
Consultee ID	1272184
Consultee Full Name	Tony and Valerie Armitage
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP15
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The Deal/Walmer road system will not cope if permission is given for anymore developments; SAP14, SAP15, SAP34 are unsound Congestion caused by over-development along the Dover Road from Ringwold into Deal will result in traffic queues more frequently than at present making walking and cycling irresistible. June 2020 Deal Town Council report requires pavements, cycle lanes, wide roads and detailed junction plans. Traffic in Kingsdown would be gridlocked winter and summer
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	In an ideal world- Ringwold Road in and out of Kingsdown to have cycle lanes and walking paths. Park and pedal scheme I Borrowpit Carpark to be activated Glen Road / Liverpool Road to have cycle lanes and walking paths St James Road / Upper Street junction to be redesigned and made safe to take all the construction traffic. Alexander Road / Upper Street junction to be redesigned and made safe to take construction / extra traffic

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP1832
Rep Status	Processed
Consultee ID	1333692
Consultee Full Name	Claudia Carr
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP15
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<ul style="list-style-type: none"> • I believe the plans to be unsound for reasons of safety. The increased pressure on the roads (esp at Glen Road) will cause inevitable traffic jams so emergency services will not be able to get through • The plans do not fully take account of the 'landscape assessment'. Bird and animal habitats will be destroyed, and alternative sites will not be joined up. • The sloping nature of both sites means it would be a flood risk for the lower lying properties and agriculture. • The infrastructure (bus services, schools, doctors) could not sustain the proposed swelling • The narrowness of the roads (esp the Ringwould Kingsdown Road) is already too dangerous to walk or cycle along and with extra traffic there's a high risk of pedestrian or cyclist's lives being lost • Risk of surface water contamination. The aquafier is inside the development zone
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP1842
Rep Status	Processed
Consultee ID	1333703
Consultee Full Name	Marion Osborne
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP15
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SAP34 not legally compliant with NPPF 20-21 items 11 DM policies NE2 (natural environment) P285 The chalk farmland of SAP34 is unsound/unsuitable for development. SAP34 is unsound on the grounds of landscape character being incompatible with criteria in SP4. SAP34 is unsound on the grounds that it borders the AONB and is valuable arable farmland. SAP34 – any development would remove a flood sponge on the top slop of the hill which drains toward Ray Bottom SAP15, so development here would contribute to flooding. SAP35 is unsound in that it involves loss of food producing farmland; destructive of the landscape character and it is in a BOA. SAP53 is unsounds as being incompatible with LSA falling within the AOB. SAP15 is unsounds as incompatible with SP4; 3.71 separation of settlements. Also, it is incompatible with statements in SP14 relating to biodiversity connectivity.

	The highways assessment of this site is unsound and inadequate. SAP15 4.160 fails to note that Liverpool Road, is a single lane road which becomes gridlocked with traffic from Kingsdown primary school twice a day
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	no comment
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP1890
Rep Status	Processed
Consultee ID	1333838
Consultee Full Name	mrs rosemary anne Holmes
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP15
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>The Deal/Walmer road system will not cope if permission is given for anymore developments, SAP14, SAP15, SAP34 are unsound. Congestion caused by overdevelopment along the Dover Road from Ringwould into Deal will result in traffic queues more frequently than at present, making walking and cycling irresistible. June 2020 Deal Town Council report requires pavements, cycle lanes wide roads and detailed junction plans. Traffic in Kingsdown would be gridlocked winter and summer.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>In an ideal world – Ringwould Road in and out of Kingsdown to have cycle lanes and walking paths. Park and pedal scheme in Borrowpit Car park to be activated. Glen Road/Liverpool Road to have cycle lanes and walking paths. St James Road/Upper Street junction to be redesigned and made safe to take all the construction traffic. Alexandra Road/Upper Street to be redesigned and made safe to take construction traffic/extra traffic.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP15 - Land at Rays Bottom, Walmer (WAL002)</p>
<p>Rep ID</p>	<p>SDLP1972</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1334285</p>
<p>Consultee Full Name</p>	<p>Mr Henry Paice</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	<p>Kingsdown Conservation Group</p>
<p>Agent Company / Organisation</p>	<p>Kingsdown Conservation Group</p>
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP15</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified Effective Consistent with National Policy</p>

4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Extracts from the 24-page submission on DDC Reg 19 Local Plan Consultation, Dover and Deal Green Party. Focused on sites affecting Ringwould with Kingsdown Parish:</p> <p>SAP15 Walmer Liverpool Road Ray's Bottom. The selection of this site is unsound firstly as it is incompatible with SP4; 3.71 Separation of Settlements and the need to prevent villages coalescing to protect landscape character. Secondly it is unsound as its selection is incompatible with the statements in SP14 relating to biodiversity connectivity as this valley bottom is already functioning as vital point of biodiversity connectivity as referred to in SAP15, the northern and western boundaries of the site, close to BOA Hawkshill Freedown, are key to biodiversity connectivity. 4.158 mis-names Hawkshill Freedown, which in fact it is an SSSI because it is globally rare, chalk-downland habitat, (not just the 'open field' in the DDC text). For decades volunteers with Walmer Council have lovingly protected this rare habitat, a very justified BOA. The geography indicates that the valley bottom is also valuable as a flood sponge, so SAP15 is unsound thirdly for this reason too. Ray's Bottom drains in a northerly direction to the whole area immediately north of Walmer Castle which is well-known to be subject to flooding.</p> <p>And fourthly the Highways Assessment of this site is unsound and inadequate, SAP15 is unsound because 4.160 fails to note that Liverpool Road is a single lane road (changing its name to Glen Road) with passing places which is becomes gridlocked with traffic from Kingsdown Primary School 2 x a day. It becomes an arterial road attempting to provide access to 30,000 conurbation of Deal/Walmer for diverted traffic when the A258 is blocked. (Cross reference SAP34 in Kingsdown). So, the selection is unsound on the grounds of danger to life from RTA's. The Transport Assessment requirement referred to in e makes no reference whatsoever to Liverpool Road becoming Glen Road at Kingsdown parish boundary and carrying diverted A Road traffic.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	I consider changes to the Plan to be the responsibility of DDC
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	to ensure the voice of residents is heard
Include files	
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP2020
Rep Status	Processed
Consultee ID	1334460
Consultee Full Name	Jenny Mills

Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP15
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	This development will not only cause massive congestion to the Road but will unbalance the school which is a amazing school and already at capacity as it takes children from all over the area Kingsdown will no longer be a village or rural which will for people who have brought there houses run the price down This is already a busy village and extending it further will cause annomosity and anger for residents
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP15 - Land at Rays Bottom, Walmer (WAL002)
Rep ID	SDLP1847
Rep Status	Processed

Consultee ID	1333706
Consultee Full Name	Cindy Crancher
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP15
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SAP34 not legally compliant with NPPF 20-21 item 11 DM policies NE2 (natural environment) P285 The chalk farmland of SAP34 is unsound/unsuitable for development. SAP34 is unsound on the grounds of landscape character being incompatible with criteria in SP4. SAP34 is unsound on the grounds that it borders the AONB and is valuable arable farmland. SAP34 – any development would remove a flood sponge on the top slop of the hill which drains toward Ray Bottom SAP15, so development here would contribute to flooding. SAP35 is unsound in that it involves loss of food producing farmland; destructive of the landscape character and it is in a BOA. SAP15 is unsound as incompatible with SP4; 3.71 separation of settlements. Also, it is incompatible with statements in SP14 relating to biodiversity connectivity. The highways assessment of this site is unsound and inadequate. SAP15 A.160 fails to note that Liverpool Road is a single lane road which becomes gridlocked with traffic from Kingsdown primary school twice a day.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	no comment
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	

Include files

SAP16 - Deal Small Housing Sites

Local Plan Consultation Point	SAP16 - Deal Small Housing Sites
Rep ID	SDLP24
Rep Status	Processed
Consultee ID	1259309
Consultee Full Name	Mr Peter Jull
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	TC4S008
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The opportunity should be taken to enable the widening of Station Road to allow free two-way traffic flow and the provision of a full width pavement on at least one side by requiring this site to be developed in conjunction with the surrounding land which was unjustifiably rejected at the initial HELAA stage to properly provide for the additional traffic generated by the development to the north.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The site specific requirements should be strengthened to require the site to be developed in conjunction with the surrounding field by providing a single access point. The width of Station Road between Cross Road and Sydney Road should be widened to at least 6m and a full width pavement provided on at least one side.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	To answer any questions unanticipated by the written response and elaborate on the proposal if required.

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP16 - Deal Small Housing Sites
Rep ID	SDLP23
Rep Status	Processed
Consultee ID	1259309
Consultee Full Name	Mr Peter Jull
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	GTM003
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	This site is undeliverable as proposed. No reasonable proposer would proceed as described as it would land lock the rest of the site submitted for inclusion in the local plan with no prospect of future productive purpose. The original HELAA landscape assessment is at odds with other landscape assessments asserting greater harm here than other sites where it is patently more severe. From the 1259309 public footpath viewpoint at Beacon Hill the houses on the other side of Northbourne Road are seen partially screened by trees at a distance of 850 yards. The proposed development would be seen partially screened by trees at a distance of 750 yards. Allowing the development of the whole site would result in dwelling being seen partially screened by trees at a distance of 700 yards. That is insufficient difference to say partial development is acceptable when development of the whole is not. It has been asserted that Great Mongeham is characterised by linear development when it clearly isn't. The site is opposite Mongeham Church Close, there's Ashton Close, Dairy Mews, the permitted Stalco site any many instances of individual properties set back from what could possibly be called linear development.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The extent of GTM003 should be reinstated to that originally submitted and the indicative capacity shown as 38. Site specific requirements should be amended to read "... individual vehicle access ...". Individual pedestrian access for each frontage property is desirable and appropriate. Site specific requirements should be further amended to read "... street frontage without a parallel vehicle access between houses and Northbourne Road, parking being provided from the rear." Additionally the internal road layout should provide access to GTM011 to avoid traffic from that site which now has Part Q permission to convert the ugly concrete barn on site to residential use. Although that permission has been improved GTM011 should be included in the Local Plan with an indicative capacity of 5 because demolition of the barn and replacement with lower height dwellings would enhance the setting of the nearby listed farmhouse.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	To answer any question unanticipated by the written submission and rebut contrary arguments.
Include files	
Local Plan Consultation Point	SAP16 - Deal Small Housing Sites
Rep ID	SDLP87
Rep Status	Processed
Consultee ID	1330796
Consultee Full Name	Mrs Lynn French
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	G - Local Plan Site Allocations
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	This objection refers to the site allocation SAP16 Bridleway Riding School TC4S008. On a previous draft of the local plan, this site was not included as the site had not been put forward for development. The fields surrounding this site were put forward but were deemed by DDC to be "not suitable for housing development" (no reason given). On this current local plan submission, Bridleway Riding School has been included as suitable for housing development (but not the surrounding fields). The decision to include TC4S008 is inconsistent and therefore not positively prepared nor justified.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	This site needs to be removed from the local plan to ensure consistency.

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP16 - Deal Small Housing Sites
Rep ID	SDLP113
Rep Status	Processed
Consultee ID	1264821
Consultee Full Name	Mr Martin Brandon
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 14 Cross Road, SAP16 TC4S008 Bridleway Riding School, RIP001
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>RIP 001. I support the exclusion of this site from development. A development here would be entirely incongruous in this rural location. Road links to the site are very poor. The development would increase use of the nearby Coldblow user worked railway level crossing which is highly undesirable. So I support the exclusion of this site from the sites of housing allocation.</p> <p>SAP16 and TC4S008. Both represent a spread of the built up area into the surrounding countryside, the Bridleway development in particular being the first south of Cross Road on that side of the railway line. This is regrettable. I am very concerned about the increase in traffic under the railway over bridge on Cross Road. This bridge is narrow and contains wrought iron elements that are highly vulnerable to vehicle collision. I could not determine if the council has consulted the rail authority on this but some specific contact would be a responsible thing to do.</p> <p>By way of illustration attached a photo of the rail bridge at Ripple Court less than a mile from Cross Road, and of the same construction on the same rail line after collision from a modest sized vehicle in March 2020. The vulnerability of the bridge is clear to see.</p>

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Review and/or delete SAP14 and TC4S008 from housing allocation. If retained establish any specific requirements of the rail authority wrt the underline bridge and use as planning conditions.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	D7W4PGXE7GOIMIMMOL0T.jpg
Local Plan Consultation Point	SAP16 - Deal Small Housing Sites
Rep ID	SDLP233
Rep Status	Processed
Consultee ID	1259582
Consultee Full Name	Mr John Samuel
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 16 - Deal Small Housing Sites TC4S047
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	N/A

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	SDLP233 Samuel Attachment Redacted.pdf
Local Plan Consultation Point	SAP16 - Deal Small Housing Sites
Rep ID	SDLP313
Rep Status	Processed
Consultee ID	1331395
Consultee Full Name	Ms Jo Edwards
Consultee Company / Organisation	Sport England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP16 Bridleway Riding School
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The riding school on the proposed allocation seems to be in operation or recently to have been, Riding is a sport use, any proposed loss of which should be assessed for accordance with paragraph 99 of the NPPF and policy PM4. It is not clear from the policy what the intention of the allocation with regard to the loss or retention of the school.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Reference to the status of the riding school / retention or alternative provision etc made.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP16 - Deal Small Housing Sites
Rep ID	SDLP519
Rep Status	Processed
Consultee ID	1331738
Consultee Full Name	Ms Tracey Wilkins
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 16 - Deal Small Housing Sites, Site GTM003
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	No

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I believe the Site-specific Issues and Requirements for site GTM003 are lacking and incomplete. I live adjacent to the site; lizards and slow worms are present in my garden. It is therefore reasonable to assume the same species are present in the proposed site. Both species appear on the list of UK Biodiversity Action Plan Priority Herpetile Species (2007) and are protected under Section 41 of the Natural Environment and Rural Communities Act (2006). Regard for their conservation must be considered as part of the planning decision. Currently the plan does not suggest a wildlife/herpetile assessment of the site.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The Dover Local Plan should modified in regards to site GTM003 to ensure an appropriate herpetile and/or biodiversity survey is carried out before the site is disturbed.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP16 - Deal Small Housing Sites
Rep ID	SDLP989
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP16
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The County Council recommends that policy specifically references improvements to Public Footpath ED49.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The County Council recommends that policy specifically references improvements to Public Footpath ED49.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP16 - Deal Small Housing Sites
Rep ID	SDLP1532
Rep Status	Processed
Consultee ID	1252520
Consultee Full Name	Rachel Collins Housing Development Manager
Consultee Company / Organisation	Dover District Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP16
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SAP16 Ethelbert Road garages Deal CT14 6RA All the sites above are Council owned sites. The intention is for these to be appraised, and if appropriate, brought forward for affordable housing within the next 5 years.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP16 - Deal Small Housing Sites
Rep ID	SDLP1324
Rep Status	Processed
Consultee ID	1252620
Consultee Full Name	Mr William Hickson
Consultee Company / Organisation	
Agent Full Name	Emily Harris
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP16 - GTM003
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified

	Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Introduction</p> <p>1.1. These representations have been prepared on behalf of William Hickson ('our Client'), in relation to Land to the East of Northbourne Road, Great Mongeham and are submitted in response to the consultation on the Dover Borough Council (DBC) Regulation 19 (R19) Local Plan Review (LPR) and Sustainability Appraisal (SA). The consultation on the Local Plan commenced on 21st October 2022 and closes on the 9th of December 2022.</p> <p>1.2. The current consultation comprises the following documents: The Local Plan Review – Draft Plan for Submission (Regulation 19) The Local Plan Review – Sustainability Appraisal (September 2022). The Local Plan Review -</p> <p>1.3. Evidence base documents have also been updated and are published as part of the consultation.</p> <p>1.4. The existing Local Plan was adopted by DDC in February 2010. Policy CP1 states that the settlement Hierarchy the location and scale of development in the District must comply with the Settlement Hierarchy.</p> <p>1.5. Land to the East of Northbourne Road has been actively promoted to DDC through the 'Call for Sites' and Regulation 18 consultations for a residential development. The Site is considered suitable, available, achievable and deliverable for a minimum of 10 dwellings.</p> <p>1.6. The Site has been allocated within the R19 LPR under draft Policy 16 for the construction of a minimum of 10 dwellings under ref. Policy 16: Residential Extensions and Annexes (Reg 19 Policy H6). Our client strongly supports the existing draft allocation.</p> <p>1.7. This representation focuses on our Client's Land to the East of Northbourne Road, which has been allocated within Policy SAP1 of the emerging Plan (ref. GT003). In addition to this draft allocation, this representation seeks to promote a wider area within our Client's landownership, comprising the entirety of the promoted site and demonstrating its capacity to sensitively increase the quantum of housing available in this area.</p> <p>1.8. The following documents are included as part of this representation:</p> <ul style="list-style-type: none"> • Sketch design Document - Holloway Architects (Appendix 1) • Illustrative Master Plans - Holloway Architects (Appendix 2) • Landscape Appraisal - Huskisson Brown Associates (Appendix 3) • Initial Access Appraisal - (incl. plan of the proposed site access) – Pell Frischmann (Appendix 4) <p>Structure of the Representation</p> <p>1.9. The structure of this representation is as follows:</p> <ul style="list-style-type: none"> • Section 2: The Site and Surrounding Context: Sets out a broad outline of Northbourne Road and its surroundings • Section 3: Illustrative proposals: Summarises the proposal and details of the Illustrative Master Plan • Section 4: Comments on the Evidence Base: Reviews relevant evidence base documents. • Section 5: Representations on the Draft Local Plan: Provides comments and recommendations on key elements of the Draft Local Plan. • Section 6: Conclusion: Summarises the observations within the representations and outlines the next steps in the draft Local Plan process. <p>The Site and Surrounding Context</p> <p>2.1. The Site comprises 3.3Ha of greenfield land adjacent to the settlement boundary, to the south west of Great Mongeham.</p> <p>2.2. The Site falls within an area identified as open countryside. However, it is bordered by dwellings to the north, east and west, with agricultural land to the south of the Site. As such, the surrounding environment</p>

provides this area with an 'edge of settlement' character.

2.3. The Site itself is located to the south west of Mongeham and suitable access can be achieved via Northbourne Road, as demonstrated in the appended Access Appraisal (appendix 4). Northbourne Road is a two-way single carriageway road, and is subject to a speed limit of 30mph within the village of Great Mongeham. Pedestrian Facilities are already available on Northbourne Road making the proposed sites reasonably well connected to local facilities and public transport network.

2.4. The closest bus stops to the Site are located at Northbourne Road junction with Mongeham Church Close, directly at the north of the Site. These stops are served by 541 and Sandwich Connect bus routes. There are two additional bus stops along Northbourne Road located approximately 125m from the Site, which are served by bus routes 542 and 554 connecting to Walmer.

The nearest railway station to the Site is Walmer, which is located approximately 2.5km (9 minutes cycling distance) south of the Site. The station is managed by Southeastern train operating company (TOC) and typically provides one service per hour to London Charing Cross via Tonbridge and Ramsgate. Given the rural context of the Site, the public transport connections are considered to be good and offer a viable alternative to driving.

Site Designations

The Site is not within: the Green Belt, an Area of Outstanding Natural Beauty (AONB) or a Conservation Area. The Site is also Flood Zone 1, with a low risk of fluvial, surface water and reservoir flooding. The Great Mongeham 'Church Area' Conservation Area is situated approximately 50m north of the Site and there are five Listed Buildings in close proximity to the Site, including Great Mongeham Farmhouse (UID: 1069855); Great Mongeham House (UID: 1343714); Church of Martin (UID: 1069782); Cross immediately south west of St Martin (UID: 1069755); the Old Rectory (UID: 1261552); and Church House (UID: 1261551). All of which are Grade II Listed, bar the Church which is Grade II* Listed. In addition, the Site is within the Groundwater Source Protection Area.

Planning history

2.7. There is no planning history available on the DDC planning portal.

Illustrative Proposal

(DDC Note: Please note that images can not be copied into the portal however the full representation including images is attached)

Allocated Site

3.1. The northern parcel of the Site which has an area of 0.77ha has been allocated for approximately 10 dwellings within the DDCLP under GTM003 (SAP16). This representation proposes to increase the size of the allocation to include the area to the south of the Site for the provision of approximately 30 new dwellings set across a plot with a size of 3.3Ha.

Figure 3.1: Approximate Red Line Boundary of the Site – dashed outline denotes allocated parcel north of the Site.

The Illustrative Masterplans and an accompanying Sketch Design Document has been prepared to demonstrate the capacity for this site to provide a landscape-led development of 10-33 homes at the Land East of Northbourne Road.

3.3. The Sketch Design Document assesses the opportunities and constraints on the Site, identifying the potential layouts for residential development across the allocated area and the wider site. These designs are not intended to be how the scheme will ultimately be delivered, they are intended to show a possible layout for accommodating the draft allocation emerging Site Allocations Policy 1, and an alternative layout to sensitively incorporate additional housing on the Site.

3.4. Utilising the Site entrance identified in the Access Appraisal, this scheme introduces a new spur road that runs parallel to Northbourne Road, and down through the Site to provide access to accommodate 31 new dwellings.

3.5. The through road sits perpendicular to the access road, providing a vista to safeguard views from St Martin's Church and the wider conservation area to the agricultural land to the south of the Site. The scheme also provides new routes through the Site to the church to encourage walkability throughout. In addition to the 31 dwellings accessed from the central block, the proposal contains a pair of detached dwellings to the

north east corner, which can act as a standalone infill opportunity. This would help create a sense of continuity along the street scene.

3.6. The scheme has been carefully considered to safeguard the rural character of the Site. To achieve this, the architects have maintained an organic layout, ensuring that it will have limited urbanising impacts on the wider environment.

3.7. In addition, the proposal has also sought to retain and enhance the field boundaries – providing an additional buffer to the Grade II Listed Great Mongeham Farmhouse, whilst incorporating two new agricultural looking dwellings to the west of the Site to complement the wider agricultural setting.

Comments on the Evidence Base

As part of the Draft Local Plan consultation, DDC has published a number of Evidence Base documents. These are listed below. Comments are provided on those which are shown in bold in this representation.

- Sustainability Appraisal Reg 19 Local Plan (September 2022)
- Habitats Regulation Assessment (September 2022)
- HELAA 2022 – Housing Site Assessments

(DDC Note: The comments on the Evidence Base and been EXTRACTED and copied onto the relevant places within the Local Plan and its accompanying Consultation Documents (HIA, SA and IDP)

Representations on the Local Plan

5.1. The policy comments in this section of the representation relate to the Land East of Northbourne Road, which is being promoted for circa 33 dwellings. This section focuses primarily on the draft Local Plan, providing commentary on the key aspects of the Plan.

(DDC Note: The comments on specific Policies within the Local Plan have been extracted and DUPLICATED against SP3 and SAP1)

Strategic Policy 3: Planning for Housing growth

5.2. Table 6.1 sets out the Council's current housing supply position and shows that in order to meet the Local Housing Need for the District, the Council will need to allocate housing sites in the Local Plan to deliver 5,288 homes over the Plan period.

5.3. DDC has outlined that their proposed growth strategy will focus on the development and regeneration of Dover Town, with further development concentrated towards Aylesham. The remainder of the housing growth will then be distributed across Local Centres and Villages in the rural area. In accordance with this, c. 0.84% of the housing growth will be distributed to smaller villages and hamlets.

5.4. Whilst our Client broadly agrees with the proposed housing strategy set out in the Local Plan, it is pertinent that it is very similar to the adopted Local Plan.

5.5. While this does not amount to the current strategy being flawed, the adopted growth strategy has been ineffective in delivering the requisite housing in the past, establishing a precedent of under delivery within the District – as highlighted in paragraph 3.67 of the Regulation 19 Draft Plan which states the following of windfall permissions:

“Over this period, the spatial distribution of windfall development has largely followed the settlement hierarchy, with 39% of windfall permissions being located at Dover, 31% at Deal and 12% within the defined settlement confines of rural villages.”

5.6. The Council should consider the influence of market signals on housing in the relevant plan policies – as set out in policy 31 of the National Planning Policy Framework (NPPF) – and increase the proportion of housing growth allocated within the rural areas to reflect this.

5.7. This representation highlights the capacity to deliver additional dwellings at the Site in a sympathetic manner, demonstrating that there is scope to increase housing provision across the Site and improve its contribution to the requisite growth in the District.

Site Allocations Policy 1: Non-Strategic Housing Allocations

Our Client fully supports the allocation of the Site in the emerging Local Plan. However, it is considered that there is an opportunity to increase the area allocated on the Site and facilitate the development of additional housing provision in the District. This is supported in paragraph 68 of the NPPF which outlines the important contribution that small and medium sized sites can make to the housing requirement,

highlighting their capacity to be built out quickly in the Local Plan period.

Section 3 of this representation clearly demonstrates that the wider site is capable of delivering approximately 30 dwellings sympathetically to wider environment. The appended Sketch Design Document highlights that the proposal can be accommodated within the existing field boundaries to enhance its surroundings.

5.10. Significantly, paragraph 67 of the NPPF outlines that:

“Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.”

5.11. This is supported by paragraph 122b of the NPPF which states that:

“[Planning policies and decisions should support development that makes efficient use of land, taking into account] local market conditions and viability.”

5.12. In accordance with this, there is a clear emphasis in national policy to produce an effective plan that is deliverable over the Plan Period. It is considered that the allocation of the entirety of the Land to the East of Northbourne Road is available, suitable and deliverable, and will make a positive contribution to the development of an effective Local Plan.

Recommendation: Whilst we generally support the Draft Local Plan, we urge Dover District Council to increase the area of the allocated area to include the parcel of the Site to the south of the Site, with an uplift from 10 dwellings to approximately 30 dwellings.

Conclusion

6.1. This representation has been prepared by Savills, on behalf of our client, William Hickson, in response to the Draft Dover District Local Plan Regulation 19 Consultation. The land currently being promoted and the subject of these representations comprises the Land to the east of Northbourne Road (Ref: GTM003).

6.2. This representation outlines our Client’s support for the allocation of the Site within Policy SA1 as a nonstrategic housing allocation. However, it is considered that there is greater scope for development across the wider site, as illustrated within the Sketch Design Document (Appendix 1) which includes two Illustrative Masterplans (Appendix 2), demonstrating that a landscape-led scheme of approximately 30 homes can be accommodated on the Site, providing a sympathetic and considered addition to Great Mongeham.

6.3. Various other technical reports related to Transport and Landscape have been submitted to the Council (Appendices 3-4), which have been used to inform the commentary on the evidence base in Section 4, and representations on the draft Policies in Section 5.

6.4. The appended reports highlight that the identified constraints set out within the Sustainability Appraisal can be overcome, including an initial access appraisal that demonstrates that the wider development can be accessed through a single point of entry off of Northbourne Road.

6.5. This representation clearly demonstrates that there is scope to increase housing provision across the Site and improve its contribution to the requisite growth in the District. This is supported by national policy, specifically in its emphasis on the capacity for small to medium development sites to contribute to housing requirement in the District, highlighting their potential contribution to enhancing rural communities.

(DDC Note: Attachment includes the Following Appendices:

- Appendix 1.0 Sketch Design Document
- Appendix 2.0 Illustrative Masterplan
- Appendix 3.0 Landscape Appraisal
- Appendix 4.0 Initial Access Appraisal

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance

with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	Harris Savills 1527 Att1.pdf
Local Plan Consultation Point	SAP16 - Deal Small Housing Sites
Rep ID	SDLP1412
Rep Status	Processed
Consultee ID	1252620
Consultee Full Name	Mr William Hickson
Consultee Company / Organisation	
Agent Full Name	Emily Harris
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP16 - GTM003
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes

6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

Introduction

- 1.1. These representations have been prepared on behalf of William Hickson ('our Client'), in relation to Land to the East of Northbourne Road, Great Mongeham and are submitted in response to the consultation on the Dover Borough Council (DBC) Regulation 19 (R19) Local Plan Review (LPR) and Sustainability Appraisal (SA). The consultation on the Local Plan commenced on 21st October 2022 and closes on the 9th of December 2022.
- 1.2. The current consultation comprises the following documents:
The Local Plan Review – Draft Plan for Submission (Regulation 19)
The Local Plan Review – Sustainability Appraisal (September 2022).
The Local Plan Review -
- 1.3. Evidence base documents have also been updated and are published as part of the consultation.
- 1.4. The existing Local Plan was adopted by DDC in February 2010. Policy CP1 states that the settlement Hierarchy the location and scale of development in the District must comply with the Settlement Hierarchy.
- 1.5. Land to the East of Northbourne Road has been actively promoted to DDC through the 'Call for Sites' and Regulation 18 consultations for a residential development. The Site is considered suitable, available, achievable and deliverable for a minimum of 10 dwellings.
- 1.6. The Site has been allocated within the R19 LPR under draft Policy 16 for the construction of a minimum of 10 dwellings under ref. Policy 16: Residential Extensions and Annexes (Reg 19 Policy H6). Our client strongly supports the existing draft allocation.
- 1.7. This representation focuses on our Client's Land to the East of Northbourne Road, which has been allocated within Policy SAP1 of the emerging Plan (ref. GT003). **In addition to this draft allocation, this representation seeks to promote a wider area within our Client's landownership, comprising the entirety of the promoted site and demonstrating its capacity to sensitively increase the quantum of housing available in this area.**
- 1.8. The following documents are included as part of this representation:
- Sketch design Document - Holloway Architects (Appendix 1)
 - Illustrative Master Plans - Holloway Architects (Appendix 2)
 - Landscape Appraisal - Huskisson Brown Associates (Appendix 3)
 - Initial Access Appraisal - (incl. plan of the proposed site access) – Pell Frischmann (Appendix 4)

Structure of the Representation

- 1.9. The structure of this representation is as follows:
- Section 2: The Site and Surrounding Context: Sets out a broad outline of Northbourne Road and its surroundings
 - Section 3: Illustrative proposals: Summarises the proposal and details of the Illustrative Master Plan
 - Section 4: Comments on the Evidence Base: Reviews relevant evidence base documents.
 - Section 5: Representations on the Draft Local Plan: Provides comments and recommendations on key elements of the Draft Local Plan.
 - Section 6: Conclusion: Summarises the observations within the representations and outlines the next steps in the draft Local Plan process.

The Site and Surrounding Context

- 2.1. The Site comprises 3.3Ha of greenfield land adjacent to the settlement boundary, to the south west of Great Mongeham.
- 2.2. The Site falls within an area identified as open countryside. However, it is bordered by dwellings to the north, east and west, with agricultural land to the south of the Site. As such, the surrounding environment provides this area with an 'edge of settlement' character.
- 2.3. The Site itself is located to the south west of Mongeham and suitable access can be achieved via Northbourne Road, as demonstrated in the appended Access Appraisal (appendix 4). Northbourne Road is a two-way single carriageway road, and is subject to a speed limit of 30mph within the village of Great Mongeham. Pedestrian Facilities are already available on Northbourne Road making the proposed sites reasonably well connected to local facilities and public transport network.
- 2.4. The closest bus stops to the Site are located at Northbourne Road junction with Mongeham Church Close,

directly at the north of the Site. These stops are served by 541 and Sandwich Connect bus routes. There are two additional bus stops along Northbourne Road located approximately 125m from the Site, which are served by bus routes 542 and 554 connecting to Walmer.

The nearest railway station to the Site is Walmer, which is located approximately 2.5km (9 minutes cycling distance) south of the Site. The station is managed by Southeastern train operating company (TOC) and typically provides one service per hour to London Charing Cross via Tonbridge and Ramsgate. Given the rural context of the Site, the public transport connections are considered to be good and offer a viable alternative to driving.

Site Designations

The Site is not within: the Green Belt, an Area of Outstanding Natural Beauty (AONB) or a Conservation Area. The Site is also Flood Zone 1, with a low risk of fluvial, surface water and reservoir flooding. The Great Mongeham 'Church Area' Conservation Area is situated approximately 50m north of the Site and there are five Listed Buildings in close proximity to the Site, including Great Mongeham Farmhouse (UID: 1069855); Great Mongeham House (UID: 1343714); Church of Martin (UID: 1069782); Cross immediately south west of St Martin (UID: 1069755); the Old Rectory (UID: 1261552); and Church House (UID:1261551). All of which are Grade II Listed, bar the Church which is Grade II* Listed. In addition, the Site is within the Groundwater Source Protection Area.

Planning history

2.7. There is no planning history available on the DDC planning portal.

Illustrative Proposal

(DDC Note: Please note that images can not be copied into the portal however the full representation including images is attached)

Allocated Site

3.1. The northern parcel of the Site which has an area of 0.77ha has been allocated for approximately 10 dwellings within the DDCLP under GTM003 (SAP16). **This representation proposes to increase the size of the allocation to include the area to the south of the Site for the provision of approximately 30 new dwellings set across a plot with a size of 3.3Ha.**

Figure 3.1: Approximate Red Line Boundary of the Site – dashed outline denotes allocated parcel north of the Site.

The Illustrative Masterplans and an accompanying Sketch Design Document has been prepared to demonstrate the capacity for this site to provide a landscape-led development of 10-33 homes at the Land East of Northbourne Road.

3.3. The Sketch Design Document assesses the opportunities and constraints on the Site, identifying the potential layouts for residential development across the allocated area and the wider site. These designs are not intended to be how the scheme will ultimately be delivered, they are intended to show a possible layout for accommodating the draft allocation emerging Site Allocations Policy 1, and an alternative layout to sensitively incorporate additional housing on the Site.

3.4. Utilising the Site entrance identified in the Access Appraisal, this scheme introduces a new spur road that runs parallel to Northbourne Road, and down through the Site to provide access to accommodate 31 new dwellings.

3.5. The through road sits perpendicular to the access road, providing a vista to safeguard views from St Martin's Church and the wider conservation area to the agricultural land to the south of the Site. The scheme also provides new routes through the Site to the church to encourage walkability throughout. In addition to the 31 dwellings accessed from the central block, the proposal contains a pair of detached dwellings to the north east corner, which can act as a standalone infill opportunity. This would help create a sense of continuity along the street scene.

3.6. The scheme has been carefully considered to safeguard the rural character of the Site. To achieve this, the architects have maintained an organic layout, ensuring that it will have limited urbanising impacts on the wider environment.

3.7. In addition, the proposal has also sought to retain and enhance the field boundaries – providing an additional buffer to the Grade II Listed Great Mongeham Farmhouse, whilst incorporating two new

agricultural looking dwellings to the west of the Site to complement the wider agricultural setting.

Comments on the Evidence Base

As part of the Draft Local Plan consultation, DDC has published a number of Evidence Base documents. These are listed below. Comments are provided on those which are shown in bold in this representation.

- Sustainability Appraisal Reg 19 Local Plan (September 2022)
- Habitats Regulation Assessment (September 2022)
- HELAA 2022 – Housing Site Assessments

(DDC Note: The comments on the Evidence Base and been EXTRACTED and copied onto the relevant places within the Local Plan and its accompanying Consultation Documents (HIA, SA and IDP)

Representations on the Local Plan

5.1. The policy comments in this section of the representation relate to the Land East of Northbourne Road, which is being promoted for circa 33 dwellings. This section focuses primarily on the draft Local Plan, providing commentary on the key aspects of the Plan.

(DDC Note: The comments on specific Policies within the Local Plan have been extracted and DUPLICATED against SP3 and SAP1)

Strategic Policy 3: Planning for Housing growth

5.2. Table 6.1 sets out the Council's current housing supply position and shows that in order to meet the Local Housing Need for the District, the Council will need to allocate housing sites in the Local Plan to deliver 5,288 homes over the Plan period.

5.3. DDC has outlined that their proposed growth strategy will focus on the development and regeneration of Dover Town, with further development concentrated towards Aylesham. The remainder of the housing growth will then be distributed across Local Centres and Villages in the rural area. In accordance with this, c. 0.84% of the housing growth will be distributed to smaller villages and hamlets.

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“Over this period, the spatial distribution of windfall development has largely followed the settlement hierarchy, with 39% of windfall permissions being located at Dover, 31% at Deal and 12% within the defined settlement confines of rural villages.”

5.6. The Council should consider the influence of market signals on housing in the relevant plan policies – as set out in policy 31 of the National Planning Policy Framework (NPPF) – and increase the proportion of housing growth allocated within the rural areas to reflect this.

5.7. This representation highlights the capacity to deliver additional dwellings at the Site in a sympathetic manner, demonstrating that there is scope to increase housing provision across the Site and improve its contribution to the requisite growth in the District.

Site Allocations Policy 1: Non-Strategic Housing Allocations

Our Client fully supports the allocation of the Site in the emerging Local Plan. However, it is considered that there is an opportunity to increase the area allocated on the Site and facilitate the development of additional housing provision in the District. This is supported in paragraph 68 of the NPPF which outlines the important contribution that small and medium sized sites can make to the housing requirement, highlighting their capacity to be built out quickly in the Local Plan period.

Section 3 of this representation clearly demonstrates that the wider site is capable of delivering approximately 30 dwellings sympathetically to wider environment. The appended Sketch Design Document highlights that the proposal can be accommodated within the existing field boundaries to enhance its surroundings.

5.10. Significantly, paragraph 67 of the NPPF outlines that:

“Strategic policy-making authorities should have a clear understanding of the land available in their area

through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.”

5.11. This is supported by paragraph 122b of the NPPF which states that:

“[Planning policies and decisions should support development that makes efficient use of land, taking into account] local market conditions and viability.”

5.12. In accordance with this, there is a clear emphasis in national policy to produce an effective plan that is deliverable over the Plan Period. It is considered that the allocation of the entirety of the Land to the East of Northbourne Road is available, suitable and deliverable, and will make a positive contribution to the development of an effective Local Plan.

Recommendation: Whilst we generally support the Draft Local Plan, we urge Dover District Council to increase the area of the allocated area to include the parcel of the Site to the south of the Site, with an uplift from 10 dwellings to approximately 30 dwellings.

Conclusion

6.1. This representation has been prepared by Savills, on behalf of our client, William Hickson, in response to the Draft Dover District Local Plan Regulation 19 Consultation. The land currently being promoted and the subject of these representations comprises the Land to the east of Northbourne Road (Ref: GTM003).

6.2. This representation outlines our Client's support for the allocation of the Site within Policy SA1 as a nonstrategic housing allocation. However, it is considered that there is greater scope for development across the wider site, as illustrated within the Sketch Design Document (Appendix 1) which includes two Illustrative Masterplans (Appendix 2), demonstrating that a landscape-led scheme of approximately 30 homes can be accommodated on the Site, providing a sympathetic and considered addition to Great Mongeham.

6.3. Various other technical reports related to Transport and Landscape have been submitted to the Council (Appendices 3-4), which have been used to inform the commentary on the evidence base in Section 4, and representations on the draft Policies in Section 5.

6.4. The appended reports highlight that the identified constraints set out within the Sustainability Appraisal can be overcome, including an initial access appraisal that demonstrates that the wider development can be accessed through a single point of entry off of Northbourne Road.

6.5. This representation clearly demonstrates that there is scope to increase housing provision across the Site and improve its contribution to the requisite growth in the District. This is supported by national policy, specifically in its emphasis on the capacity for small to medium development sites to contribute to housing requirement in the District, highlighting their potential contribution to enhancing rural communities.

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8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	Harris Savills 1527 Att1.pdf
Local Plan Consultation Point	SAP16 - Deal Small Housing Sites
Rep ID	SDLP1325
Rep Status	Processed
Consultee ID	1252620
Consultee Full Name	Mr William Hickson
Consultee Company / Organisation	
Agent Full Name	Emily Harris
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	GTM003
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails	(DDC Note: This was submitted under SAP1 However upon reading the text the comment has been relocated to SAP16) Site Allocations Policy 1: Non-Strategic Housing Allocations 5.8. Our Client fully supports the allocation of the Site in the emerging Local Plan. However, it is considered that there is an opportunity to increase the area allocated on the Site and facilitate the development of additional housing provision in the District. This is supported in paragraph 68 of the NPPF which outlines the important contribution that small and medium sized sites can make to the housing requirement, highlighting their capacity to be built out quickly in the Local Plan period. Section 3 of this representation clearly demonstrates that the wider site is capable of delivering approximately 30 dwellings sympathetically to wider environment. The appended Sketch Design Document highlights that the proposal can be accommodated within the existing field boundaries to enhance its surroundings.

to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

5.10. Significantly, paragraph 67 of the NPPF outlines that:
 “Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.”

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 “[Planning policies and decisions should support development that makes efficient use of land, taking into account] local market conditions and viability.”

5.12. In accordance with this, there is a clear emphasis in national policy to produce an effective plan that is deliverable over the Plan Period. It is considered that the allocation of the entirety of the Land to the East of Northbourne Road is available, suitable and deliverable, and will make a positive contribution to the development of an effective Local Plan. Recommendation: Whilst we generally support the Draft Local Plan, we urge Dover District Council to increase the area of the allocated area to include the parcel of the Site to the south of the Site, with an uplift from 10 dwellings to approximately 30 dwellings.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Local Plan Consultation Point	SAP16 - Deal Small Housing Sites
Rep ID	SDLP1386
Rep Status	Processed
Consultee ID	1333152
Consultee Full Name	Mr P & Mrs S Laflin & Rubix Estates Ltd
Consultee Company / Organisation	
Agent Full Name	Mr Reece Lemon
Agent Company / Organisation	Lee Evans Partnership

<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP16 (Intro Covering Letter)</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>Yes</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Yes</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Yes</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>(DDC Note - Representation submitted by Lee Evans On behalf of Mr and Mrs Lafin and Rubix Estates. Full Representation attached to SDLP1387. This document has been split across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment.)</p> <p>REPRESENTATIONS TO DOVER DISTRICT COUNCIL LOCAL PLAN (REGULATION 19) LAND AT 115 STATION ROAD, BRIDLEWAY RIDING SCHOOL, STATION ROAD, DEAL DDC REFERENCE TC42008</p> <p>Lee Evans Partnership LLP is instructed by Rubix Estates Ltd. (hereafter, the Promoter) and Mr P Lafin and Mrs S Lafin (hereafter, the Landowners) to submit representations to the Regulation 19 Submission Draft of the Dover District Local Plan 2040. On behalf of the Promoter and Landowners, this response advocates for the continued inclusion of Policy SAP16, and provides the Inspector with a series of technical documents to provide reassurance of the availability, suitability, and deliverability of the site for residential development including:</p> <ul style="list-style-type: none"> A Written Representation, prepared by Lee Evans Partnership LLP A Site Analysis and Design Package, prepared by Lee Evans Partnership LLP Indicative Site Layout, prepared by Lee Evans Partnership LLP Site Access Arrangement Plan, prepared by TPA Site Drainage Strategy Plan, prepared by MEC <p>On behalf of Rubix Estates Ltd and the Landowners we strongly advocate for the continued inclusion of land at 115 Station Road, Bridleway Riding School for residential development, as prescribed under emerging Policy SAP16. These representations conclude that the Plan is legally compliant, and provides a sound evidence-based approach to planning in the District over the plan period. It finds further that the Local Planning Authority (LPA) has sufficiently met the Duty to Cooperate.</p> <p>We welcome the opportunity to further assist or provide comment on the preparation of the Plan which will help shape future development in the area; and we welcome look forward to the opportunity to participate at later hearing sessions where appropriate.</p> <p>SITE DELIVERABILITY</p> <p>At the specific request of Dover District Council per its email of 18 November 2022, the Promoter and Landowner further wish to confirm the following information to assist in the progression of the Plan towards adoption:</p> <ol style="list-style-type: none"> 1. Current planning status It should be noted that the Promoter is currently preparing an Outline Planning Application for submission in Q2 2023, evidencing the overarching deliverability of the Site in line with the aspirations <p>of the Plan as drafted. Technical work has been instructed to underpin the detailed inputs to a future planning application. These representations are supported at this stage by some of this early-stage technical work emphasising the deliverability of the Site. 2. Firm progress being made towards the submission of an application; As above, an Outline Planning Application is targeted for submission in Q2 2023, with work underway to support such. 3. Firm progress with site assessment work; As above, an Outline Planning Application is targeted for submission in Q2 2023, with work underway to support such. 4. Clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects: The Promoter is engaged in an Promotions Agreement with the Landowners; both parties are engaged in the submission of these representations to the Regulation 19 consultation. The Site is held in single ownership and no third parties are required in the delivery of housing in this location. The Site is considered available, suitable and deliverable.</p> <p>SUMMARY</p> <p>Overall, these representations conclude that the Plan is legally compliant, and provides a sound evidence-based approach to planning in the District over the plan period. It finds further that the LPA has sufficiently met the Duty to Cooperate.</p>

	Due regard should be had to the detailed response contained within the supporting documents pursuant to these representations. We look forward to onwards participation in the Examination of the Plan in 2023, and towards the submission of a planning application in Q2 2023.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
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Include files	
Local Plan Consultation Point	SAP16 - Deal Small Housing Sites
Rep ID	SDLP1410
Rep Status	Processed
Consultee ID	1333152
Consultee Full Name	Mr P & Mrs S Laffin & Rubix Estates Ltd
Consultee Company / Organisation	
Agent Full Name	Mr Reece Lemon
Agent Company / Organisation	Lee Evans Partnership
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP16 (detailed rep on site)
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes

6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

(DDC Note - Representation submitted by Lee Evans On behalf of Mr and Mrs Labin and Rubix Estates. Full Representation attached to SDLP1387. This document has been split across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1387.)

4. POLICY SAP16 – ‘DEAL SMALL HOUSING SITES’

4.1 Policy SAP16 identifies three sites under the heading ‘Deal Small Housing Sites’. Site ‘TC4S008 25 – 115 Station Road, Bridleway Riding School, Station Road, Deal’ (the Site) is identified alongside a series of site-specific criteria.

Estimated Dwelling Number

4.2 As an overall matter, the Site is assigned an indicative capacity of 25 dwellings under the heading ‘estimated dwelling number’. This is noted and agreed as a minimum quantum of development, recognising that site yield may ultimately be higher subject to site specific opportunities.

4.3 The supporting material appended to this representation demonstrate a scheme of at least 25 dwellings could be accommodated on site. On behalf of the Promoter and Landowners, we request a site specific figure is not ‘capped’ or otherwise seen as a maximum level of growth. Site specific opportunities and constraints may lead to a figure ultimately larger than 25 dwellings, maximising site efficiencies in line with the aspirations of the Plan.

Criteria-based Policies

4.4 Policy SAP16 is criteria-based, with two criterion – A and B.

4.5 Criterion A are noted in respect of accordance with the wider policies of the Plan.

4.6 Criterion B is site specific; commentary is provided below with cross-reference to supporting technical inputs which accompany this submission:
Primary access to the site shall be provided from Station Road.

A supporting Technical Note prepared by Transport Planning Associates accompanies this representation. This Technical Note reviews the accessibility of the site and identifies with confidence that a preliminary access strategy that supports an allocation for residential development in this location in accordance with the wording of SAP16 as drafted.

Supporting plans demonstrate that access to the allocation will be taken from Station Road with ample frontage, facilitating a new and safer pedestrian footway and vehicular access, or to amend the proposed highway scheme proposed as part of the neighbouring scheme.

In all events, the primary access to the Site will be achieved from Station Road with acceptable technical specification.

This proposed criterion to Policy SAP16 is supported as a sound and deliverable policy requirement.

Speed survey required to determine whether the 30mph zone should be extended along the frontage of the site;

As outlined in the supporting Technical note, the proposed allocation would support the speed limit reduction should this not be implemented through the scheme opposite.

It is noted that the detailed enforcement of such could be secured through the planning application process and related conditions and legal agreement where required.

This proposed criterion to Policy SAP16 is supported as a sound and deliverable policy requirement.

A pedestrian footway is required along the full length of northern boundary of the site, to connect to the existing footways, provide an off-carriageway pedestrian route to Walmer station and link to adjoining new developments to the north.

As evidenced in the supporting Technical Note – and as evidenced on supporting Plan 2210-046 TN01 – this Site will enhance the pedestrian connectivity which will be safer for existing and new residents along Station Road. The Site is well-placed to provide an enhanced level of interconnectivity to Walmer Station and adjoining developments to the north via an off-carriageway route.

This proposed criterion to Policy SAP16 is supported as a sound and deliverable policy requirement.

Transport Assessment must consider and identify mitigation (potential widening/traffic management measures/junction improvements) for the surrounding local road network, taking into account the cumulative impact of this and other sites allocated in this Plan, including (but not limited to) Station Road and the junctions along it, up to and including the Station Road/Dover Road/Gram’s Road junction;

The supporting Technical Note has reviewed the neighbouring committed development. It identifies the key aspects of highways mitigation agreed in relation to that scheme. It considers the opportunities for the proposed Site Allocation at 115 Station Road, Bridleway Riding School, Deal to effectively accord with or otherwise ‘plug in’ to this consented highway scheme, specifically along Station Road.

Whilst a detailed Transport Assessment (and Travel Plan) would accompany any future application, there is considered to be no insurmountable highways impacts that would suggest undue difficulty in the Site delivering the necessary mitigation required in maximising highways safety and transport efficiency.

This proposed criterion to Policy SAP16 is supported as a sound and deliverable policy requirement.

Existing trees and hedgerows along the boundary of the site should be retained and enhanced to provide an appropriate landscape buffer;

The supporting Indicative Site Layout establishes that the existing trees and hedgerows along the boundary can be reasonably retained and enhanced, subject to a detailed arboricultural review of their condition (to be undertaken to inform a submission in Q2 2023).

An appropriate landscape buffer can be provided; the details of which would be refined in the context of any future application.

Site is within Groundwater Source Protection Zone 2;

The forthcoming planning application will be supported by a Flood Risk Assessment and Drainage Strategy which appropriately reflects the Site's location within a Groundwater Source Protection Zone. It is noted that large parts of the District fall within this drainage area; it will not preclude development of the Site in the early part of the Plan.

A supporting technical note has been prepared by MEC to identify the Site's current baseline conditions, and should be referred to by the Inspector.

Flood Risk Assessment required, due to risk of surface water flooding. As part of this the Sequential Approach should be applied to the layout of the site;

The Promoter and the Landowners agree to provide a site-specific Flood Risk Assessment, incorporating a site-wide sequential approach to housing delivery, as part of the forthcoming planning application. The supporting technical note prepared by MEC confirms that the Site is not constrained by flood risk and drainage matters, with the site wholly located in Flood Zone 1 and surface water drainage likely to discharge to soakaway. The technical note confirms that further investigation of surface water flood extents will be undertaken as part of a Flood Risk Assessment, however high risk areas appear to be located off site. In any event development will be avoided in high risk areas and wider surface water flooding will be managed as required.

The Indicative Site Layout as prepared identifies a broad layout to reflect site-specific surface water conditions, demonstrating the capability of the Site to deliver at least 25 dwellings in this location.

SuD's should be provided.

An appropriate Sustainable Drainage System (SuDS) will be provided as part of the forthcoming planning application. The Site's drainage regime will be assessed as part of a detailed drainage strategy which will inform the site's detailed design layout.

The detail of such will be presented as part of the forthcoming planning application, with treatment measures incorporated to protect groundwater in line with the technical note prepared by MEC.

The Promoter and the Landowners agree to provide SuDs as a criteria underpinning the implementation of this site allocation.

Soundness

4.7 Overall, it is clear that SAP16 – as it pertains to the Site – is of sound basis.

4.8 Development of the Site would be in keeping with, and at a scale proportionate to, the size and form of the existing settlement, all the while fully cognisant of the sustainable growth of Deal at nearby sites and the proposed allocation of such underscoring the sustainability credentials of Deal.

4.9 Its inclusion is considered to roundly accord with the thrust of the Vision and Strategic Objectives set out in the Plan.

4.10 Its allocation is considered to be made on the basis of a sound evidence base undertaken by the LPA, but also as reflected in the ongoing work of the Promoter in the preparation of an Outline Planning Application. Due regard has been had to the findings of the Call for Sites, Sustainability Appraisal, and other topic papers as prepared by the LPA in its pursuit of sustainable development.

4.11 The Housing Employment Land Availability Assessment (September 2022) is clear that the Site – which came forward under a targeted call for sites exercise in 2021 – is:

- well contained and screened to the wider countryside;
- would form a logical extension to the settlement area;
- has suitable access; and

- would require a footway along the northern boundary of the site connecting to adjacent existing footway to the north east

4.12 The HELAA went on to confirm the availability and achievability of the Site in the short to medium term. The Promoter agrees with this position, and that outlined above. Further LPA-led assessment under the Sustainability Appraisal confirms a range of benefits and consequences of the allocation. The Site performs well in most areas, and this higher level

assessment is agreed. It should be noted that where significant negative effects have been identified, these relate to wider scale matters of the Site's location in a groundwater protection areas and the presence of agricultural land, which impact a number of greenfield sites in the district. It should be noted that none of this land is agricultural. These matters are not considered insurmountable in the context of a planning application.

The Site otherwise scores consistently across all other matters, hence its proposed allocation for residential development. The Promoter and Landowners will deliver on the aspirations of this Site from the HELAA wording.

4.13 The findings of the LPA's 'Selection of the Site Allocations' paper are supported, which for this Site are clear that:

"The Site accords with the Local Plan growth strategy and will contribute to meeting the District's housing need over the plan period. Where key considerations are set out in the site allocations policies these will need to be addressed as part of the planning application process. There is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the Sustainability Appraisal" [page 15, Selection of the Site Allocations – Supporting Document, Dover District Council, Sep 2022]

4.14 The policy wording of SAP16 – specifically as it relates to this Site – is considered both positively prepared and justified, reflecting an appropriate level of guidance to ensure the deliverability of the Site for at least 25 dwellings.

	<p>4.15 No amendment is proposed to Policy SAP16, nor to the inclusion of 115 Station Road, Bridleway Riding School, Deal which is considered an 'oven ready' site capable of delivering an appropriate quantum of development in the earlier plan period.</p> <p>4.16 Having regard to the above, it is emphasised that the Site is available and is deliverable in the short-medium term, in line with the LPA's assessment informing this Regulation 19 Plan.</p> <p>4.17 It should be emphasised that – as a direct measure of its deliverability – the Promoter is currently undertaking the necessary technical inputs to inform the preparation of a planning application in Q2 2023.</p> <p>SITE DELIVERABILITY</p> <p>4.18 At the specific request of Dover District Council per its email of 18 November 2022, the Promoter and Landowner further wish to confirm the following information to assist in the progression of the Plan towards adoption:</p> <p>1. Current planning status It should be noted that the Promoter is currently preparing an Outline Planning Application for submission in Q2 2023, evidencing the overarching deliverability of the Site in line with the aspirations of the Plan as drafted. Technical work has been instructed to underpin the detailed inputs to a future planning application. These representations are supported at this stage by some of this early-stage technical work emphasising the deliverability of the Site. 2. Firm progress being made towards the submission of an application; As above, an Outline Planning Application is targeted for submission in Q2 2023, with work underway to support such. 3. Firm progress with site assessment work; As above, an Outline Planning Application is targeted for submission in Q2 2023, with work underway to support such.</p> <p>4. Clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects: The Promoter is engaged in an Promotion Agreement with the Landowners; both parties are engaged in the submission of these representations to the Regulation 19 consultation. The Site is held in single ownership and no third parties are required in the delivery of housing in this location. The Site is considered available, suitable and deliverable.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	SAP16 - Deal Small Housing Sites
<p>Rep ID</p>	SDLP1387
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1333152
<p>Consultee Full Name</p>	Mr P & Mrs S Laflin & Rubix Estates Ltd
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	Mr

	Reece Lemon
Agent Company / Organisation	Lee Evans Partnership
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP16 (Intro, Conclusion and Attachments)
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Representation submitted by Lee Evans On behalf of Mr and Mrs Laffin and Rubix Estates. Full Representation attached to SDLP1387. This document has been split across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment.)</p> <p>REGULATION 19 LOCAL PLAN CONSULTATION DOVER DISTRICT COUNCIL REPRESENTATIONS MADE IN RESPECT OF LAND AT 115 STATION ROAD, BRIDLEWAY RIDING SCHOOL, STATION ROAD, DEAL DOVER DISTRICT COUNCIL REFERENCE TC4S008 ON BEHALF OF RUBIX ESTATES LTD AND MR P LAFLIN AND MRS S LAFLIN</p> <p>INTRODUCTION</p> <p>1.1 Lee Evans Partnership LLP is instructed by Rubix Estates Ltd. (hereafter, the Promoter) and Mr P Laffin and Mrs S Laffin (hereafter, the Landowners) to submit representations to the Regulation 19 Submission Draft of the Dover District Local Plan 2040.</p> <p>1.2 The Plan outlines the scale and distribution of new development which is required to meet Dover District's needs to 2040. It further identifies the planning principles and policies to guide decisions on all new developments, including through a series of site allocations and detailed development management policies against which development proposals will be assessed during the plan period to 2040.</p> <p>1.3 This response offers the Promoter's view on whether the Plan satisfactorily meets the requirements relating to Legal Compliance, Soundness (and whether the Plan has been positively prepared, justified, effective and consistent with national policy), and whether it has satisfied the Duty to Cooperate.</p> <p>1.4 It makes specific reference to the Promoter's land interests at 115 Station Road, Bridleway Riding School, Station Road, Deal which benefits at this stage from a proposed allocation under emerging Policy SAP16 for development of 25 dwellings. This response advocates for the continued inclusion of Policy SAP16, and provides the Inspector with a series of technical documents to provide reassurance of the availability, suitability, and deliverability of the site for residential development including: This Representation and its contents; A Site Analysis and Design Package, prepared by Lee Evans Partnership LLP Indicative Site Layout, prepared by Lee Evans Partnership LLP Site Access Arrangement Plan, prepared by TPA Site Drainage Strategy Plan, prepared by MEC</p> <p>1.5 It should be noted that the Promoter is currently preparing an Outline Planning Application for submission in Q2 2023, evidencing the overarching deliverability of the Site in line with the aspirations of the Plan as drafted.</p> <p>1.6 The following comments are therefore set out in a positive and constructive manner intended to aid the clarity and implementation of the Plan, structured around the following sections: Section 2 of this Statement describes the representation site and its surroundings. Section 3 sets out commentary on the Plan as drafted, with reference to its Vision, Objectives, and key policies; Section 4 provides detailed commentary of SAP16 – Deal Small Housing Sites', alongside an indicative layout and initial technical assessment supporting the allocation of the Site; Section 5 summarises the case in support of the adoption of the Plan</p>

1.7 On behalf of Rubix Estates Ltd and the Landowners we strongly advocate for the continued inclusion of land at 115 Station Road, Bridleway Riding School for residential development, as prescribed under emerging Policy SAP16. Overall, these representations conclude that the Plan is legally compliant, and provides a sound evidence-based approach to planning in the District over the plan period. It finds further that the Local Planning Authority (LPA) has sufficiently met the Duty to Cooperate.

1.8 We welcome the opportunity to further assist or provide comment on the preparation of the Plan which will help shape future development in the area; and we welcome look forward to the opportunity to participate at later hearing sessions where appropriate.

SITE DESCRIPTION AND PLANNING CONTEXT

The Site comprises an existing residential property, hardstanding, stables, paddocks, riding school, and arena.

2.2 The site is well-related to adjacent, two-storey residential development, and falls adjacent to existing 'urban confines' for Deal, and these confines are proposed for expansion to include the Site. The site is situated in close proximity to existing services, facilities and employment opportunities allowing easy access by foot and bicycle.

2.3 The site is in close proximity to public transport links, connecting it with Deal town centre and other large employment centres such as Canterbury, Dover and Ramsgate. Walmer Station is 140 metres away or two minute walk which provides regular direct services to London St Pancras International, London Charing Cross, London Bridge and London Waterloo East in journey times of less than 1 hour and 20 minutes. Services from Walmer Station also directly provide people with services to Dover (13 minutes), Folkestone (24 minutes), Ashford (44 minutes), Canterbury (47 minutes) and Ebbsfleet (60 minutes).

2.4 Nearby residential development is of a mixed appearance and vernacular, rising generally two storeys in height. Topography in this part of Deal is varied, with Station Road appearing to fall within a valley when viewed from within the Site. Topography within the site rises due west, with land rising to the upper extent of the Site's demise.

2.5 Within the Site, its current configuration is largely characterised by the existing residential property with associated hard standing and parking, large barn, stable buildings and riding area. The rearmost parts of the Site are laid to pasture. Existing stable buildings fall to the Site's eastern boundary with the barns being as large as the property on site. Built development is then concentrated at present to the northern and eastern elements of the Site. The Site benefits from extensive boundary treatment, including existing trees and hedges which are established and offer year-round screening to the wider countryside.

2.7 The Site benefits from an existing access to Station Road via a private gated access with bellmouth to the highways network, providing wider connectivity thereafter.

2.8 It is noted that the Site sits within the immediate context of a number of major applications, including a consented development of up to 100 dwellings (ref. 20/01125), for which a Reserved Matters application is currently 'live' (ref. 21/01683). It is noted that a further proposed allocation at land west of Cross Road (for an estimated 140 dwellings) falls within the Site's context.

Figure 1. Site location plan (red shading), in the context of a multiple consented residential developments and existing high speed rail connections from Walmer Station.

Planning Policy Context

2.9 As above, the Site falls adjacent to existing 'urban confines' for Deal, albeit these confines are proposed for expansion to include the Site under Policy SAP16 where it benefits from a proposed allocation for residential development of a minimum of 25 dwellings.

2.10 As a settlement, Deal is considered a suitable location for development. The town is identified as the sole "District Centre" in the adopted settlement hierarchy. It is second in the hierarchy only to the town of Dover

2.11 The Site was identified through a targeted Call for Sites exercise in 2021, and positively assessed by Dover District Council as an available, suitable and deliverable site for residential development.

2.12 A proposed indicative site layout – duly informed by technical inputs and the emerging policy wording of SAP16 is appended to this response, and discussed at Section 4 of this report.

REPRESENTATIONS TO REGULATION 19 LOCAL PLAN CONSULTATION

3.1 As above the Dover District Local Plan to 2040 Regulation 19 Submission (The Plan) establishes the scale and distribution of new development which is required to meet Dover District's needs to 2040, identifying a series of site allocations and detailed development management policies against which development proposals will be assessed during the plan period.

3.2 This follows a period of extensive evidence-gathering, and previous consultation on the Regulation 18 Draft Local Plan in 2020.

3.3 Detailed commentary is provided herein on the Vision, Objectives, and Policies of the Plan. Commentary is not provided for all policies, and is instead reserved for those considered of most relevance to the Promoter's land interests at 115 Station Road, Bridleway Riding School, Deal.

3.4 Commentary is therefore primarily focused on SAP16 – Deal Small Housing Sites as outlined at Section 4 of this document.

However, supplementary commentary is provided elsewhere, namely on emerging policies as follows:

SP3 – Housing Growth

	<p>SP5 – Affordable Housing CC8 – Tree Planting and Protection PM1 - Achieving High Quality Design, Place Making and the provision of Design Codes PM2 – Quality of Residential Development H1 – Type and Mix of Housing TI1 – Sustainable Travel and Infrastructure TI3 – Parking on New Developments</p> <p>3.6 Commentary is provided using the references above and, where relevant, the paragraph numbers as used in the Regulation 19 Draft. 3.7 Due regard has been had to the wider evidence, and where necessary cross-reference has been made to the LPA's evidence as available as part of this consultation process.</p> <p>Conclusion</p> <p>5.1 On behalf of Rubix Estates Ltd. we strongly advocate for the continued inclusion of 115 Station Road, Bridleway Riding School, Station Road, Deal for residential development, as prescribed under emerging Policy SAP16. 5.2 Overall, these representations conclude that the Plan is legally compliant, and provides a sound evidence-based approach to planning in the District over the plan period. It finds further that the LPA has sufficiently met the Duty to Cooperate. 5.3 Specific to the Promoter's interests at 115 Station Road, Bridleway Riding School, Deal the allocation of the Site under SAP16 is considered a sound basis for the delivery of housing in this location, noting that: The Site is well-related to the existing settlement – and committed development- and is contained within the landscape and important trees and landscape features will be retained and, enhanced; The local highway network has capacity to accommodate the additional traffic associated with the development, without adverse impact and in fact provide a betterment to the existing conditions and toto be explored in greater detail in the context of a planning application as currently being prepared; The Sites falls within the EA Flood Risk Zone 1 (i.e. land assessed as having a less than 1 in 1,000 annual probability, or <0.1% chance of flooding); There are no designated heritage assets within or immediately adjacent to the site, and the development is not considered to affect the setting of any Listed Buildings. 5.4 We welcome the opportunity to further assist or provide comment on the preparation of the Plan which will help shape future development in the area; and we welcome look forward to the opportunity to participate at later hearing sessions where appropriate.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>Lemon Lee Evans (Bridalway Riding School) 1410 Att1.pdf Lemon Lee Evans (Bridalway Riding School) 1410 Att2.pdf Lemon Lee Evans (Bridalway Riding School) 1410 Att3.pdf Lemon Lee Evans (Bridalway Riding School) 1410 Att4.pdf</p>

	Lemon Lee Evans (Bridalway Riding School) 1410 Att5.pdf
Local Plan Consultation Point	SAP16 - Deal Small Housing Sites
Rep ID	SDLP1506
Rep Status	Processed
Consultee ID	1333275
Consultee Full Name	Adam Harwood
Consultee Company / Organisation	Environment Agency
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP16
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We have reviewed the new sites for housing allocation included in the Reg 19 Submission Summary of Site Allocations and would draw your attention to 3 of these sites that lie within FZ3: Northwall Road & Ethelbert Road, Deal Stonar Close, Sandwich</p> <p>These site lie within Flood Zone 3a; this is an area considered to be at 'high risk' from flooding in the absence of tidal defences. Whilst we appreciate that both Sandwich and Deal are well defended from tidal flooding, there is always a 'residual' risk from inundation in such areas. Accordingly, we would request that your Authority initially considers whether these sites suitably address the requirements of the flood risk Sequential Test before allocating them in the local plan.</p> <p>The updated PPG to the NPPF places more emphasis on residual risk; therefore when considering these allocations it should be understood that in order for development to be made safe, it is likely that the ground floor would not be suitable for any form of living accommodation. Detailed design would be subject to a site-specific FRA but given the potential depths of flooding in the event of failure or breach of defences, development is unlikely to meet the requirements of Policy CC5 or the Exception Test, unless all living and sleeping accommodation is set at first floor or above. If this is would be unacceptable to the LPA, then these sites should not be allocated.</p> <p><i>(DDC note - This is an extract from the full Environment Agency representation SDLP1458)</i></p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP16 - Deal Small Housing Sites
Rep ID	SDLP1568
Rep Status	Processed
Consultee ID	1333352
Consultee Full Name	Kentish Projects
Consultee Company / Organisation	
Agent Full Name	Grace Martin
Agent Company / Organisation	Hume Planning Consultancy Ltd
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Omission site for SAP16
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Representation submitted by Hume Planning. Full Representation attached to SDLP1568. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1568.)</p> <p>Dover Local Plan Regulation 19 Consultation: Land off West Lea, Deal We write to you on behalf of our client, Kentish Projects in relation to the Dover District Council Regulation 19 consultation on its Local Plan Our client controls the site off West Lea, Deal. The extent of the site is shown on the enclosed plan. This area of Deal is predominantly residential in character. The site itself is brownfield and a ground works company known as Crushingtons has operated from the site for a number of years. There is a significant bund of sorted hardcore on site as well as a number of buildings</p>

and the use of the site gives rise to noise and heavy goods vehicle movements along Northwall Road that has been the cause of residential complaints. The site therefore represents a nonconforming use within a residential area and is a visual detractor on the character of the surrounding area, which could be enhanced through an allocation for residential development. It was not included as a separate site within the Call for Sites. Accordingly, it hasn't been included as an allocation within the Pre-Submission version of the Local Plan unlike the SAP16 site nearby referenced below.

The site is available, and for the reasons set out below we consider it is a suitable and available site to help deliver housing to North Deal and should be included as an additional site under Policy SAP 16- 'Deal Small Housing Sites'. Deal is one of the largest settlements in the district, sitting only below Dover/Whitfield in the settlement hierarchy.

Site Description

The site comprises a roughly rectangular shaped parcel of land of. It is bound by residential properties on West Lea to the southeast, the railway line to the south west, and open grassland on all remaining sides. It is noted that land to the southeast is allocated for 8 units under Policy SAP 16 (104 Northwall Road, Deal).

The site is currently operated intensively by a ground works contractor known as Crashingtons. It shares similar characteristics to the SAP 16 site that was allocated with respect to local landscape character area designation and siting within Flood Zone 3. For this reason, it is asserted that the conclusions relating to SAP16 which have resulted in its allocation equally apply to the current omission site and in fact more so given the level of activity, clear brownfield status and untidy appearance of the site.

Suitability of the Site

The site is a sustainable, brownfield, site. It is well related to the existing residential properties of North Deal, which is a second-tier settlement in the district providing a large range of facilities and services commensurate with its role in the settlement hierarchy.

Access can be provided from Northwall Road, and on the basis that 104 Northwall Road immediately adjoining the site has been allocated it would be sensible for this site to form an extension of that allocation and be allocated for residential which would secure an enhancement for both the character of the area and the residential amenity of residential properties nearby. It is concluded that the cessation of commercial activity and residential allocation of the site would provide for a more suitable land use in this established residential area, and a more friendly neighbour use.

With regard to flood risk, we note the site is located within Flood Zone 3; this is the case for a large swathe of the settlement in this location. The methodology applied to the HEELA confirms that sites for residential development are only considered when in flood Zone 3 if they are highly sustainable. For the reasons set out above, this site, which is located immediately adjacent to the settlement confines of a second-tier settlement. 104 Northwall Road (SAP 16) is also located in Flood Zone 3 and was considered acceptable in the HEELA because it was concluded that flood risk can be appropriately mitigated. It is our view that the same principles apply here and it would be inconsistent where this same conclusion not to be drawn for this site especially given the identified enhancements housing redevelopment could deliver.

Availability of the Site

We confirm on behalf of our client, Kentish Projects, that the site is available and can be brought forward for residential development over the plan period.

SP3: Housing Growth

Whilst we welcome DDC's commitment to meeting its housing need, with Strategic Policy SP3 committing to providing at least 10,998 net additional homes over the Plan period, it is considered additional sites if suitable and available should be included within the Plan. A large proportion of growth is being directed towards the expansion of Dover/Whitfield (over 2,000), and with large strategic sites delivery rates can easily slow down during the plan period and

	<p>under-deliver. Whilst there is a buffer within the Plan, it is considered appropriate not use this as a limit, and allocate other suitable sites in sustainable locations where available.</p> <p>In this respect, it is noted that Deal sits towards at the top of the settlement hierarchy, as the district's only District Centre. Only Dover/ Whitfield sit above Deal. Deal is also an area that has attracted strong market demand which is a relevant factor to the delivery of the district's housing requirement. The emerging Plan due to the perceived constraints in Deal, only allocates 223 units in this settlement compared to over 600 in Aylesham which is a settlement located lower down the settlement hierarchy and the provision of a greater number of small sites such as this will inbuild choice and assist with the planned delivery trajectory.</p> <p>As detailed above, land off West Lea, is considered suitable for residential development. It is also available and can be delivered within the short to medium term, and in our view this site should be allocated within the Plan.</p> <p>Concluding Remarks</p> <p>Hume Planning Consultancy welcomes the opportunity to comment on this stage of the Council's Pre-Submission Local Plan and would like to reserve the right to attend the Examination in Public in due course to discuss potential development sites in Deal.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	Martin Hume Planning (Kentish Projects) Att1.pdf Martin Hume Planning (Kentish Projects) Att2_Redacted.pdf
Local Plan Consultation Point	SAP16 - Deal Small Housing Sites
Rep ID	SDLP1593
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	

Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP16
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438. SAP 14 – 16 Deal (SAP 15 cross referenced to SAP 34/35 Kingsdown) Developments at SAP 14 and 15 Walmer and Sholden will impact on surface water management and flood risk in North Deal, and Walmer.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

Sandwich

Local Plan Consultation Point	Sandwich
Rep ID	SDLP763
Rep Status	Processed
Consultee ID	1331585
Consultee Full Name	Terence Hopper
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Sandwich
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	CC5 5.33 DDC seems to have forgotten the NPPF guidance when choosing sites for Sandwich. One could be forgiven for concluding that Sites SAN010 and SAN019, which are outside of the flood Zones, have been purposely removed from the plan in order to allow the development of the sites closer to the town, without them being subjected to sequential flood risk assessments.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Reconsider sites SAN010 and SAN019. taking cognisance of the new information available through the successful planning application on part of SAN010
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	

Include files	
Local Plan Consultation Point	Sandwich
Rep ID	SDLP493
Rep Status	Processed
Consultee ID	1330328
Consultee Full Name	Sunnyside Nurseries Barry Mottershead
Consultee Company / Organisation	J.Scott, Finn's
Agent Full Name	Jane Scott
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Paragraph 4.170 and Table 4.3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The Council have failed to consider these new sites put forward in the 2021 Call for Sites
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>Finn's, on behalf of Mr Barry Mottershead, submitted two sites to Dover District Council in response to the additional Call for Sites 2021 event. One site proposed 20 market houses whilst the other provided 30 Self Build housing plots. These two areas of land fell within a larger area the Council had previously labelled SAN016 during their initial Call for Sites and therefore the Council decided not to reconsider these sites submitted in 2021. We object to the lack of allocation of these sites without due consideration to the sites submitted within the 2021 Call for Sites process. Whilst the larger site area in the original Call for Sites was found by the Council to be potentially suitable, available and achievable, the Council noted concerns over access, landscape and that part of the land was within the breach area. They noted the site would be well-connected to local amenities.</p> <p>The smaller areas of land submitted in the 2021 Call for Sites (Council references your references TC4S062 and 063) do not have the same issues affecting them as the larger site area SAN016 was disregarded for. They comprise two distinct parcels of land that benefit from defined well landscaped boundaries, site access is in the Clients control. Neither the land nor access are within an area of concern for flooding, all matters used to disregard the larger SAN016 parcel. If a separate assessment of the two sites we submitted had been carried out as expected, these differences could have been picked up and the sites assessed as suitable for development. Additionally, one of the sites was submitted as meeting the 1 hectare requirement for which the Plan must provide 10% of sites for allocation, again subject of different criteria than the larger SAN016 site.</p> <p>Table 3.3 identifies Sandwich as a Rural Service Centre. Paragraph 3.45 states that 'it has been a challenge to identify suitable and available sites in Deal and Sandwich', yet these sites have been dismissed without due consideration as part of the Local Plan process. Paragraph 4.170 states that limited sites have been identified in Sandwich due to constraints, however these sites offer 50 units between them, are on land in a</p>

	<p>single ownership, well screened and landscaped from the wider countryside, lie adjacent to the existing built area of Sandwich and close to a good range of amenities with good site access and have been entirely disregarded without consideration by the Council.</p> <p>The land is well located to the existing built area of Sandwich, with long established high boundary screening resulting in defined site boundaries and it is situated within easy walking distance of the station, primary and secondary schools and shops and other services and is a very logical location for new housing in Sandwich. We consider that in dismissing it under SAN016, the sites have not been appropriately considered as part of the Call for Sites process.</p> <p>A Technical Note by Stantec, accompanying this Representation has considered the access to the site and found suitable access can be provided and is very achievable along with secondary emergency/cycle/pedestrian access through Sunnyside Gardens (over which our client has an existing legal right of access).</p> <p>A Technical Note by Herrington Consulting Limited (copy attached), confirms the site can be delivered in compliance with the requirements set out within the NPPF in terms of flood risk.</p> <p>In terms of delivery, it is noted that the Plan's trajectory for the 7 sites proposed to be allocated within Sandwich, does not expect any delivery to commence until Year 4 after Adoption of the Plan, with 1 commencing delivery in Year 6, one site in Year 7, one site in Year 8, two sites in Year 9 and one site not until year 13. These sites are available to be delivered within the first 5 years of the Plan and will avoid a delay in delivery of housing in Sandwich. These sites should be allocated for housing within the Local Plan.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	These sites were not considered by the Council after being submitted in the Council's 2021 Call for Sites. This omission, based on the fact the Council had previously considered a larger site area that was previously submitted and dismissed as suitable for a number of reasons, resulted in the Council failing to review the new smaller sites which could meet the requirements for allocation in this Plan. The Council have highlighted the fact they have found it difficult to find sites in Sandwich yet here are two suitable and available sites that have not been assessed even though submitted in the Call for Sites process.
Include files	Herrington FINAL Technical Note_Land at Woodnesborough Road, Sandwich_[Dec22].pdf FINAL_332410924_Woodnesborough Road_Feasibility Assessment_TN01 (221205).pdf
Local Plan Consultation Point	Sandwich
Rep ID	SDLP580
Rep Status	Processed
Consultee ID	1331585
Consultee Full Name	Terence Hopper
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Sandwich
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy

4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>A document cannot be considered sound, safe, or legally compliant if it contains information that is incorrect or false. This is particularly so if the incorrect or false information leads to changes to the policies, procedures, and outcomes detailed in the document.</p> <p>A document of this nature should be compiled objectively and dispassionately. This is clearly not the case with this document. It contains many minor omissions or additions which seem small in nature when viewed individually but collectively result in significant changes to the overall conclusion and result. It contains language that is clearly designed to sway opinion and influence a decision one way or another. But more importantly, it contains information that is clearly inaccurate.</p> <p>I can only speak to the sample of sites that I have examined in Sandwich, but in that small sample I have identified statements made within the document and indeed proceeding documents, that have caused fundamental changes to the allocations there, and in doing so have caused a knock-on effect in allocations in other parts of the district.</p> <p>It is likely that some of these mistakes are down to bureaucratic failings but this cannot be the case in all circumstances.</p> <p>If this is the case with Sandwich sites, it clearly must be true of other sites in the district.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>It is very hard to make the document legally compliant at this stage given that due to inaccurate statements, two of the sites SAN010 and SAN019 have been removed or partially removed from the local plan. It is particularly disappointing to see these sites removed when much of the evidence to refute the reasons for rejection is already in the hands of DDC, DDC was asked to revisit these two sites by Sandwich Town Council at the regulation 18 stage, and at that time DDC had the relevant information, via a successful planning application on part of SAN010 to show that the main reasons for rejecting these two sites were no longer valid. SAN010 planning reference 21/01309</p> <p>Statements related to Site SAP21 are, it would appear, also untrue. The Head Teacher at the school has informed local councilors that she had not been consulted on the expansion of the school. The manner in which the allocation was changed between the Regulation 18 and Regulation 19 stages, without consultation with the majority of the stakeholders being consulted or made aware is questionable, to say the least.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I wish to speak with the inspector to give oral evidence regarding the exclusion of site SAN010 and allow them to ask questions of me that might help them in the deliberations on this site
Include files	
Local Plan Consultation Point	Sandwich
Rep ID	SDLP753
Rep Status	Processed
Consultee ID	1331585
Consultee Full Name	Terence Hopper
Consultee Company / Organisation	
Agent Full Name	Terence Hopper

Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SANDWICH
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>It would appear that the statements at 4.165 and 4.170 are incompatible.</p> <p>How can Sandwich have the biggest employment site within walking distance of the town centre and yet development in Sandwich should be compatible with the more limited range of job opportunities, shops, services, and other facilities available?</p> <p>It's almost as if DDC is doing its level best to prevent Sandwich from benefitting from Discovery Park, by limiting housing development in and around the town.</p> <p>Under the proposed plan for Sandwich, Dover District Council (DDC) appears not to be meeting its obligations as defined by local and national planning policies and also its own Strategic Rural Service Centres should be the main focus for development in the rural area.</p> <p>The proposed plan for Sandwich lacks adequate housing provision to enable the town to maintain and develop its position in the settlement hierarchy.</p> <p>The policy states:- the distribution of housing growth will therefore primarily be based on settlement hierarchy and influenced by site availability, environmental constraints and factors of delivery;. Growth should be proportionate to access to services, facilities and job opportunities, reducing the need to travel by car.</p> <p>The District plan relies heavily on developments within the outlying villages that Sandwich serves both as a Rural Service Centre and as an educational hub. In doing so, its actions are contrary to the National Planning Policy Framework (NPPF) and DDC policy DM 29</p> <p>The currently proposed development areas in Sandwich represent a piecemeal approach to town planning. They appear to be born from a misapplication of the sequential planning process and therefore present (continuously revisit) options that are less than ideal and that will have a detrimental impact on local residents and the environment within the town of Sandwich. This plan for Sandwich has the appearance of a box-ticking exercise on the part of DDC and the unfortunate residents of Sandwich will be left to deal with the consequences.</p> <p>The sites in close proximity to the town centre were rejected in the previous HELAA process and subsequent appeals process. There have been no significant changes that would alter the previous reasons for rejecting these sites. The reasons for rejection remain the same.</p> <p>The plan in its current form relies heavily on unsuitable plots that are either in close proximity to a monument (town walls) or are low-lying, suffer from poor drainage and are covered in standing water in the winter months (SAP20/SAN008, SAN023). Development of these two sites, in particular, would appear to go against policy DM6 and policy DM29</p> <p>The majority of the proposed sites impact heavily on the restricted road network within the town.</p> <p>Their development will increase the traffic load on specific, dangerous junctions and seriously reducing parking available to local residents. Contrary to policy DM29</p> <p>DDC states; A number of key considerations have been identified in relation to the proposed site allocations in Sandwich and these will need to be addressed by the relevant land owners as part of</p>

the planning process. Furthermore, there is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA on the sites here. However, It is likely that the mitigation will simply amount to the installation of permanent parking restrictions along the access routes as has been the case with SAN015 DDC appear not to have used the information gleaned from the previous HELAA (2010) process and as a consequence, some of the viewpoints are in complete contradiction to those previously stated.

The plan ignores the potential to develop SAN010 and SAN019, thus failing to ensure sufficient sustainable, housing provision for the future growth and success of the town of Sandwich and its residents.

The development of SAN010 and SAN019 may also encourage part of the adjacent fields to come forward at a later date, thus providing a continuous land supply for the future and ensuring that Sandwich maintains and develops its role within the district as a Rural Service Centre. Development of SAN019 SAN010 would also help reduce the continued pressure to develop unsuitable, detrimental sites within the confines of the town.

The reasons DDC have given for the exclusion of SAN010 and the majority of SAN019 are poorly evidenced, lacking in merit and often contrary to the opinions stated during the previous HELAA process. and at times contrary to the evidence available to DDC. Particularly that evidence which has become available for a successful planning application for housing on a portion of SAN010. DDC appear to have purposely overlooked the potential for SAN019 to open up access to future sites and instead presumed upon the future development of SAN024 when that land is unavailable and likely to remain so. In doing so DDC has restricted future housing provision and prejudiced the role of Sandwich as a Rural Service Centre within the district.

DDC appear to have misapplied the sequential planning process by considering sites that are closer to the town centre but not suitable and by rejecting the development of sites beyond those that are most desirable, but not available (SAN024).

DDC has tied in the development of SAN010 to SAN024 on the erroneous assumption that the future development of SAN024 cannot be facilitated without SAN010.

DDC has also sought to remove land previously allocated for the development of community, sports and leisure use and to change the allocation to an expansion of the adjacent school in order to accommodate children from areas of high housing growth. The residents of Sandwich should not have to lose this amenity in order to accommodate a need that occurs elsewhere

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Consider expanding housing provision on land to the S.W. of the town, which is outside areas of flood risk, thus allowing the town's shops and businesses to benefit from the extra footfall created by such developments. Sites SAN010 and SAN019

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Local Plan Consultation Point	Sandwich
Rep ID	SDLP1004
Rep Status	Processed
Consultee ID	1331831
Consultee Full Name	Catesby Estates
Consultee Company / Organisation	Catesby Estates
Agent Full Name	Lucy Wilford
Agent Company / Organisation	DHA Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Site Allocations - SAP21 : Land adjacent to Sandwich Technology School, Deal Road and supporting paras 4.188-4.191 and accompanying proposals map
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Refer to supporting statement attached Text below (copied from attached statement) added by DDC <i>Alternative Options to Deliver the School Expansion</i> <i>3.5.8 Allied to the above, flexibility is also sought with regards to where the school extension land could be located, to optimise options for the school. For example, from discussions with the local land Agent, Catesby Estates is aware that the land to the south-east of the Site, could potentially be available. This land is visually contained by woodland and residential development. Residential development also continues to the west until it meets the playing fields of the school.</i> <i>3.5.9 As already mentioned, the school site is already constrained where it meets the Site boundary (SAP21) to the east because of the current building arrangements. Allowing the potential for the school to extend further to the south-west, could provide greater flexibility for the school expansion. For example, facilitating building on the associated sports pitches, which could then move further southwest.</i> <i>3.5.10 Greater flexibility should therefore be introduced to the policy to allow for alternative options for delivering the school extension, which could improve deliverability as well as potentially delivering better design outcomes for the school.</i>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	Refer to supporting statement attached

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	In order to ensure that our case is properly put forward and understood, and to provide the opportunity to respond to any questions/points raised by the Council and Local Plan Inspector which might result outside the written representations made and following discussion at the EIP.
Include files	Catesby Final Dover District Council Reps .pdf (1)
Local Plan Consultation Point	Sandwich
Rep ID	SDLP543
Rep Status	Processed
Consultee ID	1331766
Consultee Full Name	Mr A Binskin
Consultee Company / Organisation	J.Scott, Finn's
Agent Full Name	Jane Scott
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Paragraphs 3.45 and 4.170 and Table 4.4
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The Plan has not adequately considered all available sites within Sandwich
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance	This representation is submitted by Finn's on behalf of Mr A Binskin with regard to site reference SAN031. Paragraph 4.170 states that limited sites have been identified in Sandwich due to constraints, however this site on the edge of Sandwich lies close to the Secondary School and all services and facilities within Sandwich. Paragraph 3.45 states that 'it has been a challenge to identify suitable and available sites in Deal and Sandwich', yet this larger site has been dismissed with limited consideration as to its benefits.

<p>with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The site is in mixed use, with the majority of the site last used as a wildlife park and with 4 existing residential units on site. Much of the site is considered 'brownfield'. The site benefits from existing established access onto the A256 Dover Road at the Junction with Deal Road and currently the site benefits from 57 marked out parking spaces.</p> <p>A draft site layout has shown 45 units as an indicative layout with an area of retained open space provision, however it is considered that the site is capable of accommodating 50 well designed units with suitable gardens, parking and open space provision.</p> <p>Direct access from Dover Road via foot or cycle allows easy access into Sandwich core. Pavements can be provided to both sides of Dover Road to the west of the site's entrance and improvement to the existing traffic island to provide a safe crossing point and additional work would be undertaken on this matter.</p> <p>This site offers the provision of some 50 units, on land in a single ownership with existing commercial access, well screened and landscaped and lying at the edge of Sandwich, close to a good range of amenities.</p> <p>In terms of delivery of the area proposed to be allocated under SAN031, this site is available and in single ownership and would be delivered within the first 5 years of the Plan.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>To fully explain the benefits of this site</p>
<p>Include files</p>	<p>21.170 SK01 Sketch Site Plan.pdf 21.170 - Sandwich Wildlife Park - Pre-application Document.pdf</p>
<p>Local Plan Consultation Point</p>	<p>Sandwich</p>
<p>Rep ID</p>	<p>SDLP975</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331790</p>
<p>Consultee Full Name</p>	<p>Julie Davies</p>
<p>Consultee Company / Organisation</p>	<p>CPRE Kent</p>
<p>Agent Full Name</p>	<p></p>
<p>Agent Company / Organisation</p>	<p></p>
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP18</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified Effective Consistent with National Policy</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Not Applicable</p>

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We object to the allocation of the site:</p> <ul style="list-style-type: none"> • The NPPF 155 states that 'Inappropriate development in areas at risk of flooding should be avoided ...'. The site is in flood zones 2 and 3. The site is subject to flooding and would therefore pose a considerable risk. A key consideration set out in the policy is that a sequential test and flood risk assessment is required. This should be undertaken before taking the decision to allocate the site. • The site is given orange status and the overall landscape summary in HELAA Appendix 3A and the overall landscape summary is: The development of this site would have an impact on the landscape and further assessment is required to demonstrate whether this can be mitigated. • HELAA Appendix 3B gives the site orange status as 'Highways concerns have been identified in relation to access and/or highway impact and further assessment is required to demonstrate whether this can be mitigated.' • Concerned that the scale of development proposed for Sandwich will have a detrimental impact on the Historic town with its narrow roads. • There is insufficient infrastructure to support the scale of development proposed for Sandwich.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	CPRE Kent would wish to participate at the examination hearings to explore these issues further.
Include files	
Local Plan Consultation Point	Sandwich
Rep ID	SDLP990
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All sites in Sandwich
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The County Council welcome the inclusion of policy SAP21 to safeguard land adjacent to Sandwich Technology School. It should also be noted by the District Council that land may be required for primary school expansion in Sandwich. The issue of PROW ES3 link to / Sandwich bridge due to river erosion should be acknowledged by the District Council as there is danger that access to coast, England Coast Path, and a direct link out of Sandwich will be lost. (DDC note - these are extracts of full KCC rep)
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Add that land may be required for primary school expansion in Sandwich. The issue of PROW ES3 link to / Sandwich bridge due to river erosion should be acknowledged by the District Council as there is danger that access to coast, England Coast Path, and a direct link out of Sandwich will be lost.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Sandwich
Rep ID	SDLP1502
Rep Status	Processed
Consultee ID	1271202
Consultee Full Name	Easton Builders
Consultee Company / Organisation	
Agent Full Name	Grace Martin

Agent Company / Organisation	Hume Planning Consultancy Ltd
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Sandwich (Omisson Site) SAN014
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Representation submitted by Hume Planning. Full Representation attached to SDLP1502. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1502.)</p> <p>Dover Regulation 19 Consultation: Whitefriars, Sandwich: HEELA Ref. SAN014 We write to you on behalf of our client, Easton Builders Ltd, in relation to the Dover District Council Regulation 19 consultation on its Local Plan. Our client owns the site at Whitefriars in Sandwich town centre, HEELA site ref. 014. The extent of the site is shown on the plan below and at Appendix 3:</p> <p>This site is not included as an allocation within the Pre-Submission version of the Local Plan. We are writing to object to its omission. For the reasons set out below we consider it is a suitable and available site to help deliver housing to Sandwich, one of two rural service centres in the district.</p> <p>Site Description The site comprises a roughly triangular shaped, grass and scrub parcel of land of approximately 0.29 hectares. The topography is generally flat, with slightly sloping terrain along the southern boundary. The site is fenced and not open to public use and represents an underutilised are currently overgrown parcel of land directly adjoining the central marketplace car park of Sandwich where there has been recent expansion of the surgery.</p> <p>The site is bounded by two footpaths, The Ropewalk to the south and Fellowship Walk to the west of the Site. Whilst there are trees and landscaping to the north and north easterly boundaries, the rear elevations of 1980's housing fronting Whitefriars Meadow provides a sense of enclosure, separates the site from the surrounding development and limits views into the site. This view from the south could be improved with the siting of high-quality built form on part of the site and the landscaping of public open space that could be created over a significant proportion of the site as outlined in the currently undetermined application before Dover DC (LPA Ref DOV/21/1604). It is relevant that from the consultation response of Historic England to this application that it is accepted that such a proposal could deliver a heritage benefit (please refer to Appendix 2). To the south the site is bounded by tall, evenly spaced trees along The Ropewalk many of which are elevated in relation to the site. A wooden fence sits at the northern boundary, separating the Site with the gardens of houses along Whitefriars Meadow. The site adjoins the largest public car park in Sandwich and is one of the closest land development opportunities to central Sandwich and therefore offers the opportunity for a car free development including specialist age related housing.</p> <p>It is recognised that there are a number of heritage designations which affect the site. The site is located within Sandwich Walled Town Conservation Area and a small section of the listed Town Wall is located along the south-eastern boundary of the site (Boundary walling midway along the rope walk between Woodnesborough Road and New Street, Rope Walk (Grade II). The New Gate to Woodnesborough Gate Town Wall (Scheduled Monument) runs to the south of the site. In addition, there are a large number of designated heritage assets along Moat Sole, New Street and The Chain and the surrounding area.</p> <p>Historically, the site formed the south-western part of the Priory of White Friars. There are no extant remains of the priory. It is noteworthy that Historic England acknowledge the potential for the sensitive development of the site to deliver heritage benefits.</p> <p>Suitability of the Site</p>

The site is a highly sustainable site. is located within the settlement confines of Sandwich, and is located on the edge of Sandwich town centre as defined by the NPPF (i.e. within 300 metres of the primary shopping area). Sandwich railway station, providing regular services to London and Dover, Ramsgate and Canterbury is within 500 metres from the site.

We note the HEELA assesses the suitability of this site for 9 residential units and concludes that the site is not suitable for allocation. Reasons for this include heritage impacts (although this directly conflicts with the statutory consultee comments of Historic England attached at Appendix 1), flood risk issues, landscape impact and access. We deal with each in turn. Heritage considerations

First, referring to heritage impacts. It is recognised that there are heritage considerations in terms of redeveloping the site and these would need to be considered carefully. However, it is not considered that this precludes the site from being suitable for residential development. Our client has considered this matter carefully, and has appointed Icen Heritage to prepare a Heritage and Visual Impact Assessment (October 2021) which looks at the potential impact on the heritage assets through the redevelopment of an indicative scheme providing ten apartments (Please refer to Appendix 2). The assessment concludes that the overall effect of the proposed development is considered to make a positive contribution to the local character; in part due to the fact that the existing site detracts from the character of the conservation area. The assessed scheme promotes high quality design and sustainable development at this location, finding the optimal viable use for the site and in heritage terms should be considered appropriate. The proposed development is judged to comply with the policies set out in the NPPF and as, the development is considered wholly acceptable in heritage terms. In fact, it would help deliver the council's objectives for Sandwich, which is to, amongst other things, conserve and enhance the town's rich historic environment (LP Para. 4.169).

The consultation response of Historic England at Appendix 2 confirms it is happy with the conclusions of the assessment, and that subject to a well-designed scheme, the redevelopment of this site could make a positive contribution to the local area.

Accordingly, we think it is incorrect to not include the site on heritage grounds.

Flood Risk

With regard to flood risk, we note the site is located within Flood Zone 3; this is the case for a large swathe of the settlement in this location. The methodology applied to the HEELA confirms that sites for residential development are only considered acceptable for development when in flood Zone 3 if they are highly sustainable. For the reasons set out above, this site, which is located in the centre of the settlement confines and within easy walking distance from the town centre and railway station, is one of the most sustainable land use opportunities that is readily available and can deliver heritage benefits, a conclusion that has been independently accepted by Historic England. It does not appear consistent therefore that this site has been ruled out from the HEELA process on flood risk grounds. Two sites within Sandwich are currently allocated within the Plan (SAP 18 and SAP 20) and are both located within Flood Zone 3 and these are not considered more sustainable than this site. It is considered a site allocation policy can be appropriately worded to ensure the development is acceptable in flood risk terms.

Access

We confirm that access can be provided into the site from Whitefriars Meadow. Our client owns sufficient land to facilitate and deliver this, although given the central location and the sites sustainable credentials it is also considered a car free development is appropriate.

SP3: Housing Growth

(DDC Note: Please note this section has been DUPLICATED against SP3)

Whilst we welcome DDC's commitment to meeting its housing need, with Strategic Policy SP3 committing to providing at least 10,998 net additional homes over the Plan period, it is considered additional sites if suitable and available should be included within the Plan. A large proportion of growth is being directed towards the new settlement at Whitfield (over 2,000), and with large strategic sites delivery rates can easily slow down during the plan period and under-deliver. Whilst there is a buffer within the Plan, it is considered appropriate not use this as a limit, and allocate other suitable sites in sustainable locations where available.

In this respect, it is noted that Sandwich sits towards the top of the settlement hierarchy, alongside Aylesham, as a rural service centre. Only Deal, Dover/ Whitfield sit above. Yet, due to the constraints in Sandwich, only 227 units are being allocated in this settlement compared to over 600 in Aylesham.

As detailed above, land at Whitefriars, HEELA site SAN014 is considered suitable for residential development. It is also available and can be delivered within the short to medium term, and in our view this site should be allocated within the Plan.

Concluding Remarks

Hume Planning Consultancy welcomes the opportunity to comment on this stage of the Council's Pre-Submission Local Plan and would like to reserve the right to attend the Examination in Public in due course to discuss potential development sites in Sandwich.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness

<p>matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p> Martin Hume Planning (Easton Builders) 1526 Att1_Redacted.pdf Martin Hume Planning (Easton Builders) 1526 Att2_Redacted.pdf Martin Hume Planning (Easton Builders) 1526 Att3_Redacted.pdf Martin Hume Planning (Easton Builders) 1526 Att4.pdf </p>

SAP17 - Land south of Stonar Lake and to north and east of Stonar Gardens, Sandwich (SAN004)

Local Plan Consultation Point	SAP17 - Land south of Stonar Lake and to north and east of Stonar Gardens, Sandwich (SAN004)
Rep ID	SDLP755
Rep Status	Processed
Consultee ID	1331585
Consultee Full Name	Terence Hopper
Consultee Company / Organisation	
Agent Full Name	Terence Hopper
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP17 Land South of Stonar Lake (SAN004)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>This site SAP 17 - Land south of Stonar Lake and to north and east of Stonar Gardens, Stonar Road, Sandwich (SAN004)</p> <p>This is a new application on land that is currently designated employment land. DDC has already highlighted the lack of employment opportunities within the town (Pg141. 4.170) and a housing development on this site will serve to further erode those employment opportunities. Development of this site would appear to go against The National Planning Policy Framework (NPPF) and DDC policies DM6 and DM29</p> <p>The NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at the highest risk (whether existing or future).</p> <p>Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. Given this, there is a need to reduce the risk from coastal change by avoiding inappropriate development in vulnerable areas.</p> <p>This site should be retained and developed for employment use. The desire to tidy up a site; (Pg 143 4.176), should not be used as an excuse to convert a site to housing use. If designed correctly, a new development for employment purposes could achieve that aim just as easily.</p> <p>Employment use would be much less susceptible to flood damage.</p> <p>The statement at 4.174. appears to be deliberately misleading. The majority of the site cannot be in flood zone 2 if half is in flood zone 3.</p>

	<p>These extracts from the SFRA are particularly relevant to this site. Strategic flood risk assesment 1.5.5. Impacts of Climate Change on the District</p> <p>The Environment Agency Flood Zone maps are based on current-day sea levels and climate conditions. However, these maps do not take into consideration the impact of climate change. The majority of the district to the south is located on higher ground and therefore, for the coastal areas the impact of climate change will be comparatively small. However, in the northeast of the district, the impact will be more pronounced due to the relatively flat topography of the low-lying land.</p> <p>Furthermore, the River Stour is tidally influenced throughout the entire district and thus, an increase in sea level would also result in a larger area further inland being at risk of flooding.</p> <p>Policy SP1j would seem to suggest that if land outside of areas at risk of flooding is available, then that land should be developed in preference (sequentially) to land risk from flooding, and only when risk free land is unavailable, should land at risk from flooding be developed.</p> <p>Given that this site falls entirely within flood zones 2 and 3 and it is very close to areas of previous flooding (2013) and close to the River Stour, which the SFA has identified as a major risk to flooding it would appear likely that unless the local authority has very strong evidence to support the exclusion of SAN019 together with SAN 010 it would appear the site will fail the sequential test for flood risk</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Exclude this site from housing development. Retain its use for employment which is much less susceptible to flood risk.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP17 - Land south of Stonar Lake and to north and east of Stonar Gardens, Sandwich (SAN004)</p>
<p>Rep ID</p>	<p>SDLP911</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331776</p>
<p>Consultee Full Name</p>	<p>Mrs Heather Green</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	

Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24, SAP25, SAP26, SAP27, SAP17, SAP18
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Road infrastructure will not sustain the extra housing in the area. B2046 already had a fatality in 2022, and several big accidents where it is joined by Spinney Lane, Dorman Avenue North, and the Industrial Estate. B2046 regularly closed at Wingham end causing tailbacks with queues of traffic polluting the atmosphere. Diversions through country lanes happen several times a year and cause damage to local flora and fauna on the one track country lanes leading to local towns.</p> <p>B2046 already being used by heavier lorries which are causing crumbling to the verges.</p> <p>There is no secondary school in the area so children have to travel to Dover, Sandwich and Canterbury. Bus services have recently been curtailed resulting in overcrowding, and young vulnerable children being left stranded waiting an hour or more for the next bus, or having to be collected when parents finish work.</p> <p>Train services are sporadic and the current amount of secondary school age children in the area cannot be allocated local school places.</p> <p>Sewerage, gas, broadband are nearing capacity, with regular broadband outages and lack of any FFTP in the area with the current number of houses.</p> <p>Dorman Avenue building work is still not complete, and within that plan there was provision for extra shops. Current shops are high cost and low volume, thus travel 10-15 miles to nearest superstore means more vehicles on inadequate roads.</p> <p>Local doctor's surgeries are also at capacity and many wait weeks for appointments. The local hospitals have been at bed capacity for months, with people waiting in A&E for beds overnight, sometimes for 48 hours before being treated, or going for surgery.</p> <p>The Ukraine war has shown that greenfield areas are much needed for crops so that the UK can be self-sufficient rather than relying on imports. Many local farmers have increased crop harvesting already.</p> <p>The Covid-19 pandemic has resulted in increased mental health issues, and the spread of the virus has been shown to increase in more densely housed areas, where there are limited garden spaces to breathe fresh air and exercise. Along with limited parking causing problems in the recent estates at Dorman Avenue, and assuming an extra minimum of 1 car per household the increase of cars especially at peak times on the B2046 will cause more accidents and hold ups.</p> <p>For those travelling to Sandwich or Thanet, the A257 is inadequate in terms of the junctions leading onto it. Already fatalities and severe accidents involving the use of air ambulances this year deem this road unsuitable for the current traffic levels. The Sandwich area developments will cause more disruption on these junctions, and the increase to delays on this road will cause more traffic pollution.</p> <p>The new Canterbury City Council plan has not been discussed with DDC and thus contravenes the Duty To Co-operate with both councils. Together with 640 houses in Aylesham, 3200 in the adjoining Cooting Farm Town, and another 500-800 also in close proximity, the infrastructure and the amenities cannot cope with these plans.</p> <p>The Government has recently abolished the 300,000 new homes for the next year and that was the figure on which this plan was based</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness	<p>Government has just rescinded the 300,000 new housing level, and the levels in these plans need to be modified, meaning an urgent review of this plan should be commenced.</p> <p>Lack of consultation with CCC on their forthcoming plan including Cooting Farm Town which abuts the B2046 shows failure in Duty to Co-operate with neighbouring areas, and thus this plan should be put on hold with both councils meeting to discuss both plans and redesign a way forward</p>

<p>matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>that benefits both councils. The area cannot sustain either at present and with no discussions both plans have been launched at similar times without knowledge.</p> <p>Highways involvement in terms of upgrading the B2046, straightening the blind bends, installing roundabouts at dangerous junctions, plus the dualling of the A257 before the Sandwich housing areas are finalised, must take place. Both roads have had fatalities this year, and with a doubling of housing in the surrounding area, the road state must be revisited.</p> <p>Local fauna relies on corridors away from businesses and housing and these have already been narrowed by previous recent housing in Dorman Avenue. Rare red kites, bats, and more nest and live in the area and these must be preserved, not eradicated by housing.</p> <p>A secondary school is required in the area, travel to and from other schools with inadequate/extortionate price bus and train services has to be revisited before considering the increase in housing.</p> <p>Local shops need to be varied and increased before any more housing. With only one Post Office in five local villages, the post office in Aylesham is already over-used and other village amenities and infrastructure must be revisited.</p> <p>FFTP broadband is essential now with over-use and will be impossible with new housing levels, The Government agrees to supply broadband to low income households, instead this will get worse.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP17 - Land south of Stonar Lake and to north and east of Stonar Gardens, Sandwich (SAN004)</p>
<p>Rep ID</p>	<p>SDLP613</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331790</p>
<p>Consultee Full Name</p>	<p>Julie Davies</p>
<p>Consultee Company / Organisation</p>	<p>CPRE Kent</p>
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP17</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>Yes</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Not Applicable</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Not Applicable</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails</p>	<p>Welcome this redevelopment of this brownfield which it located within a short walking distance of the town centre.</p>

to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP17 - Land south of Stonar Lake and to north and east of Stonar Gardens, Sandwich (SAN004)
Rep ID	SDLP1570
Rep Status	Processed
Consultee ID	1252100
Consultee Full Name	Mrs Amandajayne Hollobon-Baxter
Consultee Company / Organisation	Sandwich Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP17
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes

<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Yes</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>The following should be considered:</p> <p>Access via Ramsgate Road or Stonar Road requires highway audit and consideration.</p> <p>As this site has been vacant for some time consideration and potential relocation must be given to wildlife who may have taken up residence.</p> <p>Where a site adjoins a watercourse, the watercourse is maintained in its entirety and that only one access/egress can be made across it.</p> <p>Where a site contains mature, healthy trees or hedging that these are to be retained in all cases.</p> <p>Heavy traffic usage requires consideration as this is main access from Thanet and Discovery Park across the Toll Bridge into the town.</p> <p>Consideration must be given to pedestrians crossing the Toll Bridge into the town.</p> <p>Consideration must be given to the temporary impact of construction noise and vibrations on wildlife at Monks Wall Nature Reserve.</p> <p>Full archaeological surveys (not desktop ones done in Maidstone) are carried out on all sites and buildings within or the surrounding area.</p> <p>All new residential properties must have vehicle electrical charging points which will be necessary by law from 2030.</p> <p>Where a site removes or displaces any on street parking that the loss of parking is made up by additional parking spaces on the site.</p> <p>All properties are to be 50-year flood risk compliant as recommended in the NPPF.</p> <p>All access roads are to be adopted by the County's Highway Authority, so that they are maintained accordingly and there are no rights of dispute.</p> <p>All sites to accommodate full fibre communications cabling to allow for super speed internet access to support economic and home working applications.</p> <p>All sites to include drop down curbing allowing adequate accessibility for persons with disabilities or limited lack of mobility.</p> <p>Any additional street lighting shall be unobtrusive, set so as not to cause irritation to neighbouring properties and in the town centre should be of a heritage style to match existing light standards.</p> <p>Sites over 40 units should provide adequate road junction improvements to allow large scale traffic flows to move into and out of the sites without impacting on existing traffic flows.</p> <p>All sites must have adequate accessibility made for pedestrian and cyclist travel preference to protect and support alternative travel to motorised vehicles.</p> <p>Suitable screening provision should be introduced to shield all new development from existing neighbouring residents and in particular where a site is adjacent to an AONB or historic recognition.</p> <p>Section 106 funding should be directed towards improving and updating existing essential services such as doctors, dentists, schools, libraries, toilets, play areas and public recreation. A master plan of Sandwich must be undertaken to ensure that there isn't a cumulative detrimental impact on the town resulting from piecemeal developments.</p> <p>Of the requirement for affordable housing, 65% of this should be rental accommodation, social or council houses. And this should be monitored for compliance. A Design Code for Sandwich should be undertaken.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The following should be considered: Access via Ramsgate Road or Stonar Road requires highway audit and consideration. As this site has been vacant for some time consideration and potential relocation must be given to wildlife who may have taken up residence. Where a site adjoins a watercourse, the watercourse is maintained in its entirety and that only one access/egress can be made across it. Where a site contains mature, healthy trees or hedging that these are to be retained in all cases. Heavy traffic usage requires consideration as this is main access from Thanet and Discovery Park across the Toll Bridge into the town. Consideration must be given to pedestrians crossing the Toll Bridge into the town. Consideration must be given to the temporary impact of construction noise and vibrations on wildlife at Monks Wall Nature Reserve. Full archaeological surveys (not desktop ones done in Maidstone) are carried out on all sites and buildings within or the surrounding area. All new residential properties must have vehicle electrical charging points which will be necessary by law from 2030. Where a site removes or displaces any on street parking that the loss of parking is made up by additional parking spaces on the site. All properties are to be 50-year flood risk compliant as recommended in the NPPF. All access roads are to be adopted by the County's Highway Authority, so that they are maintained accordingly and there are no rights of dispute. All sites to accommodate full fibre communications cabling to allow for super speed internet access to support economic and home working applications. All sites to include drop down curbing allowing adequate accessibility for persons with disabilities or limited lack of mobility</p>

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	Hollobon-Baxter Sandwich TC 1006 Att1.pdf
Local Plan Consultation Point	SAP17 - Land south of Stonar Lake and to north and east of Stonar Gardens, Sandwich (SAN004)
Rep ID	SDLP1507
Rep Status	Processed
Consultee ID	1333275
Consultee Full Name	Adam Harwood
Consultee Company / Organisation	Environment Agency
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP17
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We have reviewed the new sites for housing allocation included in the Reg 19 Submission Summary of Site Allocations and would draw your attention to 3 of these sites that lie within FZ3: Northwall Road & Ethelbert Road, Deal Stonar Close, Sandwich</p> <p>These site lie within Flood Zone 3a; this is an area considered to be at 'high risk' from flooding in the absence of tidal defences. Whilst we appreciate that both Sandwich and Deal are well defended from tidal flooding, there is always a 'residual' risk from inundation in such areas. Accordingly, we would request that your Authority initially considers whether these sites suitably address the requirements of the flood risk Sequential Test before allocating them in the local plan.</p> <p>The updated PPG to the NPPF places more emphasis on residual risk; therefore when considering these allocations it should be understood that in order for development to be made safe, it is likely that the ground floor would not be suitable for any form of living accommodation. Detailed design would be subject to a site-specific FRA but given the potential depths of flooding in the event of failure or breach of defences, development is unlikely to meet the requirements of Policy CC5 or the Exception Test, unless all living and sleeping accommodation is set at first floor or above. If this is would be unacceptable to the LPA, then these sites should not be allocated.</p> <p><i>(DDC note - This is an extract from the full Environment Agency representation SDLP1458)</i></p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s)	

you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP17 - Land south of Stonar Lake and to north and east of Stonar Gardens, Sandwich (SAN004)
Rep ID	SDLP1851
Rep Status	Processed
Consultee ID	1333792
Consultee Full Name	James Hambling
Consultee Company / Organisation	RAMAC Holdings Limited
Agent Full Name	Megan King
Agent Company / Organisation	Nexus Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP17
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Full Representation attached to SDLP1851. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1851.) Dover District Local Plan to 2040: Regulation 19 Submission October 2022 Representations on behalf of Ramac Holdings (Trading) Ltd 1. These representations are made on behalf of Ramac Holdings (Trading) Ltd to Dover District

Council's consultation on its draft Local Plan ("the LP") under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

2. Ramac Holdings is the owner of land south of Stonar Lake and to the north and east of Stonar Gardens, Stonar Road, Sandwich ("the Stonar Site"), which is allocated for residential development by Policy SAP17 of the LP.

3. Ramac Holdings is supportive of Policy SAP17 as a sound basis to enable the sensitive heritage and recreation led regeneration of the Stonar Site, which would make use of previously developed land and deliver major public benefits.

The Stonar Site

4. The Stonar Site comprises approximately 3.5 hectares of previously developed land, located adjacent to Stonar Lake (also owned by Ramac Holdings) – a highly accessible location within walking and cycling distance of many services and facilities in Sandwich town centre. The Stonar Site is identified by the proposals map of the LP with a relevant extract at Appendix A; and a detailed aerial photo is provided at Appendix B.

5. Part of the Stonar Site is also designated a scheduled monument, which may or may not contain buried archaeology relating to the lost medieval town and port of Stonar. The extent of the scheduled monument is shown on the drawing at Appendix C, which covers the central and eastern part of the Stonar Site but not the western part adjacent to Ramsgate Road.

6. The scheduled monument is unusual as its designation encompasses an existing industrial area comprising numerous buildings and extensive areas of hardstanding, accommodating a range of commercial uses.

7. These buildings require investment and renewal to prevent further deterioration, as the industrial area is already detracting from the character / amenities of Sandwich and the wider area.

Archaeological Assessment

8. Much is known about the scheduled monument at Stonar through archaeological assessment work carried out by Canterbury Archaeological Trust for Ramac Holdings. This work comprises two parts – 'Part 1: Overview and Proposals for Archaeological Evaluation Work' (Appendix D) and 'Part 2: Detailed Evidence Base' (Appendix E).

9. The archaeological assessment has been provided to Historic England through its formal 'extended pre-application service' with this engagement ongoing.

10. The 'Part 1: Overview and Proposals for Archaeological Evaluation Work' presents that:

- it is recognised the archaeological site of Stonar is an important heritage asset both locally and nationally. Accordingly, any development on the site is being carefully considered to have minimal impact on any buried archaeology and to enhance the amenity value of the site more generally;

- to have a minimal impact on any buried archaeology, the footprint of existing buildings and hardstandings would be utilised and / or development would be located outside the scheduled monument in the western part of the site adjacent to Ramsgate Road;

- development would deliver very significant public benefits including to enhance the amenity value of the site. These benefits include:

- the above ground clearance of about three quarters of the scheduled monument and the creation of an open grassed landscape with public access;

- this open landscape would allow a far greater understanding and interpretation of the scheduled monument compared to its current industrial use;

- heritage focused improvements would be provided, including a heritage trail; a series of noticeboards informing visitors about various aspects of the history of the area; and a landscape design that could reflect and interpret what may have historically stood on the site;

- opening up the scheduled monument in this way would provide new lake-side

public greenspace with amenity, health and wellbeing benefits for existing and future residents alike. It would also help reconnect the existing historic centre of Sandwich with Stonar Lake and the scheduled monument, helping increase general awareness and understanding of the town's ancient heritage;

- without seizing this sensitive development opportunity, the Stonar Site will continue to decline as an aging industrial estate and increasingly detract from the northern setting of Sandwich;

- for an even greater understanding of the heritage impacts of the development proposals, a programme of archaeological investigation work is identified – with an area shown at Figure 2 for evaluation trenching along with a borehole transect and test pitting at the location of existing buildings.

11. An illustrative arrangement of how replacement development across the Stonar Site could be sensitively achieved is contained in the 'Part 1: Overview and Proposals for Archaeological Evaluation Work' and provided at Appendix F. This shows the sensitive replacement of buildings on the Stonar Site, with replacement development on four parcels:

- the site of Stonar House (Parcel A)
- the site of buildings fronting Stonar Road (Parcel B)
- the site of a large industrial building to the east (Parcel C)
- the buildings and yard to the north of Parcel B (Parcel D)

12. The site of nineteenth century Stonar House (Parcel A) is now a ruin that incorporates a cellar or basement. The building on Parcel B is a late twentieth century industrial block partially terraced into the rising ground to the north. The building on Parcel C is another late twentieth century warehouse block, covering about 60 metres x 35 metres. At Parcel D, a concrete yard area supports a number of buildings.

13. The archaeological assessment considers that all these structures may have caused some damage to any below-ground archaeology.

14. For the replacement buildings, foundation design is being carefully considered so as to cause minimal below-ground disturbance. Limited piles supporting shallow concrete rafts would be utilised (see detail at Appendix G). The general approach is for the replacement buildings to not have a materially greater impact than that of the existing development within the scheduled area.

15. The 'Part 2: Detailed Evidence Base' is a very detailed document presenting a comprehensive evidence base of what is known about the Stonar Scheduled Monument, which has informed the approach in Part 1.

16. Ramac Holdings is committed to continuing engagement with Historic England to investigate what archaeological remains may or may not exist on the Stonar Site and to understand what any impact of redeveloping the existing buildings would be.

17. It is important to note that a significant part of the Stonar Site, closest to Ramsgate Road, lies outside the scheduled monument. Therefore even if further archaeological assessment rules out the replacement of existing buildings within the scheduled monument, other development is still deliverable, as the illustrative layout at Appendix F highlights.

Flood Risk

18. The central part of the Stonar Site is in flood zone 1, whilst other areas benefit from flood defence infrastructure that was constructed as part of the Sandwich Tidal Defence Scheme. This was recently completed in 2018 and is capable of being maintained and upgraded as necessary in the future.

19. The Council is satisfied that the Stonar Site passes a sequential, risk based approach (as per paragraph 161 of the National Planning Policy Framework "the Framework") in the LP allocating it for residential development. This is unsurprising given its accessibility to services and facilities in Sandwich and the extent of other constraint across the District that severely limit other locations for development.

20. In respect of the Framework Exceptions Test (paragraph 160), a Technical Flood Risk Scoping

Assessment (March 2021) ("the FRSA") has been prepared by Herrington Consulting (Appendix H).

21. The FRSA sets out that for the Exceptions Test to be passed, it should be demonstrated (in accordance with paragraph 164 of the Framework) that:

- "a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and
- b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall."

22. For a) above, the wider sustainability benefits are those identified by these representations at paragraph 10 above and 25 below, and present a clear balance in support of the regeneration of the Stonar Site.

23. For b), the FRSA explains how the identified flood risk would be mitigated based on a worst case scenario should the existing flood defences not be upgraded in the future. These mitigation measures include:

- locating more vulnerable functions of each building (i.e. bedrooms) on upper floors;
- raising the floor level of each building above the modelled flood level;
- raising the land level on all or part of the Stonar Site, as has been successfully incorporated for the Willowbank development (which is feasible as the source of flooding is tidal, so the displacement of floodwater by land raising is not an issue); and
- incorporating flood resilience measures.

24. This would ensure that development on the Stonar Site would be safe for its lifetime, would not increase flood risk elsewhere, and where possible would reduce flood risk overall. The FRSA concludes (paragraph 6.7) that:

"the findings of this report provide evidence to demonstrate that if the site is allocated for heritage and recreation led residential development in the DDC Local Plan, it is possible to design a scheme which is compliant with the requirements of the NPPF and Part B of the Exceptions Test."

Benefits and Sustainable Objectives

25. The heritage and recreation led regeneration of the Stonar Site would help deliver a number of important objectives set out at paragraph 2.2 of the LP as well as those promoted by the Framework. Development would:

- enhance the heritage value of the Stonar Site, to positively promote the former medieval port of Stonar as a part of the heritage offer of the District, working with Historic England for this to be achieved in a manner that is appropriate to its significance;
- enhance the asset of Stonar Lake, as part of the District's waterside environment, through the provision of new public open space to allow it to be experienced and valued by residents and visitors, whilst currently there is only private access;
- be focussed in an accessible and sustainable location, which would utilise existing infrastructure and facilities and services, and contribute to the sustainability of local communities;
- support the regeneration and reuse of previously developed land, working with its heritage constraints;
- create an attractive, inclusive and healthy place which would promote the distinctive character and history of Sandwich;
- provide new and improved community infrastructure as open space to help meet the needs of local communities; and
- provide market and affordable homes to meet local need and boost supply.

26. The regeneration of the Stonar Site would accord with specific policies of the emerging Local Plan, including:

	<ul style="list-style-type: none"> • Policy SP3 (Housing Growth), which identifies Sandwich as a sustainable location of development; and • Policy PM3 (Providing Open Space), which supports development that would provide new public open space. <p>27. Against the heritage policies in the LP, the objectives of Policy HE1 (Designated and Non-Designated Heritage Assets) including to encourage an appropriate and viable use of redundant or under-used buildings or areas, and Policy HE3 (Archaeology) to protect and where possible enhance the integrity of scheduled monuments, are noted. Allocation Policy SAP17 is consistent with this positive approach to preserving the district's heritage whilst recognising the policy and legislative protection afforded to the Stonar Site.</p> <p>Conclusions</p> <p>28. In order to facilitate to the regeneration of a deteriorating industrial site, Policy SAP17 is an appropriate and justified approach. Alongside new homes, such development would deliver a significant area of public open space in a waterside location and measures to better interpret the heritage significance of the Stonar Site, as substantial public benefits.</p> <p>29. Importantly Policy SAP17 is also justified and consistent with national policy in respect of ensuring the heritage designation and constraints of the Stonar Site are fully understood and inform the extent / arrangement of a future scheme. Policy SAP17 correctly puts the heritage of the Stonar Site first, but making positive provision to allow its regeneration and associated benefits.</p> <p>30. Delivery on the Stonar Site would happen in the next five to 10 years - there are no leases to existing businesses beyond 2027 that do not include redevelopment clauses to enable premises to be vacated.</p> <p>31. Overall Policy SAP17 is considered sound against the tests of the Framework. Without such sensitive development to seize this opportunity, the Stonar Site will continue to decline as an aging industrial estate and continue to detract from the northern setting of Sandwich.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>Somerville Nexus Planning (Ramac) 0655 Att1_Redacted.pdf</p>

SAP18 - Sandwich Highway Depot, Sandwich (SAN006)

Local Plan Consultation Point	SAP18 - Sandwich Highway Depot, Sandwich (SAN006)
Rep ID	SDLP530
Rep Status	Processed
Consultee ID	1331747
Consultee Full Name	mrs Jill Griffiths
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP18 (SAN006)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Whilst this policy may be legally sound it does not take account of the opportunity that this site represents. Reference is made to the type of nearby housing suggesting that more of the same will do.</p> <p>The site is located close to the conservation area with its high housing density.</p> <p>It is visible from an important entrance road into the town and is therefore an opportunity to make a statement about the town.</p> <p>It is close to an infant school making it suitable especially for young families.</p> <p>It is close to ample safe green spaces</p> <p>Public transport links are good.</p> <p>The nature of its current use means that there are many vehicle movements in and out of the site on a daily basis.</p> <p>There is an opportunity to include public parking on this site to relieve pressure elsewhere or to allow alternative use to be made of some of the existing parking on the Quayside.</p> <p>It appears to be owned by KCC and the type of development could be dictated when it is sold.</p> <p>Whilst the development description refers to relevant local policies etc etc there is no positive approach looking at the unique opportunities this site has to accommodate more than 'cookie cutter', pseudo 'vernacular' housing in an estate development. Sandwich needs an exemplary development of national significance. Sandwich is renowned because in its hey day it was a town of national and international importance and this is reflected in the style of its (albeit ancient) architecture. A positive policy preparation would take these things into account and I have suggested some changes below, though probably not in the language which would be appropriate to the document.</p>

<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The 32 dwellings provided shall be principally one and two bedroom 'starter' homes for rent or part buy, part rent.</p> <p>The density of habitable rooms per acre shall not be less than that achieved in 3 or 4 storey buildings of medieval Sandwich. Dwellings should be arranged in blocks with shared access to communal space (which may include part of the cricket pitch surround).</p> <p>Private outdoor space should be the minimum to comply with local codes.</p> <p>The development should achieve the highest standards in terms of contemporary and sustainable design.</p> <p>Pedestrian links to the town centre must be reinforced.</p> <p>Other than disabled spaces, allocated parking should not be provided. Parking on the site should be public parking with permits obtainable as elsewhere in Sandwich.</p> <p>Landscaping of the site should focus on combining communal and parking spaces to provide an attractive open area well connected to the adjoining green spaces.</p> <p>These suggestions tackle some issues faced in Sandwich ie lack of suitable affordable housing lack of public parking and poor connectivity between new developments,existing residential and parking areas and the town centre. This represents a more sound policy than the regulation 19 draft which takes account of none of these.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>I would welcome the opportunity to present the proposed changes in more detail. I am not a planning professional but feel that as drafted the plan does not invite anything other than a fenced-in dead end estate of executive homes with cars parked over the gardens . I live close by, hence my particular interest.</p>
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP18 - Sandwich Highway Depot, Sandwich (SAN006)</p>
<p>Rep ID</p>	<p>SDLP756</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331585</p>
<p>Consultee Full Name</p>	<p>Terence Hopper</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to?Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP 18 Sandwich Highways Depot</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Justified Effective Consistent with National Policy</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>No</p>

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>There have been no significant changes that would alter the reasons for rejecting this site in the previous Land Allocation exercise (2013) exercise and the subsequent appeals process. The reasons for rejection remain the same.</p> <p>This site is situated on land at potential risk of flooding in the future</p> <p>.Policy SP1j would seem to suggest that if land outside of areas at risk of flooding is available, then that land should be developed in preference (sequentially) to land risk from flooding, and only when risk free land is unavailable, should land at risk from flooding be developed.</p> <p>Given that this site falls entirely within flood zones 2 and 3 and it is very close to areas of previous flooding (2013) and close to the River Stour, which the SFA has identified as a major risk to flooding it would appear likely that unless the local authority has very strong evidence to support the exclusion of SAN019 together with SAN 010 it would appear the site will fail the sequential test.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Reconsider sites SAN010 and SAN019. taking cognisance of the new information available through the successful planning application on part of SAN010
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP18 - Sandwich Highway Depot, Sandwich (SAN006)
Rep ID	SDLP913
Rep Status	Processed
Consultee ID	1331776
Consultee Full Name	Mrs Heather Green
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24, SAP25, SAP26, SAP27, SAP17, SAP18

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Road infrastructure will not sustain the extra housing in the area. B2046 already had a fatality in 2022, and several big accidents where it is joined by Spinney Lane, Dorman Avenue North, and the Industrial Estate. B2046 regularly closed at Wingham end causing tailbacks with queues of traffic polluting the atmosphere. Diversions through country lanes happen several times a year and cause damage to local flora and fauna on the one track country lanes leading to local towns.</p> <p>B2046 already being used by heavier lorries which are causing crumbling to the verges.</p> <p>There is no secondary school in the area so children have to travel to Dover, Sandwich and Canterbury. Bus services have recently been curtailed resulting in overcrowding, and young vulnerable children being left stranded waiting an hour or more for the next bus, or having to be collected when parents finish work.</p> <p>Train services are sporadic and the current amount of secondary school age children in the area cannot be allocated local school places.</p> <p>Sewerage, gas, broadband are nearing capacity, with regular broadband outages and lack of any FFTP in the area with the current number of houses.</p> <p>Dorman Avenue building work is still not complete, and within that plan there was provision for extra shops. Current shops are high cost and low volume, thus travel 10-15 miles to nearest superstore means more vehicles on inadequate roads.</p> <p>Local doctor's surgeries are also at capacity and many wait weeks for appointments. The local hospitals have been at bed capacity for months, with people waiting in A&E for beds overnight, sometimes for 48 hours before being treated, or going for surgery.</p> <p>The Ukraine war has shown that greenfield areas are much needed for crops so that the UK can be self-sufficient rather than relying on imports. Many local farmers have increased crop harvesting already.</p> <p>The Covid-19 pandemic has resulted in increased mental health issues, and the spread of the virus has been shown to increase in more densely housed areas, where there are limited garden spaces to breathe fresh air and exercise. Along with limited parking causing problems in the recent estates at Dorman Avenue, and assuming an extra minimum of 1 car per household the increase of cars especially at peak times on the B2046 will cause more accidents and hold ups.</p> <p>For those travelling to Sandwich or Thanet, the A257 is inadequate in terms of the junctions leading onto it. Already fatalities and severe accidents involving the use of air ambulances this year deem this road unsuitable for the current traffic levels. The Sandwich area developments will cause more disruption on these junctions, and the increase to delays on this road will cause more traffic pollution.</p> <p>The new Canterbury City Council plan has not been discussed with DDC and thus contravenes the Duty To Co-operate with both councils. Together with 640 houses in Aylesham, 3200 in the adjoining Cooting Farm Town, and another 500-800 also in close proximity, the infrastructure and the amenities cannot cope with these plans.</p> <p>The Government has recently abolished the 300,000 new homes for the next year and that was the figure on which this plan was based</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness	<p>Government has just rescinded the 300,000 new housing level, and the levels in these plans need to be modified, meaning an urgent review of this plan should be commenced.</p> <p>Lack of consultation with CCC on their forthcoming plan including Cooting Farm Town which abutts the B2046 shows failure in Duty to Co-operate with neighbouring areas, and thus this plan should be put on hold with both councils meeting to discuss both plans and redesign a way forward that benefits both councils. The area cannot sustain either at present and with no discussions both plans have been launched at similar times without knowledge.</p> <p>Highways involvement in terms of upgrading the B2046, straightening the blind bends, installing roundabouts at dangerous junctions, plus the dualling of the A257 before the Sandwich housing areas are finalised, must take place. Both roads have had fatalities this year, and with a doubling of housing in the surrounding area, the road state must be revisited.</p>

matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Local fauna relies on corridors away from businesses and housing and these have already been narrowed by previous recent housing in Dorman Avenue. Rare red kites, bats, and more nest and live in the area and these must be preserved, not eradicated by housing. A secondary school is required in the area, travel to and from other schools with inadequate/extortionate price bus and train services has to be revisited before considering the increase in housing. Local shops need to be varied and increased before any more housing. With only one Post Office in five local villages, the post office in Aylesham is already over-used and other village amenities and infrastructure must be revisited. FFTP broadband is essential now with over-use and will be impossible with new housing levels, The Government agrees to supply broadband to low income households, instead this will get worse.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP18 - Sandwich Highway Depot, Sandwich (SAN006)
Rep ID	SDLP614
Rep Status	Processed
Consultee ID	1331790
Consultee Full Name	Julie Davies
Consultee Company / Organisation	CPRE Kent
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP18
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible.	We object to the allocation of the site: <ul style="list-style-type: none"> The NPPF 155 states that 'Inappropriate development in areas at risk of flooding should be avoided ...'. The site is in flood zones 2 and 3. The site is subject to flooding and would therefore pose a considerable risk. A key consideration set out in the policy is that a sequential test and flood risk assessment is required. This should be undertaken before taking the decision to allocate the site.

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<ul style="list-style-type: none"> • The site is given orange status and the overall landscape summary in HELAA Appendix 3A and the overall landscape summary is: The development of this site would have an impact on the landscape and further assessment is required to demonstrate whether this can be mitigated. • HELAA Appendix 3B gives the site orange status as 'Highways concerns have been identified in relation to access and/or highway impact and further assessment is required to demonstrate whether this can be mitigated.' • Concerned that the scale of development proposed for Sandwich will have a detrimental impact on the Historic town with its narrow roads. • There is insufficient infrastructure to support the scale of development proposed for Sandwich.
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	CPRE Kent would wish to participate at the examination hearings to explore these issues further.
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	SAP18 - Sandwich Highway Depot, Sandwich (SAN006)
<p>Rep ID</p>	SDLP1572
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1252100
<p>Consultee Full Name</p>	Mrs Amandajayne Hollobon-Baxter
<p>Consultee Company / Organisation</p>	Sandwich Town Council
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	SAP18
<p>2 - Do you consider this part of the Plan sound?</p>	No
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	Positively prepared Justified Effective

	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The prime necessity of this site must include a provision for coach parking, as previously promised and the current proposal should reflect this - Coach parking element of this development must result in an increase to coach parking in Sandwich. The access route to the town via the Cricket Club should be managed in conjunction with the Club. Any housing on this site should only be on the existing hard standing and the current green areas should be retained. Where a site adjoins a watercourse, the watercourse is maintained in its entirety and that only one access/egress can be made across it. Where a site contains mature, healthy trees or hedging that these are to be retained in all cases. All sites that come onto highways that service a school have twenty mile per hour limits as part of the Highways scheme. Proximity to Sandwich Infant School and recommended parking for parents (Gazen Salts Car Park) should be considered. Full archaeological surveys (not desktop ones done in Maidstone) are carried out on all sites within or the surroundings of Sandwich town. All new residential properties must have vehicle electrical charging points which will be necessary by law from 2030. Where a site removes or displaces any on street parking that the loss of parking is made up by additional parking spaces on the site.</p> <p>All properties are to be 50-year flood risk compliant as recommended in the NPPF. All access roads are to be adopted by the County's Highway Authority, so that they are maintained accordingly and there are no rights of dispute. All sites to accommodate full fibre communications cabling to allow for super speed internet access to support economic and home working applications. All sites to include drop down curbing allowing adequate accessibility for persons with disabilities or limited lack of mobility. Any additional street lighting shall be unobtrusive, set so as not to cause irritation to neighbouring properties and in the town centre, should be of a heritage style to match existing light standards. Emergency access priority should be considered with the adjacent fire station, affording free movement for emergency vehicles. All sites must have adequate accessibility made for pedestrian and cyclist travel preference to protect and support alternative travel to motorised vehicles. Suitable screening provision should be introduced to shield all new development from existing neighbouring residents, and in particular, where a site is adjacent to an AONB or historic recognition. Section 106 funding should be directed towards improving and updating existing essential services such as doctors, dentists, schools, libraries, toilets, play areas and public recreation. A master plan of Sandwich must be undertaken to ensure that there is not a cumulative detrimental impact on the town resulting from piecemeal developments. As this site is in public ownership it should be used as an opportunity to produce an exemplar development, displaying a high-quality design featuring cutting edge technology for energy and water conservation, including the production of car ownership and high-quality pedestrian and cycling links into the town centre. The standard requirement for affordable housing should be increased to 50% on this site and 65% of this should be social rented housing. This should be monitored for compliance.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>The prime necessity of this site must include a provision for coach parking, as previously promised and the current proposal should reflect this - Coach parking element of this development must result in an increase to coach parking in Sandwich. The access route to the town via the Cricket Club should be managed in conjunction with the Club. Any housing on this site should only be on the existing hard standing and the current green areas should be retained. Where a site adjoins a watercourse, the watercourse is maintained in its entirety and that only one access/egress can be made across it. Where a site contains mature, healthy trees or hedging that these are to be retained in all cases. All sites that come onto highways that service a school have twenty mile per hour limits as part of the Highways scheme. Proximity to Sandwich Infant School and recommended parking for parents (Gazen Salts Car Park) should be considered. Full archaeological surveys (not desktop ones done in Maidstone) are carried out on all sites within or the surroundings of Sandwich town. All new residential properties must have vehicle electrical charging points which will be necessary by law from 2030. Where a site removes or displaces any on street parking that the loss of parking is made up by additional parking spaces on the site.</p> <p>All properties are to be 50-year flood risk compliant as recommended in the NPPF. All access roads are to be adopted by the County's Highway Authority, so that they are maintained accordingly and there are no rights of dispute. All sites to accommodate full fibre communications cabling to allow for super speed internet access to support economic and home working applications. All sites to include drop down curbing allowing adequate accessibility for persons with disabilities or limited lack of mobility. Any additional street lighting shall be unobtrusive, set so as not to cause irritation to neighbouring properties and in the town centre, should be of a heritage style to match existing light standards. Emergency access priority should be considered with the adjacent fire station, affording free movement for emergency vehicles. All sites must have adequate accessibility made for pedestrian and cyclist travel preference to protect and support alternative travel to motorised vehicles. Suitable screening provision should be introduced to shield all new development from existing neighbouring residents, and in particular, where a site is adjacent to an AONB or historic recognition. Section 106 funding should be directed towards improving and updating existing essential services such as doctors, dentists, schools, libraries, toilets, play areas and public recreation. A master plan of Sandwich must be undertaken to ensure that</p>

	<p>there is not a cumulative detrimental impact on the town resulting from piecemeal developments. As this site is in public ownership it should be used as an opportunity to produce an exemplar development, displaying a high-quality design featuring cutting edge technology for energy and water conservation, including the production of car ownership and high-quality pedestrian and cycling links into the town centre. The standard requirement for affordable housing should be increased to 50% on this site and 65% of this should be social rented housing. This should be monitored for compliance.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	No
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	

SAP19 - Land at Poplar Meadow, Sandwich (SAN007)

Local Plan Consultation Point	SAP19 - Land at Poplar Meadow, Sandwich (SAN007)
Rep ID	SDLP653
Rep Status	Processed
Consultee ID	1331372
Consultee Full Name	Laura Beech
Consultee Company / Organisation	Lidl Great Britain
Agent Full Name	Laura Beech
Agent Company / Organisation	Walsingham Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP19 - Land at Poplar Meadow, Adjacent to Delfbridge House, Sandwich (SAN007)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p><u>Introduction</u></p> <p>Walsingham Planning is submitting this representation on behalf of Lidl Great Britain, who has an existing store at Honeywood Parkway in Dover, and who also hopes to deliver additional investment in the District over the course of the new plan period.</p> <p><u>Context – The Need to Improve Convenience Retail Provision in Sandwich</u></p> <p>It is important to note from the outset that the existing, adopted Dover Land Allocations Local Plan identifies a clear need to improve convenience retail provision within the Deal / Sandwich trade area. Indeed, paragraph 3.237 of the Land Allocations Local Plan states that there is an identified quantitative need over the Plan period for around <u>2,400 sq.m gross</u> additional convenience goods floorspace within the area. Moreover, the adopted Plan explains that:</p> <p><i>“The Council considers that there is potential to increase the <u>quantity and quality</u> of convenience floorspace provision in Sandwich to help broaden the range and choice to the benefit of its local catchment population, whilst also helping to strengthen the role of Sandwich in the settlement hierarchy. New floorspace of an appropriate scale in a location that is well connected to the town centre would help to increase the ‘claw back’ and retention of shoppers and expenditure from the 2012 position” [our emphasis].</i></p> <p>The adopted Local Plan goes on to explain that the tight historic grain of Sandwich town centre does not readily provide opportunities for larger retail provision. The adopted Local Plan could not identify any suitable or viable sites within or on the edge of Sandwich town centre to accommodate such a scheme, and so the Plan sets out a criteria-based policy, against which any future retail applications can be assessed. Policy LA19 relates directly to ‘new convenience retail provision in Sandwich’, and states that planning permission for new convenience provision in Sandwich <u>will be permitted</u>, provided that the scheme meets the six specified criteria.</p>

We understand that Policy LA19 of the adopted Local Plan was framed by an evidence base that is now considered to be out-of-date. Notwithstanding this, it is clear that the current Local Plan identifies a very clear quantitative and qualitative need for additional food and grocery provision within the settlement of Sandwich, and this need remains unmet. Indeed, no new foodstores have been delivered within the town, and thus residents continue to have to travel further afield to undertake their main food shop.

The evidence base that informs the Regulation 19 Draft Local Plan includes an updated Dover Retail and Town Centre Needs Assessment (2021). The updated Needs Assessment shows that there is no District-wide capacity for new convenience goods floorspace in the period up to 2040, after taking into account commitments. However, when the specific towns are considered, the Study identifies that there remains some capacity for additional floorspace in Deal and Sandwich, equating to between 256 and 458 sq.m net convenience floorspace by 2040. It should be noted, however, that the 2021 Study is based on the very conservative assumptions that the retail market is in 'equilibrium' (i.e. that no stores are over-trading) and that market shares will remain constant over the study period.

Moreover, whilst the calculated quantitative need may have reduced based on the latest data assumptions, there has been no change in practice to the very real qualitative need that continues to exist for additional foodstore provision within Sandwich.

It is relevant to note that the evidence base (the 2021 Retail and Town Centre Needs Assessment) records that there were 104 retail and leisure units within Sandwich, as of 2021. Out of this total, 37% of the units comprised non-food retail stores, 23% of units provided leisure services, and 14% of units offered retail services. However, only 8% of the units (7 units in total) accommodated convenience retail shopping facilities. This is lower than the national average representation, and also represents a decline since 2015, when there were 10 food and grocery outlets within the centre.

Sandwich has limited representation from convenience retailers. Whilst the centre benefits from some independent food stores (bakers, butchers and greengrocers), there are limited 'main food' shopping opportunities. The only medium-sized foodstore is the Co-op at Moat Sole Road.

As a result, it is evident that many residents need to travel further afield – to Dover, Deal and out-of-centre destinations – to undertake their main food shopping. The household survey shopping results, reported in the Retail and Town Centre Needs Assessment, confirm that only 3% of convenience goods expenditure from the District is spent in Sandwich Town Centre, which is a very low level of expenditure retention. Within the more localised Sandwich study zone (Zone 6), less than a quarter of convenience goods expenditure is retained by local stores, which represents significant leakage of local expenditure to destinations located further afield.

Indeed, the market share analysis for main food shopping (Table 2, Appendix 2, Volume 4 of the 2021 Needs Assessment) shows that only 14% of main food expenditure within Zone 6 is retained within Sandwich. Instead, residents are travelling to Tesco Extra at White Cliffs Business Park (29%), Aldi at Cherry Tree Avenue, Dover (13%), Sainsbury's in Deal (11%), as well as destinations further afield (to Ramsgate, Margate and Canterbury) to undertake their weekly 'main food' shop. This is not a sustainable pattern of shopping, and the results highlight the clear deficiency in main food shopping provision within Sandwich that continues to exist.

We note that further growth is earmarked for Sandwich within the draft Local Plan. The identified disparity will continue to grow, as more residents move into the town, and the lack of local access to main food shopping opportunities becomes more apparent.

Policy SAP19 – Land at Poplar Meadow, Adjacent to Delfbridge House

Draft Policy SAP19 proposes to allocate land at Poplar Meadow, Sandwich, for residential development (35 units). We do not disagree with this allocation, as the site represents a sustainable development opportunity, and one that is highly accessible, being within easy walking distance of Sandwich Town Centre and also Sandwich railway station.

However, it is our view that the site would be equally suitable for retail development, as it is the most centrally-located, suitable and available site for such a use. We note also that the site lies partly within Flood Zones 2 and 3. Whilst residential development would represent a 'more vulnerable' use (where the exception test is required within Flood Zone 3a), retail is a 'less vulnerable' use that would be more suitable within the environmental constraints of the site.

We have explained above that there is strong evidence to indicate that there is a qualitative need for a new foodstore within Sandwich, to provide better local opportunities for 'main food' shopping, and to curtail the leakage of expenditure to destinations located further afield. We have also explained that – as acknowledged in the draft Local Plan – there are limited opportunities to provide sites for development within the town centre, due to its historic street layout. Thus, serious consideration should be given to the opportunity presented by the land at Poplar Meadow to provide the additional retail development the town needs, since it represents a sustainable and accessible site within walking distance of the town centre.

Moreover, we note that the site has benefitted from planning consent for retail development in the recent past. Planning permission was granted in November 2014 for a new foodstore, doctor's surgery and pharmacy on the site, together with associated car parking, landscaping, and

	<p>service yard (ref. DOV/13/00867). There have been no recent changes to the status of the site or its surroundings, or the policy context, which would alter the view that the site is suitable and available for retail use.</p> <p>Given the deficiencies that we have identified in the retail offer of Sandwich, specifically its provision for 'main food' shopping, we consider that the merits offered by the Poplar Meadow site for retail development should be fully and properly examined. We reiterate that the NPPF stipulates that planning policies should allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. Furthermore, where suitable and viable town centre sites are not available, the Council should allocate appropriate edge of centre sites, or should identify how needs can be met in other accessible locations that are well connected to the town centre.</p> <p>The draft Local Plan is unsound because the Council does not propose to make any retail allocations, despite the fact that needs identified in the adopted Local Plan remain unmet. This is not consistent with the advice provided in national policy, and does not reflect a positive and effective approach to plan-making. In particular, it is our case that full consideration should be given to the potential offered by the Land at Poplar Meadow as a suitable site for retail use. The strategy currently put forward in the Local Plan is not justified or sound because it does not take into account reasonable alternatives. Retail is a reasonable alternative use of this site, as borne out by its planning history.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>It is our view that the retail and town centre strategy put forward in the draft Local Plan is flawed and unsound. The strategy places an over-reliance on the quantitative need figures derived from 2021 Retail and Town Centre Needs Assessment, and does not take into account evidence of qualitative need. In particular, it is of great concern that the draft Local Plan does not consider the clear need that exists for additional convenience provision within Sandwich, which is identified in the adopted Local Plan, and which remains unaddressed.</p> <p>Whilst the adopted Local Plan contains a positive and proactive policy to support new retail development within Sandwich (Policy LA19), this strategy has not been carried through to the draft Local Plan.</p> <p>In the absence of an appropriate strategy to support new convenience provision within Sandwich, local residents will need to continue to travel to Deal, Dover and destinations further afield to undertake their food and grocery shopping. This is not a sustainable strategy.</p> <p>We believe that there is a need to allocate a site for foodstore development within the town, and that the Land at Poplar Meadow represents the most suitable and centrally-located site for such a use. The wording of the draft allocation should be amended and should reference the potential for foodstore development on the site.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>We would like to participate because we have recommended that modifications are required to Policy SAP19 (as well as other policies within the draft Local Plan).</p> <p>Our client also has a direct interest in the land that is proposed for allocation, and would like to participate fully in the process.</p> <p>Given the technical nature of the retail evidence base, it would be useful to participate directly in the oral examination in order to have the opportunity to discuss the proposed retail and town centre strategy for Sandwich in detail (and any potential retail allocations) and answer questions directly.</p>
<p>Include files</p>	<p>Lidl Reps - Reg 19 Draft Dover Local Plan (Dec 2022).docx (2)</p>
<p>Local Plan Consultation Point</p>	<p>SAP19 - Land at Poplar Meadow, Sandwich (SAN007)</p>
<p>Rep ID</p>	<p>SDLP651</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331585</p>
<p>Consultee Full Name</p>	<p>Terence Hopper</p>
<p>Consultee Company / Organisation</p>	

Agent Full Name	Terence Hopper
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP19 Land at Poplar Meadow, Sandwich (SAN007)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	This site is marked highly due to its proximity to the town, However, it is highly likely that any vehicular traffic coming from the site and not headed to the town, will pass by the rejected sites of SAN010 and SAN 019. There have been no significant changes that would alter the reasons for rejecting this site in the previous Land Allocation exercise (2013) exercise and the subsequent appeals process. The reasons for rejection remain the same.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Review the comments from the previous HELAA
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP19 - Land at Poplar Meadow, Sandwich (SAN007)
Rep ID	SDLP1573
Rep Status	Processed
Consultee ID	1252100
Consultee Full Name	Mrs Amandajayne Hollobon-Baxter

Consultee Company / Organisation	Sandwich Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP19
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>This site was approved for a much-needed supermarket and due to the fact that Sandwich greatly needs an alternative supermarket, this should be retained as a commercial site. Should DDC determine that this should be considered for housing, STC's comments are as follows.</p> <p>The road alterations that were previously agreed (when the site was approved for a supermarket) should be integrated into the plan, and the proposed dwellings must be of a visual appearance and finishing materials in keeping with the surroundings.</p> <p>Where a site adjoins a watercourse, the watercourse is maintained in its entirety and that only one access/egress can be made across it.</p> <p>Where a site contains mature, healthy trees or hedging that these are to be retained in all cases.</p> <p>All sites that come onto highways that service a school have twenty mile per hour limits as part of the Highways scheme. 20mph speed restriction should begin at Sandwich Technology School affording greater safety outside educational and residential establishments and access roads.</p> <p>Full archaeological surveys (not desktop ones done in Maidstone) should be carried out on all sites within or the surroundings of Sandwich town.</p> <p>All new residential properties must have vehicle electrical charging points which will be necessary by law from 2030.</p> <p>Where a site removes or displaces any on street parking that the loss of parking is made up by additional parking spaces on the site.</p> <p>All properties are to be 50-year flood risk compliant as recommended in the NPPF.</p> <p>All access roads are to be adopted by the County's Highway Authority, so that they are maintained accordingly and there are no rights of dispute.</p> <p>20mph speed restriction should begin at Sandwich Technology School affording greater safety outside educational and residential establishments and access roads.</p> <p>Consideration must be given to the temporary bridge and conditions across The Delf to ensure access is compliant and adopted by County's Highways Authority.</p> <p>All sites to accommodate full fibre communications cabling to allow for super speed internet access to support economic and home working applications.</p> <p>All sites to include drop down curbing allowing adequate accessibility for persons with disabilities or limited lack of mobility.</p> <p>Any additional street lighting shall be unobtrusive, set so as not to cause irritation to neighbouring properties and in the town centre, should be of a heritage style to match existing light standards.</p> <p>This site as well as sites over 40 units should provide adequate road junction improvements to allow large scale traffic flows to move into and out of the site without impacting on existing traffic flows.</p> <p>Further consideration must be given to traverse the pavement, proximity to bus stop, road junction and railway crossing and onto a busy main road.</p>

	<p>All sites must have adequate accessibility made for pedestrian and cyclist travel preference to protect and support alternative travel to motorised vehicles.</p> <p>Suitable screening provision should be introduced to shield all new development from existing neighbouring residents and in particular, where a site is adjacent to an AONB or historic recognition.</p> <p>Section 106 funding should be directed towards improving and updating existing essential services such as doctors, dentists, schools, libraries, toilets, play areas and public recreation.</p> <p>A master plan of Sandwich must be undertaken to ensure that there isn't a cumulative detrimental impact on the town resulting from piecemeal developments.</p> <p>Of the requirement for affordable housing, 65% of this should be rental accommodation, social or council houses. And this should be monitored for compliance.</p> <p>A Design Code for Sandwich should be undertaken.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>This site was approved for a much-needed supermarket and due to the fact that Sandwich greatly needs an alternative supermarket, this should be retained as a commercial site. Should DDC determine that this should be considered for housing, STC's comments are as follows. The road alterations that were previously agreed (when the site was approved for a supermarket) should be integrated into the plan, and the proposed dwellings must be of a visual appearance and finishing materials in keeping with the surroundings. Where a site adjoins a watercourse, the watercourse is maintained in its entirety and that only one access/egress can be made across it.</p> <p>Where a site contains mature, healthy trees or hedging that these are to be retained in all cases. All sites that come onto highways that service a school have twenty mile per hour limits as part of the Highways scheme. 20mph speed restriction should begin at Sandwich Technology School affording greater safety outside educational and residential establishments and access roads. Full archaeological surveys (not desktop ones done in Maidstone) should be carried out on all sites within or the surroundings of Sandwich town. All new residential properties must have vehicle electrical charging points which will be necessary by law from 2030. Where a site removes or displaces any on street parking that the loss of parking is made up by additional parking spaces on the site. All properties are to be 50-year flood risk compliant as recommended in the NPPF. All access roads are to be adopted by the County's Highway Authority, so that they are maintained accordingly and there are no rights of dispute. 20mph speed restriction should begin at Sandwich Technology School affording greater safety outside educational and residential establishments and access roads. Consideration must be given to the temporary bridge and conditions across The Delf to ensure access is compliant and adopted by County's Highways Authority. All sites to accommodate full fibre communications cabling to allow for super speed internet access to support economic and home working applications. All sites to include drop down curbing allowing adequate accessibility for persons with disabilities or limited lack of mobility. Any additional street lighting shall be unobtrusive, set so as not to cause irritation to neighbouring properties and in the town centre, should be of a heritage style to match existing light standards. This site as well as sites over 40 units should provide adequate road junction improvements to allow large scale traffic flows to move into and out of the site without impacting on existing traffic flows. Further consideration must be given to traverse the pavement, proximity to bus stop, road junction and railway crossing and onto a busy main road. All sites must have adequate accessibility made for pedestrian and cyclist travel preference to protect and support alternative travel to motorised vehicles. Suitable screening provision should be introduced to shield all new development from existing neighbouring residents and in particular, where a site is adjacent to an AONB or historic recognition. Section 106 funding should be directed towards improving and updating existing essential services such as doctors, dentists, schools, libraries, toilets, play areas and public recreation. A master plan of Sandwich must be undertaken to ensure that there isn't a cumulative detrimental impact on the town resulting from piecemeal developments. Of the requirement for affordable housing, 65% of this should be rental accommodation, social or council houses. And this should be monitored for compliance. A Design Code for Sandwich should be undertaken.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	

SAP20 - Woods' Yard, Sandwich (SAN008)

Local Plan Consultation Point	SAP20 - Woods' Yard, Sandwich (SAN008)
Rep ID	SDLP400
Rep Status	Processed
Consultee ID	1263168
Consultee Full Name	JOHN ELVIDGE
Consultee Company / Organisation	John Elvidge Planning Consultancy
Agent Full Name	JOHN ELVIDGE
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy SAP20
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	At Appendix D(ii), the Local Plan estimates this site being developed in Years 9 and 10 of the plan period. However, the landowner has already received numerous expressions of interest in the site from land agents and prospective developers. As such, and on the assumption that this allocation forms part of the adopted Local Plan, the site will be marketed forthwith, and it should be possible for development, once consented, to take place during Years 3 and 4, or Years 4 and 5. Planning consent has previously been granted for a widened access road, leading from Woodnesborough Road, which confirms that satisfactory vehicle and pedestrian access arrangements are achievable.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP20 - Woods' Yard, Sandwich (SAN008)
Rep ID	SDLP759
Rep Status	Processed
Consultee ID	1331585
Consultee Full Name	Terence Hopper
Consultee Company / Organisation	
Agent Full Name	Terence Hopper
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP20 Woods Yard (SAN008)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Development of this site would result in a loss of employment land that does not seem to be considered or catered for in the Local Plan. The type of businesses that currently use the site would appear not to have been considered in what could be deemed an exclusionary policy.</p> <p>The desire to tidy up a site should not be given as a reason to grant permission for housing.</p> <p>The site is at risk of surface water flooding and is partially under water every winter season. The desktop survey result for flood risk of a 1 in 100 years chance would be considered laughable for anyone familiar with the site.</p> <p>The sites inclusion would appear also to be contrary to:</p> <p>The National Planning Policy Framework (NPPF) and DDC policies DM6 and DM29</p> <p>The NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at the highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. Given this, there is a need to reduce the risk from coastal change by avoiding inappropriate development in vulnerable areas.</p> <p>Given that this site falls entirely within the flood zones, it would appear likely that unless the local authority has very strong evidence to support the exclusion of SAN019 together with SAN 010 the site would fail the sequential test. for flood risk.</p>

	There have been no significant changes that would alter the reasons for rejecting this site in the previous HELAA exercise and the subsequent appeals process; the reasons for rejection remain the same.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP20 - Woods' Yard, Sandwich (SAN008)
Rep ID	SDLP615
Rep Status	Processed
Consultee ID	1331790
Consultee Full Name	Julie Davies
Consultee Company / Organisation	CPRE Kent
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP20
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We object to the allocation of the site:</p> <ul style="list-style-type: none"> • The NPPF 155 states that 'Inappropriate development in areas at risk of flooding should be avoided ...'. Is in flood zone 2 and 3. The site is subject to flooding and would therefore pose a considerable risk. A key consideration set out in the policy is that a sequential test and flood risk assessment is required. This should be undertaken before taking the decision to allocate the site. • The site is given orange status and the overall landscape summary in HELAA Appendix 3A and the overall landscape summary is: • The development of this site would have an impact on the landscape and further assessment is required to demonstrate whether this can be mitigated. • HELAA Appendix 3B gives the site orange status as 'Highways concerns have been identified in relation to access and/or highway impact and further assessment is required to demonstrate whether this can be mitigated.' • Concerned that the scale of development proposed for Sandwich will have a detrimental impact on the Historic town with its narrow roads. • There is insufficient infrastructure to support the scale of development proposed for Sandwich.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	CPRE Kent would wish to participate at the examination hearings to explore these issues further.
Include files	
Local Plan Consultation Point	SAP20 - Woods' Yard, Sandwich (SAN008)
Rep ID	SDLP1574
Rep Status	Processed
Consultee ID	1252100
Consultee Full Name	Mrs Amandajayne Hollobon-Baxter
Consultee Company / Organisation	Sandwich Town Council
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP20
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The inclusion of this site is supported, as it will improve the appearance of this land. However, the proposal is too dense and should be reduced to 25 homes. Disputed ownership of the access road must be resolved and KCC highways adopt access road. Consideration must be given to the proximity to the railway crossing and tracks. Where a site adjoins a watercourse, the watercourse is maintained in its entirety and that only one access/egress can be made across it. Where a site contains mature, healthy trees or hedging, these are to be retained in all cases. All sites that come onto highways that service a school have twenty mile per hour limits as part of the Highways scheme. Road junction improvements should be considered and evaluated due to being on a bend, close proximity of rail crossing and large vehicles accessing the adjacent leisure park and large vehicles making deliveries to the town (i.e., Co-Op) Proximity to the town wall (Rope Walk to The Butts) should be considered as one of the main travel routes for children attending the Infant School. Full archaeological surveys (not desktop ones done in Maidstone) are carried out on all sites within or the surroundings of Sandwich town. All new residential properties must have vehicle electrical charging points which will be necessary by law from 2030. Where a site removes or displaces any on street parking that the loss of parking is made up by additional parking spaces on the site. All properties are to be 50-year flood risk compliant as recommended in the NPPF. All access roads are to be adopted by the County's Highway Authority, so that they are maintained accordingly and there are no rights of dispute. All sites to accommodate full fibre communications cabling to allow for super speed internet access to support economic and home working applications. All sites to include drop down curbing allowing adequate accessibility for persons with disabilities or limited lack of mobility. Any additional street lighting shall be unobtrusive, set so as not to cause irritation to neighbouring properties and in the town centre, should be of a heritage style to match existing light standards.</p> <p>Sites over 40 units should provide adequate road junction improvements to allow large scale traffic flows to move into and out of the sites without impacting on existing traffic flows. All sites must have adequate accessibility made for pedestrian and cyclist travel preference to protect and support alternative travel to motorised vehicles. Suitable screening provision should be introduced to shield all new development from existing neighbouring residents and in particular, where a site is adjacent to an AONB or historic recognition. Section 106 funding should be directed towards improving and updating existing essential services such as doctors, dentists, schools, libraries, toilets, play areas and public recreation. A master plan of Sandwich must be undertaken to ensure that there isn't a cumulative detrimental impact on the town resulting from piecemeal developments. Of the requirement for affordable housing, 65% of this should be rental accommodation, social or council houses. And this should be monitored for compliance.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>The inclusion of this site is supported, as it will improve the appearance of this land. However, the proposal is too dense and should be reduced to 25 homes. Disputed ownership of the access road must be resolved and KCC highways adopt access road. Consideration must be given to the proximity to the railway crossing and tracks. Where a site adjoins a watercourse, the watercourse is maintained in its entirety and that only one access/egress can be made across it. Where a site contains mature, healthy trees or hedging, these are to be retained in all cases. All sites that come onto highways that service a school have twenty mile per hour limits as part of the Highways scheme. Road junction improvements should be considered and evaluated due to being on a bend, close proximity of rail crossing and large vehicles accessing the adjacent leisure park and large vehicles making deliveries to the town (i.e., Co-Op) Proximity to the town wall (Rope Walk to The Butts) should be considered as one of the main travel routes for children attending the Infant School. Full archaeological surveys (not desktop ones done in Maidstone) are carried out on all sites within or the surroundings of Sandwich town. All new residential properties must have vehicle electrical charging points which will be necessary by law from 2030. Where a site removes or displaces any on street parking that the loss of parking is made up by additional parking spaces on the site. All properties are to be 50-year flood risk compliant as recommended in the NPPF. All access roads are to be adopted by the County's Highway Authority, so that they are maintained accordingly and there are no rights of dispute. All sites to</p>

	<p>accommodate full fibre communications cabling to allow for super speed internet access to support economic and home working applications. All sites to include drop down curbing allowing adequate accessibility for persons with disabilities or limited lack of mobility. Any additional street lighting shall be unobtrusive, set so as not to cause irritation to neighbouring properties and in the town centre, should be of a heritage style to match existing light standards.</p> <p>Sites over 40 units should provide adequate road junction improvements to allow large scale traffic flows to move into and out of the sites without impacting on existing traffic flows. All sites must have adequate accessibility made for pedestrian and cyclist travel preference to protect and support alternative travel to motorised vehicles. Suitable screening provision should be introduced to shield all new development from existing neighbouring residents and in particular, where a site is adjacent to an AONB or historic recognition. Section 106 funding should be directed towards improving and updating existing essential services such as doctors, dentists, schools, libraries, toilets, play areas and public recreation. A master plan of Sandwich must be undertaken to ensure that there isn't a cumulative detrimental impact on the town resulting from piecemeal developments. Of the requirement for affordable housing, 65% of this should be rental accommodation, social or council houses. And this should be monitored for compliance.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	

SAP21 - Land adjacent to Sandwich Technology School, Sandwich (SAN013)

Local Plan Consultation Point	SAP21 - Land adjacent to Sandwich Technology School, Sandwich (SAN013)
Rep ID	SDLP358
Rep Status	Processed
Consultee ID	1331522
Consultee Full Name	Mr IAN BLACK
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 21 land adjacent to Sandwich Technology School
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	For this site, the justification has changed from being related to a charity (the leisure centre) which was intended to provide local facilities, to being related to a private company (an academy school) whose expansion proposals are not primarily orientated towards Sandwich Ward, but towards a wider East Kent area. There has been no consultation nor local discussion about this, and to a lay person appears to be an opportunistic attempt to exploit a previous proposal related to the charity, and acquire assets by opaque manoeuvres. The School, nor DDC nor KCC have given any public indication of their reasoning or justification for this change, nor of its utility to Sandwich Ward. This is certainly unsound, may not be legally compliant and shows no attempt to invoke the neither the spirit nor letter of the duty to cooperate with local residents.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	<p>The proposal is also unsound because it continues to burden the South Ward of Sandwich with the largest potential development site: this ward has already had the Woodnesborough Road and Kumar Nursery sites: there are 3 other additional proposed sites in the South Ward. I welcome the proposed development in North Ward, if it is really necessary to burden this town with 227 houses, whereas Deal, a far larger settlement will only get 223 dwellings under these proposals.</p> <p>Looking at the site specifics:</p> <p>It is high quality arable land, continuously used for food production. Strategy SP1 h is being ignored here, at a time of increasing need for UK food security improvements due to climate change, Brexit, and a need to produce more food locally.</p> <p>It is at increasing risk from flooding, especially adjacent to any site entrance/exit onto Deal road. Policy SP1 j applies.</p> <p>The approach to Sandwich from the A258 roundabout is currently one of good, open arable farmland in constant use on the right hand side, and a screen of trees and a high long established hedge on the left, interrupted by a large school and car park already out of keeping with the rest of the landscape. There is currently a large field between the hedge and the houses along Dover Road, 3 of which are listed. These proposals would worsen the approach to Sandwich with a mass of new houses towering over the hedge and making an abrupt transition from rural to urban environments.</p> <p>A number of mature trees form the boundaries between existing Dover Road houses and the arable land.</p> <p>The SP 22 entry has the comment "Development should be laid out to protect the residential amenity of the existing residential properties to the north-east and designed to take account of the character of the Sandwich Walled Town Conservation Area;" No such comment is made for SP21: are Dover Road properties not worthy of such consideration? Surely the same consideration must apply to both sites.</p> <p>Both SAP 22 and SAP 23 propose buffer zones between the developments and other parts of the site. No buffer zone is proposed on this site, whether between the school, existing residencies or Deal road. What makes this site less worthy of such consideration?</p> <p>The school will need between 1 and 2 ha.....seems a pretty large area variation. It is not as if the school does not have access to extensive land to the west of its current buildings, and this is not land in agricultural use, nor use as recreational land with unimpeded public access. The absence of any discussion and consultation makes this aspect completely unacceptable. Basically local residents are being asked to write a blank cheque for a private company, and to rip up good quality farmland to pay for it. This is unacceptable.</p> <p>Finally, this proposed development seems part of a long term strategy to create "Sandwich New Town"....add this to Kumar, SP 23, Woodnesborough Road and the next step is to justify more infill to the north of Dover Road on yet more good agricultural land....and this was part of an older land use strategy proposed by DDC.</p> <p>DDC already has enough sites to satisfy the 5 year housing need: SP 21 does not need to be sacrificed on this altar.</p>
Include files	
Local Plan Consultation Point	SAP21 - Land adjacent to Sandwich Technology School, Sandwich (SAN013)
Rep ID	SDLP928
Rep Status	Processed
Consultee ID	1331585
Consultee Full Name	Terence Hopper
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP21
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>A document cannot be considered sound, safe, or legally compliant if it contains information that is incorrect or false. This is particularly so if the incorrect or false information leads to changes to the policies, procedures, and outcomes detailed in the document.</p> <p>A document of this nature should be compiled objectively and dispassionately. This is clearly not the case with this document. It contains many minor omissions or additions which seem small in nature when viewed individually but collectively result in significant changes to the overall conclusion and result. It contains language that is clearly designed to sway opinion and influence a decision one way or another. But more importantly, it contains information that is clearly inaccurate.</p> <p>I can only speak to the sample of sites that I have examined in Sandwich, but in that small sample I have identified statements made within the document and indeed proceeding documents, that have caused fundamental changes to the allocations there, and in doing so have caused a knock-on effect in allocations in other parts of the district.</p> <p>It is likely that some of these mistakes are down to bureaucratic failings but this cannot be the case in all circumstances.</p> <p>If this is the case with Sandwich sites, it clearly must be true of other sites in the district.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>It is very hard to make the document legally compliant at this stage given that due to inaccurate statements, two of the sites SAN010 and SAN019 have been removed or partially removed from the local plan. It is particularly disappointing to see these sites removed when much of the evidence to refute the reasons for rejection is already in the hands of DDC, DDC was asked to revisit these two sites by Sandwich Town Council at the regulation 18 stage, and at that time DDC had the relevant information, via a successful planning application on part of SAN010 to show that the main reasons for rejecting these two sites were no longer valid. SAN010 planning reference 21/01309</p> <p>Statements related to Site SAP21 are, it would appear, also untrue. The Head Teacher at the school has informed local councilors that she had not been consulted on the expansion of the school. The manner in which the allocation was changed between the Regulation 18 and Regulation 19 stages, without consultation with the majority of the stakeholders being consulted or made aware is questionable, to say the least.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I wish to speak with the inspector to give oral evidence regarding the exclusion of site SAN010 and allow them to ask questions of me that might help them in the deliberations on this site
Include files	
Local Plan Consultation Point	SAP21 - Land adjacent to Sandwich Technology School, Sandwich (SAN013)
Rep ID	SDLP608

Rep Status	Processed
Consultee ID	1331585
Consultee Full Name	Terence Hopper
Consultee Company / Organisation	
Agent Full Name	Terence Hopper
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 21 Land Adjacent To Sandwich Technology School
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I object to the change to the site allocation policy for this site SAP021</p> <p>The proposed changes to the sites original allocation appear to be contrary to: PM4, PM5, PM6, SP1(f), SP2, DM1, DM4, CC1, Localism Act 2011.</p> <p>The reallocation of this site appears not to have been informed by stakeholder and community engagement and so it is possible that DDC may not have acted as required by the NPPF guidance.</p> <p>The document appears to contain statements regarding this site that are misleading and possibly false. This could call into question the legality and justification for the changes to the allocation for this site and by extension, the legality and justification of the Regulation 19 document as a whole.</p> <p><i>How has it been prepared? 1.4 The preparation of the Local Plan has been informed by stakeholder and community engagement,</i></p> <p>The plan states</p> <p><i>4.191 The previous site allocation policy for this site safeguarded an area of land within this site for the expansion of Sandwich Sports and Leisure Centre. However, the council has recently updated the Indoor Sport and Leisure Facility Strategy (2022) which does not identify a need for expansion of this facility, and the site is now under management of the school. KCC education, and the school themselves have identified a need for school expansion.</i></p> <p>This statement is blatantly false and completely contrary to the findings of the plans sports and leisure assessments. as detailed in PM4 6.55 and PM4 6.56</p> <p>PM4 6.55</p> <p><i>6.55 However, the main priorities emerging from the Strategy in relation to meeting future needs are: There is a deficit in swimming pool water space of a 6 lane 25m pool.</i></p> <p><i>the latent demand reports completed for Tides Leisure Centre show that a significant level of latent demand exists for that site.</i></p>

Other potential areas for improved health and fitness facilities are in the settlements of Aylesham and Sandwich. There is a requirement to increase the level of provision of dedicated multi-purpose studio space within the District. This is linked to the potential latent demand for health and fitness facilities, which also support the need for increased studio space for group exercise.

There is unmet demand in the district for boxing and martial arts facilities, with strong growth in club membership in recent years. Boxing and martial arts clubs looking for dedicated facilities will be supported in doing so.

Outdoor Sports and Playing Pitches

6.56 To inform the provision of outdoor playing pitches in the District, the Council produced a Playing Pitch Strategy (PPS) in 2019. The primary purpose of the PPS is to provide a strategic framework which ensures that the provision of outdoor playing pitches meets local and community needs for existing and future residents, and visitors to the district.

there are both current and future localised shortfalls in specific analysis areas. 3G pitches - Supply and demand analysis highlight that Dover District has insufficient supply of 3G pitches to meet current and future demand for football training, based on the FA training model. This shortfall equates to two full size 3G pitches.

DDC has indicated that there is no further need for extra sports facilities in the district, this is blatantly untrue as evidenced above. Furthermore; the bulk of these facilities are concentrated in the South of the district, in Dover and Deal, remote from Sandwich and its residents. That may not prove particularly problematic for those that have the means and the ability to access these facilities, but completely excludes those who don't. The socially disadvantaged and those that might need to be encouraged to take more exercise are precisely the people within our communities that we should be aiming to facilitate. The planned changes to the site appear to exclude the very people most at risk and as such, the loss of our site to accommodate school expansion or housing would appear to be contrary to strategic policy **SP2 Planning For a Healthy and Inclusive Community. Together with PM4 Sports Provision**

Strategic Policy 2 - Planning for Healthy and Inclusive Communities.

What are we trying to achieve?

3.16 To support improvements in the health and well-being of residents, improve quality of life for all and reduce health inequalities through high-quality place-making, including the provision of high-quality green infrastructure and access to attractive areas of public open spaces in the built-up areas of the District.

PM4 - Sports Provision What are we trying to achieve?

6.52 To improve the provision of good quality sports facilities, to meet the District's needs and increase participation in sports and physical activity, particularly among children and young people, to tackle obesity and improve health and well-being. Justification for approach

6.53 One of the core planning principles of the NPPF (2021) is to improve health, social and cultural well-being for all, and deliver sufficient community and cultural facilities and services to meet local needs. It establishes the importance of access to high quality open spaces and opportunities for sport and recreation that can make an important contribution to the health and well-being of communities. Indoor Sports

The statement from DDC that there is no need for an expansion of the current sports facility is purposely misleading. DDC has been made well aware that rather than an expansion to the current facility, there was to be a new community facility built on this land. The plans have been appraised and agreed upon by DDC planning officers through the normal pre-application process, for which the trustees paid £1,200

Copy of plans and email conversations with DDC planning officers inc pre app request/advice

Furthermore:

It would appear that the Head Teacher at Sandwich Technology School was not consulted on the changes to this document either by KCC or DDC and is not in favour of the expansion of the school. You will note that the school has academy status and is therefore pretty much in control of its own destiny.

This would appear to be contrary to obligations to make proper consultation and brings into question whether or not the plan itself is legal and/or justified.

Copy of letter from the school to Sandwich Town Council attached.

An extract from the HELAA on this site states

HELAA Main Report September 2022

SAN013 Land adjacent to Sandwich Technology School, Deal Road, Sandwich 60 40 To take into account the area of the site at risk from surface water flooding

This comment was extracted from the HELAA main report and designed one would assume to help support the proposed changes at the regulation 19 stage. It would appear to be, at the very least, disingenuous, given that this is one of the sites in Sandwich at least at risk from flooding.

It would appear therefore that the reasons given by DDC for the changes in the plan for SAP021 between the Regulation 18 and Regulation 19 stages are not well evidenced, contain false or misleading statements and lacked the desired level of consultation between the interested parties (Sandwich Technology School, Sandwich Town Council, The trustees to whom the land was originally promised etc). It would appear that the change was effected by some rather opaque deal between the KCC and DDC. and there should be serious concerns about how this proposed change to the original allocation came about.

Expansion of the school will be almost entirely to provide for children in Deal, Dover and Thanet where the provision of educational facilities has not kept pace with the rapid expansion of housing. There will be little benefit to the town of Sandwich, its shops and businesses or its residents. And the loss of a community space combined with extra traffic and parking issues will have a long-term detrimental impact on Sandwich residents.

Deal and Walmer have recently experienced high levels of housing development and yet I noticed that DDC has not offered the spare land it has at Tides Leisure Centre, in order to facilitate an expansion of the adjacent Goodwin academy in Deal.

In fact, the plans infrastructure delivery plan appendix 1. infrastructure delivery schedule IDS indicates there are no plans to expand provision at any other secondary school in the district, despite the substantial housing increase in both Dover and Deal. I very much suspect it is likely the same for Thanet District Council.

The decision to change the allocation in the Reg 19 document would therefore appear to be contrary to the aims of the local plan. Specifically policy DM4 sustainable Travel and SP1 (f) Reducing The Need To Travel

In order to fit with the aims of the Local Plan; 'to reduce the carbon footprint of the district and to promote sustainable travel, the provision of facilities such as schooling should take place where the need occurs/ is highest. Expansion of the school would appear to be contrary to policies DM1, DM4 and SP1(f)

DM1 Reduce Carbon Emissions

Sustainable travel and SP1 (f. Reducing the need to travel and maximising opportunities for 'smarter' sustainable transport options to deliver the highest possible share of trips by the most sustainable travel modes. and

Expansion of the school will be detrimental to the town in terms of the loss of potential community assets and an increase in traffic and verge-side parking outside the entrance and along Dover Road which has already been blighted by the housing development there.

The proposal to expand the school represents such an onerous contribution by the land owner/developers that it is possible that the site will not be put forward for development. We will then lose the opportunity of gaining land for the community.

This action by DDC has the likely result that Sandwich will lose any chance to build what will undoubtedly be a valuable asset for the future of our community

The current proposal to expand the school and that made in the representations by the land owner, to allocate all of the land for housing, will result in the loss of what has the potential to be a significant asset for the future of Sandwich, both in terms of amenity and of the future physical and mental well being of the communities residents.

DDC seem to have developed a planning strategy that will require people in Sandwich and surrounding areas to travel to Dover and Deal for leisure facilities and for children from Dover and Deal to travel to Sandwich for educational needs. This would appear contrary to policy DM4 Sustainable Travel and SP1 (f) reducing the need to travel

SP1 (f). *Reducing the need to travel and maximising opportunities for 'smarter' sustainable transport options to deliver the highest possible share of trips by the most sustainable travel modes.*

Surely it would be more beneficial for the children of Sandwich and those in the surrounding areas, to have easy access to sports and recreational facilities, and the educational need of the children in the expanding communities of Dover, Deal and Thanet, be facilitated in those communities?

It is well recognised that there is a current problem nationally with children not being able to swim and not having the facilities to be able to learn to swim. DDC should look to ensure that the children of the people it represents have easy access to the appropriate facilities.

Local schools and Sandwich Technology School in particular would benefit from having the expanded sports and leisure facilities in close proximity.

However, the proposed facility should not be thought of as just a gym and a pool, it would be a community space.

And, as per the findings of the Neighbourhood Plan Steering committee, set up by STC in response to the 2010 process. *'The Sports Centre could form the focal point for future housing development in the town'*

It should be noted that the trustees to whom the land is to be passed have the support of a large developer with local connections, who wishes to give something back to the Town.

DDC has highlighted the difficulty in finding suitable housing sites within the town and recognises in the document that the quantity of housing planned for Sandwich is less than would normally be expected for a rural service centre, because of this difficulty. And yet it proposes a change to the allocation on this site that will not only unnecessarily rob its residents of a valuable piece of community land, but also reduce the housing provision within the town by twenty units.

The previous allocation of a mixed development on this site appears to be the most viable option, providing a reasonable level of housing development, while also providing potential for a facility that will be of great value to the community of Sandwich.

The original allocation would also help ensure that the contributions for developing sports and leisure facilities made by the developers of the various sites in Sandwich are used to develop facilities that benefit the town itself, rather than being spread/ spent in other communities within the district which finds favour with DDC.

Improve community involvement.

The development of a community facility on this site. As allocated in the previous plan, has the potential to greatly increase community involvement and will help to change the perception amongst many of the town's residents, that is only that part of the town within and around the walls that are generally considered of importance by the Town and District Councils.

The school has adequate land on which to build new structures, close to the most recent build and the caretaker's house.

This is a speculative land grab by the school and the KCC. it will not benefit the community of Sandwich.

Removal of the site for sports and leisure use would appear to be contrary to PM4. PM5. and PM6.

PM4 - *Sports Provision What are we trying to achieve?*

6.52 *To improve the provision of good quality sports facilities, to meet the District's needs and increase participation in sports and physical activity, particularly among children and young people, to tackle obesity and improve health and well-being. Justification for approach*

6.53 *One of the core planning principles of the NPPF (2021) is to improve health, social and cultural well-being for all, and deliver sufficient community and cultural facilities and services to meet local needs. It establishes the importance of access to high quality open spaces and opportunities for sport and recreation that can make an important contribution to the health and well-being of communities. Indoor Sports*

6.55 *However, the main priorities emerging from the Strategy in relation to meeting future needs are: There is a deficit in swimming pool water space of a 6 lane 25m pool.*

the latent demand reports completed for Tides Leisure Centre show that a significant level of latent demand exists for that site. Which would imply there is further need for sports facilities that are not being met

Other potential areas for improved health and fitness facilities are in the settlements of Aylesham and Sandwich. There is a requirement to increase the level of provision of dedicated multi-purpose studio space within the District. This is linked to the potential latent demand for health and fitness facilities, which also support the need for increased studio space for group exercise.

There is unmet demand in the district for boxing and martial arts facilities, with strong growth in club membership in recent years. Boxing and martial arts clubs looking for dedicated facilities will be supported in doing so.

PM5 - Protection of Open Space, Sports Facilities and Local Green Space

What are we trying to achieve?

6.69 To ensure that valued open spaces within the District are retained and protected for all to access and enjoy, to promote active lifestyles and healthy and inclusive communities. To ensure that existing deficiencies in open space are not increased and that the future needs of communities

6.72 The NPPF states that existing open space, sports and recreational buildings and land (including playing fields) should not be built on unless it can be demonstrated that they are surplus to requirements, the loss would be replaced by equivalent or better provision or the development is for alternative sports and recreation provision.

PM6 - Community Facilities and Services What are we trying to achieve?

6.85 To ensure that all the District's communities are well served by a range of public, private, community and voluntary services and facilities that are appropriate to meet people's everyday needs, and are affordable and accessible.

Justification for approach

6.86 The NPPF (2021) states that planning policies and decisions should plan positively for the provision and use of community facilities and other local services to enhance the sustainability of communities and residential environments and guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs.

6.87 The provision of healthy and sustainable communities is central to the vision of this Local Plan. For neighbourhoods and villages to function effectively as communities with a high quality of life, minimising social exclusion and promoting integration and healthy lifestyles, it is important that the people living in them have easy access to a good range of community facilities and services. Having things to do and places to go underpins people's physical and mental health for all sections of the community.

6.88 Some community facilities need to be provided at the level of the neighbourhood or village, whereas others are more likely to be of a scale that means they should be provided at strategic locations such as town centres (for example museums and arts facilities). All community facilities should however be inclusive and easily accessible on foot or by public transport.

6.89 Given the provision of community services and facilities is an important part of the Council's vision for maintaining sustainable communities within Strategic Policy SP2 – Planning for Healthy and Inclusive Communities, and that they are recorded within the Settlement Hierarchy Matrix which supports this Local Plan, it is very important that they are not lost, particularly in the rural areas. This policy ensures that they can only be lost if they are no longer needed, or if they are satisfactorily replaced with an alternative provision.

6.90 The Council recognises that local communities are often best placed to identify buildings or land that furthers their social well-being, or social interests, as well as neighbourhood infrastructure needs. It is also recognised however that there may be challenges relating to ensuring sufficient funding for ongoing operational costs associated with a community facility. It is therefore important to ensure that existing land and facilities for community purpose is not lost to other uses without careful consideration of local needs and options for retaining the opportunity in community use. Assets of Community Value (ACV) as designated under the Localism Act 2011 by local communities cannot be considered for loss or redevelopment.

Assets of Community Value (ACV) as designated under the Localism Act 2011 by local communities cannot be considered for loss or redevelopment.

Although this land had yet to be passed to the community it had been allocated for community use and could arguably be considered to be an Asset Of Community Value (AVC) and therefore under the provisions of the Localism Act, 2011 cannot be considered for loss or development.

The owners of this land made the offer of donating land for community use, directly to the government inspector, at the public examination of the previous local plan. It was made in order to secure the development of 60 houses on the remaining land.

	<p>The stalling of the development of this land and the subsequent changes to the allocation proposed by the land owners are simply undertaken to avoid the obligation placed upon them by the previous plan allocation. Under these circumstances, they should not be considered. and their application to change the allocation should therefore be excluded under the provisions of the Localism Act 2011.</p> <p>The application by KCC would appear not to be supported by the school itself, which has academy status and therefore changes to the previous allocation for the land, that would cause loss of community land should also be excluded under the provisions of the Localism Act 2011</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Revisit the plan and re assess the current planned allocation</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>I am one of the trustees to whom the designated community land was to be passed. I would like to speak directly to the inspector to explain our aims to develop a sports, leisure, and community centre for the people of Sandwich, and how we intend to achieve it. I may be able to give answers to the inspector to help them in their deliberations on this site.</p>
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP21 - Land adjacent to Sandwich Technology School, Sandwich (SAN013)</p>
<p>Rep ID</p>	<p>SDLP856</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331585</p>
<p>Consultee Full Name</p>	<p>Terence Hopper</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	<p>Terence Hopper</p>
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP21 Land Adjacent to Sandwich Technology School (SAN013)</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Local Sandwich and District councilor Mr Daniel Friend conducted an online petition through his FaceBook page. The petition ran for less than two weeks from December 1st 2022 to dec 9th 2022 Please see attached petition of 265 names
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	that DDC takes cognisance of the strength of feeling amongst the residents of Sandwich, that this change to the recognised land allocation is unjust and detrimental to our community and the manner in which it has been changed should be a matter of deep concern.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP21 - Land adjacent to Sandwich Technology School, Sandwich (SAN013)
Rep ID	SDLP820
Rep Status	Processed
Consultee ID	1331585
Consultee Full Name	Terence Hopper
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP21 Land Adjacent to Sandwich Technology School (SAN013)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The Indoor Sports and Facilities Strategy 2022 Identifies a need for Indoor Sport New Health and Fitness Facilities Identified need in this area as set out in the Indoor Sports and Facilities Strategy 2022 In the Sandwich area source infrastructure Delivery Plan IDP App1 Pg 53</p> <p>It is interesting to note that while the Sandwich Sports Centre was in the hands of the community trustees DDC felt unable to support it, despite many requests and meetings between the trustees and DDC heads.</p> <p>Now that a £1.5m community asset, representing tens of thousands of hours of community time and effort, freely given, to raise the funds for, build and run for thirty years has fallen into the hands of the school through lack of support from DDC, DDC now seems able to support it through plans to provide a sink fund for future repairs.</p> <p>while I welcome the support of the Sports Centre in order to ensure future sports provision to Sandwich residents. I am saddened that DDC allowed it to be lost from community ownership.</p> <p>It should also be noted that despite gaining this property without any payment whatsoever, the school refused to make any assurances regarding future access to the public, and it is quite possible if the school should decide that is in its own interest, that Sandwich residents could lose all access to any sports and leisure provision.</p> <p>It would now appear that despite a recognised shortfall in the Sandwich area of indoor Health and Fitness Facilities, of the type planned by the former trustees of the Sports Centre, DDC seems set on changing the previous allocation of this land for Community Sports and Leisure use.</p> <p>The trustees have worked hard to plan for a new facility, the building of which, will ensure the security of future Sports and Leisure Provision in Sandwich.</p> <p>It would seem for some reason that DDC is again trying to thwart their efforts to provide for the physical and mental well-being of their community.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness	Change the allocation back to its original status. DDC to support the building of a new facility to meet the recognised shortfall of this type of provision in the area. Or at the very least stop trying to hamper it and work constructively with those to provide a facility for the community of Sandwich

matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP21 - Land adjacent to Sandwich Technology School, Sandwich (SAN013)
Rep ID	SDLP699
Rep Status	Processed
Consultee ID	1331585
Consultee Full Name	Terence Hopper
Consultee Company / Organisation	
Agent Full Name	Terence Hopper
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 21 Land Adjacent To Sandwich Technology School
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I object to the change to the site allocation policy for this site SAP021 The proposed changes to the site's original allocation appear to be contrary to: PM4, PM5, PM6, SP1(f), SP2, DM1, DM4, CC1, Localism Act 2011.

The reallocation of this site appears not to have been informed by stakeholder and community engagement and so it is possible that DDC may not have acted as required by the NPPF guidance.

The document appears to contain statements regarding this site that is misleading and possibly false. This could call into question the legality and justification for the changes to the allocation for this site and by extension, the legality and justification of the Regulation 19 document as a whole.

How has it been prepared? 1.4 The preparation of the Local Plan has been informed by stakeholder and community engagement,

The plan states

4.191 The previous site allocation policy for this site safeguarded an area of land within this site for the expansion of Sandwich Sports and Leisure Centre. However, the council has recently updated the Indoor Sport and Leisure Facility Strategy (2022) which does not identify a need for expansion of this facility, and the site is now under management of the school. KCC education, and the school themselves have identified a need for school expansion.

This statement is blatantly false and completely contrary to the findings of the plans sports and leisure assessments. as detailed in **PM4 6.55** and **PM4 6.56**

PM4 6.55

6.55 However, the main priorities emerging from the Strategy in relation to meeting future needs are: There is a deficit in swimming pool water space of a 6 lane 25m pool.

the latent demand reports completed for Tides Leisure Centre show that a significant level of latent demand exists for that site.

Other potential areas for improved health and fitness facilities are in the settlements of Aylesham and Sandwich. There is a requirement to increase the level of provision of dedicated multi-purpose studio space within the District. This is linked to the potential latent demand for health and fitness facilities, which also support the need for increased studio space for group exercise.

There is unmet demand in the district for boxing and martial arts facilities, with strong growth in club membership in recent years. Boxing and martial arts clubs looking for dedicated facilities will be supported in doing so.

Outdoor Sports and Playing Pitches

6.56 To inform the provision of outdoor playing pitches in the District, the Council produced a Playing Pitch Strategy (PPS) in 2019. The primary purpose of the PPS is to provide a strategic framework which ensures that the provision of outdoor playing pitches meets local and community needs for existing and future residents, and visitors to the district.

there are both current and future localised shortfalls in specific analysis areas. 3G pitches - Supply and demand analysis highlight that Dover District has insufficient supply of 3G pitches to meet current and future demand for football training, based on the FA training model. This shortfall equates to two full size 3G pitches.

DDC has indicated that there is no further need for extra sports facilities in the district, this is blatantly untrue as evidenced above. Furthermore; the bulk of these facilities are concentrated in the South of the district, in Dover and Deal, remote from Sandwich and its residents. That may not prove particularly problematic for those that have the means and the ability to access these facilities, but completely excludes those who don't. The socially disadvantaged and those that might need to be encouraged to take more exercise are precisely the people within our communities that we should be aiming to facilitate. The planned changes to the site appear to exclude the very people most at risk and as such, the loss of our site to accommodate school expansion or housing would appear to be contrary to strategic policy **SP2 Planning For a Healthy and Inclusive Community. Together with PM4 Sports Provision**

Strategic Policy 2 - Planning for Healthy and Inclusive Communities.

What are we trying to achieve?

3.16 To support improvements in the health and wellbeing of residents, improve quality of life for all and reduce health inequalities through high quality place making, including the provision of high quality green infrastructure and access to attractive areas of public open spaces in the built up areas of the District.

PM4 - Sports Provision What are we trying to achieve?

6.52 To improve the provision of good quality sports facilities, to meet the District's needs and increase participation in sports and physical activity, particularly among children and young people, to tackle obesity and improve health and well-being. Justification for approach

6.53 One of the core planning principles of the NPPF (2021) is to improve health, social and cultural well-being for all, and deliver sufficient community and cultural facilities and services to meet local needs. It establishes the importance of access to high quality open spaces and opportunities for sport and recreation that can make an important contribution to the health and well-being of communities. Indoor Sports

The statement from DDC that there is no need for an expansion of the current sports facility is purposely misleading. DDC has been made well aware that rather than an expansion to the current facility, there was to be a new community facility built on this land. The plans have been appraised and agreed upon by DDC planning officers through the normal pre-application process, for which the trustees paid £1,200

Copy of plans and email conversations with DDC planning officers inc pre app request/advice

Furthermore:

It would appear that the Head Teacher at Sandwich Technology School was not consulted on the changes to this document either by KCC or DDC and is not in favour of the expansion of the school. You will note that the school has academy status and is therefore pretty much in control of its own destiny.

This would appear to be contrary to obligations to make proper consultation and brings into question whether or not the plan itself is legal and/or justified.

Copy of letter from school to Sandwich Town Council attached.

An extract from the HELAA on this site states

HELAA Main Report September 2022

SAN013 Land adjacent to Sandwich Technology School, Deal Road, Sandwich 60 40 To take into account the area of site at risk from surface water flooding

This comment was extracted from the HELAA main report and designed one would assume to help support the proposed changes at the regulation 19 stage. It would appear to be, at the very least, disingenuous, given that this is one of the sites in Sandwich at least at risk from flooding.

It would appear therefore that the reasons given by DDC for the changes in the plan for SAP021 between the Regulation 18 and Regulation 19 stages are not well evidenced, contain false or misleading statements and lacked the desired level of consultation between the interested parties (Sandwich Technology School, Sandwich Town Council, The trustees to whom the land was originally promised etc). It would appear that the change was effected by some rather opaque deal between the KCC and DDC. and there should be serious concerns about how this proposed change to the original allocation came about.

Expansion of the school will be almost entirely to provide for children in Deal, Dover and Thanet where the provision of educational facilities has not kept pace with the rapid expansion of housing. There will be little benefit to the town of Sandwich, its shops and businesses or its residents. And the loss of a community space combined with extra traffic and parking issues will have a long-term detrimental impact on Sandwich residents.

Deal and Walmer have recently experienced high levels of housing development and yet I noticed that DDC has not offered the spare land it has at Tides Leisure Centre, in order to facilitate an expansion of the adjacent Goodwin academy in Deal.

In fact, the plans infrastructure delivery plan appendix 1. infrastructure delivery schedule IDS indicates there are no plans to expand provision at any other secondary school in the district, despite the substantial housing increase in both Dover and Deal. I very much suspect it is likely the same for Thanet District Council.

The decision to change the allocation in the Reg 19 document would therefore appear to be contrary to the aims of the local plan. Specifically policy DM4 sustainable Travel and SP1 (f) Reducing The Need To Travel

In order to fit with the aims of the Local Plan; 'to reduce the carbon footprint of the district and to promote sustainable travel, the provision of facilities such as schooling should take place where the need occurs/ is highest. Expansion of the school would appear to be contrary to policies DM1, DM4 and SP1(f)

DM1 Reduce Carbon Emissions

Sustainable travel and SP1 (f. *Reducing the need to travel and maximising opportunities for 'smarter' sustainable transport options to deliver the highest possible share of trips by the most sustainable travel modes.* and

Expansion of the school will be detrimental to the town in terms of the loss of potential community assets and an increase in traffic and verge-side parking outside the entrance and along Dover Road which has already been blighted by the housing development there.

The proposal to expand the school represents such an onerous contribution by the land owner/developers that it is possible that the site will not be put forward for development. We will then lose the opportunity of gaining land for the community.

This action by DDC has the likely result that Sandwich will lose any chance to build what will undoubtedly be a valuable asset for the future of our community

The current proposal to expand the school and that made in the representations by the land owner, to allocate all of the lands for housing, will result in the loss of what has the potential to be a significant asset for the future of Sandwich, both in terms of amenity and of the future physical and mental well being of the communities residents.

DDC seem to have developed a planning strategy that will require people in Sandwich and surrounding areas to travel to Dover and Deal for leisure facilities and for children from Dover and Deal to travel to Sandwich for educational needs. This would appear contrary to policy DM4 Sustainable Travel and SP1 (f) reducing the need to travel

SP1 (f). *Reducing the need to travel and maximising opportunities for 'smarter' sustainable transport options to deliver the highest possible share of trips by the most sustainable travel modes.*

Surely it would be more beneficial for the children of Sandwich and those in the surrounding areas, to have easy access to sports and recreational facilities, and the educational need of the children in the expanding communities of Dover, Deal and Thanet, be facilitated in those communities?

It is well recognised that there is a there is a current problem nationally with children not being able to swim and not having the facilities to be able to learn to swim. DDC should look to ensure that the children of the people it represents have easy access to the appropriate facilities.

Local schools and Sandwich Technology School in particular would benefit from having the expanded sports and leisure facilities in close proximity.

However, the proposed facility should not be thought of as just a gym and a pool, it would be a community space.

And, as per the findings of the Neighbourhood Plan Steering committee, set up by STC in response to the 2010 process. *'The Sports Centre could form the focal point for future housing development in the town'*

It should be noted that the trustees to whom the land is to be passed have the support of a large developer with local connections, who wishes to give something back to the Town.

DDC has highlighted the difficulty in finding suitable housing sites within the town and recognises in the document that the quantity of housing planned for Sandwich is less than would normally be expected for a rural service centre, because of this difficulty. And yet it proposes a change to the allocation on this site that will not only unnecessarily rob its residents of a valuable piece of community land, but also reduce the housing provision within the town by twenty units.

The previous allocation of a mixed development on this site appears to be the most viable option, providing a reasonable level of housing development, while also providing potential for a facility that will be of great value to the community of Sandwich.

The original allocation would also help ensure that the contributions for developing sports and leisure facilities made by the developers of the various sites in Sandwich are used to develop facilities that benefit the town itself, rather than being spread/ spent in other communities within the district which finds favour with DDC.

Improve community involvement.

The development of a community facility on this site. As allocated in the previous plan, has the potential to greatly increase community involvement and will help to change the perception amongst many of the town's residents, that is only that part of the town within and around the walls that are generally considered important by the Town and District Councils.

The school has adequate land on which to build new structures, close to the most recent build and the caretaker's house.

This is a speculative land grab by the school and the KCC. it will not benefit the community of Sandwich.

Removal of the site for sports and leisure use would appear to be contrary to PM4. PM5. and PM6.

PM4 - Sports Provision What are we trying to achieve?

6.52 To improve the provision of good quality sports facilities, to meet the District's needs and increase participation in sports and physical activity, particularly among children and young people, to tackle obesity and improve health and well-being. Justification for approach

6.53 One of the core planning principles of the NPPF (2021) is to improve health, social and cultural well-being for all, and deliver sufficient community and cultural facilities and services to meet local needs. It establishes the importance of access to high quality open spaces and opportunities for sport and recreation that can make an important contribution to the health and well-being of communities. Indoor Sports

6.55 However, the main priorities emerging from the Strategy in relation to meeting future needs are: There is a deficit in swimming pool water space of a 6 lane 25m pool.

the latent demand reports completed for Tides Leisure Centre show that a significant level of latent demand exists for that site. Which would imply there is further need for sports facilities that are not being met

Other potential areas for improved health and fitness facilities are in the settlements of Aylesham and Sandwich. There is a requirement to increase the level of provision of dedicated multi-purpose studio space within the District. This is linked to the potential latent demand for health and fitness facilities, which also support the need for increased studio space for group exercise.

There is unmet demand in the district for boxing and martial arts facilities, with strong growth in club membership in recent years. Boxing and martial arts clubs looking for dedicated facilities will be supported in doing so.

PM5 - Protection of Open Space, Sports Facilities and Local Green Space

What are we trying to achieve?

6.69 To ensure that valued open spaces within the District are retained and protected for all to access and enjoy, to promote active lifestyles and healthy and inclusive communities. To ensure that existing deficiencies in open space are not increased and that that the future needs of communities

6.72 The NPPF states that existing open space, sports and recreational buildings and land (including playing fields) should not be built on unless it can be demonstrated that they are surplus to requirements, the loss would be replaced by equivalent or better provision or the development is for alternative sports and recreation provision.

PM6 - Community Facilities and Services What are we trying to achieve?

6.85 To ensure that all the District's communities are well served by a range of public, private, community and voluntary services and facilities that are appropriate to meet people's everyday needs ,and are affordable and accessible.

Justification for approach

6.86 The NPPF (2021) states that planning policies and decisions should plan positively for the provision and use of community facilities and other local services to enhance the sustainability of communities and residential environments and guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs.

6.87 The provision of healthy and sustainable communities is central to the vision of this Local Plan. For neighbourhoods and villages to function effectively as communities with a high quality of life, minimising social exclusion and promoting integration and healthy lifestyles, it is important that the people living in them have easy access to a good range of community facilities and services. Having things to do and places to go underpins people's physical and mental health for all sections of the community.

6.88 Some community facilities need to be provided at the level of the neighbourhood or village, whereas others are more likely to be of a scale that means they should be provided at strategic locations such as town centres (for example museums and arts facilities). All community facilities should however be inclusive and easily accessible on foot or by public transport.

6.89 Given the provision of community services and facilities is an important part of the Council's vision for maintaining sustainable communities within Strategic Policy SP2 – Planning for Healthy and Inclusive Communities, and that they are recorded within the Settlement Hierarchy Matrix which supports this Local Plan, it is very important that they are not lost, particularly in the rural areas. This policy ensures that they can only be lost if they are no longer needed, or if they are satisfactorily replaced with an alternative provision.

6.90 The Council recognises that local communities are often best placed to identify buildings or land that furthers their social well-being, or social interests, as well as neighbourhood infrastructure needs. It is also recognised however that there may be challenges relating to ensuring sufficient funding for ongoing operational costs associated with a community facility. It is therefore important to ensure that existing land and facilities for community purpose is not lost to other uses without careful consideration of local needs and options for retaining the opportunity in community use. Assets of Community Value (ACV) as designated under the Localism Act 2011 by local communities cannot be considered for loss or redevelopment.

Assets of Community Value (ACV) as designated under the Localism Act 2011 by local communities cannot be considered for loss or redevelopment.

Although this land had yet to be passed to the community it had been allocated for community use and could arguably be considered to be an Asset Of Community Value (AVC). Therefore under the provisions of the Localism Act, 2011 cannot be considered for loss or development.

The owners of this land made the offer of donating land for community use, directly to the government inspector, at the public examination of the previous local plan. It was made in order to secure the development of 60 houses on the remaining land.

The stalling of the development of this land and the subsequent changes to the allocation proposed by the land owners are simply undertaken to avoid the obligation placed upon them by the previous plan allocation. Under these circumstances, they should not be considered. and their application to change the allocation should therefore be excluded under the provisions of the Localism Act 2011.

The application by KCC would appear not to be supported by the school itself, which has academy status and therefore changes to the previous allocation for the land, that would cause loss of community land should also be excluded under the provisions of the Localism Act 2011

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Return the proposal for this site to the original allocation of the previous plan (2013). and perhaps include a degree of certainty so that we may work toward this community project.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

I am one of the trustees in whose custody the land allocated for sports, leisure, and community use was to be passed. I would like to be able to speak directly to the inspector in order to tell them what we envisage for the site and how we plan to achieve it. It might also be beneficial for the inspector to be able to ask questions of me in order to assist in their deliberations on the site

Include files	
Local Plan Consultation Point	SAP21 - Land adjacent to Sandwich Technology School, Sandwich (SAN013)
Rep ID	SDLP764
Rep Status	Processed
Consultee ID	1331585
Consultee Full Name	Terence Hopper
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP21
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	PM4 appears to be applied in such a manner as to centralise much of the sports provision, to the point where it excludes the most vulnerable and disadvantaged in our society. The re-allocation of land at SAP21 from community land destined to enhance the health and welfare of the residents of Sandwich. To land for the expansion of the adjacent school, in order to facilitate the education of the expanding populations of Deal, Dover and Thanet, is a prime example.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	

Include files	
Local Plan Consultation Point	SAP21 - Land adjacent to Sandwich Technology School, Sandwich (SAN013)
Rep ID	SDLP715
Rep Status	Processed
Consultee ID	1331831
Consultee Full Name	Catesby Estates
Consultee Company / Organisation	Catesby Estates
Agent Full Name	Lucy Wilford
Agent Company / Organisation	DHA Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Local Plan Allocations - SAP 21
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	See supporting statement attached
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	See supporting statement attached
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	In order to ensure that our case is properly put forward and understood, and to provide the opportunity to respond to any questions/points raised by the Council and Local Plan Inspector which might result outside the written representations made and following discussion at the EIP.
Include files	Catesby Final Dover District Council Reps .pdf (2)
Local Plan Consultation Point	SAP21 - Land adjacent to Sandwich Technology School, Sandwich (SAN013)
Rep ID	SDLP712
Rep Status	Processed
Consultee ID	1331831
Consultee Full Name	Catesby Estates
Consultee Company / Organisation	Catesby Estates
Agent Full Name	Lucy Wilford
Agent Company / Organisation	DHA Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Site Allocations - SAP21 : Land adjacent to Sandwich Technology School, Deal Road and supporting paras 4.188-4.191 and accompanying proposals map
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Refer to supporting statement attached
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Refer to supporting statement attached

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	In order to ensure that our case is properly put forward and understood, and to provide the opportunity to respond to any questions/points raised by the Council and Local Plan Inspector which might result outside the written representations made and following discussion at the EIP.
Include files	Catesby Final Dover District Council Reps .pdf (1)
Local Plan Consultation Point	SAP21 - Land adjacent to Sandwich Technology School, Sandwich (SAN013)
Rep ID	SDLP1575
Rep Status	Processed
Consultee ID	1252100
Consultee Full Name	Mrs Amandajayne Hollobon-Baxter
Consultee Company / Organisation	Sandwich Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP21
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	STC rejects Regulation 19 for this site and endorses Regulation 18 which outlines the community use of the application which was previously designated / safeguarded for community use. As per Regulation 18 half of the site should be retained for community use. If this was reinstated this site would be supported if the following caveats were included: The hedge along Deal Road should be retained to screen the site. The entrance/exit should be on DEAL ROAD, and DEAL ROAD should be reduced to a 30mph speed limit (currently 40mph), this reduction should also continue outside Sandwich Technology School. Mini roundabout should be introduced to manage traffic speed due to heavy traffic use entering the town and accessing the schools. The site should also include a temporary parking provision that could be for school traffic for drop off/pick up times to discourage parking on Dover Road. STC requests confirmation from DDC and the landowner that part of this land is designated / safeguarded for community use. Biodiversity sensitivity must be considered.

Impact of increased traffic & concern for highway safety, particularly for students should be mitigated, including consideration of problems associated with school drop off/pick up times must be addressed and resolved before the development progresses.

The heritage data is wrong, there are 3 listed properties directly adjacent, and so the heritage arguments against other local sites should apply here as well. There have been major concerns about water supply and in 2015 concerns about sewage were raised.

There is an existing irrigation main across the site that needs to be investigated and considered.

Where a site adjoins a watercourse, the watercourse is maintained in its entirety and that only one access/egress can be made across it.

Where a site contains mature, healthy trees or hedging that these are to be retained in all cases. The hedge along Deal Road should be retained to screen the site.

All sites that come onto highways that service a school have twenty mile per hour limits as part of the Highways scheme. Full archaeological surveys (not desktop ones done in Maidstone) are carried out on all sites within or the surroundings of Sandwich town.

All new residential properties must have vehicle electrical charging points which will be necessary by law from 2030. Where a site removes or displaces any on street parking that the loss of parking is made up by additional parking spaces on the site.

All properties are to be 50-year flood risk compliant as recommended in the NPPF.

All access roads are to be adopted by the County's Highway Authority, so that they are maintained accordingly and there are no rights of dispute.

All sites to accommodate full fibre communications cabling to allow for super speed internet access to support economic and home working applications.

All sites to include drop down curbing allowing adequate accessibility for persons with disabilities or limited lack of mobility.

Any additional street lighting shall be unobtrusive, set so as not to cause irritation to neighbouring properties and in the town centre, should be of a heritage style to match existing light standards. Sites over 40 units should provide adequate road junction improvements to allow large scale traffic flows to move into and out of the sites without impacting on existing traffic flows.

All sites must have adequate accessibility made for pedestrian and cyclist travel preference to protect and support alternative travel to motorised vehicles.

Suitable screening provision should be introduced to shield all new development from existing neighbouring residents and in particular where a site is adjacent to an AONB or historic recognition.

Section 106 funding should be directed towards improving and updating existing essential services such as doctors, dentists, schools, libraries, toilets, play areas and public recreation. A master plan of Sandwich must be undertaken to ensure that there isn't a cumulative detrimental impact on the town resulting from piecemeal developments.

Of the requirement for 30% affordable housing, 65% of this should be rental accommodation, social or council houses. And this should be monitored for compliance.

A Design Code for Sandwich should be undertaken.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

STC rejects Regulation 19 for this site and endorses Regulation 18 which outlines the community use of the application which was previously designated / safeguarded for community use. As per Regulation 18 half of the site should be retained for community use. If this was reinstated this site would be supported if the following caveats were included: The hedge along Deal Road should be retained to screen the site. The entrance/exit should be on DEAL ROAD, and DEAL ROAD should be reduced to a 30mph speed limit (currently 40mph), this reduction should also continue outside Sandwich Technology School. Mini roundabout should be introduced to manage traffic speed due to heavy traffic use entering the town and accessing the schools. The site should also include a temporary parking provision that could be for school traffic for drop off/pick up times to discourage parking on Dover Road. STC requests confirmation from DDC and the landowner that part of this land is designated / safeguarded for community use. Biodiversity sensitivity must be considered. Impact of increased traffic & concern for highway safety, particularly for students should be mitigated, including consideration of problems associated with school drop off/pick up times must be addressed and resolved before the development progresses. The heritage data is wrong, there are 3 listed properties directly adjacent, and so the heritage arguments against other local sites should apply here as well. There have been major concerns about water supply and in 2015 concerns about sewage were raised.

There is an existing irrigation main across the site that needs to be investigated and considered. Where a site adjoins a watercourse, the watercourse is maintained in its entirety and that only one access/egress can be made across it. Where a site contains mature, healthy trees or hedging that these are to be retained in all cases. The hedge along Deal Road should be retained to screen the site. All sites that come onto

	<p>highways that service a school have twenty mile per hour limits as part of the Highways scheme. Full archaeological surveys (not desktop ones done in Maidstone) are carried out on all sites within or the surroundings of Sandwich town. All new residential properties must have vehicle electrical charging points which will be necessary by law from 2030. Where a site removes or displaces any on street parking that the loss of parking is made up by additional parking spaces on the site. All properties are to be 50-year flood risk compliant as recommended in the NPPF. All access roads are to be adopted by the County's Highway Authority, so that they are maintained accordingly and there are no rights of dispute. All sites to accommodate full fibre communications cabling to allow for super speed internet access to support economic and home working applications. All sites to include drop down curbing allowing adequate accessibility for persons with disabilities or limited lack of mobility. Any additional street lighting shall be unobtrusive, set so as not to cause irritation to neighbouring properties and in the town centre, should be of a heritage style to match existing light standards. Sites over 40 units should provide adequate road junction improvements to allow large scale traffic flows to move into and out of the sites without impacting on existing traffic flows. All sites must have adequate accessibility made for pedestrian and cyclist travel preference to protect and support alternative travel to motorised vehicles. Suitable screening provision should be introduced to shield all new development from existing neighbouring residents and in particular where a site is adjacent to an AONB or historic recognition. Section 106 funding should be directed towards improving and updating existing essential services such as doctors, dentists, schools, libraries, toilets, play areas and public recreation. A master plan of Sandwich must be undertaken to ensure that there isn't a cumulative detrimental impact on the town resulting from piecemeal developments. Of the requirement for 30% affordable housing, 65% of this should be rental accommodation, social or council houses. And this should be monitored for compliance. A Design Code for Sandwich should be undertaken.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP21 - Land adjacent to Sandwich Technology School, Sandwich (SAN013)
Rep ID	SDLP1397
Rep Status	Processed
Consultee ID	1333213
Consultee Full Name	Mr Martin Coleman
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP21
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy

4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Dear Sirs, It is with regret I note the change in the 2020 from 2010 local plan with regards to the community sports use at Sandwich Technology School.</p> <p>I therefore disagree with DDC planning Department changing the designation of land next to Sandwich Technology School in the proposed Local Plan.</p> <p>We will lose important community sports land.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP21 - Land adjacent to Sandwich Technology School, Sandwich (SAN013)
Rep ID	SDLP1744
Rep Status	Processed
Consultee ID	1287651
Consultee Full Name	Lynn Davis
Consultee Company / Organisation	Club Sandwich
Agent Full Name	Lynn Davis
Agent Company / Organisation	Lynn Davis Architects
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP21
2 - Do you consider this part of the Plan sound?	No

<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified Effective Consistent with National Policy</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>No</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>No</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>DDC Note: Please see Attachment 1 (Att1) for full representation. The representation is best viewed with original formatting. This is a GROUP REPRESENTATION. The list of people (including names and addresses) will be made available to the Inspector on request.</p> <p>Att1: Full representation; Att 2: Proposed Scheme A Att 3: Proposed Scheme B Att 4: Proposed Ground Floor Plan Att 5: Proposed First Floor Plan Att 6: Proposed Elevations 1 Att 7: Proposed Elevations 2 Att 8: Copies of emails (REDACTED)</p> <p>SUBMITTED GROUP REPRESENTATION</p> <p>Group 1 (11 people): The following persons object to DDC Planning Department changing the designation of the land described above in the proposed new Local Plan in 2022.</p> <p>Group 2 (9 people): From the proposed Local Plan 2022, we the undersigned object to the removal of the community sports use from the above section. We will lose important community sports land.</p> <p>Group 3 (18 people): NAMES FOR CLUB SANDWICH PETITION LISTED BELOW SUPPORT THE AIMS OF CLUB SANDWICH TO REINSTATE LAND ADJACENT TO SANDWICH TECHNOLOGY SCHOOL AS IN SAP21 BACK TO COMMUNITY SPORTS USE AS IN LOCAL PLAN 2010</p> <p>Group 4 (9 people): The following persons object to DDC Planning Department changing the designation of the land described above in the proposed new Local Plan in 2022. We will lose important community sports land.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Reinstatement of the use of the land for community sports and leisure as set out in DDC Local Plan 2010</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	SDLP1744 Club Sandwich Att1.pdf SDLP1744 Club Sandwich Att2.pdf SDLP1744 Club Sandwich Att3.pdf SDLP1744 Club Sandwich Att4.pdf SDLP1744 Club Sandwich Att5.pdf SDLP1744 Club Sandwich Att6.pdf SDLP1744 Club Sandwich Att7.pdf SDLP1744 Club Sandwich Att8 (Redacted).pdf
Local Plan Consultation Point	SAP21 - Land adjacent to Sandwich Technology School, Sandwich (SAN013)
Rep ID	SDLP1768
Rep Status	Processed
Consultee ID	1333639
Consultee Full Name	Hazel and Alan Robinson
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP21
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	As Sandwich residents, we do not agree to the change of designation of the land adjacent to Sandwich Technology School. This land should remain as a sports facility
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness	

matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	SDLP1768 Robinson Att1.pdf
Local Plan Consultation Point	SAP21 - Land adjacent to Sandwich Technology School, Sandwich (SAN013)
Rep ID	SDLP2004
Rep Status	Processed
Consultee ID	1334445
Consultee Full Name	Helen Conn
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP21
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Dear Sirs, I do not agree with the DDC Planning Department changing the designation of Land next to Sandwich Technology School in the proposed Local Plan. We will lose important community sports land for those living in Sandwich and Deal.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP21 - Land adjacent to Sandwich Technology School, Sandwich (SAN013)
Rep ID	SDLP2013
Rep Status	Processed
Consultee ID	1334452
Consultee Full Name	Jenny Gates
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP21
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>I am amazed that this project looks to be going ahead with out the involvement of the local community. In the forty years that I have lived in Sandwich , I have been a member of the leisure club and helped to raise funds in the past. I cannot believe that the school have taken this facility away from the public. I do not agree with the proposal to change the land use. Sandwich is a growing town and the community needs access to the proposals by the Trust.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP21 - Land adjacent to Sandwich Technology School, Sandwich (SAN013)</p>
<p>Rep ID</p>	<p>SDLP2025</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1334465</p>
<p>Consultee Full Name</p>	<p>Sheila Pound</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to?Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP21</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified Effective Consistent with National Policy</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Yes</p>

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I do not agree to the Dover District Planning Department changing the designation of Land next to the Sandwich Technology School in the proposed local plan. Community sports land is very important for people's health and well being and this should not be lost.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP21 - Land adjacent to Sandwich Technology School, Sandwich (SAN013)
Rep ID	SDLP1771
Rep Status	Processed
Consultee ID	1333678
Consultee Full Name	Sandra and Stuart Jones
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP21
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective

	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	We do not agree with the DDC Planning Department changing the designation of Land next to Sandwich Technology School in the proposed Local Plan. We will lose important community sports land, and both of us as people who have benefitted from such facilities in the past, are firm believers in sports amenities being available to the maximum number in the community able to use them
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP21 - Land adjacent to Sandwich Technology School, Sandwich (SAN013)
Rep ID	SDLP2003
Rep Status	Processed
Consultee ID	1334444
Consultee Full Name	Bob Brewin
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP21
2 - Do you consider this part of the Plan sound?	No

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I do not agree with DDC Planning Department changing the designation of Land next to Sandwich Technology School in the proposed Local Plan. We will lose important community sports land that was intended for the community.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP21 - Land adjacent to Sandwich Technology School, Sandwich (SAN013)
Rep ID	SDLP2024
Rep Status	Processed
Consultee ID	1334463
Consultee Full Name	Peter Pound
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP21
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I strongly object to Dover District Council changing the designation of the land next to Sandwich Technology School in the proposed Local Plan. This will have the effect of depriving local people of important community sports land.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP21 - Land adjacent to Sandwich Technology School, Sandwich (SAN013)
Rep ID	SDLP1701
Rep Status	Processed
Consultee ID	1333453
Consultee Full Name	roy and tess Elliott
Consultee Company / Organisation	

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP21
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Dear Sir, My wife and I are writing to object to the DDC's plans to open the land mentioned above for housing development. It is against the existing long term plans for the continuing development of this site for the benefit of community sports and leisure amenities. These plans will both complement and enhance those amenities already existing on the secondary school fields, the result of a previous community initiative. The plans include a lapping pool and adjoining learner pool, much desired by local Junior School Head Teachers as learning to swim is part of their school curriculum, plus other sporting and parking amenities. The support for this development is wide spread in the local community and the gains in terms of health in the community over generations will be immense. Support this proposal, do not prevent it.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP21 - Land adjacent to Sandwich Technology School, Sandwich (SAN013)
Rep ID	SDLP2015
Rep Status	Processed
Consultee ID	1334454

Consultee Full Name	Avril Gray
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP21
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Dear Sirs We do not agree with the DDC Planning Dept changing the designation of Land next to Sandwich Technology School in the proposed local plan. We will lose important community sports land.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP21 - Land adjacent to Sandwich Technology School, Sandwich (SAN013)
Rep ID	SDLP2023

Rep Status	Processed
Consultee ID	1334462
Consultee Full Name	Harriet Page
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP21
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I do not agree with the DDC Planning Department changing the designation of Land next to Sandwich Technology School in the proposed Local Plan. We will lose important community sports land which the local community need so very, very much. It is a traversity and complete loss of public funding that this has happened.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

SAP22 - Land at Archers Low Farm, Sandwich (SAN023)

Local Plan Consultation Point	SAP22 - Land at Archers Low Farm, Sandwich (SAN023)
Rep ID	SDLP205
Rep Status	Processed
Consultee ID	1261587
Consultee Full Name	Mrs Edith Gilbert
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP22
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Inclusion of land allocation for housing at Archers Low Farm, Sandwich SAP22 (SAN023) is at odds with Strategic Policy 13, item g, for "irreplaceable habitats".</p> <p>Development of this site will result in both loss and deterioration of irreplaceable habitats. It should be noted that this loss also includes loss of established woodland and trees whose importance has been recognised with legal protection under a Tree Preservation Order.</p> <p>There are clearly no exceptional circumstances in this instance to justify this loss and deterioration and public benefit cannot be demonstrated to outweigh the loss and deterioration which will be caused for such an insignificant housing gain.</p> <p>While this ambiguity remains the proposed Plan cannot be considered at "sound".</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will	Deletion of SAP22 will contribute towards making this plan sound.

make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP22 - Land at Archers Low Farm, Sandwich (SAN023)
Rep ID	SDLP202
Rep Status	Processed
Consultee ID	1261587
Consultee Full Name	Mrs Edith Gilbert
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP22
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>This proposed plan recognises "irreplaceable habitats" and notes that the district has proportionately less woodland than many other districts (SP13 para 3.271).</p> <p>Strategic Policy 13 (g) will only permit development in wholly exceptional circumstances where public benefit clearly outweighs the loss or deterioration of irreplaceable habitats.</p> <p>Land at Archers Low Farm, Sandwich, SAP22 (SAN023) if developed for housing will cause both loss and further deterioration of irreplaceable habitats. In this instance there are no exceptional circumstances to justify inclusion. As noted above, the plan recognises rarity of woodland in the district. This site not only contains some of this very rare woodland but uniquely in this instance importance of this woodland is underlined and legally protected by a Tree Preservation Order.</p> <p>It is difficult to comprehend how this proposed plan can be accepted as "sound" with such a glaring and obvious anomaly.</p>

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Deletion of SAP22 will contribute towards making this Plan sound.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP22 - Land at Archers Low Farm, Sandwich (SAN023)
Rep ID	SDLP203
Rep Status	Processed
Consultee ID	1261329
Consultee Full Name	Mr Colin Watson
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP22
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	I believe this draft plan is "unsound". It may well place climate change at top of the agenda under Strategic Policy 1 but then contradicts itself seeking to destroy legally protected and extremely rare woodland by attempting to secure a quick housing allocation gain (SAP22, SAN023). We must not dilute how important this issue is not only for our district but the entire planet.

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

The HELAA was both out of step with environmental protection issues and inconsistent in its reasoning. It did not place sufficient importance on protection of our environment over short-term housing gain.

Within this proposed draft plan Policy SP14 needs a firm and unambiguous statement to ensure all brown field and redevelopment options are fully exhausted before any green field areas can be exploited.

In particular, the site (SAP22, SAN023) Land at Archers Low Farm, Sandwich, should clearly be deleted. It is environmentally a sensitive site with officially protected woodland and trees. It has been rejected for development by our elected Councillors who recognised its' very important contribution to our rural landscape. The small proposed reduction (within this Regulation 19 Draft) in number of proposed housing units suggested for this site is nonsense! Any size of development would inevitably destroy this area and have catastrophic effect on the well-established natural eco systems and cause an unnecessary release of large amounts of stored carbon with removal of mature woodland and trees.

Unfortunately, I suspect you will desperately cling to your plan as drafted and take no notice of my words or the many hundreds of other people and local town council who have objected to this site being developed or the district councillors who rejected the planning application with sound reasoning or the previous independent planning inspector who said the last draft local plan could only be considered as "sound" with removal of the allocation for land at Archers Low Farm Incidentally the only site he singled out in the entire district!

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Deletion of SAP22 will contribute towards making this plan sound.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Local Plan Consultation Point

SAP22 - Land at Archers Low Farm, Sandwich (SAN023)

Rep ID

SDLP204

Rep Status

Processed

Consultee ID

1261587

Consultee Full Name

Mrs
Edith
Gilbert

Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP22
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Council Leader Trevor Bartlett may look very pleased with himself when bigging up this plan in his Leaders Foreword address but I would question if he has really studied all the details!</p> <p>He states the plan “protects the setting and character of the town of Deal, the medieval town of Sandwich and the villages ...”</p> <p>Development of Land at Archers Low Farm, Sandwich (SAP22) for housing directly and adversely affects the setting of Sandwich (a FACT confirmed by the Inspectorate of Planning December 2014).</p> <p>At the time the Inspector was fully aware of any amount of suggested so called “mitigation measures” but clearly recognised its geographical importance and recommended deletion of this site nothing has changed!</p> <p>My suggestion is to delete this allocation to make this proposed plan “sound”.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Delete SAP22 to contribute to making this plan sound.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP22 - Land at Archers Low Farm, Sandwich (SAN023)
Rep ID	SDLP357
Rep Status	Processed
Consultee ID	1331521
Consultee Full Name	Kim Verrier
Consultee Company / Organisation	
Agent Full Name	Kim Verrier
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP22
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The Land at Archers Low is in a nitrate neutrality zone, effluence from this site could easily contaminate groundwater due to known surface water flooding as well as the high risk of current and future tidal and fluvial flooding due to it being on the edge of Level 2 and 3 flood zones. The site is near to special areas of conservation of national and international importance and also Sites of Special Scientific Interest, including the River Stour, estuary and Sandwich Bay. Any flooding of the site could be detrimental to these special conservation and scientific sites.</p> <p>The nearby Level 2 and Level 3 flood zones and known surface water flooding is likely to increase in future due to climate change and increased weather events. An full assessment has not been done using a sequential tests and exception test etc of the flood risk considering current and future flood risk.</p> <p>I don't think the NPPF has been followed in allocating this site as it states that to minimise the flood risk, development should be directed away from areas most at risk. Moreover there should be a consideration on protecting green space and brownfield sites should be prioritised, this has not been done.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	A sequential and exception flood risk should be undertaken for surface water flooding, fluvial and tidal water flooding. Since the area is greenfield and protects the heritage of the historic town, the Archers Low site should be withdraw the from the Local Plan

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	As above
Include files	
Local Plan Consultation Point	SAP22 - Land at Archers Low Farm, Sandwich (SAN023)
Rep ID	SDLP894
Rep Status	Processed
Consultee ID	1331019
Consultee Full Name	mr Richard Parkinson
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP22 - Land at Archers Low Farm, Sandwich (SAN023)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I fully support the group submission by over 1000 local residents which requests the Inspectorate to take this site out of the Local Plan. Their submission which I have made on their behalf makes it clear why this should happen and I will not repeat it all here.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance	Remove this site from the Plan

with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP22 - Land at Archers Low Farm, Sandwich (SAN023)
Rep ID	SDLP761
Rep Status	Processed
Consultee ID	1331585
Consultee Full Name	Terence Hopper
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP22 Land at Archers Low Farm (SAN023)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible.	SAP22 - Land at Archers Low Farm, St Georges Road, Sandwich (SAN023) I object to the development of this site in its current form Development of this site would appear to go against The National Planning Policy Framework (NPPF) and DDC policies DM6 and DM29 NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas of highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

without increasing flood risk elsewhere. Given this, there is a need to reduce the risk from coastal change by avoiding inappropriate development in vulnerable areas.

SAP22/SAN023 suffers from being low lying, close to or within flood areas. It also, according to testimony given to the government inspector during the previous HELLA process, suffers from localised flooding during the winter months. . One wonders how this will be dealt with if the land were to be developed and where the surface run-off from hard surfaces would go.

Road access is via Sandwood Road and St George's road.

Both of these routes suffer from issues relating to constrictions of flow, caused by the narrowness of the road, multiple blind bends and vehicles parked outside the local residents' homes. One assumes that measures to improve the traffic flow along these routes will result in the loss of parking along their length, and subsequent loss of this amenity to local residents, as has proved to be the case with the development at SAN015. (Kumor Nursery).

NB The development at SAN015 (Kumor Nursery) mitigated the loss of parking spaces to local residents by including some on-site parking provision. Given the length of Sandown Road and in particular St George's Road, I cannot see how such a method can be employed to reduce the loss of amenity to local residents.

Both Sandown and St Georges Road pass the entrances to Sir Roger Manwood's school and further traffic flowing from this site would increase the hazards at peak times. Of particular concern is the area at the junction of Manwood Road and St Georges Road and the proximity of the narrow, blind, bend to this junction. A further blind bend is situated within 100 metres of the junction and navigation of this is complicated by the access to the railway station being in the same location. In total, there are three blind bends on St George's Road). A little further on, the junction with St George's Road and New Street suffers from poor sight lines, particularly when school children are waiting for or boarding buses. This junction has opposing bus stops in close proximity. It is not unknown, particularly at peak times, for buses to be parked on both sides of the road. There is also an entrance to a petrol station opposite this junction. The junction also suffers from being in close proximity to the level crossings.

Development of this site in the proposed density would cause unacceptable pressures on the local highways network, increase the hazards at junctions, bends and school entrances, particularly at peak times and adversely impact parking for residents living along the routes to the site. This would appear to be contrary to policy DM29

There have been no significant changes that would alter the reasons for rejecting this site in the previous HELAA exercise and the subsequent appeals process.

This site has also been through the normal planning process more recently and been refused.

The inclusion of this site by DDC Appears to confirm the general belief amongst the district's residents, that much of this process and indeed the planning processes within the district as a whole are a farse and that many of the decisions are cut and dried before the process even begins.

A development of perhaps ten executive houses would be more in keeping. with the surroundings have a lower impact on the local environment and present an insignificant impact on the highways network.

However, DDC has a track record that shows them to be incapable or unwilling to prevent an intensification in the housing density once a site has been accepted onto the local Plan.

A site that is currently being developed on the Woodnesborough Rd in Sandwich as a result of the last Local Plan, saw the density rise from a promised 100 (due to residents' concerns regarding the impact on the highways network to 140 plus. DDC has shown itself to be untrustworthy in cases such as this, and I would therefore reject this site's inclusion in the local plan, and then expect the owners to apply for a lower housing density through the normal process, where more control can be exercised.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will

Remove this land from the local plan.

make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP22 - Land at Archers Low Farm, Sandwich (SAN023)
Rep ID	SDLP616
Rep Status	Processed
Consultee ID	1331790
Consultee Full Name	Julie Davies
Consultee Company / Organisation	CPRE Kent
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP22
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We object to the allocation of this site:</p> <ul style="list-style-type: none"> The NPPF 155 states that 'Inappropriate development in areas at risk of flooding should be avoided ...'. The site is clipped by Flood zones 2 and 3 along the boundary. The site is subject to flooding and would therefore pose a considerable risk. A Flood Risk Assessment should be undertaken before taking the decision to allocate the site. HELAA Appendix 3B gives the site orange status as 'Highways concerns have been identified in relation to access and/or highway impact and further assessment is required to demonstrate whether this can be mitigated.' Concerned that the scale of development proposed for Sandwich will have a detrimental impact on the Historic town with its narrow roads. <p>There is insufficient infrastructure to support the scale of development proposed for Sandwich.</p>

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	CPRE Kent would wish to participate at the examination hearings to explore these issues further.
Include files	
Local Plan Consultation Point	SAP22 - Land at Archers Low Farm, Sandwich (SAN023)
Rep ID	SDLP868
Rep Status	Processed
Consultee ID	1331929
Consultee Full Name	Mr Richard Parkinson
Consultee Company / Organisation	Sandwich Residents Group
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP22 - Land at Archers Low Farm, Sandwich (SAN023)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	This is a group submission on behalf of over 1000 local residents (Sandwich pop. <5000). A spreadsheet of names and addresses is attached. The spreadsheet was prepared following guidelines provided by the Dover Local Plan Consultation Team. Their email of 21 Nov refers. 1037 people completed a paper or electronic form agreeing with the following statements. 965 of these people are local residents and 72 are regular

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

visitors. 7 disagreed. Source documentation can be provided if required. There is extremely strong local opposition to this site reappearing in the Local Plan.

This is a beautiful English meadow providing a rural feel to the edge of Sandwich. It is not at all suitable for development for the following reasons:

- It is part of a vital green belt around the Town
- Any development would significantly change the character of the area
- Providing vehicular access to the site requires an access road to be driven through the small forest on the eastern edge of the site adjoining Sandown Road
- Development would lead to an enormous loss of bio-diversity
- Plus damage to resident and migratory wild and birdlife habitats
- This would be destruction of green (not brown) Grade 1 farmland
- Development of the site will require the destruction of many listed trees
- Any remaining trees will be at risk especially if they are in back gardens as proposed in the recent planning application
- A recent planning application was declined and is now under appeal. A decision will have been made by the time this Local Plan is considered by the Inspectorate. Please refer to all the objections made to the application and the appeal.
<https://publicaccess.dover.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=QOXTWMFZN5300> and Appeal Case #3303230 at the Planning Inspectorate
- We are not opposed to all development in Sandwich and understand the need for there to be some. A number of other suitable sites have been approved or are available.
- We have been here before. When reviewing the last local plan in 2014, the inspector recommended that this site was removed from the plan (please see below). It has crept back in due to the recent planning application.
- The planning criteria suggested in the draft Local Plan do not provide sufficient mitigation.

This site is not suitable for any development and should be removed to make the plan sound.

For reference: The Inspector's ruling last time regarding this site - the Local Plan review in 2014 refers:

1. This site is allocated in the LALP for residential development with an estimated capacity of 50 dwellings. This allocation is not justified because of the harmful visual impact on the character and appearance of the local area that would result.
2. The site is an integral part of the unspoilt countryside that wraps around this part of Sandwich and as a result makes a significant contribution to the town's setting. At present the trees and the open cultivated land on the site provide a soft and attractive edge to the town. The construction of dwellings on the site and the formation of a new access on to Sandown Road would constitute an unwarranted intrusion into the countryside to the detriment of the sensitive landscape setting of this part of Sandwich. Other allocations in Sandwich endorsed in this report, including Sites LA14 and LA16, do not share the same landscape value.
3. The retention of the trees on the site, even if associated with a buffer area, and coupled with the retention of farming and woodland uses nearby, would not be able to mitigate the visual harm to an acceptable extent. The development would be particularly apparent from Sandown Road during the winter months when the existing deciduous vegetation is not in leaf. The standard of road likely to be required and the necessary sight-lines along Sandown Road would also open up views of the site and would be likely to involve tree loss. Although Sandown Road may not be heavily used by vehicles and pedestrians, and some existing housing development in the area may not be of the highest quality, this does not obviate the need to assess the visual implications of this particular allocation. Taking account of all these factors the allocation of this site is not justified. Main Modification MM24 deletes this site from the LALP and is required to make the plan sound.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful

The allocation of this site is not justified. The modification is that the site should be deleted from the Dover Local Plan to make the plan sound.

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	To provide an update on the current planning application appeal which will have been decided by the time the Dover Local Plan is considered by the Inspectorate.
Include files	
Local Plan Consultation Point	SAP22 - Land at Archers Low Farm, Sandwich (SAN023)
Rep ID	SDLP890
Rep Status	Processed
Consultee ID	1331876
Consultee Full Name	Mr Constantinos Sarafoglou
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP22 - Land at Archers Low Farm, Sandwich (SAN023)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The biodiversity issue is not taken seriously enough. Local Traffic issues are seriously misjudged. Infrastructure not sufficient.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance	SAP22 should be removed from the current local plan as it was from the previous one. Full support to the local residents the want this site to be removed from the current Local Plan.

with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP22 - Land at Archers Low Farm, Sandwich (SAN023)
Rep ID	SDLP845
Rep Status	Processed
Consultee ID	1331922
Consultee Full Name	Matthew Porter
Consultee Company / Organisation	Fernham Homes Ltd & Walker Residential Ltd
Agent Full Name	Matt Porter
Agent Company / Organisation	DHA Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy SAP22 - Land at Archers Low Farm, St Georges Road Sandwich (SAN023) Policy SP3 - Housing Growth Policy SP4 - Windfall Development Policy SP11 - Infrastructure and Developer Contributions Policy SP12 - Strategic Transport Infrastructure
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We consider that the plan is sound, but object to elements of Policy SAP22 - Land at Archers Low Farm, St Georges Road Sandwich (SAN023) and Policy SP3 - Housing Growth. These objections are set out in the consultation response submitted on behalf of Fernham Homes Limited and Walker Residential Limited (ref DHA/30245).</p> <p>1 Introduction</p> <p>1.1 Purpose of this Representation</p> <p>1.1.1 This representation has been prepared by DHA Planning on behalf of Fernham Homes Limited and Walker Residential Limited in response to the Dover District Council 'DDC' Local Plan (Regulation 19) consultation which runs until 9th December 2022.</p>

1.1.2 We understand that DDC is in the process of preparing a new Local Plan to set out a strategy for development for the period to 2040 and that the Council are presently seeking comments on the pre-submission Plan prior to its submission for examination in early 2023.

1.1.3 Our client controls 'Land at Archers Low Farm, Sandown Road, St Georges Road, Sandwich' (hereafter referred to as 'Land at Archers Low' or 'the Site') and is promoting the residential allocation of the Site as part of the new Dover District Local Plan preparation process. The Site is allocated for residential development in the Regulation 19 Pre-submission Plan for the provision of 35 dwellings under policy reference 'SAP22'.

1.1.4 It is highlighted that as part of the Regulation 18 Local Plan, the Site was allocated under the 'Site Allocations Policy 1 Non-Strategic Housing Allocations' for approximately 40 dwellings (reference SAN023).

1.1.5 The purpose of the representation is to support the allocation of 'Land at Archers Low' for a greater quantum of development and provide comment on the consistency of the allocation with the proposed strategy, draft policies and our client's position in respect of the 'soundness' of the Plan, but to object to the indicative capacity set out in the policy.

1.1.6 In this regard, we remain wholly supportive of the principle of the residential allocation of the Site and agree that it represents a logical and sustainable location to direct growth consistent with the growth strategy of the Plan as a whole, however we submit that more effective use of our client's Site can be made – and object (solely) to this element of the policy.

1.1.7 Accordingly, we say that Land at Archers Low can further assist the Council in meeting the growing need for new homes in the district and help to ensure the Council can have greater confidence in meeting its market and affordable housing targets in full.

1.1.8 Based on the current national and local planning context, we consider the Site to be a highly suitable edge-of-settlement location to allocate land for housing to help meet the need for new homes in the district and its effective use should be appropriately maximised in accordance with national policy objectives.

1.1.9 Further details regarding the Site and commentary on the consistency of the allocation with the proposed strategy, draft policies and our client's position in respect of the 'soundness' of the Plan are set out in the following sections of this document.

1.2 About Fernham Homes

1.2.1 Fernham Homes Limited are a local award winning small and medium sized (SME) housebuilder, established in 1997 and has a strong track record of delivering high quality residential and mixed use developments in Kent over the last 25 years. This has been acknowledged through the receipt of nationally recognised awards, including the gold Evening Standard Awards best family home 2022 and 2019 bronze WhatHouse Best Small Housebuilder.

1.2.2 SME housebuilders are recognised in the National Planning Policy Framework ('NPPF') at paragraph 69 as making an important contribution to meeting the housing requirements of an area, and being able to build out relatively quickly. Similarly, this has also been recognised by the Planning Inspectorate. This is particularly the case with Fernham Homes, which is privately owned with access to significant resources. This provides significantly more flexibility than national and other regional housebuilders, and allows Fernham Homes to deliver housing rapidly and to a high quality, beautiful and sustainable standard (para 126 of the NPPF).

1.2.3 Fernham Homes Limited has embarked on a sustained period of growth, with an adopted and robust business plan to deliver around 300 houses per year in five years time.

1.2.4 A key element of Fernham Homes' operations is to take a very careful approach to site selection: a huge amount of due diligence is undertaken as part of this, and therefore Fernham Homes Limited only invests in those sites which meet the NPPF requirements of being available, suitable, and deliverable. As set out below land at Archers Low Farm, Sandwich ('SAP22') is firmly considered to be such a site.

1.2.5 Similarly, a key feature of Fernham Homes' approach is to work positively and proactively with local planning authorities (LPAs), both during the preparation of local plans and at planning application stage. Fernham Homes Limited are fully committed to engaging with Dover District Council in the preparation of its Local Plan, and firmly subscribe to the national policy approach set out in paragraphs 15 and 16 c) of the NPPF that "the planning system should be genuinely plan-led" and should be shaped by early, proportionate and effective engagement between LPAs and others, including businesses and developers. Accordingly, Fernham Homes Limited would welcome the opportunity to discuss the matters contained in this representation, including the availability, suitability, deliverability and capacity of land at Archers Low Farm, Sandwich ('SAP22') directly with Dover District Council members and officers, ahead of the submission of the Local Plan for examination.

1.3 Representation Structure

1.3.1 The representation structure is outlined below for ease of reference:

Chapter 2 (Consultation Background) – Sets out the context of the Dover District new Local Plan preparation, relevant national planning requirements and a summary of our current position.

Please refer to paragraph 52 of appeal decisions: APP/M2270/W/21/3283924 and APP/M2270/W/21/3288645

Chapter 3 (Legal Tests of Soundness) - Assessing whether the plan is sound, having regard to the tests of soundness outlined by paragraph 35 of the NPPF.

Chapter 4 (Duty to Co-operate) - Assessing whether the plan is sound, having regard to the duty to cooperate outlined by paragraph 24 of the NPPF.

Chapter 5 (Housing Need) - Consideration of market and affordable housing need and assessment of proposed housing allocations and supply sources.

Chapter 6 (Assessment of Suitability) - Re-introduces our client's Site and provides a summary of planning constraints and opportunities, including the quantum of development that could be accommodated, why the Site is suitable for development and why the principle of the draft allocation for residential development is both justified and consistent with the Council's strategy for growth in the district. It also sets out why we consider there is scope for a higher number of dwellings at the site. This consideration amounts to an objection to one element of the strategy – namely that those sites around the most sustainable settlements should be maximised.

Chapter 7 (Conclusion) - Summarises the key points raised throughout the representation and re-affirms our client's support for the principle of the Site's allocation and the principle of the proposed strategy ahead of the submission of the Plan for examination, and the objections in terms of capacity.

2 Dover District Council – Draft for Submission Local Plan (Regulation 19)

2.1 Consultation Background

2.1.1 DDC are required to prepare a new Local Plan, as the current suite of development plan documents were adopted in 2002, 2010 and 2015. The Core Strategy (CS) (adopted 2010) in particular has a time horizon up to 2026 and requires updating.

2.1.2 The new Local Plan will set out the vision, strategic objectives and overarching development strategy for the growth of the District over the period to 2040. It provides the planning policy framework to guide the future development of the area, addressing needs and opportunities for housing, the economy, community facilities and infrastructure, as well as the basis for conserving and enhancing the natural and historic environments, mitigating and adapting to climate change, and achieving well designed places.

2.1.3 For the avoidance of doubt, the new Local Plan, on adoption, will replace the CS 2010 and the Land Allocations Plan 2015, as well as saved policies from the 2002 Local Plan.

2.1.4 DDC's Regulation 19 Local Plan outlines the key issues that need to be addressed between now and 2040. In particular, the Plan sets out the following key planning issues for the District:

- Ensuring that new development in the District contributes to the mitigation of, and adaptation to, climate change.
- Supporting the Council to deliver its intention to be a carbon neutral district by 2050.
- Managing flood risk and coastal change.
- Ensuring that a sufficient amount and variety of land is identified to deliver a continuous supply of housing across the Plan period and that the Council maintains a five-year housing land supply.
- Delivering growth in a way that focuses development in the least sensitive areas of the District in order to conserve and enhance the District's rich natural and historic environments.
- Supporting sustainable development in rural areas to enhance the vitality of rural communities.
- Working with partners to facilitate the delivery of the Whitfield Urban Expansion.
- Ensuring a range of housing tenures, types and sizes are provided across the District to meet the needs of the local community and provide choice and flexibility in the housing market.
- Promoting economic growth, tourism, and investment in the District's Town Centres in line with the Council's Economic Growth Strategy.
- To address the impact of the COVID-19 pandemic.
- Delivering strategic transport improvements, including upgrades to the Duke of York and Whitfield roundabouts to support the scale of housing and economic growth identified in the Plan.

- Promoting sustainable transport initiatives to encourage a modal shift to more sustainable forms of transport like walking and cycling.
- Ensuring that infrastructure is delivered, in the right place, at the right time, to meet the needs of the District and support the levels of development identified in the Local Plan.
- Supporting the delivery of attractive, high-quality, design led developments and the creation of healthy, inclusive and safe communities, that are well served by good quality services and facilities to support people's lives.
- Conserving and enhancing the District's rich and diverse natural landscape, including the five international sites within the district, the Kent Downs Area of Outstanding Natural Beauty (AONB), five Sites of Special Scientific Interest (SSSIs), two National Nature Reserves (NNRs), two stretches of Heritage Coasts and two Marine Conservation Zones.
- Delivering a net gain in biodiversity in the District over the plan period.

• To promote the conservation, restoration and where appropriate the enhancement of the District's heritage assets, in order to protect their significance and to ensure that they can be best appreciated and enjoyed by current and future generations.

2.1.5 The new Local Plan will be examined by an Inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is 'sound'. This submission will comment on each of the above, highlighting where we believe any areas of concern lie or where modifications may be required.

2.2 DDC's Local Development Scheme

2.2.1 The District Council has a duty to review the policies contained within the development plan every five years. The 2014/2015 Authority Monitoring Report signalled the need to review key parts of the Council's adopted CS evidence base.

2.2.2 The Council's Local Development Scheme (LDS) first outlined the delivery timetable for the Local Plan Review (LPR) in the March 2017 publication. Since then, the LDS has been updated on an annual basis. The most recent September 2022 LDS summarises that following the preparation of the principal evidence base documents, the Local Plan Review Regulation 18 consultation took place for 8 weeks in January 2021. The Regulation 19 consultation was scheduled for 7 weeks during Q4 of 2022 and is the subject of this representation.

2.2.3 Moving forward, submission of the Plan is anticipated in Q1-2 2023 with the Examination in Public in Q3-4 2023. The new Local Plan is currently scheduled for adoption in 2024.

2.2.4 As planned, DDC are now undertaking the Regulation 19 Draft Local Plan Consultation, for which this submission is made

3 Legal Test of Soundness

3.1 Legislation and Guidance

3.1.1 The new Local Plan will be examined by an Inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is 'sound'. It is a statutory requirement that every development plan document must be submitted for independent examination to assess when it is "sound", as well as whether other statutory requirements have been satisfied (s.20(5) of the 2004 Act). By s.19 of the 2004 Act, in preparing a development plan document a local planning authority must have regard to several matters including national policies and advice contained in guidance issued by the Secretary of State. Such guidance currently exists in the form of the NPPF and is summarised below. This states that Plans must be:

(a) Positively Prepared: based on a strategy which seeks to meet objectively assessed development and infrastructure requirements

3.1.2 This means that the Local Plan should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. The NPPF set out principles through which the Government expects sustainable development can be achieved.

(b) Justified: an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence

3.1.3 This sets out the requirement that the Local Plan should be based on a robust and credible evidence base involving:

I. Research/fact finding: the choices made in the plan are backed up by facts.

II. Evidence of participation of the local community and others having a stake in the area.

3.1.4 The Local Plan should demonstrate an appropriate strategy, taking into account reasonable alternatives and based on proportionate evidence. These alternatives should be realistic and subject to sustainability appraisal. The Plan should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

(c) Effective: deliverable over its period based on effective joint working on cross-boundary strategic priorities

3.1.5 This makes clear that the Local Plan should be deliverable, requiring evidence of:

- Sound infrastructure delivery planning;
- Having no regulatory or national planning barriers to delivery;
- Delivery partners who are signed up to it; and
- Coherence with the strategies of neighbouring authorities, including neighbouring marine planning authorities.
- The new Local Plan should be flexible and able to be monitored.

3.1.6 The Local Plan should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen. The plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the Local Plan should make clear that major changes may require a formal review including public consultation. Any measures which the Council has included to make sure that targets are met should be clearly linked to an Annual Monitoring Report.

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national policy.

3.1.7 This submission comments on each of the above in further detailing, highlighting areas of support and where modifications are required as appropriate.

3.2 Legal Compliance

3.2.1 In terms of legal compliance, the main requirements for the early stages of Local Plan consultation are in relation to:

- planning for community engagement;
- the sustainability appraisal (including consultation with the statutory environment consultation bodies);
- identifying significant cross boundary and inter-authority issues; and
- ensuring that the plan rests on a credible evidence base, including meeting the Act's requirement for keeping matters affecting the development of the area under review.

3.2.2 In addition to the above, the NPPF states² that: "Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:

a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;

b) Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

(i) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or

Paragraph 11, NPPF 2021

(ii) Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

3.2.3 In addition, to the above, the NPPF states³ that Plans should:

a) be prepared with the objective of contributing to the achievement of sustainable development;

b) be prepared positively, in a way that is aspirational but deliverable;

c) be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;

d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

e) be accessible through the use of digital tools to assist public involvement and policy presentation; and

f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

3.2.4 It is important to note that the NPPF4 requires strategic policies to set out an overall strategy for the pattern, scale, and design quality of places, and make sufficient provision for:

a) housing (including affordable housing), employment, retail, leisure and other commercial development;

b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

c) community facilities (such as health, education and cultural infrastructure); and;

d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

3.2.5 It is clear from the above, that any local plan should set out a comprehensive and cohesive approach to future development.

Paragraph 16, NPPF 2021

Paragraph 20, NPPF 2021

4 Duty to Co-Operate

4.1 Legal and NPPF Requirements

4.1.1 Section 33A of the Planning and Compulsory Purchase Act 2004 sets out a statutory 'Duty to Cooperate' (DtC) – i.e. a legal obligation - to all bodies as prescribed by Regulation 4 of the Town and Country Planning (Local Planning) England Regulations 2012 (the Regulations).

4.1.2 The duty requires DDC to cooperate with other persons to 'maximise the effectiveness' with which named activities are undertaken. Those activities include the preparation of development plan documents (such as this Local Plan document) and activities that support that activity 'so far as relating to a strategic matter'.

4.1.3 A strategic matter is defined by S33A(4) in summary as: (a) 'sustainable development or use of land that has or would have a significant impact on at least two planning areas' (a planning area in this case is the area of a borough or district council); and (b) 'sustainable development or use of land in a two tier area' (as this is) 'if the development or use (i) is a county matter, or (ii) has or would have a significant impact on a county matter'. County matters broadly relate to minerals and waste and associated developments as defined by Paragraph 1 of schedule 1 to the Town and Country Planning Act 1990 (as amended).

4.1.4 Section 33A (7) requires DDC (and persons subject to the DtC) to have regard to any guidance issued by the Secretary of State about how the duty is to be complied with. In that regard Paragraph ID 9-004-29140306 of the Government's Planning Practice Guidance (PPG) confirms amongst other things that the DtC is not a duty to agree (albeit that local planning authorities should make every effort to secure the necessary cooperation on strategic cross border matters before they submit local plans for examination).

4.1.5 The NPPF establishes that effective and on-going joint working is an integral part of the plan making process that will, amongst other things, determine whether development needs that cannot be met wholly within a plan can be met elsewhere. The NPPF goes on to state at paragraph 27 that in order to demonstrate effective and on-going joint working strategic policy making authorities should: "... prepare and maintain one or more statements of common ground documenting the cross-boundary matters being addressed".

4.1.6 In addition to the District's own housing pressures, part of the DtC involves considering whether neighbouring authorities' unmet housing need can be accommodated. It is worth highlighting that recent amendments to the London Plan have identified that the City's housing need has become increasingly more difficult to deliver and therefore areas outside London will be faced with

having to absorb more of London's housing need. Consequently, DDC has a duty to explore whether it can accommodate some of this overspill of London's unmet need.

4.2 Assessment of DDC's discharging of the Duty to Co-operate

4.2.1 It is recognised that work to discharge the DtC remains ongoing by DDC and will continue prior to submission as part of the preparation of the Local Plan evidence base.

4.2.2 Notwithstanding the above, at this stage it is understood that DDC have engaged with the members of the East Kent Regeneration Board including neighbouring East Kent planning authorities, Kent County Council (KCC) and its subsidiary departments:

- Folkestone and Hythe District Council
- Canterbury City Council
- Thanet District Council
- KCC
 - KCC Highways & Transportation
 - KCC Minerals & Waste
 - KCC Heritage Conservation
 - KCC Flood & Water Management
 - KCC Natural Environment & Coast
 - KCC Infrastructure including Education

4.2.3 In February 2016, the Council adopted a Memorandum of Understanding (MOU) in respect of the DtC between the East Kent Regeneration Board members. A review of the MOU took place and was agreed in January 2021.

4.2.4 The East Kent MOU sets out the framework in which the authorities will work together on strategic issues and will actively engage. It forms the overarching framework and context within which Statements of Common Ground (SoCG) will be agreed between individual authorities.

4.2.5 Further engagement is also confirmed to have taken place between the following prescribed bodies and other relevant bodies:

- Environment Agency
- National Highways
- Historic England
- Natural England
- Network Rail
- NHS Kent and Medway Clinical Commissioning Group (CCG) – now known as Integrated Care Board (ICB) since July 2022
- Kent Downs AONB Unit
- Other infrastructure providers

4.2.6 Whilst work remains ongoing, at this stage it is understood that SoCGs have been agreed and signed between the following parties:

- DDC and Folkestone & Hythe District Council
- DDC and Canterbury City Council
- DDC and Thanet District Council
- DDC and Kent County Council
- Dover District Council and National Highways

4.2.7 As part of the DtC Evidence Base documents, DDC prepared a detailed DtC Statement (dated September 2022) which sets out a summary of the engagement that has taken place, firstly by organisation, and then by issue. Whilst the statement focuses on strategic issues and duty to co-operate bodies it also includes information relating to engagement on non-strategic issues and co-operation with other bodies that are not prescribed by the regulations. In addition, Appendices 1, 3 and 4 identify the main meetings and other correspondence that has taken place throughout the plan making process.

4.3 Summary

4.3.1 On account of the above and the documents published within the Council's Local Plan Evidence Base, we are satisfied that the Council as the strategic policy making authority has demonstrated effective and on-going joint working with neighbouring authorities, the county council, prescribed bodies and other relevant bodies. Further, we agree that DDC has prepared and maintained SoCG documenting the cross-boundary matters being addressed in accordance with the Framework and the DtC may be discharged by the Planning Inspector under Section 20(5) (c) of the Planning and Compulsory Purchase Act 2004.

4.3.2 Without prejudice to the above, should ongoing work by the Council result in significant changes in circumstances such that the signed SoCGs may be amended or withdrawn, our client reserves the right to alter their consultation response accordingly and be present at the examination of the Plan to discuss further.

5 Housing Need

5.1 Context

5.1.1 Paragraph 11 of the NPPF is explicit in its requirement for strategic policy-making authorities to promote a sustainable pattern of development that seeks to meet the need in full.

5.1.2 Paragraph 20 of the Framework is equally clear that strategic policies should set out an overall strategy for the pattern, scale and design quality of places. Policies should make sufficient provision for the development that is required as well as associated infrastructure, community facilities and should set out a strategy for the conservation and enhancement of the natural, built and historic environment.

5.1.3 Given this national planning context, the emerging Local Plan should provide a comprehensive and cohesive approach to future development in Dover district, capable of making sufficient provision for the identified needs, whilst balancing the conservation and enhancement of the natural, built and historic environment.

5.1.4 National guidance states that strategic policy-making authorities will need to calculate their local housing need figure at the start of the plan-making process. This number should be kept under review and revised where appropriate.

5.1.5 In calculating the local housing need, paragraph 61 of the NPPF states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance - unless exceptional circumstances justify an alternative approach.

5.1.6 Further, in addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

5.2 DDC's Housing Need

5.2.1 The Standard Method for assessing housing need, issued alongside the Ministerial Statement on 16 December 2020, sets an indicative housing need figure for Dover District of 596 dwellings per annum. However, the affordability ratio which factors into the local housing need assessment is updated annually. For Dover District the latest housing need calculation is 611 dwellings per annum (dpa), equating to a total housing need of 10,998 dwellings for the Plan period to 2040. We understand that the Regulation 19 Local Plan seeks to meet this need in full and in addition to the minimum figures, DDC have set an appropriate contingency buffer of 926 dwellings of the Plan period, equating to 8.4% of the total Plan period figure.

5.2.2 For context, the current adopted CS requirement is 700 dwellings per annum. This followed the adoption of a high-growth strategy in 2010 of 14,000 homes to 2026 based around the recommendations of the Dover Regeneration Strategy and above the minimum 10,100 requirement across the same period, as set out in the emerging (at the time) Regional Spatial Strategy.

5.2.3 For the avoidance of doubt, accounting for the Committed Supply Total of 5,282 dwellings, the new Local Plan will be required to allocate sufficient land to accommodate a minimum of 6,642 new homes over the remaining plan period to 2040. It is understood that this will be derived from the following sources:

- Whitfield Urban Expansion Allocation: 2,200 dwellings
- Local Plan Allocations (excluding Whitfield): 3,392 dwellings
- Windfall Allowance (70 a year from year 4): 1,050 dwellings

5.2.4 On this basis, it is evident that a substantial quantum of Plan-led housing delivery will be required in order to meet the new Local Plan's housing target. Due to the nature and dwindling supply of available urban land in Dover town and the remaining higher order settlements of Deal and Sandwich, the restrictive effect of the coast, the Kent Downs AONB, environmental constraints and the limited capacity of the district's remaining mid- and lower order settlements to accommodate significant levels of growth, meeting Dover's housing needs inevitably will require the release of significant greenfield land.

5.2.5 In our view, sustainable and accessible sites logically located adjacent to existing urban areas, including Sandwich, represent the most sustainable and reliable sources of growth for the Plan period, consistent with the overarching strategic objectives of draft policy SP3 within the emerging Plan. Such sites are best placed to deliver the significant number of new homes that are required and are most capable of making meaningful contributions to the associated public infrastructure, affordable housing and mix of new homes that is urgently needed in the District as well as further balancing the role of strategic-scale development at Whitfield within the emerging Plan's proposed growth pattern.

6 Site Specific Assessment

6.1 Overview

6.1.1 The previous chapters of this representation (Chapter 3-5) outline our client's position relating to the soundness of the Plan in which our client is confirmed to be supportive in principle of the Local Plan as a sound strategy for the growth of the district to 2040. It is clear that Sandwich must continue to form a principal location for focusing sustainable housing delivery in Dover district and will assist in ensuring an appropriate balance of sites are identified, capable of supporting the strategic role of Whitfield within the forthcoming Plan Period.

6.1.2 As introduced in the preceding sections, Fernham Homes Limited and Walker Residential Limited control 'Land at Archers Low, Sandwich' and are continuing to promote the residential allocation of the Site. The Site is allocated for residential development in the Regulation 19 Pre-submission Plan for the provision of 35 dwellings under policy reference 'SAP22'.

6.1.3 As aforementioned, the Site was allocated in the Regulation 18 Local Plan for approximately 40 dwellings under the 'Site Allocations Policy 1 Non-Strategic Housing Allocations' (reference SAN023).

6.1.4 Notwithstanding our client's support of the draft allocation within the Regulation

19 Plan in principle, we suggest that the policy text be re-visited prior to submission, to allow a higher dwelling per hectare guide to ensure the Site is developed to its full potential. It is submitted that the SAP22 policy wording should be amended to more accurately reflect the capability of the Site to accommodate approximately 40 - 45 dwellings (broadly in line with the previous site allocation in the Regulation 18 Local Plan), deliverable early in the Plan period.

6.1.5 Fernham Homes Limited and Walker Residential Limited are fully committed to the delivery of the Site within the next five years, and subject to a grant of planning permission in Spring 2023 – please see below – anticipate starting developing on site in 2023. Indeed, for the avoidance of doubt it is confirmed that Fernham Homes Limited and Walker Residential Limited have previously submitted a planning application ('ref: 22/00274') for the residential development of the Site for 44no. dwellings with associated access, parking, open space, landscaping, drainage, and infrastructure. (Amended plans and details).

6.1.6 Following a positive recommendation to grant planning permission by Officers at the DDC Planning Committee, the application was refused following consideration at Planning Committee on 31st March 2022. The application is now the subject of an appeal with a date confirmed for a two day hearing on the 17th - 18th January 2023. The site layout is shown in Figure 6.2.

6.1.7 For the avoidance of doubt, our client's support of the proposed allocation, subject to their objection to the capacity and considerations that it can accommodate an increased capacity of approximately 40 – 45 dwellings, is made without prejudice to the ongoing appeal. Should the appeal be allowed, this would realise the delivery of the residential allocation in accordance with the policy requirement (albeit more dwellings), which is consistent in its key elements with the submitted appeal scheme.

6.2 Site and Surroundings

6.2.1 The Site is situated to the southeast of St. George's Road and southwest of Sandown Road, on the southern edge of Sandwich.

6.2.2 The Site is a predominately undeveloped parcel of land totalling approximately

2.37 hectares, with tall and dense hedge and tree planting around the perimeter of the Site and an existing agricultural access point off St Georges Road to the north-west of the Site

6.2.3 The Site comprises a level enclosed field mainly formed of uniform improved grassland bounded on all sides by trees mixed in age, species, condition and character. There are also semi-derelict agricultural buildings in the southwest corner.

Figure 6.1: Site Location Plan (Drawing no. 29923A/01)

6.2.4 The Site comprises a level enclosed field mainly formed of grassland bounded on all sides by trees mixed in age, species, condition and character. There are also semi derelict agricultural buildings in the southwest corner.

6.2.5 The Site is bounded by existing residential development along St Georges Road to the north and west, undeveloped land to the east and south, Sandown Road to the north-east and a small area of residential development fronting Sandown Road further to the east of the Site.

6.2.6 The Site enjoys access to a number of local facilities and services which are within a reasonable walking distance, including schools, local shops, healthcare, employment, and public transport links. The Sir Roger Manwood Secondary School, Sandwich railway station and the historic town centre (including convenience stores) are all located within 800m of the Site. Sandwich Junior School and the local supermarket are located just over 800m from the Site. Larger shops and supermarkets are available in the local area, including Westwood Cross

8 miles to the north and Deal, 6 miles to the south. In terms of planning constraints, a Tree Preservation Order (TPO) protects trees on the northwest boundary of the Site and the belt of trees bounding the northeast and southeast.

6.3 Development Capacity

6.3.1 For the purposes of this representation, Land at Archers Low Farm, Sandwich is submitted with capacity for approximately 40 – 45 dwellings (broadly in line with the previous site allocation in the Regulation 18 Local Plan), as part of a high- quality, landscape-led residential scheme capable of delivery early in the Plan period.

6.3.2 Significant work has already been advanced by the project team as part of the submitted planning application and the subsequent appeal in which the proposed development has been informed following a thorough analysis of the Site opportunities, constraints and surroundings. The key design principles have been to create an attractive, permeable and legible layout set with a strong landscape framework, utilising existing landscape features, to accommodate a mixture of high-quality and attractive homes, of a scale and design that reflect its setting and surroundings.

6.3.3 In summary the vision for the Site is to create a high quality residential development which includes:

Circa 40 – 45 no. residential dwellings, comprising 30% Affordable Housing and a mixture of 2, 3 and 4 bedroom properties.

A series of open spaces that perform multiple functions including informal space, a local area of play (LAP), ecological mitigation areas and incorporation of native and wildflower meadow planting.

Retention of trees on the northern and southern boundaries and the provision of new woodland planting. This will include proactive management of the retained and proposed woodland belts to encourage structural and species diversity and improve the overall health and longevity of these assets. The provision of significant biodiversity net gain is envisaged, and has been demonstrated can be delivered through the application and appeal.

Low key principle vehicular access point onto Sandown Road through landscaped entrance with trees and vegetation maintained, introduction of wildflower planting.

Footpath connectivity onto St Georges Road.

Tree lined connecting avenue creating strong legibility and navigation throughout the layout.

Figure 6.2: Proposed Site Plan as amended in December 2021 (Produced by Clague Architects – Drawing no. 29923A/11)

6.3.4 For context, at the time of determination of application ref: '22/00274', full planning permission was sought for the erection of 44 dwellings, together with associated access to Sandown Road, a pedestrian crossing point on St Georges Road, parking, open space, landscaping, drainage, and infrastructure works.

6.3.5 It is highlighted that draft policy PM1 seeks to provide a density typically between 30-50 net dwellings per hectare (dph). In this respect, it is highlighted that at 45 dwellings, the Site would provide a density of approximately 22.5 dph. Whilst it is acknowledged that lower density development may be more appropriate in edge of settlement locations, this demonstrates that even at a capacity 45 dwellings, the density is relatively low. Furthermore, as part of the previous application 22/00274, DDC confirmed at paragraph 2.23 of the Committee Report that subject to a detailed assessment of visual impacts, a proposed scheme of 44 dwellings on the Site is considered appropriate.

6.3.6 The above proposed Site plan submitted during the determination of the application demonstrates the capability of the Site to comfortably accommodate circa 40 – 45 residential units, together with significant boundary and internal landscaping elements.

Draft Allocation in the Regulation 18 Local Plan:

6.3.7 As aforementioned, the Site was proposed to be allocated for a capacity of approximately 40 dwellings in the Regulation 18 Local Plan under the 'Site Allocations Policy 1 Non-Strategic Housing Allocations' (reference SAN023).

6.3.8 The Site was considered as part of DDC's Housing and Economic Land Availability Assessment (HELAA) (December 2020) for the development of approximately 40 dwellings. The summary of suitability as provided by DDC is summarised as follows:

- The Site is in an Area of Archaeological potential and a Heritage Assessment will be required.
- The Site clips Flood Zone 2 and 4, along the boundary and an FRA would need to be undertaken.
- The Site was removed from the LALP (Local Allocations Local Plan) by the Inspector on landscape grounds, however, with the provision of an enhanced landscape buffer to the east, south and west of the site to provide year-round screening, it is considered that the impact on the landscape can be mitigated. The housing number on the site has also been reduced to address landscape concerns.
- Access to this site would be possible via Sandown Road, however vehicle access onto St Georges Road is likely to be challenging due to limited footway width and subsequent sightline requirements, so would need to be restricted to emergency/pedestrian access only.
- The provision of 40 dwellings is unlikely to create a severe impact on the surrounding highway network, however St Georges Road and Sandown Road (including Knightrider Street and the route to the High Street/Quay) are subject to constrained geometry due to on street parking, as such, a review on-street parking controls may be required to manage any increase in traffic-flow.
- There is a general concern over the potential cumulative impact of development in and around Sandwich and on routes within the town, which should be considered as part of future traffic modelling exercises.
- A Transport Assessment is required.
- Further information should be provided to demonstrate that access is achievable. However, cumulative impact on the highways network needs to be assessed.

6.3.9 At the time, owing to the matters set out above the Site was considered 'Amber' in the reg/amber/green (RAG) rating. However the clients have since demonstrated within the planning application and subsequent appeal submission that the proposed development for 44 dwellings would address the queries above.

6.4 Draft Policy Allocation 'Land at Archers Low Farm, Sandwich Road, Sandwich' (SAP22)

6.4.1 As introduced in the preceding sections, our client's Site at Archers Low is allocated for residential development within the Dover Pre-submission (Regulation 19) Local Plan. For ease of reference, the draft policy wording is as follows:
 "SAP22 – Land at Archers Low Farm, St Georges Road, Sandwich (SAN023)

The Site, Land at Archers Low Farm, St Georges Road, Sandwich, as shown on the policies map is allocated for an indicative capacity of 35 dwellings.

Development proposals for the Site shall include the following:

- a) Development should be laid out to protect the residential amenity of the existing residential properties to the north-east and designed to take account of the character of the Sandwich Walled Town Conservation Area;
- b) The existing trees on the boundaries of the site should be retained and enhanced to mitigate the impact of development on the landscape and provide opportunities for biodiversity habitat creation and enhancement;
- c) Trees which need to be removed to enable an access to be provided to the site, shall be kept to the minimum needed to provide necessary visibility, and will be required to be replaced on-site;
- d) The layout of the scheme should provide a sufficient buffer between the existing mature trees on the site and residential properties, to ensure appropriate residential amenity for future residents and the protection of existing trees once the site is developed;
- e) A site-specific Flood Risk Assessment must be carried out in accordance with Policy CC5, including a comprehensive investigation into surface water flood risk. This shall also inform the application of the Sequential Approach to the layout of the site by locating the most vulnerable elements in the lowest risk areas;
- f) Primary vehicular, pedestrian and cycle access to the site shall be provided from Sandown Road;
- g) In accordance with Policy SP13 a wintering bird survey must be undertaken in advance of a planning application on the site. If the bird survey identifies that the development will exceed the threshold of significance, mitigation will be required. A suitable scheme of mitigation will need to be submitted with the planning application for the site;
- h) Environment assessment study required to address any potential impact on the Sandwich Bay SPA and Ramsar;

i) A Heritage Assessment, to include appropriate archaeological investigations must be carried out in accordance with Policy HE1 and Policy HE3, the results of which should inform the layout and design of the development which is necessary to avoid harm to any heritage assets identified through the assessment; and

j) The occupation of the development should be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider. Development should provide a connection to the sewerage system at the nearest point of adequate capacity.”

6.4.2 To be clear, our client remains wholly supportive of the allocation of the Site for residential development and is committed to delivering the Site early in the Plan period (start on site in 2023). We agree that it represents a logical and sustainable location to direct growth consistent with the growth strategy of the Plan as a whole, however we submit that more effective use of our client’s Site can be made – and therefore object to the capacity identified.

6.4.3 Accordingly, we say that Land at Archers Low can further assist the Council in meeting the growing need for new homes in the district and help to ensure the Council can have greater confidence in meeting its market and affordable housing targets in full.

6.4.4 It is submitted that the SAP22 policy wording should be amended to reflect the capability of the Site to accommodate approximately 40 – 45 dwellings (broadly in line with the previous site allocation in the Regulation 18 Local Plan), deliverable early in the Plan period.

6.5 Strategic Justification for Development

Spatial Strategy

6.5.1 The proposed Housing Distribution for the district across the Plan period is established within Policy SP3 ‘Housing Growth’ which sets out that the distribution of housing growth in the district is primarily based on the settlement hierarchy and influenced by site availability, environmental constraints and factors of delivery.

6.5.2 Rightly, a key aim of the growth strategy is to focus development in the least sensitive areas of the district in order to conserve and enhance the Dover’s rich natural and historical environment.

6.5.3 A retained theme from the adopted Plan, is that the Council’s settlement strategy continues to focus on the development and regeneration of Dover Town and Whitfield (3381 dwellings). Approximately half of the district’s planned housing is in this location, the majority of which again is to come forward as part of the strategic urban expansion of Whitfield ‘SAP1’ (2200 minimum dwellings).

6.5.4 Development will then be focused in the District Centre of Deal (223 dwellings), and the Rural Service Centres of Sandwich (227 dwellings) and Aylesham (649 dwellings). Following the settlement hierarchy rigidly would distribute housing in the preceding order, however the Plan recognises that housing delivery in Deal and Sandwich continues to be constrained by a number of factors including flood risk, ecological designations, heritage and highways. Further, Deal has experienced generally high levels of windfall development across the previous Plan period and accordingly there is now a dwindling supply of available, suitable sites in both settlements. On account of this context, the Council have sought to direct the majority of the remaining higher order settlement growth (outside of Dover & Whitfield) to Aylesham, through the strategic expansion to the town.

6.5.5 Outside of the four principal district settlements, the Rural Settlement Hierarchy (August 2022) identified that the majority of lower-order settlements in the district emerge as having a low level of facilities within the hierarchy and six settlements having none of the key indicators of sustainable services. Plainly, these settlements offer very limited opportunities for growth and it is evident that the forthcoming Plan will be reliant on the settlements of Dover (including Whitfield), Deal, Sandwich and Aylesham to deliver the housing growth that is required.

6.5.6 We further note the findings of the Strategic Housing Market Assessment (2017) which identified that Sandwich and the north is the most expensive part of district with median property prices for all sizes of homes significant in excess of prices in Deal and Dover town and the south. It is suggested that issues of unaffordability are most likely to effect entry-level properties and result in existing residents being forced to seek more affordable properties elsewhere in Dover district or neighbouring authority areas.

6.5.7 Given this context, it is clear that where available and suitable opportunities for residential development do exist within the district’s higher order settlements, including our client’s Site at Land at Archers Low which can provide a policy compliant level of affordable housing, it is imperative that the effective use of these sites are appropriately maximised in accordance with draft policy SP3 of the emerging Plan and national policy objectives.

6.5.8 Notwithstanding our client’s in principle support or the proposed strategy, we are concerned that highly sustainable, edge-of-settlement sites, particularly in higher tier settlements such as Sandwich have not been fully maximised to reflect their accessible location and capability to accommodate a greater quantum of development. On this basis, we are concerned that the strategic objectives underlying draft policy SP3 ‘Housing Growth’ may not be fully realised, to the detriment of market and affordable housing delivery and the wider policies seeking to conserve and enhance the district’s natural and historic environment.

6.5.9 Consequently, our clients object to policy SP3 as drafted, on the basis that there is a clear need to maximise the delivery of housing at sites around Sandwich, and this has not been undertaken – for example at Land at Archers Low, where it has previously been demonstrated that the site has sufficient capacity to deliver approximately 5-10 additional units over the draft allocation, that will otherwise be required to be delivered elsewhere in the district, in potentially less accessible and more sensitive locations.

Greenfield Development and Consistency with Housing Trajectory

6.5.10 Due to the nature and dwindling supply of available urban land in Dover town and the remaining higher order settlements of Deal and Sandwich, the restrictive effect of the coast, the Kent Downs Area of Outstanding Natural Beauty, environmental constraints and the limited capacity of the district's remaining mid- and lower order settlements to accommodate significant levels of growth, release will be required if the Council is to meet its housing and development commitments moving forward.

6.5.11 In our view, sustainable and accessible sites logically located adjacent to existing urban areas, including Sandwich, represent the most sustainable and reliable sources of growth for the Plan period, to support the role and timescales of strategic urban extensions and to deliver the significant number of new homes that are required within the forthcoming Plan period.

6.5.12 Moreover, greenfield edge-of-settlement sites are, in our experience, typically most capable of making meaningful contributions to the associated public infrastructure, affordable housing and mix of new homes that is urgently needed in the district.

6.5.13 The Sustainability Appraisal Scoping Report (2018) sets out that over the course of the adopted Plan period, the key sustainability issues facing Dover District in relation to housing are as follows:

Population growth, household growth and demographic change will place additional demand on key services and facilities such as housing, health, education and social care. The Local Plan offers a new opportunity to manage these pressures, encouraging mixed communities;

There is a need for affordable housing across the District. At present, the mean price of dwellings is higher than the national average. The Local Plan will help to expedite its delivery; and,

There is the need for a mix of housing types that cater for the needs of a range of people, including the growing number of single person and elderly households. Without an up-to date Local Plan, the required housing is less likely to be delivered.

6.5.14 It is evident that the new Dover Local Plan must allocate a mix of reliable sites capable of steadily delivering not only the quantum of housing that is required, but also the associated public infrastructure, affordable housing and a mix of unit types and tenures suitable for a wide range of future occupants.

6.5.15 The Housing Topic Paper (September 2022) provides further context and summarises under Chapter 7 'Historical Housing Delivery' that Dover has historically placed significant reliance on windfall development over the current adopted Plan period, with windfall sites accounting for 44% of all completed dwellings over the preceding 10-year period.

6.5.16 Moreover, it is highlighted that at the beginning of the 10 year period, the majority of new dwellings were being built on brownfield land. However, from the monitoring year 2013-14 onward development on greenfield land began to play a much greater part in the location for new development as show in figure 1 below. This trend of increased housing development on greenfield land is a result of the allocations within the CS and Land Allocation DPD being built out and is associated with an approximate doubling of completions in the district. From 2013-14 onwards the average number of completed dwellings per annum has doubled to that of the early years of the CS, as the strong delivery rates of greenfield sites form the predominant source of housing. This is despite an overall declining trend of brownfield completions towards the latter half of the Plan period. This is generally not an uncommon trend in the majority of local planning authorities areas, where opportunities for available and suitable sites in urban centres dwindle throughout the Plan period.

Figure 1: DDC Brownfield / Greenfield Completions 2010/11 to 2020/21 (source: Housing Topic Paper September 2022)

6.5.17 In light of the above context, it is clear that the adopted Dover Local Plan suffered from an initial under delivery of Plan-led housing growth in which windfall development sources were largely required to take up the slack in the early phases of the Plan period, as major allocated sites failed to deliver at the rates initially expected.

6.5.18 It is equally apparent that initial slow completion rates were quickly addressed once greenfield allocations commenced development, feeding into strong completions in the latter half of the Plan period. In our experience, greenfield sites are typically associated with stronger delivery rates and provide a reliable source of housing growth. The allocation of an appropriate mix of sites and scales is required in order to ensure steady and sustained Plan-led housing delivery across the Plan period and to avoid a reliance on windfall development to address the shortfall.

6.5.19 Consequently, given all of the above, it is imperative that the new Local Plan allocates a sufficient variety and scales of site capable of both ensuring steady and sustained housing completions and capable of making necessary contributions to public infrastructure and services, affordable housing and mix of unit types to address the key issues raised in the Sustainability Appraisal.

6.5.20 In our view, edge-of-settlement greenfield sites such as our client's Site Land at Archers Low represents the most reliable and sustainable source of housing delivery for the Plan period. Such sites are typically less constrained by wider factors and less affected by unforeseen delays such as land contamination. Moreover, greenfield sites typically are more capable of delivering the policy compliant affordable housing, unit mix and developer contributions that are urgently needed and in the case of our client's Site, have already been demonstrated within the present planning application and appeal submission.

6.5.21 It is understood that the Plan is predicated on the delivery of strategic scale development at Whitfield comprising the development of circa 2,200 new homes. Consequently, in order to avoid a repetition of the previous Plan, the Council have sought to ensure that a pool of reliable greenfield allocation, including that of our client's are included within the Plan, capable of delivering the early growth that is required within the housing trajectory prior to the commencement of major allocations later in the Plan period.

6.5.22 We note that within the Housing Trajectory 'Appendix D', the Council have included allocated units from Years 4 onwards, with extant permissions (accounting for 5% non-implementation) demonstrated to be solely capable of delivering the growth required in Years 1-3. Notwithstanding our client's commitment to commencement on site in 2023 and the initial delivery of units at Land at Archers Low in 2024 (subject to successful appeal), we support this pragmatic approach and suggest this represents a sound basis on which to set the district's housing trajectory. We note also the inclusion of an appropriate windfall allowance and the included contingency buffer to further ensure reasonably flexibility in the housing supply.

6.5.23 On account of all of the above, we submit that the allocation of Land at Archers Low forms part of a sound strategy for growth in the district for the forthcoming Plan period. Land at Archers Low is capable of delivery early in the Plan period, representing a reliable source of housing growth in a highly sustainable and accessible location adjacent to the existing settlement boundary of Sandwich, consistent with the Council's preferred settlement strategy. However, we object on the submission that the Site is capable of making a greater contribution to the district's housing need and suggest an amended wording of the policy to allocate the Site for approximately 40-45 dwellings. Nonetheless, the Site is unconstrained and capable of providing a high-quality residential development including a mix of unit types and tenures, a meaningful contribution to the supply of affordable housing and contributions to public services and infrastructure, benefiting both existing residents and future occupiers.

Policy SP4 'Windfall Development'

6.5.24 Separately, we note the provisions of policy SP4 windfall development. Proposals at Land at Archers Low would likely be acceptable in principle under this provision and we support the policy inclusion for appropriate, proportionate windfall development.

6.5.25 Our client is fully committed to the delivery of the Site which is available and suitable for delivery early in the Plan period and is presently pursuing an appeal on the Site for a greater quantum of units than the allocation in the Regulation 19 Plan. There is consequently little to be gained from potentially delaying delivery of the Site by withdrawing the allocation. Notwithstanding the provisions of SP4, it is reiterated that our client fully supports the allocation of the Site under SAP22 for residential development as the most appropriate mechanism for delivery of the Site and the opportunity for genuinely Plan-led development in Sandwich and the provision of associated benefits to public services and infrastructure, contribution to affordable housing supply and the delivering of a mix of house types and tenures.

Infrastructure Delivery

6.5.26 Paragraph 11 of the Framework is clear that all plans should promote a sustainable pattern of development. This includes aligning growth and infrastructure. Paragraph 20 goes on to confirm that strategic polices will be expected to make sufficient provision for associated development infrastructure.

6.5.27 In this regard, draft policies SP11 'Infrastructure and Developer Contributions' and SP12 'Strategic Transport Infrastructure' of the emerging Plan form the key strategic polices for infrastructure delivery. We agree that where development would create a need, or would have an impact, or would exacerbate an existing deficiency in infrastructure provision, appropriate developer contributions may be sought.

6.5.28 It is however emphasised that in all developments, infrastructure requirements must be demonstrated to be necessary through assessment during determination of the application on a case-by-case basis. Where new development is proposed, it does not automatically follow that major infrastructure contributions are always required or contribution to strategic infrastructure proposals are appropriate. For instance, it is our client's view that any infrastructure requirements must be demonstrated through a robust and transparent assessment at application stage, taking into account the submission of detailed supporting evidence, for example following consideration of the Transport Assessment in the case of highway infrastructure contributions.

Alignment with Sustainability Appraisal Findings

6.5.29 As part of the preparation of the Local Plan, the Council has identified and appraised a range of growth and spatial options through the Sustainability Appraisal (SA) which provides an assessment of how different options perform in environmental, social and economic terms, to help inform which option should be taken forward and combined with wider evidence documents, have been used to determine the growth and spatial strategy set out in the Plan.

6.5.30 Five potential distributions of growth were identified during preparation of the draft Regulation 18 Local Plan:

- Spatial Option A: Distributing growth to the District's suitable and potentially suitable housing and employment site options (as needed to deliver the scale of growth required).
- Spatial Option B: Distributing growth proportionately amongst the District's existing settlements based on their population.
- Spatial Option C: Distributing growth proportionately amongst the District's existing settlements based on the District's defined settlement hierarchy.
- Spatial Option D: Distributing growth in the same way as the adopted Local Plan, focussing most growth in and around Dover town.
- Spatial Option E: Distributing growth more equally across the District's settlements: Dover, Deal, Sandwich and Aylesham, as well as the rural villages.

6.5.31 The conclusion of the SA was that Spatial Options C (settlement hierarchy) and D (adopted Core Strategy with Dover focus) generally perform the most strongly against the SA objectives, particularly when delivering the baseline growth scenario. However, given the environmental constraints that exist around Deal and Sandwich, very few suitable and potentially suitable sites have been identified in these towns. Given this, the Council's preferred option for the distribution of housing and economic growth comprises a combination of options A (HELAA sites), C (settlement hierarchy) and D (Dover focus). The distribution of housing and economic growth in the District is therefore primarily based on the settlement hierarchy, and influenced by site availability, environmental constraints and factors of delivery.

6.5.32 On account of the above, our client agrees that the proposed growth strategy, and by extension, policy SP3 in principle represents a sound and evidence-led strategy for growth. However, given the clear acknowledgement of the dwindling supply of available sites in the higher order settlements of Deal and Sandwich, which has necessitated a minor deviation from the strongest performing spatial options, we submit that where sites are available and suitable for development in Deal and Sandwich, these must be fully maximised, reflecting their accessible location and their ability to reduce the need to develop into less accessible and more sensitive sites elsewhere in the district to accommodate the growth that is required.

Site Specific Sustainability Appraisal

6.5.33 Land at Archers Low Farm, St George's Road, Sandwich is included under HELAA reference 'SAN23' within the SA Site Assessment (Appendix F). The site performs strongly, with particular positives identified with regards to SA Objectives related to housing, accessibility, the economy, sustainable transport and climate change mitigation, in large parts due to the edge-of-settlement location and proximity of the site to key services in Sandwich.

6.5.34 We note negatives associated with the development of a greenfield site, including loss of agricultural land, however this would be true of the majority of greenfield sites and it is abundantly clear that Dover's housing need cannot be met solely on brownfield sites. We note also minor negatives / uncertain associated with biodiversity, the historic environment and landscape, however it is not clear whether these take into account the high-quality design, biodiversity enhancement and landscape mitigation proposed under the application/appeal. Irrespective, these are not considered to outweigh the clear and tangible sustainability benefits associated with edge-of-settlement development and the site's consistency with the preferred spatial options.

Summary

6.5.35 Taking all of the above into consideration, our client is wholly supportive of the inclusion of land promoted at Archers Low, as a future housing allocation within the Dover District emerging Local Plan. The allocation is considered wholly consistent with the objectives of the Plan and forms part of a sound evidence-led growth strategy consistent with the recommendations of the Sustainability Appraisal for the district to 2040, subject to the sole objection in relation to capacity.

6.6 Deliverability

6.6.1 Prior to the current appeal proposal, the Site has had no planning history of a residential nature or a history of unimplemented permissions. There are not considered to be any impediments to the Site being allocated for development commencing within the first five years of the Plan period. Combined with an appropriate number and scale of wider allocations in Sandwich and elsewhere across the district, this would ensure steady delivery of housing in Dover district across the majority of the Plan period and support the role and timescales of strategic housing delivery at Whitfield towards the latter half of the Plan period.

6.6.2 Fernham Homes Limited – a local SME with a strong history and track record of delivery, together with an adopted and robust business plan for growth – has control over the site, and are poised to commence work on its residential development very promptly after the receipt of planning permission, potentially (subject to the successful outcome of the current appeal) in 2023. Delivery of housing is expected from 2024.

6.6.3 For the reasons set out in this representation, the Site is considered suitable for the residential development of approximately 40 – 45 dwellings. The Site is adjacent to the urban area of Sandwich, one of the four higher order settlements in the district and the Council's preferred locations for Plan-led growth within the district. Development at Land at Archers Low would form a natural and logical development east of Sandwich with excellent accessibility to day-to-day services and amenities via active travel modes within Sandwich itself and convenient access to public transport infrastructure (including Sandwich train station) for onward travel to key neighbouring settlements including Dover, Ramsgate, Canterbury and Ashford.

6.6.4 Finally, in respect of suitability, there are no physical limitations or problems such as access, infrastructure, flood risk, hazardous risks, pollution or contamination.

6.6.5 On behalf of the landowner, we submit that there are no known financial restrictions that would impact upon the viability of a future housing scheme or that would prohibit development coming forward within the early stages of the Plan period. To the contrary, we consider there to be an opportunity to deliver a high-quality, sustainably located residential development scheme consistent with the Council's proposed growth strategy comprising an appropriate mix of market and affordable housing and capable of contributing to a range of community facilities, public infrastructure and services locally.

6.6.6 Given the advanced nature of the proposals by virtue of the submitted planning application, in terms of specific timescales, should the ongoing appeal be allowed, we understand that Fernham Homes Limited and Walker Residential Limited are capable of commencing work on-site in early 2023, with delivery in 2024 and completion of the Site anticipated in 2025.

6.6.7 The Site is in single ownership and there are no complicated legal agreements or covenants that would prohibit the ability to bring forward the Site early in the Plan period. The Site is therefore considered available and achievable for the purposes of the tests of deliverability.

7 Conclusion

7.1 Summary

7.1.1 This representation has been prepared by DHA Planning on behalf of Fernham Homes Limited and Walker Residential Limited, in response to the Dover District Council Local Plan (Regulation 19) consultation which runs until 9th December 2022.

7.1.2 Our client controls 'Land at Archers Low Farm, Sandown Road, St Georges Road, Sandwich' and is promoting the residential allocation of the Site as part of the new Dover District Local Plan preparation process. The Site is allocated for residential development in the Regulation 19 Pre-submission Plan for the provision of 35 dwellings under policy reference 'SAP22'.

7.1.3 Taking all of the above into consideration, we consider that the Site promoted at Land at Archers Low should remain included as a future housing allocation within the Dover District emerging Local Plan. The allocation is considered, in principle, wholly consistent with the objectives of the Plan and forms part of a sound growth strategy for the district to 2040. However, it is imperative that the effective use of these higher-order settlement sites are appropriately maximised in accordance with draft policy SP3 of the emerging Plan, and wider policies seeking to otherwise conserve and enhance the district's natural and historic environment and national planning policy objectives. We are concerned that this has not been fully undertaken and object solely on this basis.

7.1.4 Consequently, our clients object to policy SP3 as drafted, on the basis that there is a clear need to maximise the delivery of housing at sites around Sandwich, and this has not been undertaken – for example at Land at Archers Low, where it has previously been demonstrated that the site has sufficient capacity to deliver approximately 5-10 additional units over the draft allocation, that will otherwise be required to be delivered elsewhere in the district, in potentially less accessible and more sensitive locations.

7.1.5 Without prejudice to our client's support in principle of the proposed allocation at Land at Archers Low, we would urge the Council to re-visit the allocation policy text and allow a higher dwelling per hectare guide to ensure the Site is developed to its full potential and the objectives of draft policy SP3 are most effectively realised. It is submitted that the SAP22 policy wording should be amended to more accurately reflect the capability of the Site to accommodate approximately 40 – 45 dwellings (broadly in line with the previous site allocation in the Regulation 18 Local Plan), deliverable early in the Plan period.

7.1.6 In addition to being a highly sustainable and logical edge-of-settlement allocation, the Site is deliverable in a single land ownership with no viability issues, legal or third-party constraints present. Our client is fully committed to the delivery of Land at Archers Low and there are no impediments to the Site being capable of delivery within the initial 0-5 years of the Plan period.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	For the reasons set out in the consultation response submitted on behalf of Fernham Homes Limited and Walker Residential Limited (ref DHA/30245), the capacity of Land at Archers Low Farm, St Georges Road Sandwich (SAN023) should be increased to 40 - 45 dwellings.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Please refer to the consultation response submitted on behalf of Fernham Homes Limited and Walker Residential Limited (ref DHA/30245).
Include files	30245 DDC Rep_Archers Low Farm FINAL 09 12 22.pdf
Local Plan Consultation Point	SAP22 - Land at Archers Low Farm, Sandwich (SAN023)
Rep ID	SDLP1576
Rep Status	Processed
Consultee ID	1252100
Consultee Full Name	Mrs Amandajayne Hollobon-Baxter
Consultee Company / Organisation	Sandwich Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP22
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes

6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

STC feel very strongly that this site should be excluded from the proposed LALP following a robust response objecting to this application submitted recently to DDC in support of over 450 negatives responses to this proposal, highlighting the following issues: traffic generation, vehicular access, traffic and safety concerns.

The proposed housing, access road and associated infrastructure would: Be visible from Sandown Road and constitute an unwarranted visual intrusion into the countryside.

Be amplified by the loss of, and impact on, ancient trees and woodland on the site. Would cause the loss of a significant number of trees and considerable encroachment into Root Protection Areas of retained trees. These trees, many of which are the subject of TPOs, contribute significantly to the area's character, the unrivalled beauty of the countryside and the sensitive landscape setting of this part of Sandwich.

Be outside of the settlement confines of Sandwich. Would severely harm the landscape and beauty of the countryside, contrary to Policies DM1, DM15 and DM16 of the Dover District Council Core Strategy and paragraphs 130, 131 and 174 of the NPPF.

This would significantly and demonstrably outweigh the benefits of the application.

The Planning Inspector's previous objections to the site should also be re-iterated: This site is allocated in the LALP for residential development with a new estimated capacity of 50 dwellings.

This allocation is not justified because of the harmful visual impact on the character and appearance of the local area that would result. The site is an integral part of the unspoilt countryside that wraps around this part of Sandwich and as a result makes a significant contribution to the town's setting. At present the trees and the open cultivated land on the site provide a soft and attractive edge to the town.

The construction of dwellings on the site and the formation of a new access on to Sandown Road would constitute an unwarranted intrusion into the countryside to the detriment of the sensitive landscape setting of this part of Sandwich.

Other allocations in Sandwich endorsed in this report, including Sites LA14 and LA16, do not share the same landscape. The retention of the trees on the site, even if associated with a buffer area, and coupled with the retention of farming and woodland uses nearby, would not be able to mitigate the visual harm to an acceptable extent. The development would be particularly apparent from Sandown Road during the winter months when the existing deciduous vegetation is not in leaf.

The standard of road likely to be required and the necessary sightlines along Sandown Road would also open up views of the site and would be likely to involve tree loss. Although Sandown Road may not be heavily used by vehicles and pedestrians, and some existing housing development in the area may not be of the highest quality, this does not obviate the need to assess the visual implications of this particular allocation. Taking account of all these factors the allocation of this site is not justified.

Main Modification MM24 deletes this site from the LALP and is required to make the plan sound." (from Inspectors-Report-Complete.pdf (dover.gov.uk)) Nothing has changed since 2013 that makes this site now suitable for the proposed development.

If the site was to remain in the Local Plan, the following would be necessary: • Consideration must be given to tree preservation and impact greatly on the natural vista. • There are already significant traffic problems on St. George's Road and Sandown Road that cause obstructions and gridlock. • Special consideration should be given to the issues covered by Policies DM1, DM15 and DM16 of the Dover District Council Core Strategy and paragraphs 130, 131 and 174 of the NPPF.

- Where a site adjoins a watercourse, the watercourse is maintained in its entirety and that only one access/egress can be made across it.
- Where a site contains mature trees or hedging that these are to be retained in all cases.
- All sites that come onto highways that service a school have twenty mile per hour limits as part of the Highways scheme.
- Full archaeological surveys (not desktop ones done in Maidstone) are carried out on all sites within or the surroundings of Sandwich town.
- All new residential properties must have vehicle electrical charging points which will be necessary by law from 2030. • Where a site removes or displaces any on street parking that the loss of parking is made up by additional parking spaces on the site.
- All properties are to be 50-year flood risk compliant as recommended in the NPPF.
- All access roads are to be adopted by the County's Highway Authority, so that they are maintained accordingly and there are no rights of dispute.
- All sites to accommodate full fibre communications cabling to allow for super speed internet access to support economic and home working applications.
- All sites to include drop down curbing allowing adequate accessibility for persons with disabilities or limited lack of mobility.

- Any additional street lighting shall be unobtrusive, set so as not to cause irritation to neighbouring properties and in the town centre should be of a heritage style to match existing light standards.

- Sites over 40 units should provide adequate road junction improvements to allow large scale traffic flows to move into and out of the sites without impacting on existing traffic flows. • All sites must have adequate accessibility made for pedestrian and cyclist travel preference to protect and support alternative travel to motorised vehicles.

- Suitable screening provision should be introduced to shield all new development from existing neighbouring residents and in particular where a site is adjacent to an AONB or historic recognition.

Section 106 funding should be directed towards improving and updating existing essential services such as doctors, dentists, schools, libraries, toilets, play areas and public recreation.

- A master plan of Sandwich must be undertaken to ensure that there isn't a cumulative detrimental impact on the town resulting from piecemeal developments.

- Of the requirement for affordable housing, 65% of this should be rental accommodation, social or council houses. And this should be monitored for compliance.

- A Design Code for Sandwich should be undertaken.

Where a site contains mature trees or hedging these should be retained in all cases. All healthy trees should be retained. Suitable screening provision should be introduced to shield all new development from existing neighbouring residents and in particular where a site is adjacent to an AONB or historic recognition.

Be amplified by the loss of, and impact on, ancient trees and woodland on the site. Would cause the loss of a significant number of trees and considerable encroachment into Root Protection Areas of retained trees. These trees, many of which are the subject of TPOs, contribute significantly to the area's character, the unrivalled beauty of the countryside and the sensitive landscape setting of this part of Sandwich.

This allocation is not justified because of the harmful visual impact on the character and appearance of the local area that would result. The site is an integral part of the unspoilt countryside that wraps around this part of Sandwich and as a result makes a significant contribution to the town's setting.

At present the trees and the open cultivated land on the site provide a soft and attractive edge to the town.

Modification MM24 deletes this site from the LALP and is required to make the plan sound." (from Inspectors-Report-Complete.pdf (dover.gov.uk))

If the site was to remain in the Local Plan, the following would be necessary: Consideration must be given to tree preservation and impact greatly on the natural vista.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

STC feel very strongly that this site should be excluded from the proposed LALP following a robust response objecting to this application submitted recently to DDC in support of over 450 negative responses to this proposal, highlighting the following issues: traffic generation, vehicular access, traffic and safety concerns.

If the site was to remain in the Local Plan, the following would be necessary: • Consideration must be given to tree preservation and impact greatly on the natural vista. • There are already significant traffic problems on St. George's Road and Sandown Road that cause obstructions and gridlock. • Special consideration should be given to the issues covered by Policies DM1, DM15 and DM16 of the Dover District Council Core Strategy and paragraphs 130, 131 and 174 of the NPPF. • Where a site adjoins a watercourse, the watercourse is maintained in its entirety and that only one access/egress can be made across it. • Where a site contains mature trees or hedging that these are to be retained in all cases. • All sites that come onto highways that service a school have twenty mile per hour limits as part of the Highways scheme. • Full archaeological surveys (not desktop ones done in Maidstone) are carried out on all sites within or the surroundings of Sandwich town. • All new residential properties must have vehicle electrical charging points which will be necessary by law from 2030. • Where a site removes or displaces any on street parking that the loss of parking is made up by additional parking spaces on the site. • All properties are to be 50-year flood risk compliant as recommended in the NPPF. • All access roads are to be adopted by the County's Highway Authority, so that they are maintained accordingly and there are no rights of dispute. • All sites to accommodate full fibre communications cabling to allow for super speed internet access to support economic and home working applications. • All sites to include drop down curbing allowing adequate accessibility for persons with disabilities or limited lack of mobility. • Any additional street lighting shall be unobtrusive, set so as not to cause irritation to neighbouring properties and in the town centre should be of a heritage style to match existing light standards. • Sites over 40 units should provide adequate

	<p>road junction improvements to allow large scale traffic flows to move into and out of the sites without impacting on existing traffic flows. • All sites must have adequate accessibility made for pedestrian and cyclist travel preference to protect and support alternative travel to motorised vehicles. • Suitable screening provision should be introduced to shield all new development from existing neighbouring residents and in particular where a site is adjacent to an AONB or historic recognition. Section 106 funding should be directed towards improving and updating existing essential services such as doctors, dentists, schools, libraries, toilets, play areas and public recreation. • A master plan of Sandwich must be undertaken to ensure that there isn't a cumulative detrimental impact on the town resulting from piecemeal developments. • Of the requirement for affordable housing, 65% of this should be rental accommodation, social or council houses. And this should be monitored for compliance. • A Design Code for Sandwich should be undertaken. Where a site contains mature trees or hedging these should be retained in all cases. All healthy trees should be retained. Suitable screening provision should be introduced to shield all new development from existing neighbouring residents and in particular where a site is adjacent to an AONB or historic recognition. Be amplified by the loss of, and impact on, ancient trees and woodland on the site. Would cause the loss of a significant number of trees and considerable encroachment into Root Protection Areas of retained trees. These trees, many of which are the subject of TPOs, contribute significantly to the area's character, the unrivalled beauty of the countryside and the sensitive landscape setting of this part of Sandwich. This allocation is not justified because of the harmful visual impact on the character and appearance of the local area that would result. The site is an integral part of the unspoilt countryside that wraps around this part of Sandwich and as a result makes a significant contribution to the town's setting. At present the trees and the open cultivated land on the site provide a soft and attractive edge to the town. Modification MM24 deletes this site from the LALP and is required to make the plan sound." (from Inspectors-Report-Complete.pdf (dover.gov.uk)) If the site was to remain in the Local Plan, the following would be necessary: Consideration must be given to tree preservation and impact greatly on the natural vista.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP22 - Land at Archers Low Farm, Sandwich (SAN023)
Rep ID	SDLP1089
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared

	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SAP 22 at Archers Low Farm presents especially damaging problems so The inclusion of SAP 22 is not legally compliant with NPPF 2021 item 11. (b)ii ' <i>SPs should provide for objectively assessed needs for housing & other uses, . . . unless(ii) any adverse impacts of doing so would significantly & demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole</i> '.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	SAP22 - Land at Archers Low Farm, Sandwich (SAN023)
Rep ID	SDLP1598
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP22
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438. SAP 17 – 23 Sandwich SAP 22 at Archers Low Farm presents especially damaging problems, so the inclusion of SAP 22 is not legally compliant with NPPF 2021 item 11. (b)ii 'SPs should provide for objectively assessed needs for housing & other uses, unless(ii) any adverse impacts of doing so would significantly & demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole'.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP22 - Land at Archers Low Farm, Sandwich (SAN023)
Rep ID	SDLP2042
Rep Status	Processed
Consultee ID	1262599
Consultee Full Name	MR. Malcolm

	Sim
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP22
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>This site was included in the previous draft Local Plan in 2013 but on examination by the Government Planning Inspector was considered unsuitable for development . His reason was that construction of houses on this site and a new access onto Sandown Road would result in an unwanted intrusion into the countryside to the detriment of the sensitive setting of this part of Sandwich. The situation remains the same today and I do not understand why the site was reintroduced into the draft local plan in 2021. I note that the original plan in 2021 was for 40 houses but this has now been reduced to 35 houses "to mitigate the effect on ancient trees" DDC planning department will be well aware of the strong local opposition to the planning application by Fernham Homes which was rejected by DDC planning committee and is now waiting appeal. A major reason for residents concern was the harm that development will have on the environment ; biodiversity and habitat for wildlife . There are about 80 trees on the site, some of which are old and very tall and it is inevitable that those trees which survive the original development will eventually be lost as the gardens would be so small. Reduction of 40 houses to 35 will have a minimal effect to say the least Considering the looming climate crisis should we be considering destroying so many trees? This site was recognised as unsuitable for development in 2014 and the same applies today. I also have a major concern regarding the flooding potential that might result from developing this site. The top corner of the field can flood during heavy rain in the Winter and the floods spread into the rear gardens of 152 and 154 St, Georges Rd. Pictorial evidence of this has been submitted to DDC This is of course ground water flooding and we have a high water table in this area. The corner of Sandown Rd. and St. Georges Rd. can also flood after heavy rain with the flood sometimes extending 40 or 50 yds. along St. Georges Rd.. What would the effect be of concreting over of half he site together with the loss of the sponge effect of all the trees which will inevitably be destroyed? Surely this can only exacerbate the flooding problem which already exists along St.Georges Rd. I strongly oppose the inclusion of this site in the local plan and would be grateful if you could consider my comments.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP22 - Land at Archers Low Farm, Sandwich (SAN023)
Rep ID	SDLP1955
Rep Status	Processed
Consultee ID	1334258
Consultee Full Name	Mrs Janette Judd
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP22
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I am writing to object to the proposal to build 44 houses on the meadow at Archers Low Farm, Sandwich Kent.</p> <p>On 31st March 2022, Dover District Council turned down this application, mainly on environmental grounds. 450 objections were received from residents of Sandwich, and extraordinary response from a small community.</p> <p>Plans for building on this established farmland have previously been turned down. The Dover District Local Plan has never included this site as suitable for a housing development. Nothing has happened over the years which could possibly change this decision.</p> <p>One could say that the trees, natural habitat and wildlife have become more established over this time and therefore more crucial to the precious environmental in this area of Sandwich.</p> <p>Other important factors regarding the infrastructure of a mall town like Sandwich needs to be addressed –</p> <ol style="list-style-type: none"> 1 Local medical services are under extreme pressure, both at GP and Hospital level. 2 Local schools are running at full capacity

	<p>3 The roads leading to the proposed building site are already blocked by parked cars. The traffic survey undertaken by the developer was done in lockdown when the school was closed (Sir Roger Manwoods School). It is completely inaccurate and should not be acknowledged when considering the application.</p> <p>4 There are two right angled bends joining Sandown Road with St George's Road. These are prone to flooding, the water table here being very high. Also, rather dangerous for pedestrians: a friend was recently run over by a car on this junction, sustaining fractures to his shoulder.</p> <p>Please listen to our heartfelt objections. Fernham Homes also need to listen. These are brownfield sites in and around Sandwich where they could build without destroying farmland, established trees and wildlife.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Heartfelt objection. These are brownfield sites in and around Sandwich where they could build without destroying farmland, established trees and wildlife.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	

SAP23 - Sydney Nursery, Dover Road, Sandwich (SAN019)

Local Plan Consultation Point	SAP23 - Sydney Nursery, Dover Road, Sandwich (SAN019)
Rep ID	SDLP221
Rep Status	Processed
Consultee ID	1331255
Consultee Full Name	Ian JLSE Bull
Consultee Company / Organisation	Jarvis Land South East Ltd
Agent Full Name	Ian Bull
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP23 - Sydney Nursery, Dover Road.
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>In respect of Housing, the NPPF states;</p> <p>"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay."</p> <p>The Strategic Housing requirement is a 'minimum' target and in order to 'boost significantly' the supply of homes, it is important that Local Plans maximise the potential of suitable sites for the delivery of dwelling completions.</p> <p>The NPPF recognises that;</p> <p>Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly.</p> <p>Policy SAP23 proposes an allocation of c.10 dwellings on land at Sydney Nursery, Dover Road, Sandwich. The site allocated is part of a larger area, edged red on the attached plan, fronting Dover Road to the North and bounded to the South by the A258, Deal Road. There is existing residential development to the East and West of the site and the site is 'contained' by mature boundary planting. Safe and satisfactory vehicular and pedestrian access can be delivered from the Dover Road and there are no constraints to the site's development. The development would comprise 'Sustainable Development' and represent a 'small or medium' sized site capable of early delivery.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s)	<p>It is requested that Policy SAP23 be reworded as follows;</p> <p>SAP23 - Land at Sydney Nursery, Dover Road, Sandwich (SAN019)</p> <p>The site, Land at Sydney Nursery, Dover Road, Sandwich, as shown on the policies map is allocated for an indicative capacity of 35 dwellings.</p>

you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Development proposals for the site shall include the following: a Development should be laid out to protect the residential amenity of the existing residential properties to the North-East and South West b The existing trees on the boundaries of the site should be retained and enhanced to mitigate the impact of development on the landscape and provide opportunities for biodiversity habitat creation and enhancement; c The layout should retain and enhance boundary planting and incorporate a 'landscape buffer' along the Southern boundary. The layout of the scheme should provide a sufficient buffer between the existing mature trees on the site and residential properties, to ensure appropriate residential amenity for future residents and the protection of existing trees once the site is developed; e Primary vehicular, pedestrian and cycle access to the site shall be provided from Dover Road; f The development should incorporate a SUDs;g A Contamination Assessment should be undertaken.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	It is submitted that the proposed draft allocation does not represent the best use of the site and to restrict the extent and capacity of draft allocation SAP23 was arbitrary and unjustified. There is no evidence to support the sites restriction. It is submitted that attendance at the examination allow a detailed consideration of the merits of the site and will assist the inspector in his/her deliberations.
Include files	2208055 - Former Sydney Nursery (Sheet 1)[12] (1).pdf
Local Plan Consultation Point	SAP23 - Sydney Nursery, Dover Road, Sandwich (SAN019)
Rep ID	SDLP312
Rep Status	Processed
Consultee ID	1331398
Consultee Full Name	Debbie Kent
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to?Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP23 and SAP21
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	It does not consider the local infrastructure sufficiently

<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>There is mention of the reopening of the closed end of Dover Road to access the bypass. This would not relieve any pressure on the local roads in Sandwich at all. Local traffic would use it to avoid using the current road only to save a few moments of time to go to Dover. This is a dangerous junction and should not be reconsidered as an option. With a proposed site of 10 houses on Sydney nursery, why would this be necessary, when the addition of houses at the Kumar site are using the road now. This solves nothing.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Not Applicable</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP23 - Sydney Nursery, Dover Road, Sandwich (SAN019)</p>
<p>Rep ID</p>	<p>SDLP676</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331585</p>
<p>Consultee Full Name</p>	<p>Terence Hopper</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	<p>Terence Hopper</p>
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP23 / SAN019 Sydney Nursery, Dover Rd Sandwich</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified Effective Consistent with National Policy</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>No</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Not Applicable</p>

6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

SAP23 - Sydney Nursery, Dover Road, Sandwich (SAN019)

The development of the whole site of Sydney Nursery has been excluded from the plan.

The reasons for rejecting this site and the site SAN010 are poorly evidenced and in some cases contrary to the evidence to hand.

By removing these sites on unsupportable grounds, DDC has been unable to follow the settlement hierarchy. SP3 3.43 and SP3.3.45. Therefore the document is rendered unsound and unjustified.

Rejecting these two sites on this basis would be contrary to the following policies:-

SP1 (f) and (j), SP1 - Planning for Climate Change / The Climate Change Act 2008

SP2, Planning for healthy and Inclusive Communities

SP6 Economic Growth,

SP7 Retail and Town Centre,

SP10 Sandwich Town Centre

DM Policy 1: Reducing Carbon Emissions. n

DM Policy 4: Sustainable Travel.

DM Policy 6: Flood Risk.

The rejection of these two sites has had a major impact on the whole plan and is likely to have rendered it unsound and unjustified.

Contrary to the representations made by Sandwich Town Council in its reply to the Regulation 18 Draft Plan Document, that *the development of the whole of this site, with SAN010 should be considered in tandem*, SAN010 and SAN019 have been removed from the plan.

Both sites appear to have negative comments attached to them that are neither justified nor supported by the evidence to hand.

The reasons for rejecting SAN010 from the Local Plan appear to change from document to document.

Perhaps this may be to prevent sequential tests for flood risk from coming into play for the majority of the planned sites for Sandwich.

SP1 j) j Ensuring that development does not increase flood risk, including by taking a sequential approach to avoid development in flood risk areas, and where possible reduces the risk of flooding.

Certainly, the reasons for rejecting the two sites are not well supported, particularly given that a portion of the site SAN010, Rose Nursery (closest to the roundabout), and arguably that portion of the two sites most at risk from traffic noise, gained outline planning permission on April 6th 2022. for seven, self and custom-built homes. under DDC planning reference 21/01309.

DDC has in its possession the Noise Assessment Survey and Coal Mining Report, received as part of the normal planning process and these documents prove that the main reasons given for excluding this site from the Land Allocation are unfounded and unjust. DDC was asked to revisit this site together with SAN019 by Sandwich Town Council, in its response to the Regulation 18 Draft Plan.

It should be noted that the residents of The Crescent, a residential area situated between the two sites of SAN019 and SAN010, appear not to find the traffic noise too much of a problem and a great many of them have decided upon extending their homes rather than being driven away by traffic noise as one might expect if the findings of the plan were accurate.

It should be noted that the sites are also shown as being at a 1 to 30-year risk of surface water flooding. This conclusion is most likely the result of a desktop, geological assessment and bears no resemblance to the facts. A soil survey conducted prior to building works on the adjacent

property at 173, Dover Rd revealed the water table to be at 7 metres and the well at the same property and recently measured at 6.75 metres, remains permanently dry, despite it being used as a soak-away for rainwater from the properties roof.

A further reason for the site's (SAN010) rejection was that its development could prejudice future access to SAN024. Given that SAN024 has ample frontage with the A256. Sandwich Bypass. using SAN10 would not make economic sense and is therefore unjustifiable.

Furthermore, it cannot be justifiable for SAN010 to be rejected in order to protect the future financial interests of the owner of SAN024. It also seems somewhat disingenuous to recognise that SAN010 may provide future highway access to SAN024 and at the same time mark SAN010 down in the HELAA for lacking highway access.

It may be that DDC had hoped to prevent the inclusion of SAN010 in order to use some of the land to meet the Strategic Transport Improvements Objective of making improvements to the junction of A256 and A258 on the Sandwich Bypass, but as stated that portion of the land now has planning permission for housing and it would now be nonsensical to use this land for that purpose rather than the orchard land to the S.W., outside the bypass.

The owners of SAN010 have taken on comments from the planning committee and will be designing access arrangements for the seven plots that are of sufficient proportions to allow for the future development of SAN010 in its entirety. It is possible in this case, for a connection to be made with SAN024. Although I suspect that the nature of SAN024 will mean that it is not required.

The exclusion of these sites on this basis seems to be particularly unsound, given that the council has in its possession an acoustic survey taken on the portion of the Site SAN010 that has planning permission, it would not be justified to reject the inclusion of SAN010 on these grounds. It would also seem likely that to exclude SAN019/SAP23 on similar grounds would be equally unjustified.

To reject either of these two sites on the grounds of traffic noise is contrary to the evidence to hand and therefore not justified.

It then follows that the plan itself is not justified. For in precluding these two sites there follows a knock-on effect that renders the plan itself unsound.

The exclusion of sites SAN 019 and SAN 010, both of which are outside flood zones 2 and 3 Has meant that in order to find the required number of housing sites in the area of Sandwich, DDC has to revisit sites that have been rejected from the previous Land Allocation process. **The reasons for rejecting these sites remain the same as in the previous Land Allocation Exercise.**

The majority of those revisited sites fall within flood zones 2 and three and as such are at significant risk of flooding in the future.

Because these sites have been rejected, DDC have to look at sites that are further afield from the recognised settlement hierarchy and therefore more likely to have a greater impact on carbon emissions due to the increased need to travel by car. **SP1, The Climate Change Act 2008**

Housing situated farther afield and outside the normal settlement hierarchy is also less likely to use sustainable means of transport to access shops and services. impact **SP2**

SP2 - Planning for Healthy and Inclusive Communities

1 Ensuring that new development is well served by services and facilities (for example education, health care, community, cultural facilities, play, youth, recreation, sports, faith and emergency facilities) and that a mix of uses are provided in new development that support daily life. facilities) and that a mix of uses are provided in new development that support daily life.

2 Creating opportunities for better active travel, to promote physical health, including provision for safe cycle and pedestrian routes.

It is recognised that the demand for housing in Sandwich outstrips the supply and therefore many young Sandwich residents find themselves unable to afford a house in their home town. This results in a much older demographic and impacts the cohesiveness of family units and reduces the level of support that families can give to one another, particularly the young and the old. Family life can be a cohesive force in society. **SP2**

The two sites SAN019 and SAN010 would provide a significant boost to the housing supply in Sandwich. Impact **SP3, SP2, SP10**

By removing these sites on unsupportable grounds, DDC has been unable to follow the settlement hierarchy. SP3 3.43 and SP3.3.45. Therefore the document is rendered unsound and unjustified

Strategic Policy 3 - Housing Growth What are we trying to achieve?

3.28 To provide greater choice of high-quality housing to meet the needs of Dover District's growing population and changing demographic, and address affordability issues.

3.29 To focus new development at accessible and sustainable locations which can utilise existing infrastructure, facilities and services, and to ensure development contributes to the sustainability of local communities and services, supporting regeneration and wherever possible make the best use of brownfield land. Justification for approach

3.43 If the distribution of housing growth in the district were to purely follow the settlement hierarchy (as set out in Appendix E) the secondary focus for development should be the District Centre of Deal, followed by the Rural Service Centres of Sandwich and Aylesham.

3.44 However, Deal has seen high levels of windfall development over the past ten years, due to market demand, which has resulted in a limited supply of suitable housing sites.

3.45 Housing delivery in Deal and Sandwich also continues to be constrained by a number of factors including flood risk, wildlife sites, heritage and highways. Given this, it has been a challenge to identify suitable and available sites in Deal and Sandwich and the growth potential of these settlements is therefore currently considered to be relatively limited.

It is well evidenced that the centre of Sandwich is in danger of losing its vitality and there has been a continuous decrease in the number of shops and businesses in the town over many years. The town requires more footfall. one of the most positive methods of increasing footfall in the town would be to increase housing. The two sites SAN019 and SAN010 would help achieve this. **Impact SP6, SP7, SP10**

Strategic Policy 6 - Economic Growth

What are we trying to achieve? 3.99 To grow and diversify the Dover District economy by providing additional employment floor space, making it an attractive and competitive place to start, grow and invest in a broad range of businesses, attracting more and better jobs and attracting and retaining working age people.

Strategic Policy 7 -

Retail and Town Centres

What are we trying to achieve? 3.126 To support and strengthen the role of the District's town, local and village centres through their diversification, enhancement, and improvements to public realm, while maintaining their distinctive characters. Justification for approach 3.127 The District's town, local and village centres are a focus for activity and community life providing shopping, leisure, employment, culture as well as other services. This is particularly the case for Dover, Deal and Sandwich town centres.

Strategic Policy 10 - Sandwich Town Centre

What are we trying to achieve?

3.179 To protect the vitality and viability of Sandwich Town Centre and enhance the role that the centre plays in providing accessible shops and services for the community it serves ,and as a destination for visitors. Justification for approach

3.180 Sandwich is renowned for its medieval street pattern and high concentration of listed buildings. The town centre serves the daily needs of its local residents and is a key tourist attraction. The centre benefits from its proximity to the internationally significant golf course - The Royal St George's Golf Club which is one of the courses on The Open Championship rotation. Sandwich is also relatively well-connected in terms of road and rail links.

3.181 The retail profile of the centre is dominated by independent traders who contribute to the overall diversity, vitality and viability of the centre. In terms of representation by multiples this includes Boots, Costa, and the Co-op. The update to the Retail and Town Centre Needs Assessment found that vacant units have increased by 8 outlets, resulting in a vacancy rate of 13.5%, which is more than double that of 5.4% in 2018. The current vacancy rate is now approaching the national average of 14%. Over the same period, the proportion of comparison goods outlets has decreased marginally to 36.5% from 35.1% in 2018, with convenience goods outlets also having decreased to 7.6% from 8.2% previously and leisure services outlets having decreased to 23.1% from 25.2% in 2018. This is likely due to the impact of the pandemic on the town centre, meaning it may see a recovery in the future, however proactive monitoring over the Plan period will be required to assess the health of the town centre

SP10 - Sandwich Town Centre The Council will support in principle proposals which enhance the vitality and viability of Sandwich Town Centre and enable it to maintain its role as a vibrant town centre offering a range of compatible uses reflecting its individual character and economy

One could be forgiven for concluding that DDC has rejected SAN019 and SAN010 in order to prevent those other sites from being subjected to a sequential test for flood risk.

DDC have then been unable to follow the settlement hierarchy and therefore national planning guidance or indeed their own policy guidance. In order to meet the housing need in the district DDC has then suggested the Garden Village Principles, which aims to justify the building of large numbers of houses in remote village locations. This policy appears to be based more on idealism and hope than sound reasoning, pragmatism and common sense.

Such actions call into question DDCs commitment to Strategic Policy SP10 and its resolve to meet the aims and objectives of the plan itself. Despite the mental gymnastics DDC have used to justify the development of large-scale housing in village locations, it is likely that these developments will end up as remote housing estates from which residents will need to travel for the majority of their needs; employment, services, education etc.

It then follows that DDC has been unable to follow the national guidance on sustainable development and transport

DDC has introduced a plan that does not adhere to its stated objectives to reduce the overall carbon footprint of the district and to reduce the need to travel or to encourage sustainable travel

It has embarked on a plan that does not make sufficient use of the recognised settlement hierarchy calling into question its commitment to the stated aims and objectives: Reducing the need to Travel.

Promoting sustainable Travel, Reducing the overall carbon footprint of the District and protecting and promoting the vitality of Sandwich. Policies SP1, SP2, SP3, SP6, SP10. DM5, CC1, CC5, TI1 would seem to apply

It has not made the best use of the means to achieve those aims.

The proposed, small scale, development at SAN019/SAP23, of ten houses would appear to be contrary to policy DM 29

SAN019 is, one of the more suitable sites, but only if the whole of this site was to be developed. Access should be via both Dover Road and A258. DDC has suggested that only a small portion of the land, which fronts Dover Road, should be developed and that the majority of the land is unsuitable. The reasons for reaching this conclusion are not well supported.

Not developing the whole of the SAN019 site, would discard an opportunity to significantly increase housing provision within Sandwich and enable the development of further sites on Dover Road while simultaneously reducing traffic flow at the Sandwich end of Dover Road.

SAN 019 is outside the flood zone and if the whole site was to be developed, traffic to and from it would neither adversely impact traffic flow within the town nor deny local residents parking amenity (as is the case with other sites closer to the town).

The site has the potential to significantly reduce the highways impact caused by the development of SAN 015 Kumor Nursery, reducing traffic flows at the lower, Sandwich end of Dover Road and also along the Deal Road, outside the main entrance to Sandwich Technical School.

Development of the whole site has the potential to open up other sites situated along Dover Road, In particular, SAN010 and perhaps, at a later time, parts of SAN024

In the current proposal for this site DDC Has stated that the traffic caused by the proposed development of ten houses would be countered by the reduction of traffic caused by its current use. This is a somewhat disingenuous statement, given that the land identified as suitable is currently occupied by one horse and therefore probably responsible for somewhere in the region of two to four traffic movements along Dover Road per day.

DDC has expressed concerns regarding the visual impact and the ability to screen the site at SAN019. However, in terms of visual impact, this site differs very little from SAN 007 and would be more easily screened than the approved development at SAN 013.

The current viewpoint from DDC on the ability to screen this site would seem to be at odds with that which they expressed in the previous HELAA (copy attached marked APP A. SAN019 pg 1-2).

Comments on SAN019 from the previous SHLAA under SHL065 include:- Landscape impact. The site is reasonably well contained, visually although there are glimpses through to the A258. With sufficient buffer landscaping on this frontage, including that boundary with the intervening field to the SE, the landscape impact would be acceptable. The boundary screening to the Technical College and the land to the SW would need to be retained.

Analysis. Although the development of the site would not have a detrimental impact on the wider landscape or setting of the historic town (which would include mitigation) and the site is located within walking distance of the local college and public transport, there is a KCC Highways objection to any development that would increase traffic movements through the Dover Road/Deal Road junction where there are known problems.

NB, It is to be noted that a little later on when SAN015 (Kumor Nursery), situated on the same road, was put forward for the development of 67 houses, KCC Highways expressed few issues with traffic movements and supported the application.

The development of SAN019 in its entirety would reduce the impact of noise from the A256, Sandwich bypass, on local residents. The proximity of the site to the bypass would likely include the implementation of some noise of mitigating measures. These measures could possibly take the form of a continuation of the tree-covered, earth mound, which runs from the site to the Dover Road roundabout, and shields the houses situated on The Crescent.

Given the sums of money involved in a development of this size, (particularly if SAN010 is also developed), it would not be unfeasible for an earth bund to be installed and mature trees to be transplanted in order to provide an instant acoustic and visual screen.

DDC has also expressed concern about the limited frontage with the A258. However, A plan of the site (see appendix a) appears to indicate the frontage with the A258 is not as small as suggested by DDC. Additionally, the owner of an adjoining triangle of land to the West (former donkey paddock) (see appendix b) and shaded red), is willing to sell his land. This would increase the frontage considerably and allow suitable access arrangements to be made.

KCC highways have previously indicated that they would not be against a left in, left out junction in order to gain access to SAN019 from the A258 (See attached email from KCC highways appendix c)) as long as measures were taken to prevent traffic leaving the site turning right. If this were to take the form of a central reservation, then the concerns regarding the hazard to pedestrians seeking to access the bus stop on the opposite side of the road would also be addressed. A left in left out junction would also severely restrict Dover Road from becoming a 'rat run'

It would seem that the concerns DDC have expressed regarding the development have been offered reasonable solutions or, as is the case for visual impact, countered by previous, opposing statements made by DDC themselves. Development of this site in its entirety would fit with the aims and objectives of the neighbourhood steering group and Sandwich Town Council at the time of the previous HELAA (2013). 'To Make Sandwich Technical School and the adjacent Sports Centre the focal point for future development in Sandwich'. Those involved with the process at the time will recall that, due to an administrative error, the proposals were not submitted in time and were therefore not accepted for consideration by the government inspector.

See attached appendices a) DDC comments on the site from previous HELAA, marked SAN019 (previously SHL065) pages 1-2 b) Adjacent land (former donkey paddock) available to increase frontage with A258 Sandwich bypass c) Communication from KCC highways indicating that access to SAN from A258 (Sandwich bypass) is achievable via a left in left out junction.

Incidentally, Other potential housing sites in the vicinity, SAN010 and SAN019 have been removed from the plan (contrary to the representations made by STC at the Draft Regulation 18 stage).

I suspect that this was because their inclusion would have brought into play the sequential test for flood risk for the majority of the planned sites for Sandwich.

SP1 j) *Ensuring that development does not increase flood risk, including by taking a sequential approach to avoid development in flood risk areas, and where possible reduces the risk of flooding.*

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful

Re-evaluate the complete development of SAN019 and include SAN010 in the Local Plan.

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I wish to be able to speak directly to the inspector in order to convey the benefit of including these two sites and allow them to question ask questions of me in order to make a more informed judgment on the sites.
Include files	001_Site Location Plan.pdf Rose Nursery Accoustic Assessment 2021 .pdf RN Coal Mining Report.pdf
Local Plan Consultation Point	SAP23 - Sydney Nursery, Dover Road, Sandwich (SAN019)
Rep ID	SDLP531
Rep Status	Processed
Consultee ID	1331749
Consultee Full Name	The Roses Beneficiaries Association
Consultee Company / Organisation	J.Scott, Finn's
Agent Full Name	Jane Scott
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	4.170 and Table 4.3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The Council has identified in paragraph 3.45 a difficulty in finding sites in Sandwich however have dismissed this site which is appropriate, available and in single ownership and can be delivered within the first 5 years of the Plan.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance	Land at Sydney Nursery, Dover Road, Sandwich This representation is submitted by Finn's on behalf of the Roses Beneficiaries Association, as sole owners of the site reference SAN019. Part of the site fronting Dover Road is proposed to be allocated under Policy SAP23 for residential development for 10 units and this allocation is fully supported.

with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

However, we object to the failure to allocate the remainder of the site to Deal Road and are still seeking the allocation of the whole site put forwards under the Call for Sites with the larger area of the Nursery site to the south of the area proposed to be allocated, identified in red in the HELAA maps. The total number of units sought was 61. There is also an option to provide a care home facility on the land.

Initial highway access work has been carried out and access to this land was also considered. The frontage site was found to be available and achievable, with access from Dover Road. On the wider site, the Council raised concerns over access from A258 Deal Road and stated that it does not appear to be achievable. Initial transport scoping on access has been carried out along with pre-application advice from Kent Highways. This work, referred to as Access 2 in the attached documentation, shows that provision of an access from Deal Road is indeed possible and achievable, likely with a left hand turn only, directing traffic towards the western Deal Road roundabout.

This would enable a new access road linking through the site with Dover Road, to relieve the traffic on Dover Road and enable easier access to the bypass without negotiating the school frontage and the junction of Dover Road with Deal Road at its western end. It would also enable the provision of new housing adjacent to the Secondary School and in close proximity to Delf Farm Shop and a wide range of facilities offered in Sandwich as a Rural Service Centre.

Paragraph 3.45 states that 'it has been a challenge to identify suitable and available sites in Deal and Sandwich', yet this larger site has been dismissed with only the site frontage being found suitable over concern suitable access could not be provided from Deal Road. However, suitable access can be provided to the A258 Deal Road.

Paragraph 4.170 states that limited sites have been identified in Sandwich due to constraints, however this site offers some 60 units, on land in a single ownership, well screened and landscaped and lying adjacent to the existing built area of Sandwich, close to a good range of amenities.

The land is well located to the existing built area of Sandwich, with long established high boundary screening resulting in defined site boundaries and it is situated within easy walking distance of the station, junior and secondary schools and shops and other services and is a very logical location for new housing in Sandwich. We consider that the whole of SAN019 should be allocated for residential development either in the form of residential dwellings or mixed residential dwellings and care home facility.

In terms of delivery of the area proposed to be allocated under SAN019, it is noted that the Plan's trajectory for the sites proposed to be allocated within Sandwich, does not expect any delivery to commence until Year 4 after Adoption of the Plan, with 1 commencing delivery in Year 6, one site in Year 7, one site in Year 8, two sites in Year 9 and one site not until year 13. This site is noted for delivery in years 12 and 13 however for such a small site which is available and in single ownership, it would be delivered within the first 5 years of the Plan and will avoid a delay in delivery of housing in Sandwich. Therefore the trajectory should be amended to reflect this.

In terms of delivery should the whole area submitted for SAN019 be allocated, commencement of delivery would be within the first 5 years of the plan starting in Year 3 with build out at a rate of 12 units per year over 5 years. This larger site should be allocated for housing within the Local Plan.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

The Council have highlighted at paragraph 4.170 that limited site allocations have been identified in Sandwich due to the constraints that exist. However this site is available for development, located adjacent to the Secondary School and close to the Junior School and the range of facilities offered within Sandwich, yet has been dismissed over access concerns. Access to the site from the A256 Deal Road has been assessed and suitable access can be provided. The site offers an opportunity to significantly improve traffic flow and access to Dover Road in a managed way and offers highway benefits to this end of Sandwich. The whole site should be allocated for development.

Include files

[Site Access Technical Note v03 \(all\).pdf](#)
[Response_PAP-2022-42.pdf](#)
[highway boundary 45214497 Plan.pdf](#)

Local Plan Consultation Point

SAP23 - Sydney Nursery, Dover Road, Sandwich (SAN019)

Rep ID

SDLP1577

Rep Status

Processed

Consultee ID

1252100

Consultee Full Name	Mrs Amandajayne Hollobon-Baxter
Consultee Company / Organisation	Sandwich Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP23
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Sandwich Town Council agrees in principle to this ten home development but strongly opposes opening up of the access to the bypass as the residents are against this and it is not appropriate, measurable or achievable.</p> <p>No other objections raised to what is a small 'infill' self-build site, however the following mitigation should take place: The following should be considered:</p> <p>KCC highways have previously indicated that they would not be against a left in, left out junction in order to gain access from the A256, as long as measures were taken to prevent traffic leaving the site turning right. If this were to take the form of a central reservation, then the concerns about the hazard to pedestrians seeking to access the bus stop on the opposite side of the road would also be addressed.</p> <p>In the case of both SAP21 and SAP23, the roundabout at the junction of the Dover / Deal Road should be reconstructed to allow direct access to the by-pass, thus pre-emptively relieving the inevitable extra pressure on the narrow streets in Sandwich itself.</p> <p>There would need to be full consideration made on the impact on the protected woods behind the houses in what used to be The Crescent. In particular the wildlife (rabbits/foxes/owls/woodpeckers to name a few), which I think would be disturbed and, in all probability, have to migrate elsewhere. Mitigation of site planning. Earth bund to be installed and mature trees to be transplanted, in order to provide an instant screen.</p> <p>Where a site adjoins a watercourse, the watercourse is maintained in its entirety and that only one access/egress can be made across it.</p> <p>Where a site contains mature, healthy trees or hedging that these are to be retained in all cases.</p> <p>Speed limit should be reduced to 20mph due to heavy traffic use and residential and school access as all sites that come onto highways that service a school have twenty mile per hour limits as part of the Highways scheme.</p> <p>Full archaeological surveys (not desktop ones done in Maidstone) are carried out on all sites within or the surroundings of Sandwich town.</p> <p>All new residential properties must have vehicle electrical charging points which will be necessary by law from 2030. Where a site removes or displaces any on street parking that the loss of parking is made up by additional parking spaces on the site.</p> <p>All properties are to be 50-year flood risk compliant as recommended in the NPPF.</p> <p>All access roads are to be adopted by the County's Highway Authority, so that they are maintained accordingly and there are no rights of dispute.</p> <p>All sites to accommodate full fibre communications cabling to allow for super speed internet access to support economic and home working applications.</p> <p>All sites to include drop down curbing allowing adequate accessibility for persons with disabilities or limited lack of mobility.</p>

Any additional street lighting shall be unobtrusive, set so as not to cause irritation to neighbouring properties and in the town centre should be of a heritage style to match existing light standards.

Sites over 40 units should provide adequate road junction improvements to allow large scale traffic flows to move into and out of the sites without impacting on existing traffic flows.

All sites must have adequate accessibility made for pedestrian and cyclist travel preference to protect and support alternative travel to motorised vehicles.

Suitable screening provision should be introduced to shield all new development from existing neighbouring residents and in particular where a site is adjacent to an AONB or historic recognition.

Section 106 funding should be directed towards improving and updating existing essential services such as doctors, dentists, schools, libraries, toilets, play areas and public recreation. A master plan of Sandwich must be undertaken to ensure that there isn't a cumulative detrimental impact on the town resulting from piecemeal developments.

Of the requirement for affordable housing, 65% of this should be rental accommodation, social or council houses. And this should be monitored for compliance.

A Design Code for Sandwich should be undertaken. There would need to be full consideration made on the impact on the protected woods behind the houses in what used to be The Crescent.

In particular the wildlife (rabbits/foxes/owls/woodpeckers to name a few), which I think would be disturbed and, in all probability, have to migrate elsewhere.

Earth bund to be installed and mature trees to be transplanted, in order to provide an instant screen. Where a site contains mature trees or hedging that these are to be retained in all cases.

Suitable screening provision should be introduced to shield all new development from existing neighbouring residents and in particular where a site is adjacent to an AONB or historic recognition.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Sandwich Town Council agrees in principle to this ten home development but strongly opposes opening up of the access to the bypass as the residents are against this and it is not appropriate, measurable or achievable. No other objections raised to what is a small 'infill' self-build site, however the following mitigation should take place: The following should be considered: KCC highways have previously indicated that they would not be against a left in, left out junction in order to gain access from the A256, as long as measures were taken to prevent traffic leaving the site turning right. If this were to take the form of a central reservation, then the concerns about the hazard to pedestrians seeking to access the bus stop on the opposite side of the road would also be addressed. In the case of both SAP21 and SAP23, the roundabout at the junction of the Dover / Deal Road should be reconstructed to allow direct access to the by-pass, thus pre-emptively relieving the inevitable extra pressure on the narrow streets in Sandwich itself. There would need to be full consideration made on the impact on the protected woods behind the houses in what used to be The Crescent. In particular the wildlife (rabbits/foxes/owls/woodpeckers to name a few), which I think would be disturbed and, in all probability, have to migrate elsewhere. Mitigation of site planning. Earth bund to be installed and mature trees to be transplanted, in order to provide an instant screen. Where a site adjoins a watercourse, the watercourse is maintained in its entirety and that only one access/egress can be made across it. Where a site contains mature, healthy trees or hedging that these are to be retained in all cases. Speed limit should be reduced to 20mph due to heavy traffic use and residential and school access as all sites that come onto highways that service a school have twenty mile per hour limits as part of the Highways scheme. Full archaeological surveys (not desktop ones done in Maidstone) are carried out on all sites within or the surroundings of Sandwich town. All new residential properties must have vehicle electrical charging points which will be necessary by law from 2030. Where a site removes or displaces any on street parking that the loss of parking is made up by additional parking spaces on the site. All properties are to be 50-year flood risk compliant as recommended in the NPPF. All access roads are to be adopted by the County's Highway Authority, so that they are maintained accordingly and there are no rights of dispute.

All sites to accommodate full fibre communications cabling to allow for super speed internet access to support economic and home working applications. All sites to include drop down curbing allowing adequate accessibility for persons with disabilities or limited lack of mobility. Any additional street lighting shall be unobtrusive, set so as not to cause irritation to neighbouring properties and in the town centre should be of a heritage style to match existing light standards. Sites over 40 units should provide adequate road junction improvements to allow large scale traffic flows to move into and out of the sites without impacting on existing traffic flows. All sites must have adequate accessibility made for pedestrian and cyclist travel preference to protect and support alternative travel to motorised vehicles. Suitable screening provision should be introduced to shield all new development from existing neighbouring residents and in particular where a site is adjacent to an AONB or historic recognition. Section 106 funding should be directed towards improving and updating existing essential services such as doctors, dentists, schools, libraries, toilets, play areas and public recreation. A master plan of Sandwich must be undertaken to ensure that there isn't a cumulative

	detrimental impact on the town resulting from piecemeal developments. Of the requirement for affordable housing, 65% of this should be rental accommodation, social or council houses. And this should be monitored for compliance. A Design Code for Sandwich should be undertaken. There would need to be full consideration made on the impact on the protected woods behind the houses in what used to be The Crescent. In particular the wildlife (rabbits/foxes/owls/woodpeckers to name a few), which I think would be disturbed and, in all probability, have to migrate elsewhere. Earth bund to be installed and mature trees to be transplanted, in order to provide an instant screen. Where a site contains mature trees or hedging that these are to be retained in all cases. Suitable screening provision should be introduced to shield all new development from existing neighbouring residents and in particular where a site is adjacent to an AONB or historic recognition.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP23 - Sydney Nursery, Dover Road, Sandwich (SAN019)
Rep ID	SDLP1923
Rep Status	Processed
Consultee ID	1331952
Consultee Full Name	Louis Wilkin
Consultee Company / Organisation	Aspire LPP
Agent Full Name	Louis Wilkin
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP23
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible.	(DDC Note - This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1923.) A proposal for mixed use development that includes a circa 70 bed care home, 0.8 acre of open space, sound buffer, 30/35 houses, improved

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

footpath and a crossing on Deal Road

Sydney Nursey, Dover Road, Sandwich, CT13 0DB – SAN019

A proposal for a mixed used development
Sydney Nursey, Dover Road, Sandwich, CT13 0DB
09/12/2022

1.0 Indicative Site Plan

2.0 Introduction

The whole site of Sydney Nursey (SAN019) was submitted in the call for sites for the new Dover Local Plan. Only the front acre has been put forward into the regulation 19 draft Local Plan. In the sustainability appraisal the reason why the whole site was not put forward was that the site was in a relatively inaccessible location and exposed to noise pollution from Deal Road. The cover letter explains how the proposal will make the site more accessible for low carbon means and reduce the noise the pollution for the residents. It also highlights that there is a substantial borough wide need for care homes and a local need.

3.0 Improving the Sustainability of the Site

The public footpath that runs to the west of the site, allows for easy access to a very regular bus service of at least two buses an hour. At present the footpath would be considered inadequate for regular use. After speaking with a highway consultant, we propose an improvement to the footpath, to make it accessible all year round. This will improve access not only for the residents of the proposed development, but the wider community. The bus stop is located on a busy road, crossing over to access the bus routes heading west would be extremely dangerous. An improvement to allow safe crossing of the road will be implemented and will obviously need to be accepted by Kent County Council Highway Authority. All of these improvements will make the location a lot more accessible by low carbon means for the whole community.

4.0 Reducing the Noise Pollution From Deal Road

We have been in contact with a noise consultant about how we can reduce the noise pollution from Deal Road. They believe that with the strategy below it will significantly reduce the noise. There will be an exclusion area where residential housing will be not built. This will have a three positive affects for the future residents. The first is increasing the distance the houses are from the A258. Secondly, it allows for substantial screening, planting of trees, and acoustic fencing to reduce the noise impact of the road. It will also provide just under an acre of public space for walks and it will have space to provide a much needed children's playground for the local community to use.

5.0 Need Case for a Care Home

There is a demonstrable local and borough wide need for care beds. The Dover SHMA (2017) identified an undersupply across the Borough at the time of publication of 270 beds over the next 23 years. That is to say, some 12 beds are needed in the Borough every year. These figures do not accurately account for the need. The Kent County Council's (KCC) Kent Social Care Accommodation Strategy 'Better Homes: Greater Choice (July 2014) notes that the average size care home in Dover is 31 Beds. In the KCC strategy it states that there are high number of converted Victorian properties or older smaller care homes that are unable to accommodate the more complex needs of individuals. It is considered that many care homes that are under 40 beds will be considered unviable to operate, as they do not benefit from the economies of scale of larger care homes and do not have the facilities for the changing needs of an ageing population. According to the Care Quality Commission (CQC) the average size home, is de-registering is 27 beds. It is expected that larger Victorian properties and or older smaller care homes that have so far supported residential care in the district will become too costly to reconfigure to modern standards, and these will be

brought forward for conversion or redevelopment into other uses.

The CQC state that market standard for care home provision is that every room should have ensuite provision. Many of the older care homes will either have zero ensuite provision or minimal. According to Carterwood Analytics there are 30 operational/planned care homes within the Borough of Dover. Out of these 30 care homes there are only 6 that are considered to be future proof, these are homes with over 40 beds and have full ensuite provision. Out of the 1212 beds that are operational or planned only 419 beds are considered future proof by the Kent County Council's Kent Social Care Accommodation Strategy and CQC.

Carterwood Analytics have provided a more localised assessment of need. Within a catchment of 3 miles of the site, there is a current undersupply of 123 market standard beds and 143 wetroom beds. There is one operational care home in the 3-mile radius that only has 20 beds and was opened in 1986. This is not considered future proof, plus it has a CQC rating of red, which classes it as inadequate. There have been two closures of care homes in the last four years, one was 32 beds and other was 34 beds. One of these closures was a KCC care home Wayfarers, it was shut down as it no longer conforms to CQC requirements of ensuite provision and the unit cost of Wayfarers was about three times higher than the average unit cost in Dover (Kent Online, 2019). This is clear evidence that many smaller homes are closing increasing the demand for care beds.

There have been two recent applications for new care homes in the Dover Borough, 17/01345 and 18/00079. In both of these there has been evidence of a need in the Borough. In the application, 18/00079 the KCC Strategic Commissioning responded to the application stating that "the profile of existing care home accommodation needs to change to more modern fit for purpose accommodation and as a result could see the closure or remodeling of older, smaller provision", they also go to say that by 2021, the Dover district requires an additional capacity of 270 care units. In the other application 17/01345 that was won at appeal (3213086), the inspector makes reference to the demographic changes in the Dover Borough, which will see people living over 65 increase 72% between 2011 and 2031. The inspector concludes that due to this demographic change "a planning objection to the principle of the further care home proposed cannot be adequately substantiated."

6.0 The Need for an Allocation of a Care Home

The regulation 19 Dover Local Plan 2040 has not allocated any care home beds. Therefore, the evident need of care homes will have to come from windfall sites over the planned period. Windfall sites that are larger enough to accommodate a care home in sustainable locations are extremely rare. To make sure that there is adequate provision of care homes Dover Council need to start allocating sites, otherwise not enough care homes will come forward to meet the identified need in the Dover Borough.

7.0 Conclusion

The improvements to the public footpath, the improved crossing, noise mitigation, public space and the evident need for a care home result in a very compelling case for the Council to accept this allocation on the site.

It is therefore respectfully requested that this proposal be adopted into the New Dover Local Plan.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at

<p>examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>Wilkin Aspire (Sydney Nursery) Em Att1_Redacted.pdf</p>

Local Plan Consultation Point	Aylesham
Rep ID	SDLP85
Rep Status	Processed
Consultee ID	1265239
Consultee Full Name	Mrs Burnett A Burnett
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24 /SAP25/SAP27E2 SaP26
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Hello education for teens and activities for teens. Social places to attend. employment limited too many small businesses a need to provide bigger employers. We coal site needs to provide for local community .toursim is over prices for local community to use. housing lacks bungalors , disabled accomadation , nursery for children. Old age care needs. Taking away farming land.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	E ducation for teenage. Transport safe for school age people. Teenagers in Aylesham are disadvantaged by having to travel to town by loss of time leading to missed out of school activities and study time. place for young people to attend after school at weekends. Coffee shops study's. more inclusive for people with disabilities, bunglos , garden space for social housing needs. farm land removed were is the food production going to be provided.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Aylesham
Rep ID	SDLP88
Rep Status	Processed
Consultee ID	1330717
Consultee Full Name	Mrs Mandy Gass
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	The development within the Aylesham village
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Population within Aylesham has almost trebled over the last 6 years with no additional employment opportunities, education facilities, roads or public transport or medical facilities so to,include Aylesham in the plan with no improvements to the already insufficient resources is not sound. Development within Aylesham has already satisfied the government's requirements. Aylesham has not been given what has been promised in the last lot of development. with regard to its duty to cooperate - the plan has only been advertised via the internet which is insufficient plus it has put the onus on the community to advertise. The open events should have been better publicised and support should have been given to the community who wish to comment. The system is not user friendly and it is complicated. more time should be given for the public to respond, specifically as this has come out at the same time as the Canterbury plan and it is over the Christmas period.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance	Remove the proposed new developments from Aylesham until sufficient infrastructure is already in place. Do the consultation in a tick box (poll) type form. Advertise it locally in person as well as the internet.

with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I feel it's important to have representation from those that live in Aylesham.
Include files	
Local Plan Consultation Point	Aylesham
Rep ID	SDLP162
Rep Status	Processed
Consultee ID	1329874
Consultee Full Name	Ms Nicola Purcell
Consultee Company / Organisation	Aylesham Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP12 Strategic Transport Infrastructure
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Over the past few years, Aylesham has seen a vast amount of development. This has put considerable strain on local amenities such as local shops and medical services.</p> <p>Any possible future developments, whatever size, must provide Aylesham with additional facilities, in particular for young people, local shopping facilities and the infrastructure that will allow more people to move freely around the village.</p> <p>Aylesham Parish Council believes that any future development must improve amenities and provisions for young people.</p> <p>In terms of transport, all future developments must focus on pedestrian and cycle traffic. With emphasis on the improvements of train and bus services appropriate to the size of the Parish, rather than road users to both combat road traffic and assist with the climate emergency.</p>

	<p>Aylesham and Snowdown only have a regular bus service to Canterbury, and more recently there have been attempts to end school bus services to Dover. New development should bring a net increase in public transport, not a steady decline.</p> <p>In addition, there is considerable strain on local roads and any future development must be accompanied with a plan to make significant upgrades to key routes such as Spinney Lane and B2046 (Adisham Road).</p> <p>Any chances of alleviating road traffic are severely hampered in Aylesham. Both the bus services and train service to Aylesham and Snowdown are completely substandard. Aylesham Train Station and Snowdown Train Station are both inaccessible for many residents.</p> <p>Aylesham Parish Council would welcome the opportunity to work with Network Rail and Southeastern to address the ongoing issues with train access to both Stations.</p> <p>Aylesham Parish Council believes that any further development can only happen after improvements to both the bus and train services to and from both Aylesham and Snowdown. Ensuring provisions are sustainable, accessible and appropriate for the size of the whole Parish.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Aylesham
Rep ID	SDLP161
Rep Status	Processed
Consultee ID	1329874
Consultee Full Name	Ms Nicola Purcell
Consultee Company / Organisation	Aylesham Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24- Land to the South of Aylesham (AYL003)
2 - Do you consider this part of the Plan sound?	No

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Aylesham North (500 homes) has now been removed from the Draft Local Plan. Aylesham Parish Council welcomes this decision.</p> <p>In the south, site AYL003 runs from Spinney Lane (with Aylesham Road to the East and Ackholt Wood to the West) all the way to housing in the village of Snowdown. This site has a proposed development of 640 homes. The site map has been amended (as per SA[1]) to properly reflect land ownership and remove a private property from the proposed area.</p> <p>This relates to SAP24 South Aylesham.</p> <p>In addition, there is 1 smaller site (AYL001 policy SAP27) located on land on Dorman Avenue North. Initially this land was due to be windfall housing but is now allocated for 9 houses.</p> <p>Aylesham Parish Council opposes the uses of AYL001 for the development of 9 houses as this would result in the loss of registered native woodland.</p> <p>Aylesham Parish Council believes this level of development is over-bearing on the village and risks altering the character of the community. This is far beyond the original master-plan.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Aylesham
Rep ID	SDLP136
Rep Status	Processed
Consultee ID	1330970
Consultee Full Name	Mr Paul Henley

Consultee Company / Organisation	Womenswold Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p><u>Comments on the Dover District Draft Local Plan from Womenswold Parish Council</u></p> <p>Womenswold Parish Council is submitting comments based on discussion at the Parish Council meeting on 8th November 2022. The Council wishes to comment as follows on the proposed housing estate SAP 24 of 640 houses on land between Aylesham and Snowdown:-</p> <p><u>Rural Nature</u></p> <ul style="list-style-type: none"> The proposed site of the housing estate is on a greenfield site in a rural community. This proposal would severely impact on the rural nature of the area. In addition, valuable farm land will be lost to the production of food. This is clearly much needed in these difficult times <p><u>Water</u></p> <ul style="list-style-type: none"> The area in question lies in a drought stricken part of the South East. This summer and most summers we have water shortages. This development can only exacerbate the problem. In addition, Canterbury City Council is planning a total of 3620 (minimum) houses in the adjacent area, adding to the burden of water shortage. <p><u>Sewage</u></p> <ul style="list-style-type: none"> The whole of the South East suffers from extremely poor infrastructure for the disposal of raw sewage. There have been many recent instances whereby Water Companies have pumped raw sewage into the sea which has resulted in large fines. Clearly the addition of nearly 4000 home will only add to this problem. <p><u>Traffic</u></p> <ul style="list-style-type: none"> The proposal, together with Canterbury City Council's proposal will increase the strain on the rural road infrastructure. In particular, the B2046 is already extremely busy. There have been many accidents at the junction to the entrance to Womenswold Parish. In addition the slip road on the A2 (London Bound) is far too short. The increase in traffic created by these developments will only make this worse. The roundabout on the A260 by the A2 was built to deal with the huge increase in traffic coming from Aylesham under the current Aylesham expansion. It does not take into account the further proposed increases. <p><u>Infrastructure</u></p> <ul style="list-style-type: none"> Currently there is a major shortage of facilities which contribute to facilitate supporting the community:- <ul style="list-style-type: none"> Doctor surgeries. There are no secondary schools in the area. The nearest schools are in Canterbury, Sandwich and Dover. This necessitates a bus ride on overcrowded and unreliable buses. This also contributes to increased Greenhouse gasses and increased traffic congestion. The addition of so many houses will seriously exacerbate the problem.

- There is only one small Coop in Aylesham which hardly copes with current levels of business.

Public Transport

- Buses: The bus service is already poor with little sight of improvement
- Trains: There is a station at Snowdown but the service is slow, once an hour to London for a 2 hour journey. The stations at Snowdown and Aylesham also do not cope with current levels of use. Parking is an issue and walking is difficult along narrow country lanes with no footway.

Summation

Womenswold Parish Council objects to the proposed Housing Estate SAP 24.

It is too large, and when the adjacent Canterbury City Council plans (R20 and R1) are taken into account, it effectively creates an Aylesham/Womenswold Conurbation in a very rural area of Outstanding Natural Beauty.

There is currently little infrastructure to support existing communities. The proposal would seriously impact on this.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Comments on the Dover District Draft Local Plan from

Womenswold Parish Council

Womenswold Parish Council is submitting comments based on discussion at the Parish Council meeting on 8th November 2022.

The Council wishes to comment as follows on the proposed housing estate SAP 24 of 640 houses on land between Aylesham and Snowdown:-

Rural Nature

- The proposed site of the housing estate is on a greenfield site in a rural community. This proposal would severely impact on the rural nature of the area. In addition, valuable farm land will be lost to the production of food. This is clearly much needed in these difficult times

Water

- The area in question lies in a drought stricken part of the South East. This summer and most summers we have water shortages. This development can only exacerbate the problem. In addition, Canterbury City Council is planning a total of 3620 (minimum) houses in the adjacent area, adding to the burden of water shortage.

Sewage

- The whole of the South East suffers from extremely poor infrastructure for the disposal of raw sewage. There have been many recent instances whereby Water Companies have pumped raw sewage into the sea which has resulted in large fines. Clearly the addition of nearly 4000 home will only add to this problem.

Traffic

- The proposal, together with Canterbury City Council's proposal will increase the strain on the rural road infrastructure. In particular, the B2046 is already extremely busy. There have been many accidents at the junction to the entrance to Womenswold Parish. In addition the slip road on the A2 (London Bound) is far too short. The increase in traffic created by these developments will only make this worse.
- The roundabout on the A260 by the A2 was built to deal with the huge increase in traffic coming from Aylesham under the current Aylesham expansion. It does not take into account the further proposed increases.

Infrastructure

- Currently there is a major shortage of facilities which contribute to facilitate supporting the community:-
 - Doctor surgeries.
 -
 - There are no secondary schools in the area. The nearest schools are in Canterbury, Sandwich and Dover. This necessitates a bus ride on overcrowded and unreliable buses. This also contributes to increased Greenhouse gasses and increased traffic congestion. The addition of so many houses will seriously exacerbate the problem.
 - There is only one small Coop in Aylesham which hardly copes with current levels of business.

	<p>Public Transport</p> <ul style="list-style-type: none"> • Buses: The bus service is already poor with little sight of improvement • Trains: There is a station at Snowdown but the service is slow, once an hour to London for a 2 hour journey. The stations at Snowdown and Aylesham also do not cope with current levels of use. Parking is an issue and walking is difficult along narrow country lanes with no footway. <p>Summation</p> <p>Womenswold Parish Council objects to the proposed Housing Estate SAP 24.</p> <p>It is too large, and when the adjacent Canterbury City Council plans (R20 and R1) are taken into account, it effectively creates an Aylesham/Womenswold Conurbation in a very rural area of Outstanding Natural Beauty.</p> <p>There is currently little infrastructure to support existing communities. The proposal would seriously impact on this.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Aylesham
Rep ID	SDLP213
Rep Status	Processed
Consultee ID	1330207
Consultee Full Name	Mrs Sara Garrity
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	HELAA Ref AYL001
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>The plan is not sound as it does not address the flooding that currently occurs at the junction of Dorman Avenue North, with moderate rainfall. The already completed housing development has increased the frequency of surface flooding in the area and the promised upgrade to the drainage system has not happened, currently, there are no plans from Southern Water to improve the situation.</p> <p>The area identified for development consists of woodland that helps to control the surface water runoff, if this is removed then, as a direct result, more flooding will occur.</p> <p>This woodland contains a number of Ancient and Veteran trees (as identified by the Woodland Trust, Tree I.D. 216747, 217804, 217808, 217809) https://ati.woodlandtrust.org.uk/tree-search/tree?treeid=217809&from=3523&v=2189965&ml=map&z=18&nwLat=51.22840516018046&nwLng=1.1970068468518935&seLat=51.22665829532552&seLng=1.1990989698835097#/</p> <p>According to the 'Keepers of time: Ancient and native woodland and trees policy in England' (May 2022) Protection of the resource.</p> <p>1.2 Requires local planning authorities to consult with the secretary of state for Leveling up, Housing and Communities before granting planning permission for developments affecting ancient woodland.</p> <p>1.3 Consult on the protections for long-established woodlands in the planning system, recognising their high ecological and societal value.</p> <p>1.5 Update the ancient woodland inventory to cover the whole of England, 'this will include smaller ancient woodland sites of less than 0.25 hectares'</p> <p>Photos relating to the trees are attached with additional images sent to; localplan@dover.gov.uk</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The removal of this site (AYL 001) from the plan to preserve the Ancient woodland and remove the increased risk of flooding that would inevitably occur if the development went ahead.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Not Applicable</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>report.PNG FM2.PNG FM1.PNG</p>
<p>Local Plan Consultation Point</p>	<p>Aylesham</p>
<p>Rep ID</p>	<p>SDLP496</p>

Rep Status	Processed
Consultee ID	1259309
Consultee Full Name	Mr Peter Jull
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Monitoring & Review
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The plan was compliant until the day before the Regulation 19 consultation was authorised Canterbury City Council published their Regulation 18 consultation including significant development adjacent to the authority boundary at Aylesham.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	If this proceeds it makes some of the conditions proposed for SAP24 irrelevant and the reasons for not including proposed development north of Aylesham outdated . There needs to be significant consultation with Canterbury City Council on the future of Aylesham to ensure the provision of employment land, retail etc. in line with a masterplan that provides effective local planning.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	By the time Public Examination takes place, Canterbury's local plan will have progressed to the point that comments need to be updated/
Include files	
Local Plan Consultation Point	Aylesham

Rep ID	SDLP808
Rep Status	Processed
Consultee ID	1261008
Consultee Full Name	Dr John Garcia-Rodriguez
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Developments of land around Aylesham, Nonington and Elvington
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>What planning discussions have happened with Nonington Parish Council and equivalents for Aylesham and Elvington? Exhibitions and requests for comments but not proper conversations and discussions. You cannot call this cooperation. The Duty to Cooperate has not been fulfilled - also evidenced by the councils' objections and surprise at these plans.</p> <p>Despite the plan strategically saying that most development is needed in Dover and that it has an imbalance of housing and is unattractive, DDC has decided to inappropriately "promote" Aylesham now a large village, isolated with few amenities, to the status equivalent to Sandwich, a town that has developed over centuries and has many facilities and bus routes based on it. This is not justified and so the plan is not positively prepared.</p> <p>Roads around Aylesham, Nonington and Elvington have already too much traffic. Where are the assessments? The attached map shows how poor the road infrastructure is. the roads are narrow, bendy and almost all without pavements. There are v few bus services - none in Nonington. The plan is not sound as there would be far too much new traffic. So the plan is ineffective, not positively prepared and not justified.</p> <p>Where is the employment to come from? We do not need more space - there are empty units. Snowdown Colliery site is going to remain leased to the NCB Residuary Body and not developed - as confirmed by the owner. Even if it were to be released, the costs of development, whilst preserving key buildings and on this brownfield site, would not be economic. In the plan, this is a pillar of justifying the developments and the need for more housing but it is very tenuous to say the least - so the plan is unjustified and unsound.</p> <p>The population of Dover District and surrounding districts is pretty static. There is not the robust evidence to justify the degree of planned housing expansion. The plan is not justified or positively prepared. Large developments in East Kent provide housing which looks cheap to London boroughs which can place people they are responsible for into East Kent. We have seen this already in several places. Those placed are unlikely to bring prosperity to the region given their dependence on local authorities for housing. This is not serving the needs or wishes of the existing local population so on these two counts the plan is not positively prepared, evidenced or has there been cooperation with locally elected bodies like parish councils who are only too aware of relatively large influxes from London into new developments. It is also not effective as many of these people will not have the skills to fill employment needs.</p>

	<p>The description of one of the areas as a "Country Park" yet it has 420 houses allocated is disingenuous. Is this an attempt to allay concerns? The areas around Aylesham are also earmarked by Canterbury City Council for major development. It would turn the whole area into an isolated housing estate, most people commuting for work elsewhere. The lack of facilities risks widening inequalities as it would not be attractive to people with the resources to live elsewhere.</p> <p>Given the lack of soundness of this plan, I doubt that it is legally compliant.</p> <p>This is not just nimbyism - we should be planning something that we ourselves could well imagine being keen to move into. I really doubt many DDC planners or councillors or plan inspectors would wish to move into the new estates in the proposed locations and with the lack of facilities that this plan envisages. From the heart - do you really think that this is what you want to do? Create a big housing estate of poorer people? Almost an East Kent ghetto? Large housing estates carefully and optimistically planned and built elsewhere have gone quite wrong for similar reasons - poverty and isolation.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>I cannot see how the current plans can go ahead. There needs to be a rethink, ideally abandoning plans to turn this area predominantly into a large housing estate.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>IMG_3811.jpeg</p>
<p>Local Plan Consultation Point</p>	<p>Aylesham</p>
<p>Rep ID</p>	<p>SDLP959</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1266351</p>
<p>Consultee Full Name</p>	<p>Dr Sharon Danby</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SP3 Housing growth</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Due to the governments announcement 5/12/22 the plan is not positively prepared as the development needs must be reassessed. This means it is no longer justified as there now is the room without central government pressure to find reasonable alternatives. It is also not effective as the pressure put on local communities and existing infrastructure is unreasonable and means that it is not deliverable. The plan is also not consistent with NPPF 2021 as the many landscape and heritage assets in Dover District are being compromised by the level of unsustainable overdevelopment which the current plan has allowed.</p> <p>The Housing Growth statement that the aim is to , "provide a greater choice of high-quality housing to meet the needs of Dover districts's growing population and changing demographic and address affordability issues", does not seem internally consistent with the details provided in the plan which underestimates the evidence showing a large part of district population growth is due to aging. The details thus render SP 3 and SP 5 less effective and less sound.</p> <p>Under the current LDP developers have shied away from the badly needed regeneration of Dover and concentrated on building maximum profit, minimum affordability developments of large homes around the more desirable town of Deal and out in Whitfield. The supposed regeneration of Dover has resulted in another generic shopping centre and a more depressed high street and has not lifted the rest of Dover. The promenade area is uplifted but there seems to be little connectivity to the rest of Dover.</p> <p>The government department (DLUHC) decision that Dover needs 611 new dwellings a year and a minimum of 10,998 new homes between now and 2040 we find very incompatible with legally binding Net Zero Strategy, Climate Emergency Declaration 2019 and Climate Change Act 2008, and unsound. We should be transforming existing housing stock into zero carbon homes as is happening in East Sussex, led by Lewes DC. Combining these numbers with 3.51 and the statement '76.7% of the new homes are on greenfield sites, while 23.3% are on brownfield sites' is unsound and unacceptable to the public.</p> <p>We feel that our communities are being harvested by developers and our worries are not being heard or needs met in terms of infrastructure. Thanks to certain national newspaper Sunday supplements, Deal is desired as a 2nd home location by the wealthy from London and elsewhere. Holiday homes which spend most of the year empty in Deal, Dover and coastal villages of Kingsdown and St Margarets are stopping locals from buying affordable homes in their own area from existing housing stock.</p> <p>It must also be pointed out that at least one of the sites included in the 23.3% of brownfield sites is actually a site intended by SEEDA as local nature reserve having rewilded on unstable slag (only rendered stable by tree-planting, a site which DDC forgot to make a local nature reserve in 2004, and it has become a biodiversity hotspot well known to genuine ecologists nationally; Betteshanger Park.</p> <p>Central government in London, according to Housing Today is imposing a disproportionate amount of housing growth on Kent and the SE. There is a grievous lack of democratic accountability across Kent. So the chances of protecting Kent, of achieving a Growth Strategy that creates climate-friendly jobs and suitably sized, suitably-priced zero-carbon homes for the next generation of local families, are not good. The space available for infrastructure, functions well for compact coastal towns of the size that Deal / Walmer and Sandwich were 5 years ago.</p> <p>The level of greenfield overdevelopment which has been disastrous under the current weak LDP is putting Deal infrastructure under strain now, so in-fill should make up the majority of the allocations for Deal and that the housing growth specified for District Centre of Deal and around its boundaries needs to be stopped or radically reduced. Either or both of SAP 15 / SAP 34 would destroy the only road access alternative for diverted traffic. (See detailed comments under SAP 15/ SAP 34 below). Housing Growth that threatens gridlock, blocking off a conurbation of 30,000 from access by emergency vehicles, commuters, school buses is not sustainable housing growth and is very unsound.</p> <p>3.29 I note and welcome a degree of shift from the Reg 18 draft, in that more sites have been selected with a view to using 'existing infrastructure, facilities and services, with a greater professed purpose to ensure development contributes to the sustainability of local communities and services'.</p> <p>I note with appreciation both the increase in the number of sites in Dover town SAP 6 – SAP 13, and the SAP 26 Former Snowdown Colliery, Aylesham near a rail station for example. It should be possible to state a determination to 'make best use of brownfield – non-rewilded – land) without giving developers the opt-out qualification 'wherever possible'.</p>

	<p>On Five Year Housing Land Supply. 3.39 Having stated the Council had 6.03 years land supply plus a 5% buffer; it is not sound, effective or legally compliant to then state 'the provision of additional sites within the first 5 years of plan period is needed to ensure resilience and promote flexibility;'. Instead of ensuring resilience, it will create exactly the destructive suburbanisation of a rural district that many, many of the resident electorate are most worried about.</p> <p>3.46 It is the conspicuous lack of a secondary school in Aylesham that prevents Aylesham becoming the small garden town planners aspire to. The provision of a secondary school by 2028 should be a condition of SAP 23. There seems to be a complete lack of planning in the statement that now</p> <p>3.48 Many, many of the current residents of ex mining village Elvington were / are dependent on buses that have recently (2022) been cut, (following KCC cut to bus subsidies) to get to work in Canterbury, Folkestone, Sandwich, Thanet or Dover, or to get to secondary school, or to get to doctors, or to shop. These people had environmentally sustainable public transport service that has been cut. KCC is saying it is looking at potential bankruptcy in 2023, so promises of new services and facilities are met with some disbelief. The selection of this site is ONLY sound with cast-iron conditions to provide all of the services we mention below, including new drainage infrastructure. Council housing in Elvington has been subject to flooding from the sewage system, long overdue for replacement. As in Dover deprived wards, there are unhealthy EPC EFG homes in Elvington that need to be transformed into zero carbon home to lift residents out of fuel and therefore food poverty.</p> <p>3.68 Windfall. Unless existing settlement boundaries are respected, there is suburban ribbon development creep from field to field to field. To render the plan sound it should contain a statement 'Previously existing settlement boundaries will be respected, until such time as town and parish councils may have agreed changes with Dover District Council, in accordance with the principles of Localism Act 2011.' In the current economic climate, it seems very naïve to hope that 'new housing in villages can help them retain existing services such as public transport, retail (many pubs are going under because lack of staff and sky high energy bills) and schools'. Indeed we have lost a large proportion of our bus services in the district.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Push back to central government and demand a reduction in the housing allocation of 10,998 new homes. Now possible after announcements 5/12/22 from Prime Minister.</p> <p>Regenerate Dover as a priority, retrofitting existing housing stock to provide well insulated renewable energy powered homes. Windfall development only should be allowed in Deal, Sandwich and surrounding villages. Create a self sufficient sustainable garden village at Aylesham with secondary school and green infrastructure and homes far beyond future homes standard.</p> <p>Provide better facilities and transport links for Whitfield to ensure that homeowners are not car dependent.</p> <p>Lobby central government for changes to the rules for ownership of second homes. Priority should be given to locals.</p> <p>Make the wording in the plan stronger in favour of brownfield sites eg 3.32 <i>sufficient amount and variety of land</i> should also state that brownfield must be used before greenfield as per stated in NPPF 21.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>Aylesham</p>
<p>Rep ID</p>	<p>SDLP853</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331884</p>
<p>Consultee Full Name</p>	<p>Mr Andy Tee</p>

Consultee Company / Organisation	Nonington Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	AYL003 and others as specified below and attached.
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>These comments are relevant to AYL003 the questions around legality and soundness seem to relate to the whole plan. The comment below focuses on this Aylesham.</p> <p>1.0 Summary</p> <p>Top down housing targets, geography and an historic underinvestment in the strategic road network have created genuine constraints in the Dover District. Nevertheless, an LDP where 76% of all proposed housing is on greenfield sites is inherently unsustainable.</p> <p>From the loss of irreplaceable agricultural land and habitat, to reinforcing the district's car dependency by creating greenfield sprawl that will significantly change the rural character of the north west of Dover District, DDC's Reg 19 LDP DDC's will deliver the wrong houses in the wrong locations. It won't improve the environment or mitigate climate change. If the purpose of the planning system is (as set out in the NPPF) to ensure that sustainable development is pursued in a positive way, we believe this plan cannot be considered to be justified and it will not enable the delivery of sustainable development.</p> <p>1.1 Objective</p> <p>Overarching concerns about the sustainability of the adopted land allocation strategy were raised in our Reg 18 comments (see attached). Our Reg 19 response is focuses on mitigating the traffic impacts from the proposed development that (as a small village located on one of the 2 main rural routes between the A256 / 7 and the A2) will have a direct, severe and devastating impact on our community. These impacts are outlined in Section 2.0 below.</p> <p>Based on our experience on Aylesham (DOV/07/01081 and DOV/13/0120), Nonington Parish Council believe that the site-specific impact focus of S106 means it is not an effective framework for mitigating cumulative impacts from multiple spatially distributed developments on a rural road network. It is impossible to disaggregate traffic flow to attribute the increase to specific site.</p> <p>We note that Reg 19 Housing Policy 4.21 states that cumulative impact all sites allocated in this Plan on common road links must be considered. However, in judging how this might work in practice, we reviewed how the cumulative traffic impacts from the current plan period developments (in Aylesham, Sholden, Woodnesborough, Sandwich, Sholden, Eastry, Betteshanger, Discovery Park) have been considered in relation to the C195 route on which the village is located. To date only Aylesham has been required to measure traffic impacts (DOV/13/0120 – Variation of Conditions 76 of Planning Permission DOV/07/01081) to identify the traffic impact arising from the cumulative occupation'. Conducted in April 2018 with 380 of 447 units occupied, the traffic consultants, MLM, concluded that no impact could be attributed to the development because the identified increases were in line with ONS data showing road traffic increased by 29% from 1990 to 2018. It is noteworthy that greenfield housing, like that Aylesham, with unrealistic assumptions of self- containment were – in turn – identified as a key driver national car use increases.</p> <p>Combined with our concerns about the robustness of the employment, sustainability and traffic baseline evidence (outlined below), we are seeking effective mitigation enshrined in a Local Plan policy rather than deferring this to a S106 negotiation at the planning application stage.</p> <p>1.2 Basis for Objecting</p>

1.2.1 Inconsistent and Insufficient Traffic Evidence undermining Plan Soundness and Sustainability

MHCLG's guidance states that an LDP should be based on robust transport evidence base collected in advance that should encompass: the cumulative impacts of existing and proposed development on transport networks, a review journey purpose and accident records as well contextual data such as travel to work areas in order to measure the impact on the locality in economic, social and environmental terms.

I. Detailed traffic evidence has been collected for the DDTM area in the REGULATION 19 TRANSPORT MODELLING FORECASTING REPORT but the strategic housing and employment sites outside the DDTM area have only been modelled 'in significantly less detail'.

The result is that the area bounded by A2, B2046, A256 and A257 has significantly less robust traffic evidence, undermining the scope for an effective analysis of cumulative impacts of existing and proposed development on transport networks in this area. This area includes Sandwich, Aylesham, Elvington, Eythorne, Eastry, Wingham, Shepherdswell and Ash and has 1554 of the Reg 19 plan new dwellings allocated within it (Source: Distribution of Housing Site Allocations by Settlement). This accounts for 78% of all Dover District's Reg 19 housing allocations outside Dover and Whitfield. This area also encompasses the strategic employment sites at Discovery Park and the Aylesham Development Area. Detailed Analysis of Traffic Evidence is set out in Section 4.1

II. The sustainability evidence base uses 'unrealistic assumptions about self-containment' and unfounded onsite employment assumptions that are not supported by contextual travel and commuting pattern data. For example in SA 7.51 LUC incorrectly include Snowdown Colliery as a strategic site inflating site employment sustainability and under estimating outbound commuting from Aylesham.

III. There are inconsistencies in the sustainability evidence base. For example SA Section 6.207 states that Eythorne (and Elvington) has 'relatively good access to existing local rail...services'. Eythorne railway station closed to passenger traffic in 1948.

IV. The Office of Road and Rail passenger data for Aylesham between 01/01/2016 – 01/01/2020 show rail journeys per head of population in Aylesham fell as the first phases of the 'garden village' were occupied. Transport in Aylesham has actually become less, not more sustainable.

1.2.2 The Duty to Co-operate

DDC were only made aware of Canterbury City Council's (CCC's) Reg 18 plan for 3200 houses north of B2046 and the 420 dwellings on land contiguous to SW Aylesham in September 2022, shortly before the publication of their Reg 19 plan.

We haven't seen a statement of common ground or any evidence of the active ongoing constructive engagement and co-operation required to maximise the effectiveness of local plan in the context of strategic cross boundary matters or of any coherent strategy based on agreements between them.

As all authorities are required to reach agreement on strategic matters before submission we expect this is under review but – based on the absence of co-operation evident to date – we question whether the legal duty to co-operate can be complied with in a meaningful way.

1.2.3 Scale of Cross Boundary Development Impact on DDC Reg 19 Evidence Base and Plan Soundness

Although DOV/07/01081 and DOV/13/0120 promoted Aylesham as a 'Garden Village', in their Reg 19 plan Dover District Council propose that Aylesham becomes a small Garden Town of 15,000 (LDP 4.196 and 4.199). Canterbury City Council propose another 3,620 dwelling adjoining Aylesham to create a single 'new town' or Freestanding Garden City with a population of 25-30,000 people. A development of this scale requires realistic assumptions about self-containment, a strong foundation of employment and appropriate infrastructure to avoid creating an unacceptable severe cumulative impact on adjacent road network.

The consideration and mitigation of transport impacts is an essential part of Government's wider policy objectives for sustainable development. The objectives set out in NPPF para 111, DDC's Reg 19 Policy T12

10.8 can only be effectively delivered against a robust evidence base that provides the clear benchmarks and thresholds that a planning application can be measured against.

Canterbury City Council's stated Reg 18 position is that the traffic impacts of their proposed new town joining Adisham to Aylesham are mitigated by the planned south Canterbury bypass which, they claim, will reduce traffic impacts as measured across their district. No evidence has been provided to establish how this will mitigate the impact of 3,620 additional dwellings on the rural road network in Dover District.

As highlighted in 1.2.1 (i) above, in relation to DDC's Reg 19 plan, we have existing concerns regarding the absence of a robust transport evidence base for the area bounded by A2, B2046, A256 and A257, collected in advance and benchmarking existing traffic levels so the cumulative impacts of proposed developments on transport networks can be subsequently measured.

The additional scale of Canterbury's proposed development and proximity to Aylesham and the District's boundary, means that DDC's Reg 19 plans is not positively prepared as it is not informed by agreements with other authorities or consistent with achieving sustainable development.

It is not justified as it is clearly not based on proportionate traffic or sustainability evidence.

We would argue that this also compromises plan efficacy given the absence of effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.

2.0 Location - Background

Nonington is set along a 1.2 mile stretch of a rural road with constrained widths, a number of single lane pinch points and long stretches (including in the heart of the Easole Conservation area) with no pavements. This route connects Sandwich and the A257 to the A2. A 'rat run', the C195 is badly impacted by the cumulative impact of traffic from Sandwich, Deal, Eastry, Woodnesborough, Sholden (via Drainless Road, Heronden Rd and Thornton Road), Elvington and Aylesham, with pre-pandemic baseline traffic of 90,800 vehicles a month. (MLM / K & M SURVEYS 2018 - 7 day total (East and West) = 20,888 traffic movements)

KCC Highways confirm Holt Street, Easole Street and Sandwich Road route (Linking B2046 and Sandwich) is classified as the C195 and is "not a secondary route, as defined in our road hierarchy, and "for reasons of various highway constraints along the corridor". It should, therefore, be protected from the cumulative or inappropriate traffic impacts. However, as detailed in item 1.1 above, in the current plan period no actual measures have been put in place to mitigate development traffic impacts on the C195 route.

We have had several accidents, 6 road accident deaths on the C195 since 2014 and multiple crashes in the village mostly unrecorded by the police.

Multiple single lane pinch points with no pavements. On street parking and private driveways used as passing points

We have a problem with speeding in excess of the speed limit of 30mph. MLM's s106 surveys 2014 and 2018 showed Holt Street Nonington speeds heading SE 38 mph and NW 37 mph.

Applications directly increasing C195 local traffic in the current LDP:

Aylesham 1320 dwellings (DOV/07/01081), Sholden 230 residential dwellings (DOV/10/01065), Sandwich 120 residential dwellings (DOV/19/00243), Hammil 29 residential dwellings (DOV/16/01026). Woodnesborough 24 residential dwellings (DOV/11/00965) with a number of application to be decided including a 120 bedroom hotel and 210 residential dwellings in Betteshanger Country Park.

3.0 TI1 - Sustainable Transport and Travel

Item 10.1 seeks to 'facilitate a shift away from petrol and diesel powered vehicles over the lifetime of the Plan and promote sustainable forms of transport and travel'.

The evidence doesn't support the deliverability of this goal on a Reg 19 housing allocation with over 76% of all new dwellings on greenfield sites. These are known to have significantly higher car dependency than brownfield sites. If we take Aylesham as an example, DOV/07/01081 and DOV/13/0120 committed to the expansion of Aylesham Garden Village and promoting sustainable transport predicated on the rail service. Yet, the Office of Road and Rail passenger data show rail journeys per head of population in Aylesham dropped between 01/01/2016 – 01/01/2020. Despite the 'garden village' aspirations, transport in Aylesham has actually become less, not more sustainable.

Public transport, cycling and walking uptake is highest in metropolitan and dense urban areas where use of public transport is typically 35%-50%. This falls dramatically in greenfield developments in ex-urban and rural sites. Research also shows significant sustainable transport adoption variations exist within settlement types driven by socio-economic and topographical factors. (Source - Bennett Institute for Public Policy at the University of Cambridge 2020.) None of this appears to be considered.

KEY FACTS

- Elvington and Whitfield don't have rail connections. Stagecoach have cancelled the 38 bus service.
- ONS Travel to Work Census data for Elvington showing 95.8% of journeys were made in cars, vans and motorbikes while only 2.7% were by bus.
- ONS Travel to Work Census data for Whitfield, Elvington and Aylesham combined: 82.5% of all journeys were in a Car. Only 5.8% on public transport.
- The 'Dover Fast Track' represents the largest infrastructural investment in the district. At £50-£70 million, is it an effective use of scarce capital investment or a white elephant?

ORR Passenger entries and exits for Aylesham data shows passenger numbers per head of population dropping Jan 2016- Dec 2020.

o Passenger entries and exits increased by 19.6%. 2016-17 to 2019-20.

o Aylesham Population increased by 30% over the same period.

NOTE _ 20-21 data discounted because of Covid. 2016 Population=4,980. By March 2018, 493 new dwellings had been completed. Estimated mean new dwelling occupied by 2019- 2020 = 500. Estimated population increase = 1,500.

Aylesham Elvington Whitfield Combined

Train 74 (4.1%) 60 (3.06%) 29 (1.4%) 2.3%
 Bus 66 (3.6) 49 (2.5) 86 (4.3) 3.5%
 Car/Van 1130 (62.0) 1544 (84.9) 1411 (69.7) 72.2%
 Passenger in car/van 163 (8.9) 141 (7.8) 182 (9.0) 8.6%
 Motorcycle 18 (1.0) 45 (2.5) 30 (1.5) 1.7%
 Bicycle 29 (1.6) 19 (1.0) 34 (1.7) 1.4%
 Taxi 0 (0) 9 (0.5) 6 (0.3) 0.26%
 On foot 201 (11.0) 89 (4.9) 110 (5.4) 7.1%
 Source ONS Census Data Travel to Work 2001

Conclusion

This policy cannot be said to be 'positively prepared' when the evidence shows it is not consistent with achieving sustainable development;

This policy cannot be said to be 'justified' as it is not based on proportionate evidence if we accept the PAS definition as 'evidence obtained with an understanding of the way in which issues arise within a plan area to enable an understanding of the issue/topic in question thereby leading to clear analysis and a consequential strategic or policy position within the plan'.

- As non-planners, we are struck by the fact that plan making appears to focus on assigning 'sustainability' labels to plan policies without evaluating the evidence for how well these deliver in the real world. What is the local evidence that garden villages or towns actually deliver improvements in sustainable travel? Has the 900 house garden village expansion of Aylesham delivered the expected uptake of cycling and public transport use? Has the provision of employment space delivered the expected expansion in the local employment base, in shops, services, and local business employment (within new office space) capable of accommodating supporting 40% of the population? Or does the evidence show that it is a dormitory commuter suburbs – the antithesis of the Garden City idea.

Failure to assess the performance of policies risk creating confirmation bias and recycle poor policies that deliver poor outcomes. So is this plan policy 'consistent with national policy'? Does it enable 'the delivery of sustainable development in accordance with the policies in this Framework? Based on the evidence and judged against the policies set out in NPPF para 7,8, 9 and 10 then the answer is no.

The absence of evidence is not evidence of absence. PAS state good evidence should contain reliable, objectively collected recent data and will not contain unjustified assumptions. If the evidence shows assumptions about 'self-containment' are unrealistic and that the offer of plentiful land for industry has not delivered the expected employment, then these are unjustified assumptions.

4.0 Reg 19 T12 - Transport Statements, Assessments and Travel Plans

In item 10.7 set out their goal of 'promoting the delivery of sustainable development' stating that 'Traffic generated by development should normally be targeted towards the primary and secondary route network in the District. Other routes should not be subject to inappropriate levels of traffic generation or unsuitable traffic movements'.

Although KCC Highways consulted with DDC on policy (T12) they haven't published benchmark traffic levels or defined 'inappropriate' or 'unsuitable' traffic impacts because 'baseline conditions vary considerably from location to location'. Nor does NPPF para 111 provide a definition of 'severe' or 'unacceptable'. DDC also seek discretionary power over:

- When or whether Transport Assessments and Travel Plans are required.
- And to decide what constitutes a severe residual cumulative impact on the local highway on a case by case basis.

Without the robust benchmark data on existing traffic (as required by MHCLG and DDC's Sustainability Appraisal of Growth Options), it unclear how this will work in practice. Especially given the pressure to deliver on housing targets and the local government financial incentives to facilitate housing inherent the New Homes Bonus which we understand paid £1,728,587 to DDC in 2019.

- The Reg 19 proposed Aylesham South and Snowdown sites are accessed directly from the C195 / Holt Street, which is also the direct route to the A2 from Elvington. This will increase our traffic issues.
- While recognising the 'porosity' of the contiguous rural road network the traffic impacts from the proposed Aylesham site on to Holt Street, WSP data and modelling is restricted to the observation that 'Holt Street is not modelled but anticipated trips for Aylesham Development will leave the network here'.
- No ACT data has been collected or for traffic heading North on Adelaide Road from Elvington to the A2 or from Aylesham heading south east to Sandwich, Discovery Park and South Thanet

PAS state good evidence should contain reliable, objectively collected recent data and will not contain unjustified assumptions. For the area bounded by the A2, B2046, A256 and A257, we believe the patchy 2018 ACT traffic evidence fails this test as it does not include:

1. Disaggregated SERTM data.
2. Node Impedance Calculation (ICA)
3. VISUM Network Map of existing and proposed roads
4. Detailed benchmark capacity PCU per Lane per lane data for Links types including for Rural Roads and Minor Road Rural Village (30mph).
5. Education Cat Trips prior matrices .

In assessing whether the Reg 19 sites in Aylesham and Elvington likely to result in inappropriate levels of traffic generation or unsuitable traffic movements' on the C195 route, we reviewed the following data to establish the likely impact:

- 2011 ONS Census data,
- ONS - Nomos data, labor market statistics and DataShine ESRC BODMAS conclusions in the Sustainability Assessment,
- WSP's DDTM and Reg 19 traffic data,
- the Office of rail and Road Estimates of station usage and
- Onsite employment assumptions
- Education commuting data.
- AA Route Planner

The key findings are itemised in Section 4.1 below.

Reg 19 TI2 - Conclusions

Reg 19 SA Appendix B confirms the District's residents 'rely heavily on cars to...access employment, education, amenities and services' and predicts an increase of commuting from Aylesham to Sandwich (the district's 2nd commuting hub) as well as to Thanet and Deal. In addition to reduced onsite employment at Aylesham (reduced in WSP modelling from 1013 in Reg 18 to 263 in Reg 19) and the absence of any direct public transport links to Discovery Park, Deal or Thanet; the absence of Secondary education facilities and the primary education capacity issues in Aylesham will also continue to drive increases in commuting road traffic on the C195.

The conclusions are clear, Aylesham will increase traffic on the surrounding rural road network but what is not clear is how DDC propose to deliver their goal of 'promoting the delivery of sustainable development' or ensure 'Other routes should not be subject to inappropriate levels of traffic generation or unsuitable traffic movements'.

DDC have failed to engage with the conclusions from existing evidence base or commission a sufficiently robust traffic data for the area bounded by A2, B2046, A256 and A257 containing >78% of all Dover Districts Reg 19 housing allocations outside Dover and Whitfield. Consequently there are no clear thresholds against which future applications can be measured. If, as a result, unsound policies are included in the LDP, then no subsequent s106 developer contribution led mitigation will be achievable.

Therefore, we conclude the policy is unsound because:

1. This plan is not consistent with achieving sustainable development and therefore cannot be called positively prepared.
2. Ignoring the area-specific evidence itemized in 4.0 and below, this policy cannot claim to be based on proportionate evidence and., so, cannot be considered justified.

4.1 Traffic Evidence Summary

1. Despite the Ministry of Housing, Communities & Local Government 2020 LDP guidance stressing the importance of contextual data such as travel to work areas (and that evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively). Although referenced at a District level in the Sustainability Assessment, none of this contextual or empirical evidence has been considered in the LDP strategic site allocation process in relation to the impact of Aylesham and Elvington on the road network.

2. From ONS data to SA commuter patterns and to SHMA 2017 all highlight a strong trend of out-commuting. ONS data shows high car reliance in all major strategic site locations.

3. WSP's DDTM (Reg 18 Traffic Plan Assessment 2020 / Regulation 19 Transport Modelling Forecast Main Report or Appendices) report conducted detailed modelling of the Dover and Deal traffic. Other areas were 'modelled in significantly less detail'.

4. Despite recognising the LDP will 'lead to large increases in flow' in Aylesham, WSP's analysis is limited to a handful of ATC's (automatic traffic counters) on the B2046 1n 2019. WSP's report offered no conclusions on the area north of the A256 as it was outside the DDTM area. Although concerns were raised at Reg 18 no new traffic data or modelling has been introduced at Reg19.

We understand KCC Highways have 'requested projected development flows leaving the currently modelled areas in that direction to sense check on any need to extend the models'. However, given the site-specific impact focus of S106 means it is not an effective framework for

mitigating cumulative impacts from multiple spatially distributed developments on a rural road network, we believe an specific LDP policy is required.

5. 'Critical locations on the road network with poor accident records should be identified in order to determine if the proposed land allocations will exacerbate existing problems and whether highway mitigation works or traffic management measures will be required to alleviate such problems. The accident records should be compared with accident rates on similar local roads'. (MHCGL guidance on traffic evidence for LDP)

There have been 4 deaths on Holt / Easole Street within 1.5 miles of the Aylesham Road junction. How many deaths are required in order for Holt Street to qualify as having a poor accident record and to be included in the detailed traffic modelling?

6. The Elvington data consists of ATC and manual data counts. By citing proximity to A256, the implicit study assumption is that the A256 is the primary route used. No empirical data collected on the traffic heading to the A2 / M2 / M26 or M25 from Elvington.

7. WSP recognised the porosity between the B2046 and the adjacent rural road network, yet provided no analysis of (1) the rural road capacity restrictions or (2) of baseline cumulative traffic from development to date or (3) the projected increase on the road network from the LDP.

8. According to WSP, Highways England approved matrix information from the South East Regional Transport Model (SERTM) used by WSP in Deal was only disaggregated using the 2011 Census data for the DDTM area. As noted in 2.2.13 of WSP's 2018 DDTM the SERTM data is very coarse and with no disaggregation would provide little insight into Elvington and Aylesham commuting patterns via the rural road network

9. There is an extensive resource of rural road network ATC data from Aylesham's s106 TA's (2007/ 2014/2018 etc.) that could have been consulted. KCC Highways confirm the ACT data used for Phase 2b of the Aylesham Village Expansion has not been considered.

10. WSP's observation on likely traffic impacts of proposed Aylesham Development on the rural road network is restricted to 'Holt Street is not modelled but anticipated trips for Aylesham Development will leave the network here'. WSP implicitly assumed all traffic for Aylesham will access and leave the site form Dorman Ave North. ATC and modelling evidence shows this assumption to be unsound.

11. In their Reg 18 comments on Aylesham KCC raised concerns over 'the impact of the development on the highway network, particularly as Aylesham has no secondary education provision so the need for travel by private vehicle for secondary school age children may be higher than in other areas of the district'. No modelling of the associated traffic impacts has been provided.

Note - During the development of the 2015 DTM and 2018 DDTM car trips which are made to schools were modelled by WSP. Despite the absence of a Secondary School no similar exercise has been conducted on

12. By highlighting the need to expand St Joseph's primary, KCC's Reg 19 comment identify the shortfall of primary places in Aylesham. Unlike in the DDTM area WSP has not modelled car trips which are made to schools for Aylesham or Elvington. There are 378 primary places in Aylesham for a current population of 6,000 with a further 630 houses proposed in this LDP. This is below the national average. As a result the pupils attend schools across the area. For example at Goodnestone & Nonington CE Primary School 43% of pupils come from Aylesham and 30% Elvington creating up to 4 car trips of 1-3 miles each per day.

13. KCC Highways informs us that education commuting will be dealt in a Transport Assessment. We have been unable to locate any education commuting evidence in the Transport Assessment evidence for (App no 07/01081) for either Phase 1 or 2 in Aylesham or a School Travel Plan as recommended in Managing Our Roads (DfT, 2003) and The Future of Transport – a Network for 2030 (DfT) White Paper, 2004.

14. In Reg 18 comments, KCC raised concerns regarding the additional flow anticipated on Shepherdswell Road due to the narrow, rural nature of the road. Holt Street / Easole St / Sandwich Rd are similar in terms of their physical constraints and traffic levels. Both are 'rat runs' between the A2 A256 and significant coastal settlements. In relation to application 19/00381, Richard Smith (Senior Development Planner - KCC Highways) accepted a reduced vision splay from 45m to 25 metres on Easole Street based on an independent highways report describing Easole Street as being a narrow road, 'in a rural location with a tight bend to the west and a junction to the east. The road has no footways, with high hedges bordering each side of the road, creating an extremely constrained environment. There is evidence of vehicles crossing the centre line; the markings are very worn and hardly visible'.

15. ORR Passenger entries and exits for Aylesham data shows passenger numbers per head of population dropping Jan 2016- Dec 2020.

o Passenger entries and exits increased by 19.6%. 2016-17 to 2019-20.

o Aylesham Population increased by 30% over the same period.

NOTE _ 20-21 data discounted because of Covid. 2016 Population=4,980. By March 2018, 493 new dwellings had been completed. Estimated mean new dwelling occupied by 2019- 2020 = 500. Estimated population increase = 1,500.

16. WSP's Reg 19 Traffic Report is based on the 2018 DDTM study which undertook a detailed analysis of the rural road network the other (western) side of the A256 using disaggregated SERTM data, Node Impedance Calculation (ICA), mapped out on a VISUM Network map. This

established benchmark capacity PCU per Lane data for a range of defined link types including 'Rural Roads' and 'Minor Road Rural Village (30mph)'.

17. In their Sustainability Appraisal of Growth Options in the Dover District Council Local Plan Topic Paper: Overarching Strategy (Part 1) point 1.5. DDC undertook to 'assess growth options in terms its likely effects on environmental...using available evidence including commuting patterns, transport infrastructure, traffic congestion (and related air quality and carbon emissions issues)'. Although some data was considered, the detailed data was not considered when evaluating the impact of the Aylesham or Elvington sites

18. In the SA LUC use ONS - Nomos data, labor market statistics and DataShine ESRC BODMAS (using 2011 ONS Census data) to establish commuter patterns. Based on this the Reg 19 SA Appendix B confirms the District's residents 'rely heavily on cars to...access employment, education, amenities and services' and predicts an increase of commuting from Aylesham to Sandwich (the district's 2nd commuting hub) as well as Thanet and Deal.

19. DDC's LDP Sustainability Appraisal identifies Sandwich as the District's key centre for inbound commuting. The Reg 19 provision of employment sites in Aylesham have been reduced by 85% from 1013 jobs in Reg 18 to 263 jobs in Reg 19. (source WSP main Report (i) Reg 18 and (ii) Reg 19. Reduced onsite employment will increase site generated commuting traffic.

(NOTE The Reg 19 Sustainability Assessment has not been revised to reflect the 85% reduction of onsite jobs, calling its conclusion about Aylesham site sustainability into question).

20. The Local Plan (Reg 18 and Reg 19) Sustainability Appraisal for the proposed sites in Aylesham and Elvington is – for traffic purposes - limited to recording the proximity of proposed dwellings to a bus stop and / or train station. The ONS - Nomos data, labor market statistics and DataShine ESRC BODMAS conclusions in the Sustainability Assessment, analysis of car dependency and commuting patterns or journey to work data was considered on the site assessments. This appears to limit real world applicability.

21. None of the evidence base on car dependency in Greenfield ex-urban developments nor car-dependency and the commuting pattern evidence appears to have been considered.

22. SA Section 6.207 states that Eythorne and Elvington already have 'relatively good access to existing local rail and bus services'. However Eythorne railway station closed to passenger traffic in 1948. In response to our Reg 18 RFI DDC stated that the SA did not claim Elvington 'already have relatively good access to existing local rail and bus services'. However, this is a direct quote from the SA - 6.207. This claim is factually false but is a base assumption used to justify Aylesham and Elvington's compliance with SA 4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles.

23. MHCGL guidance on traffic evidence for LDP states 'Critical locations on the road network with poor accident records should be identified in order to determine if the proposed land allocations will exacerbate existing problems and whether highway mitigation works or traffic management measures will be required to alleviate such problems. The accident records should be compared with accident rates on similar local roads'. There have been 4 deaths on Holt / Easole Street within 1.5 miles of the Aylesham Road junction. How many deaths are required in order for Holt Street to qualify as having a poor accident record?

4.2 Base Data Availability

One problem we encountered is availability of the granular base data that forms the building blocks for the LDP traffic and commuting evidence. We can't find base data. For example

- The Dover Transport Model (DTM) Local Model Validation Report November 2016 is not available. So we have to rely on DDTM for the base modelling data for additional trips zonal distribution.

- In the SA LUC use ONS - Nomis data, labour market statistics and DataShine ESRC BODMAS (using 2011 ONS Census data) to establish commuter patterns. However, this data set is not available for review.

The SA conclusions suggest a data granularity (e.g. the availability of Aylesham to Deal commuting numbers), that is absent from the methodology employed in LUC's site-specific sustainability assessments. This would matter less were LUC's Reg 19 report not used inflated employment assumptions for Aylesham creating unsound sustainability conclusions.

4.3 Employment Evidence Driving Commuting

1. The Reg 19 SA 7.51 (Reg 19 Strategic employment allocation policies) and Table 7.6 include former Snowdown Colliery as a strategic site. This incorrect. Aylesham site employment has been reduced from 1,013 onsite jobs in Reg 18 to 267. The sustainability conclusions have not been reassessed. This clearly undermines the deliverability NPPF para 72 b.

	<p>2. DDC provided site employment estimates to both LUC and WSP for SA and Traffic modelling purposes. Aylesham's employment modelling conclusions in the 2022 SA are contradictory and misleading. They don't align with the WSP's modelling numbers, which reduced by 84% from 1,013 onsite jobs in Reg 18 to 267 on site jobs in Reg 19.</p> <p>3. In the Reg 19 SA main report (3: 4.75, SA 3 - 7.160 and table Table 7.6) still cite Aylesham as a 2nd largest employment hub with Land off Holt Street identified as ++ positive effect against. Also true for Reg 19 Appendix B growth and spatial options findings by SA objective, which offer conclusions based on inflated on site employment numbers numbers In Appendix F Snowdown employment drops to a 'Minor positive (+)'. This looks like a revised assessment that hasn't then been added into the main report.</p> <p>4. Trip generation for employment sites (approach agreed with NH and KCC) the potential jobs were calculated using the SQM area of the site and dependant on the land use type an employment number was provided have not been used in the SA. As onsite employment is a key indices of sustainability:</p> <p>a. Why is the discrepancy in Aylesham employment number in the SA?</p> <p>b. Has the South Aylesham site's sustainability been reassessed by LUC to reflect the reduction in onsite employment?</p> <p>c. Why is WSP using a different employment assumption to LUC?</p> <p>5. Has the council assessed the financial viability of the development proposal for Snowdown Colliery? The land owner informs us their existing tenant has a substantial remediation liability and is unaware of any ongoing discussions about reassigning this not have they aware of any detailed financial backing that would fund the redevelopment of this site. Obviously a site needs to be deliverable. Has it passed deliverability benchmarking test to justify the site's continued inclusion in the LDP?</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Use robust evidence that is reliable, objectively collected recent data based on an understanding of the data collected and the characteristics of the plan area without relying on unjustified assumptions or unsupported assertions. This should include an assessment and evaluation of projected 2014 outcomes based on the sustainability transport assumptions and on site employment assumptions.</p> <p>Engage with the significant body of evidence that clearly shows that an LDP with 76% of all proposed housing is on Greenfield sites is inherently unsustainable. From the loss of irreplaceable agricultural land and habitat, to reinforcing the district's car dependency by creating greenfield sprawl that will significantly change the rural character of the north west of Dover District, DDC's Reg 19 LDP DDC's will deliver the wrong houses in the wrong locations. It won't improve the environment or mitigate climate change.</p> <p>If the purpose of the planning system is (as set out in the NPPF) to ensure that sustainable development is pursued in a positive way, we believe this plan cannot be considered to be justified and it will not enable the delivery of sustainable development.</p> <p>Initiate active ongoing constructive engagement with Canterbury City Council to maximise the effectiveness of local plan in the context of strategic cross boundary matters and generate a coherent evidence-based strategy that deliverable plan that is not predicated on nebulous or unsupported claims of sustainability enabled by a failure to engage with a robust, impartial and objective evidence base.</p> <p>Base the plan on a properly resourced and deliverable employment strategy that engages with local businesses to ensure that the plan can deliver the right employment, community facilities to make the Garden City label actually signify a sustainable community rather than just sustainability washing to gerrymander an environmentally harmful planning outcome that will lead to a loss of irreplaceable agricultural land and habitat, reinforce the district's car dependency by creating greenfield sprawl that will significantly change the rural character of the north west of Dover District, DDC's Reg 19 LDP DDC's and deliver the wrong houses in the wrong locations. It won't improve the environment or mitigate climate change. If the purpose of the planning system is (as set out in the NPPF) to ensure that sustainable development is pursued in a positive way, we believe this plan cannot be considered to be justified and it will not enable the delivery of sustainable development.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>This has been outlined in detail in other policy submissions.</p>
<p>Include files</p>	<p>Nonnington PC LDP Reg 19 Comments_Dec22_V1.0.pdf (3)</p>

Local Plan Consultation Point	Aylesham
Rep ID	SDLP1692
Rep Status	Processed
Consultee ID	1330927
Consultee Full Name	Mrs Clare Marsh
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Aylesham
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Education</p> <p>There are too few places in the primary schools we have already, Aylesham Primary school has already been enlarged to accommodate the original build at Dorman Avenue North. It cannot realistically be made larger. Another new primary school will be needed.</p> <p>There is no secondary school provision mentioned! Do they no longer need education after the age of 11?</p> <p>There is very little adult education, there seems to be very little recommendation, support or finance</p> <p>Green Infrastructure</p> <p>The provision of open space has been overlooked.</p> <p>There is a mention to the field at the side of St. Peter's Church, which is church land, not council or developer owned. This is already in regular use for various church clubs, activities including infant, youth and disabled programmes.</p> <p>Spinney lane is already an open space and as it is ancient woodland should not be altered in any way.</p> <p>Nonnignton areas that are mentioned will not benefit Aylesham residents.</p> <p>The plan is inaccurate as the crescent play area is in Snowdown and not Dorman Avenue as stated.</p> <p>The skate park is already in place. It is not in the right situation as it encourages anti social behavior. Children/youth should be included in the heart of society not tucked away in hopes they are not seen!</p> <p>Where is the consultation from the youth as to the facilities they would use rather than the ones the council/developers decide they will have? What is the point of building something they already have?</p>

	<p>There used to be a youth club that was funded by KCC Youth, but due to funding cuts was shut and subsequently burnt. As KCC are short of funds, how do they propose to fund a youth club and a youth worker. Even if DDC and the developers help for the short term, what long term plan is in place?</p> <p>The community need a large supermarket, not just another convenience shop as the plan suggests. The Co-Op and the three convenience stores that are already in situ are unable/incapable of meeting the demand of the growing community. This is supposed to be the 4th most deprived area in Kent, so why should the community have to be faced with the escalated costs these smaller shops charge?</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	No
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
Include files	
Local Plan Consultation Point	Aylesham
Rep ID	SDLP1202
Rep Status	Processed
Consultee ID	1331777
Consultee Full Name	Mr James Blomfield
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	Sustainability Appraisal Reg 19 Chapter 6 - Draft Local Plan SA p74-165 / Chapter 3 Sustainability Context p15-29 / Whole Plan Viability Study Chapter 8 Local Plan Policy Requirements / Housing + Economic Land Availability Assessment HELAA - Main Report TC45 - Assessment of Sites p11
<p>2 - Do you consider this part of the Plan sound?</p>	No
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	Positively prepared Justified Effective

	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p><u>Dover Local Plan – Section 19 Consultation</u> SAP 44</p> <p>SOUNDNESS</p> <p>The revised Local Plan is not sound for the following reasons:</p> <p>It has not been justified and is not effective. It has not been positively prepared to meet ‘objectively assessed’ needs and for this reason is not consistent with National Policy.</p> <p>Why have the reasonable, sustainable alternatives for additional housing previously suggested in larger development centres such as North Aylesham, Elvington and Ethorne and Farthingloe and included within the original plan have now been removed? At the same time the proposed allowance for housing has been increased in Capel-le-Ferne and will not be deliverable.</p> <p>The original draft Local Plan has been changed so that 900 fewer houses are proposed overall and yet the number of houses proposed in Capel-le-Ferne has increased to 95.</p> <p>This is on top of recent planning permission for 34 houses off Capel Street, 15 dwellings at Longships on Cauldham Lane and 40 new dwellings in a recently completed development at Grasslands.</p> <p>Why is Dover District Council spreading development across numerous small sites which is uneconomic and unsustainable rather than concentrating in larger developments where existing services, facilities and infrastructure are already available?</p> <p>Why Dover District Council persist with this policy in relation to Capel-le-Ferne when it clearly is not in keeping with the council's stated objectives?</p> <p>SP2 - Planning for Healthy and Inclusive Communities and SP3 – Housing growth</p> <p>SP2 - Planning for Healthy and Inclusive Communities and SP3 – Housing growth</p> <p>SP2 states that <i>‘The Council will support the creation of healthy, inclusive and safe communities in the District by ensuring that new development is well served by services and facilities (for example education, health care, community, cultural facilities, play, youth, recreation, sports, faith and emergency facilities) and that a mix of uses are provided in new development that support daily life.’</i></p> <p>SP3 states that what they are trying to achieve is <i>‘To focus new development at accessible and sustainable locations which can utilise existing infrastructure, facilities and services, and to ensure development contributes to the sustainability of local communities and services, supporting regeneration and wherever possible make the best use of brownfield land’.</i></p> <p>But the proposals for Capel-le-Ferne do not meet any of the objectives in the above Strategic Policies as follows:</p> <ol style="list-style-type: none"> 1 The location of the proposed development in SAP 44 will connect to existing overloaded roads using Capel Street as its primary access point. 2 The proposed development is on arable land, currently in use and not brownfield land. 3 The development of the village is clearly not sustainable – Capel-le-Ferne has little or no facilities and services – only one small shop, no post office, no health care facilities, no doctor, no dentist, no pubs within the village confines and only a primary school. Therefore, in order to access services, residents need to drive to either Folkestone or Dover which is clearly at odds with SP1 – Planning for Climate Change. 4 The addition of 40 dwellings recently completed at Grasslands has not led to any benefit to the community in terms of new services or facilities. 5 Trying to ‘grow the villages’ by increasing the number of houses, but not having any plans to help develop services and facilities is unsustainable, uneconomic and unethical. It will only lead to more unnecessary travel. 6 There is only a single bus service and no train service at all. 7 The strategic policy SP6 – Economic Growth identifies areas distant from Capel-le-Ferne for economic development. Capel-le-Ferne has little opportunity for employment generation so cannot be seen to contribute to SP6.

8 The agreed number of number of houses for the site was originally set at 100, then reduced to 50 to allow a single point of access to the site. It has now been increased to 70 and is deemed achievable. This is not realistic and undeliverable. It would appear that the increase in the number of houses is being driven by economic needs to cover developer contributions which are likely to be substantial rather than by any need by Dover District Council to provide more housing. The development at Longships under SAP45, which has been granted planning permission, exceeds the allocated housing number by 5 dwellings on the basis that sticking to the SAP45 allocation of 10 houses would be uneconomic. The development of SAP44 is likely to encounter similar cost problems and is unlikely to be achievable in the proposed timetable (2021-2026)

Consultation With Statutory Consultees (Reg 22)

Dover Council **has not fully consulted with statutory consultees** to ensure that the existing facilities where present are sufficient or that plans are in place for future development of infrastructure.

SP11 – Infrastructure and Developer Contributions states: *Supporting infrastructure should be provided in advance of, or alongside, the development, unless there is sufficient existing capacity. The appropriate phasing for the provision of infrastructure will be determined on a case-by-case basis with reference to the most up to date Infrastructure Delivery Plan (IDP) and the priority classification along with other relevant evidence, and in consultation with the relevant providers.*

It is noted that the site at Aylesham North (AYL004) has been removed for transport reasons – essentially Kent County Council objected on transport grounds. However, given 500 homes in a sustainable location (two rail stations, large settlement), that would seem to be the obvious logical focus for development and the Council has failed its Duty to Cooperate with Kent County Council by failing to ensure the relevant transport assessments are undertaken and potential mitigation identified and agreed; rather than simply removing the large site from the plan and increasing allocations on the edge of villages (such as Capel-le-Ferne) that they hope are small enough to slip under the radar at Examination. This is not ethical.

The existing infrastructure in Capel-Le-Ferne is already struggling to cope with the existing level of housing. Water supply is weak throughout the village, power outages are common, and drainage has insufficient capacity and frequently blocks.

The addition of 90 houses along with the 49 already given planning permission will make this worse. Access to the site is proposed via Capel Street, an already congested road (little off street parking, busy cut through, primary school).

Note also the checkered history of road traffic accidents and injuries caused at the congested at the junction of Capel Street/Cauldham Lane from New Dover Road.

Looking through the supporting Infrastructure Delivery Plan (IDP), no mention is made of any suggested improvements to facilities/services or for any proposed improvements to be carried out by Kent Highways, Southern Water (drainage) or Affinity Water (water supply) in Capel-le-Ferne.

Incremental development such as extensions to villages are more difficult to plan for with respect to infrastructure as they are too fragmented and should therefore be avoided.

Transport modelling has been carried out for developments in other areas, but nothing has been done for Capel-le-Ferne where there will be over 100 new houses accessing Capel Street, a narrow congested road. This was highlighted as a significant problem during the long drawn out process of granting planning permission for 34 dwellings off Capel Street. The revised Local Plan is proposing to add a further 70 houses along with 20 dwellings on Cauldham Lane. All the traffic from these developments will exit onto the New Dover Road at the junction of Capel Street/Cauldham Lane –a poorly designed junction which has been identified in numerous surveys as a real problem for development in the area. **The Local Plan does not include any transport modelling for this area.**

Kent County Council have reservations about access to the site SAP44 indicating that it is not ideal. Given the current frequent traffic congestion in the area, this is not surprising. Particular concern was raised regarding emergency vehicle access, hence the requirement for a secondary access to SAP44 and further consultation with the emergency services. However, it should be noted that this secondary access is via a single track lane. Clearly insufficient consultation has been carried out at this stage.

Although Dover District Council have consulted with Capel-le-Ferne Parish Council as required, they have not engaged fully with the parish council as the objections raised by the council to overdevelopment of the village have been ignored both in this local plan and in planning permissions granted in the past. If the purpose of consultation is to incorporate the views of the local population, Dover District Council have clearly failed in this regard.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>Changes I would make:</p> <p>Take SAP 44 out of the plan completely as it is not following the policies that the council say they are trying to Achieve and not following their own policies.</p> <p>Choose one of the alternative sites for additional housing in larger development centres such as North Aylesham, Elvington and Ethorne and Farthingloe and included within the original plan. In particular, Aylesham North (AYL004) is far more appropriate, given 500 homes in a sustainable location (two rail stations, large settlement), that would seem to be the obvious logical focus for development</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I would like to participate as I represented the Village Council in recent Planning Committee meetings.
Include files	Crashmap.png Cauldham Lane CT18 7HG.jpeg SDLP1202 Blomfield - Att 3.jpg.jpeg (1)
Local Plan Consultation Point	Aylesham
Rep ID	SDLP2029
Rep Status	Processed
Consultee ID	1267457
Consultee Full Name	Marilyn Lewis
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Aylesham
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I have tried to use the website and failed. I am a resident of Womenswold and the expansion of Aylesham will affect the area greatly. I would like to raise the following objections. 1. Aylesham has struggled to absorb the latest development into its community and a further development of this size would destroy the character of a village and the community. 2 There are no references to infrastructure in the plan i) there are very few shops at the moment, the co-op which we use is very busy and would not cope with the extra custom. There is only a mention of a small general shop in the plans ii) There is only one doctors, this is very efficient but could not cope with the extra patients as it is difficult to get appointments at the moment. iii) There is no plan to expand the B2046. This is a narrow road which is very busy with traffic at the moment, It is incredibly difficult to get out at the beacon junction with the Snowdown road at present and people become frustrated causing accidents and near misses. There is only a 60 mile restriction on that road. iv) There are no plans for extra schools and there is no secondary school at present. v) There is a very limited bus service and the trains are only once an hour. 3 The area for development is adjacent to Kent Downs AONB. There is ancient woodland and agricultural land that provides a wonderful habitat for wildlife. 4 The Government are planning that we should be self sufficient in food which will be difficult to achieve if we build over prime agricultural land
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Aylesham
Rep ID	SDLP1254
Rep Status	Processed
Consultee ID	1332985
Consultee Full Name	Dean Lewis Estates Ltd
Consultee Company / Organisation	Dean Lewis Estates Ltd
Agent Full Name	Nicole Burnett
Agent Company / Organisation	Burnett Planning

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Aylesham - Submission Site
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p><i>(DDC Note - Text Extracted from Document sent from Nicole Burnett on Behalf of Dean Lewis Estates. Representation has been split across relevant areas of the Local Plan. Full attachment can be found below.)</i></p> <p>1 INTRODUCTION</p> <p>1.1 Context</p> <p>1.1.1 Dean Lewis Estates (from hereon referred to as DLE) is a professional strategic land promotion company specialising in the delivery of sustainable development.</p> <p>1.1.2 This submission provides DLE's response to and representations in respect of the emerging Dover District Local Plan, Regulation 19 Submission version consultation document. This submission focuses on the strategic policies in relation to housing growth and also site allocations with respect of Aylesham.</p> <p>1.1.3 This representation includes a site submission for land north of Aylesham and is supported by a vision document for the site included as Append 1. and a Highways and Sustainable Travel report included as Appendix 2. DLE are keen to work with the landowners and the Council to bring forward a high-quality residential development in this sustainable location.</p> <p>CONCLUSIONS</p> <p>6.1.1 DLE has considered the Regulation 19 version of the Local Plan and welcome the opportunity to provide comments on this. DLE hope that the comments provided within this submission are helpful and look forward to getting involved at later stages of the plan preparation.</p> <p>6.1.2 DLE has land interests at Aylesham, and through this submission have provided details regarding the potential for this site to deliver housing through an allocation in the emerging Local Plan. DLE are keen to work with the landowners and the Council to bring forward high-quality residential developments in this sustainable location.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	Burnett Dean Lewis Estates 0942 Att2.pdf Burnett Dean Lewis Estates 0942 Att3.pdf Burnett Dean Lewis Estates 0942 Att1.pdf
Local Plan Consultation Point	Aylesham
Rep ID	SDLP1258
Rep Status	Processed
Consultee ID	1332985
Consultee Full Name	Dean Lewis Estates Ltd
Consultee Company / Organisation	Dean Lewis Estates Ltd
Agent Full Name	Nicole Burnett
Agent Company / Organisation	Burnett Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	North Aylesham - Omission Site
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	(DDC Note - Text Extracted from Document sent from Nicole Burnett on Behalf of Dean Lewis Estates. Representation has been split across relevant areas of the Local Plan. Full attachment can be found under reference SDLP1254.) Aylesham 4.1.1 As outlined above, the proposed allocation for 500 dwellings to the north of Aylesham that was identified in the Regulation 18 consultation document has been removed from the Regulation 19 version of the Local Plan. 4.1.2 The indicative number of dwellings which the Local Plan identifies to be delivered in Aylesham is 649 dwellings (as set out in table 3.3). DLE note that the delivery of these dwellings is expected through the delivery of SAP24, land to the south of Aylesham. 4.1.3 As the Council are aware, DLE are promoting land to the north of Aylesham for a mixed-use scheme which could deliver in the region of 500 dwellings. Further site specific details are provided in section 5 of this submission. 4.1.4 Whilst DLE do not dispute the inclusion of Aylesham south within the Local Plan, it is questioned why the Council have selected this site over the site to the north of Aylesham. When reviewing the HELAA commentary for the two sites this raises a number of queries regarding the Council's justification.

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

4.1.5 DLE note that within the 2020 version of the HELAA, both AYL003 (south of Aylesham) and AYL004 (north of Aylesham) are considered part potentially suitable / part unsuitable. The commentary regarding the two sites at this stage was very similar with both including the same commentary regarding Aylesham as a growth location, risk of surface water flooding and KCC Highways concerns.

4.1.6 The site to the south is considered to have High landscape sensitivity, whereas the site to the north is identified as Medium-High.

4.1.7 The 2020 HELAA with regards to anticipated delivery identified the site to the north (AYL004) as short term and the site to the south (AYL003) as medium term.

4.1.8 DLE note that with regards to the assessment of these two sites, the conclusions of the 2022 version of the HELAA differs from the earlier iteration. With respect to both sites the wider highways implications are identical but there is no proper justification to demonstrate that the northern site is any less capable of satisfactorily mitigating the highways issues that are identified as being equally applicable to both sites. Therefore, the evidence before the council does not justify the deletion of this allocation on this basis.

4.1.9 DLE do not believe, in this respect, that the Council have followed the evidence and that the right site has been selected for inclusion in the Regulation 19 version of the plan. In fact, it seems somewhat illogical to favour the site to the south of Aylesham over the land to the north, where the Highways issues stated are the same, and would need addressing for both sites, however the landscape sensitivity is identified as greater for the site to the south and it also faces added complexities of being a cross boundary site, with part of the site falling in Canterbury District. Whilst DLE note that the HELAA outlines that the housing development is only proposed on land in Dover District, DLE believe that the cross-boundary nature of the site may result in some added complexities which could impact on the timescale of delivery.

4.1.10 Given the points raised above, and the fact that the land to the north of Aylesham was considered suitable for inclusion within the Regulation 18 version of the Plan, DLE are unclear of any justified and logical reason for its exclusion at this stage of the plan. Whilst it is noted that the overall scale of housing delivery has reduced through this iteration of the plan, retaining the site to the north of Aylesham would only help ensure delivery of the necessary scale of housing within the plan period and provide flexibility for any delivery issues with other allocations. As such DLE make the recommendation that the site to the north of Aylesham be reinstated as an allocation in the emerging plan.

SITE SUBMISSION – LAND AT ADISHAM ROAD, AYLESHAM

5.1 The Settlement and Site Location

5.1.1 Figure 2 below shows the site, land at Adisham Road, Aylesham. DLE are promoting this site for residential development on behalf of the landowners. A vision document for the site is included as Appendix 1 to this submission.

DDC Note - Image not included, see attachment.

site lies on the northern edge of Aylesham, with access to be taken off Adisham Road. To the south of the site lies Aylesham Garden Village. It is intended to continue to use Garden City principles at the Adisham Road site, which will encourage wide tree lined streets, with good walking, cycling and sustainable links, and useable green space and community facilities at the heart of the scheme.

5.1.3 The site comprises approximately 36 hectares of land, which is currently in agricultural use. Approximately 20 ha of the site is developable for residential use and the residual will be used for green and blue infrastructure and supporting community uses.

5.1.4 The site does not lie within the Conservation Area, is not susceptible to flood risk and is in a sustainable location with access to a range of local amenities and services. The site provides the opportunity to deliver a logical extension to the north of the village. The scale of the site also means that significant community benefits could be included within a scheme following consultation with the local community.

Services and Facilities

5.2.1 Aylesham is identified as one of two Rural Service Centres in the Local Plan, and whilst the majority of new housing is to be directed to Dover Town and at Whitfield Urban Expansion, policy SP3 of the emerging plan outlines that following this development will be focussed in the District Centre of Deal and the Rural Service Centres of Sandwich and Aylesham. In particular paragraph 3.71 of the Local Plan notes how Aylesham has been identified as a Rural Service Centre for over 30 years and continues to play an important role.

5.2.2 DLE consider Aylesham to offer a highly sustainable location, offering a wide range of facilities and services including a train station, primary school, health centre, industrial estate and range of additional shops and services.

5.2.3 Given the scale of services and facilities in Aylesham, it offers a logical location to provide additional housing land. DLE believe that as per the previous iteration of the plan, an allocation to the north of Aylesham is appropriate and would assist in delivering the overall scale of housing across the district within the plan period.

Highways Constraints

5.3.1 DLE note the Highways issues raised by Kent County Council (KCC) in relation to this site, in particular the capacity constraints at Wingham Junction and the strategic capacity issues on the A2.

5.3.2 Earlier this year DLE commissioned Prime Transport Planning to prepare a Highways and Sustainable Transport representation in relation to this site. The full report has been included as Appendix 2 to this submission.

5.3.3 This Highways representation notes that access to the site from Adisham Road is largely unconstrained due to the circa 1km frontage within the public highway. Primary access can be provided from Adisham Road and there is the potential opportunity to provide connection, if required, to Ratling Road be it full vehicular or restricted emergency vehicles or buses. Pedestrian and cycle connection can be provided to Drift Road and/or Blue Flame Road via the existing PRoW. The access strategy will provide safe and convenient access for pedestrians, cyclists and public transport users.

5.3.4 The highways representation acknowledges concerns regarding traffic impact. A detailed junction capacity assessment of recent changes to the A2/A260 junction will be undertaken and mitigation considered if necessary.

5.3.5 The constraints at the B2046 High Street/A257 Canterbury Road junction in Wingham are recognised. Whilst opportunities to change the form of the junction appear limited, the existing highway and public realm materials are of poor aesthetic value and there is certainly scope to design and construct a high quality public realm scheme using a more modern palette of materials which will enhance the setting, encourage slower traffic speeds through the junction and create a more pleasance and safer environment for pedestrians and cyclists. Any such scheme will involve consultation with DDC, KCC and Historic England.

5.3.6 DLE and its consultant team will be happy to work with the developers behind the other emerging allocations as well as statutory authorities to design and deliver any mitigation schemes to ensure that they can accommodate planned levels of growth and do not restrict further development.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Local Plan Consultation Point

Aylesham

Rep ID

SDLP1679

Rep Status

Processed

Consultee ID

1330717

Consultee Full Name

Mrs
Mandy
Gass

Consultee Company / Organisation

Agent Full Name

Agent Company / Organisation

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Aylesham
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>With regard to all of the Aylesham proposals.</p> <p>firstly with regard to Dorman Avenue North the nearest primary school is Aylesham Primary and not St Joseph's.</p> <p>with regard to all proposals in Aylesham.</p> <p>GP practice - we cannot get appointments nor be referred to hospitals due to funding.</p> <p>We have to wait 10 days for our prescriptions as boots cannot cope.</p> <p>the villagers including the elderly have to leave the village for basic needs such as COVID boosters.</p> <p>hence the medical practice cannot cope now let alone with more properties/people.</p> <p>Education- there are no nursery school places.</p> <p>secondary school- there are issues getting our children into school- there have been near misses where there are insufficient buses and the build up of children have surged- almost getting run over. The government are not fulfilling their duty to provide secondary schools within the legislated distance and not providing free school transport to compensate for the same. The secondary schools that are available are now over subscribed. The restrictive routes in and out of Aylesham would not cope with additional traffic to basic amenities that the villagers need let alone additional villagers.</p> <p>Aylesham railway station is no longer manned and is unsafe in the evenings- children are playing on the tracks. Essential routes are cancelled and the disabled are unable to cross the bridge so the station is unfit for those villagers that are already here.</p> <p>there are no adequate facilities for the youth even though these were promised in the previous plans where the houses have already been built.</p> <p>there are no employment opportunities in the footing industrial estate.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Aylesham
Rep ID	SDLP1522
Rep Status	Processed
Consultee ID	1333323
Consultee Full Name	Kavanagh Motor Services Ltd
Consultee Company / Organisation	
Agent Full Name	Grace Martin
Agent Company / Organisation	Hume Planning Consultancy Ltd
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Omission Site in Aylesham (TC4S114)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Representation submitted by Hume Planning. Full Representation attached to SDLP1522. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1522.)</p> <p>Dover Local Plan Regulation 19 Consultation: Land at Ratling Road, Aylesham We write to you on behalf of our client, Kavanagh Motor Services Ltd in relation to the Dover District Council Regulation 19 consultation on its Local Plan Our client owns land off Ratling Road, Aylesham, which is currently in employment use. The extent of the site is shown on the enclosed plan. This site is not included as an allocation within the Pre-Submission version of the Local Plan. We are writing to object to its omission. For the reasons set out below we consider it is a suitable and available site to help deliver housing to Aylesham, one of two rural service centres in the district.</p> <p>Site Description The broadly rectangular site is bound by Ratling Road to the east, the railway line to the west and the Yodel distribution centre to the south. The site is a brownfield site that adjoins the existing Aylesham settlement confines. Aylesham railway station is located in close proximity, c. 200 metres by foot. The site is currently in use for employment uses; it is therefore a previously developed brownfield site. The site is not located within an area at risk of flooding.</p>

Suitability of the Site

The site is a sustainable, brownfield, site. It is located in close proximity to the settlement confines of Aylesham, which is a third-tier settlement in the district providing a large range of facilities and services commensurate with its role. It is also located within easy walking distance to the railway station and is therefore a sustainable site.

There is an existing access from Ratling Road.

There are limited environmental or historical constraints which would prevent this site from being redeveloped. It is located within flood zone 1 which is sequentially preferable for development.

The site is assessed as part of the Council's HEELA (Site TC4S114). It was dismissed on the basis that the site is suitable for employment and there is a need for employment land in the borough. However, there is significant employment land allocated in Aylesham to meet the need over the plan period including land within the South of Aylesham allocation for 640 units (SAP 25) and at the former Snowdon Colliery (SAP26). There are positive place shaping, and transport arguments, to locate the employment floorspace in certain locations and this relatively small employment site could be relocated.

It is also noted that through the HEELA the site is dismissed on the grounds that it is an isolated site in the countryside. With its proximity to Aylesham railway station and the built-up area we would dispute this assessment particularly given the site is previously developed land. It will positively enhance the landscape and provide a strong, permanent edge to settlement plus. Further, it would have positive highway implications on the settlement by removing heavier vehicle movements across the two constrained /narrow railway bridges.

Availability of the Site

We confirm on behalf of our client, Kavanagh Motor Services Ltd that the site is available and can be brought forward for residential development over the plan period.

SP3: Housing Growth

(DDC Note - Section DUPLICATED against SP3)

Whilst we welcome DDC's commitment to meeting its housing need, with Strategic Policy SP3 committing to providing at least 10,998 net additional homes over the Plan period, it is considered additional sites if suitable and available should be included within the Plan. A large proportion of growth is being directed towards the expansion of Dover/Whitfield (over 2,000), and a large proportion to land to the south of Aylesham (640). Large strategic sites delivery rates can easily slow down during the plan period and under-deliver. Whilst there is a buffer within the Plan, it is considered appropriate not use this as a limit and allocate other suitable sites in sustainable locations where available.

As detailed above, the employment site at Ratling Road, is considered suitable for residential development. It is also available and can be delivered within the short to medium term, and in our view this site should be allocated within the Plan.

Concluding Remarks

Hume Planning Consultancy welcomes the opportunity to comment on this stage of the Council's Pre-Submission Local Plan and would like to reserve the right to attend the Examination in Public in due course to discuss potential development sites in Aylesham.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files	Martin Hume Planning (Kavanagh Motor) 1517 Att1.pdf Martin Hume Planning (Kavanagh Motor) 1517 Att2_Redacted.pdf
Local Plan Consultation Point	Aylesham
Rep ID	SDLP1824
Rep Status	Processed
Consultee ID	1272950
Consultee Full Name	Delia Webb
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	AYL002
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	As Aylesham has already had hundreds of houses built since 2016 in our village, it no longer has the village 'feel', surrounded by houses on all sides. AYL002 is the last remaining green area within the village where children run and play, and walkers / dog walkers can enjoy a safe walk, where they can be seen, so will not be attacked or accosted. I don't think it is too much to ask to leave this space, we as an area have, and are having so many houses built, it is changing the ethos, with no infrastructure being put in the builders plans - yes, done? No!! where AYL004 has 500 homes removed, thank you, but we desperately need a secondary school, a proper supermarket, and another doctors surgery. Persimmons and Barratts should be putting a proper sum in to accomplish this, that 500 homes space could be used for this with their financial help.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	I don't think it is sound planning or justified to take the last green space away from the village. It is not effective for mental health, exercise space for children to run or play or adults to walk. Your local plan does not even state how many houses, so I cant state what modification is needed, none is the preferred amount.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Aylesham
Rep ID	SDLP1904
Rep Status	Processed
Consultee ID	1274390
Consultee Full Name	Mr and Mrs Young
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Aylesham
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	For over 30 years, Aylesham has had permission to greatly expand their boundaries. They have built some new homes that seem to enhance their village and give the new and old dwellers good access to the A2 and a very large village green with excellent shops and space for many more. The roads within the village are wide and spacious,
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Aylesham
Rep ID	SDLP1565
Rep Status	Processed
Consultee ID	1333350
Consultee Full Name	Kent County Council
Consultee Company / Organisation	
Agent Full Name	Grace Martin
Agent Company / Organisation	Hume Planning Consultancy Ltd
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Omission Site - Aylesham
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Representation submitted by Hume Planning. Full Representation attached to SDLP1565. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1565.)</p> <p>Dover Local Plan Regulation 19 Consultation: Former Youth Centre, Aylesham We write to you on behalf of our client, Kent County Council in relation to the Dover District Council Regulation 19 consultation on its Local Plan Our client owns the former Youth Centre site on Ackholt Road, Aylesham. The extent of the site is shown on the plan below:</p>

This site was not included within the Call for Sites. Accordingly, it hasn't been included as an allocation within the Pre-Submission version of the Local Plan. However, this site is available, and for the reasons set out below we consider it is a suitable and available site to help deliver housing to Aylesham and should be included as an allocation for development.

Aylesham is one of the largest settlements in the district, sitting alongside Sandwich as a Rural Service Centre, only below Dover, Whitfield and Deal in the settlement hierarchy.

Site Description

The site is bound by Ackholt Road to the north, the railway line to the east and existing employment and commercial units to the south. Land to the south is located for employment purposes (SAP 25 'Aylesham Development Area'). Beyond that is a significant new housing allocation for around 640 new homes at land to the south of Aylesham (SAP 24).

The site is a long-standing vacant, brownfield site. The Aylesham Youth Centre formally occupied the building on the site, but this has been vacant for over ten years following fire damage and later demolition. The site over recent years has been the subject of vandalism and anti-social behaviour. There are large amounts of hardstanding on the site beyond these areas the site is untidy and overgrown. There are TPO trees on the site but these lie to the perimeter and would not constrain development.

The site is located within the settlement confines of Aylesham and is located opposite the railway station. It is therefore a highly sustainable site.

The site is not located within an area at risk of flooding.

Suitability of the Site

The site is a sustainable, brownfield, site. It is located within the settlement confines in the Pre-Submission Local Plan of Aylesham, which is a third-tier settlement in the district providing a large range of facilities and services commensurate with its role. It is also located directly opposite the railway station and is therefore a highly sustainable site.

Access can be provided from Ackholt Road. The redevelopment of this site would facilitate the provision of pedestrian and cycle links from the railway station through to the employment allocation (SAP 25) and the significant residential allocation and should form an important linking component of the wider strategic allocations that are already supported in the emerging local plan.

There are limited environmental or historical constraints which would prevent this site from being redeveloped. It is located within flood zone 1 which is sequentially preferable for development. The Policies Map identified trees covered by a TPO which will need to be considered as part of any scheme, but given the site includes an existing building and hardstanding this will not prohibit redevelopment.

Availability of the Site

We confirm on behalf of our client, Kent County Council, that the site is available and can be brought forward for residential development over the plan period.

SP3: Housing Growth

Whilst we welcome DDC's commitment to meeting its housing need, with Strategic Policy SP3 committing to providing at least 10,998 net additional homes over the Plan period, it is considered additional sites if suitable and available should be included within the Plan especially brownfield opportunities in central locations that are so close to the rail station. A large proportion of growth is being directed towards the further expansion of Whitfield (over 2,000), and a large proportion to land to the south of Aylesham (640). Large strategic sites delivery rates can easily slow down during the plan period and under-deliver. Whilst there is a buffer within the Plan, it is considered appropriate not to use this as a limit, and allocate other suitable sites in sustainable locations where available.

As detailed above, the former Youth Centre in Aylesham, as a brownfield site is considered suitable for residential development. It is also available and can be delivered within the short to medium term, and in our view this site should be allocated within the Plan.

Concluding Remarks

Hume Planning Consultancy welcomes the opportunity to comment on this stage of the Council's Pre-Submission Local Plan and would like to reserve the right to attend the Examination in Public in due course to discuss potential development sites in Aylesham.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	Martin Hume Planning (KCC Former Youth Centre) 1516 Att1_Redacted.pdf Martin Hume Planning (KCC Former Youth Centre) 1516 Att2.pdf
Local Plan Consultation Point	Aylesham
Rep ID	SDLP2006
Rep Status	Processed
Consultee ID	1334447
Consultee Full Name	Joyce Dalton
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Aylesham
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I would like to object to the proposed housing development at Aylesham, on the grounds - 1. Increase in traffic on the country roads surrounding Aylesham with substantial risk to local population. 2 Large increase in people imposed on on rural community. 3 Increased demand on local services ie, doctors, hospitals, dentist, and schools.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Aylesham
Rep ID	SDLP2011
Rep Status	Processed
Consultee ID	1334450
Consultee Full Name	Janet Gambrell
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Aylesham
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>Dear Planners and Politicians, I am writing to express my dismay at the plans to develop the area around Nonington, Aylesham and Adisham.</p> <p>1) This is a rural area where there are natural habitats which need to be preserved for wildlife and human regeneration. We need to preserve areas of trees and open spaces. People living here do not want an urban environment imposed on them. We should be preserving such areas for ecological reasons and farmland should be kept for food production. What has happened in Ukraine has brought home to us the problems of reliance on outside sources.</p> <p>2) The infrastructure is not adequate for the present population. We are already being told to limit our use of water. There are not enough schools, hospitals or schools for our needs. The sewage systems would not cope.</p> <p>3) The roads are already overcrowded, causing air pollution and the roads are not properly maintained. Many are country lanes hardly fit for present traffic flow.</p> <p>4) Public transport for our village of Nonington is practically non-existent. Even more cars would be needed.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	

SAP24 - Land to the South of Aylesham (AYL003)

Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)
Rep ID	SDLP28
Rep Status	Processed
Consultee ID	1259309
Consultee Full Name	Mr Peter Jull
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The indicative masterplan is flawed regarding the expectations for landscaping. The south east edge is already heavily wooded and the nearest building that might receive any benefit is a water works. The eastern end of Ackholt Wood and the western corner of Snowdown recreation ground provide a natural point beyond which taking land out of productive agricultural use to provide landscape mitigation for views which are of trees is entirely inappropriate. Ackholt wood as a whole might be ancient but the trees of which it is comprised are not particularly old. Providing a landscape buffer around its north eastern edge raises questions of the nature of the buffer, its management, amenity value and access. If its purpose is to protect the wood then it would be better designated as garden land to avoid encroachment by playing children and dog walkers. Following publication of Canterbury's Local Plan consultation, any landscaping along the district boundary is likely to be superfluous in mitigating views from the AONB as the other side will become a development site.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The extent of SAP24 needs to be redrawn to not extend beyond a line between the eastern end of Ackholt Wood and the western corner of Snowdown recreation ground. Landscaping buffers should be removed from the indicative plan other than along the aforementioned line. The policy wording should explicitly reference joint working with Canterbury City Council regarding the masterplan.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	To answer any questions not anticipated by the written response.
Include files	
Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)
Rep ID	SDLP53
Rep Status	Processed
Consultee ID	1252063
Consultee Full Name	Mrs Janet Holness Keith Holness
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The plan fails to see the loss of acres of beautiful countryside and local awareness of the wishes of the community who use this land visually and recreation.</p> <p>The plan indicates a line through Ackholt Wood. This cannot be so, it is sacrilege to carve up this ancient woodland. Red kites live in this wood as well as many other species. If housing is deemed to be absolutely necessary, which I believe is not, then more than 15 metres should be between this wood and any housing development.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The land between the railway line and Aylesham Road could be used for housing purposes as it is not visually attractive and it is between the existing business park and the Gipsy site. This will not have as such a dramatic and damaged effect on the countryside which locals value .

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)
Rep ID	SDLP25
Rep Status	Processed
Consultee ID	1255357
Consultee Full Name	Mr Jamie Pout
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Sap24
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The facilities and amenities being offered are insufficient for the scale of development and there is insufficient upgrades to infrastructure to make this deliverable.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	Open space provision must be provided in a timely fashion as this has not happened in the current development. Many residents have lived in new homes for 6 or 7 years and now moved on without seeing new parks, allotments, new sports hall or new bus service. Allotments should be provided on-site and not added to the on going site on Ratling Road as that location is inappropriate. Aylesham and Snowdown train stations are not accessible and so do not meet the needs of current residents, let alone any new users and so there should be provisions to improve these stations.

<p>if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Bus services are still substandard, with DDC only recently recognising that there is no regular service to Dover. This makes life difficult for anyone without a car and makes it difficult to meet sustainable travel targets.</p> <p>Spinney Lane needs significant upgrades to cope with the volumes of traffic that will inevitably come from additional development.</p> <p>Whilst there is mention of contributions to off-site pre-school, there is already a deficit of nursery places in Aylesham and so a firmer commitment to improve provisions should be included to mitigate the impact of this development.</p> <p>Even after repeated calls, there are no plans for a pub-restaurant or improvements to medical facilities (although CCC have mentioned this in their local plan). Facilities are currently stretched and any further development will stretch them further make life worse for current residents.</p> <p>There must be suitable SUDs designed into this development. The current development in Aylesham has led to increased surface flooding of roads due to inadequate design which cannot continue to happen.</p> <p>Tree planting is welcomed, but this must come with a medium to long term plan to inspect and maintain these trees to ensure that they survive to a point when they start to sequester carbon.</p> <p>The IDP suggests a community hall or similar but this is not in the local plan document. It would be good to see this as a more certain commitment so this definitely happens, with land put aside within the SAP24 area.</p> <p>It would be welcomed for traffic assessments to be completed before these sites are given the green light to fully assess the impact on the B2046 as mentioned, rather than doing this after the sites have been approved.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP24 - Land to the South of Aylesham (AYL003)</p>
<p>Rep ID</p>	<p>SDLP91</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1330820</p>
<p>Consultee Full Name</p>	<p>Mr Adrian Bennett</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	

Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Aylesham South
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Insufficient infrastructure at present to accommodate additional homes. Aylesham has undergone massive development in the last three years that I have noticed and even more prior to that. I believe it to have doubled in size without any increase in facilities. The development is on farmed land which King Charles 111 has said he is against this type of housing. Aylesham is recognised as a deprived area already without additional burden on its already stretched public services. The main access to the A2 is via the B2046. Dover council withdrew a development of 500 homes in North Aylesham as the B2046 was not able to support the additional traffic that would arise
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Remove the site
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)
Rep ID	SDLP134
Rep Status	Processed
Consultee ID	1330959
Consultee Full Name	Mr lan

	Hobson
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 24
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>There is very little evidence that Dover has cooperated with Canterbury. SAP 24 lies adjacent to R20 (420 (minimum) houses. This makes almost 1000 houses in a rural area.</p> <p>When I visited the exhibition at Aylesham. The view outside the window was very rural and attractive. The 2 plans are to submerge the area under housing</p> <p>I asked one of the officers why the Canterbury plan did not appear on the Dover plan. His reply was "We didn't know anything about it till it was published. Clearly no cooperation!!!</p> <p>Traffic in the area will be extremely difficult, especially with regard to Canterbury's R20 and R1. All of this would create almost 5000 houses with a narrow B road to cater for the traffic.</p> <p>Rural Area. This is fine agricultural land which is badly needed</p> <p>Water and waste. This area cannot cope with current levels (pumping sewage into the sea) never mind additional housing estates.</p> <p>Services. Shops dentists, doctors - all stretched at the moment with one small coop serving the area.</p> <p>Transport. Very little, people will be forced onto the roads (see above)</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	

Include files	
Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)
Rep ID	SDLP59
Rep Status	Processed
Consultee ID	1330565
Consultee Full Name	Miss Jenna Murray
Consultee Company / Organisation	Carter Jonas
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24 - Land to the south of Aylesham (AYL003)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>These representations are submitted on behalf of Axis Land Partnerships ('Axis') to the Regulation 19 Submission Local Plan ('the Draft Plan'). Since the Regulation 18 stage, Axis have been appointed by the landowners of the site to promote the site through the remaining stages of the Local Plan. As a land promotion and development company, Axis is experienced in delivering large strategic housing sites.</p> <p>We confirm that Axis considers the Draft Plan to be legally compliant. However, in order for draft policy reference SAP24 to be considered sound, Axis request that the following comments and/or amendments are taken into account.</p> <p>Figure 4.6 Land to the South of Aylesham- Indicative Development Strategy (Policy SAP24), Page 157: This figure illustrates the Land to the South of Aylesham strategic site allocation area. However, we note that there is an error as the site known as the 'Aylesham Development Area' which is allocated for employment use under draft Policy SAP25 has been included within this figure. As this site does not form part of draft Policy SAP24, in order for this policy to be considered sound, Axis request that the area shaded in purple labelled 'Employment Allocation' is removed from Figure 4.6 so that this accurately reflects the strategic site allocation policy area. Accordingly, it would not be effective to include this employment site within the SAP24 policy area as it would be undeliverable as part of this allocation.</p> <p>As part of the submitted Dover Local Plan Regulation 18 representations, we successfully demonstrated that the site is able to accommodate circa 640 new dwellings. We therefore support draft Policy SAP24's allocation to deliver an estimated 640 new homes over the Plan period to 2040. The Government's objective to significantly boost the supply of new homes is supported by the National Planning Policy Framework (NPPF). The NPPF notes that a sufficient amount and variety of land should come forward where it is needed and that this should be underpinned by the local housing need assessment. An allocation for 640 new homes on this site would significantly contribute to the District's need for 10,998 dwellings over the new Local Plan period to 2040. Axis's Masterplan for the site demonstrates that the 640 homes can be accommodated on the site and the Vision Document has been submitted in support of these representations.</p> <p>The provision of 10 permanent gypsy and traveller pitches on the land to the north of Snowdown Caravan Site has been removed from the Draft Plan. The landowners submitted Dover Local Plan Regulation 18 representations did not support this element of the proposed draft allocation due to the potential impacts on the amenity of the residents of the adjacent property and the Draft Plan supporting evidence base confirms that this site is in fact unsuitable to be taken forward to the next stage of assessment.</p>

In terms of the detailed requirements of draft Policy SAP24:

- a) The provision of a wide mix of housing on this site has been carried forward from the Dover Local Plan Regulation 18 document and this is supported.
- b) The NPPF supports the preparation of design codes by landowners and developers in support of a planning application for sites that they wish to develop and that states that these documents should be used to guide decisions on applications in the absence of locally produced design guides or design codes. We support the use of design codes to be developed as part of, or to supplement, the masterplan for the site.
- c) Part C refers to 'employment opportunities' to be provided as part of the strategic site allocation. In error, accompanying Figure 4.6 which shows the 'Land to South of Aylesham' area has been drawn to also include the site boundary for draft Policy SAP25 (Aylesham Development Area) which is allocated for employment uses. This should be removed from Figure 4.6 as this does not accurately represent the SAP24 site allocation area. Draft Policy SAP25 refers to the "potential for this site to come forward in conjunction with the additional homes planned to the south of Aylesham to create sustainable employment opportunities". Given this proposed employment site is situated directly to the northeast of the site, the indicative development area for SAP24 is not allocated for employment uses as shown within Figure 4.6 or Table 4.4, and the 39.94 ha former Snowdown Colliery site to the southwest of the site is allocated for employment and tourism uses under draft Policy SAP26, we request that reference to "employment opportunities" is removed.

As set out in the landowners submitted Dover Local Plan Regulation 18 representations, given its size, the parcel of land to the east of Aylesham Road which sits within the developable area for Policy SAP24 could accommodate a community facility and a small convenience food store. Therefore, there would be incidental employment opportunities created by the non-residential uses associated with the site, rather than a designated employment area providing direct employment opportunities. Accordingly, it would not be justified to allocate this site for specific employment opportunities which would impact upon the deliverability of the site, and rather incidental employment opportunities created by any non-residential uses only will be provided, and for that reason draft Policy SAP24, Part C is unsound.
- d) The provision of open and informal open spaces for leisure and recreation across the site is supported.
- e) The development of the site to be well related to the existing settlement of Aylesham and respect the residential amenity of adjoining properties is supported. The location of future development within the District boundary, to the north and east of Ackholt Wood, along the Aylesham Road towards Snowdown Village and on the parcel of land to the east of Aylesham Road is also supported. Plan Ref: Site Location Plan (001) has been submitted alongside these representations. This plan shows the accurate site boundary for Land to the South of Aylesham and shows the precise location of the District boundary which runs along the west of the site.
- f) We support the provision of suitable access arrangements from Spinney Lane and Aylesham Road.
- g) We support points i-iv in relation to the wider strategic and local highway mitigation measures to be informed by a Transport Assessment. In terms of point iv, an assessment of the impact of the scheme on the A2/B2046 has been completed and this identified that the impacts were not significant. However, National Highways, who have responsibility for the junction, have not yet been consulted but will be in due course.
- h) On and off-site sustainable transport measures including new and improved pedestrian links and cycle paths to connect the site with Snowdown Station and the services and facilities in Aylesham as well as public transport provision informed by a Travel Plan is supported.
- i) Improvements to the Public Right of Way network to increase connectivity in the area is supported.
- j) We support the protection and enhancement of heritage assets and their settings through appropriate mitigation measures and the submission of a Heritage Assessment and Archaeological Assessment.
- k) We support the protection and enhancement of the area of ancient woodland as well as the submission of a tree survey and ecological survey in advance of a planning application being submitted for the site.
- l) We support the use of a Landscape and Visual Impact Assessment to inform both the layout of the development and the detailed provision of the landscape buffer.
- m) A Preliminary Ecological Assessment has already been carried out on site and this will be used to inform any development proposals coming forward on the site. We therefore support the instruction of appropriate species and habitat surveys to be carried out prior to the determination of a planning application and to help inform the proposed layout and design of future proposals.
- n) We support the submission of a Flood Risk Assessment to inform the application of the sequential approach to the layout of the site.
- o) We support the carrying out of a wintering bird survey in advance of a planning application being submitted for the site.

	<p>p) We support the integration of communications infrastructure to facilitate home working, the phased occupation of the development to align with the delivery of sewage infrastructure and the planning of the site layout to ensure future access to existing water and wastewater infrastructure for maintenance and upsizing purposes.</p> <p>q) Part Q refers to financial contributions towards the required off-site infrastructure and provides a non-exhaustive list of potential contributions. The NPPF notes that planning obligations must only be sought where they meet all of the following three tests: a) necessary to make the development acceptable in planning terms; b) directly related to the development; and c) fairly and reasonable related in scale and kind to the development. We consider that any requested contributions need to be specific, relevant and appropriate to the proposed development therefore Part Q of Policy SAP24 is not justified and is considered to be unsound.</p> <p>We also note that Part Q refers to the delivery of required off-site infrastructure “in accordance with Strategic Policy 8”. However, this policy relates to ‘Dover Town Centre’ rather than infrastructure contributions. We consider than Strategic Policy 8 has been referred to in error, and the correct policy reference here is ‘Strategic Policy 11- Infrastructure and Developer Contributions’.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Figure 4.6 Land to the South of Aylesham- Indicative Development Strategy (Policy SAP24), Page 157: This figure illustrates the Land to the South of Aylesham strategic site allocation area. However, we note that there is an error as the site known as the ‘Aylesham Development Area’ which is allocated for employment use under draft Policy SAP25 has been included within this figure. As this site does not form part of draft Policy SAP24, in order for this policy to be considered sound, Axis request that the area shaded in purple labelled ‘Employment Allocation’ is removed from Figure 4.6 so that this accurately reflects the strategic site allocation policy area. Accordingly, it would not be effective to include this employment site within the SAP24 policy area as it would be undeliverable as part of this allocation.</p> <p>Part C of draft Policy SAP24 refers to ‘employment opportunities’ to be provided as part of the strategic site allocation. In error, accompanying Figure 4.6 which shows the ‘Land to South of Aylesham’ area has been drawn to also include the site boundary for draft Policy SAP25 (Aylesham Development Area) which is allocated for employment uses. This should be removed from Figure 4.6 as this does not accurately represent the SAP24 site allocation area. Draft Policy SAP25 refers to the “potential for this site to come forward in conjunction with the additional homes planned to the south of Aylesham to create sustainable employment opportunities”. Given this proposed employment site is situated directly to the to the northeast of the site, the indicative development area for SAP24 is not allocated for employment uses as shown within Figure 4.6 or Table 4.4, and the 39.94 ha former Snowdown Colliery site to the southwest of the site is allocated for employment and tourism uses under draft Policy SAP26, we request that reference to “employment opportunities” is removed.</p> <p>As set out in the landowners submitted Dover Local Plan Regulation 18 representations, given its size, the parcel of land to the east of Aylesham Road which sits within the developable area for Policy SAP24 could accommodate a community facility and a small convenience food store. Therefore, there would be incidental employment opportunities created by the non-residential uses associated with the site, rather than a designated employment area providing direct employment opportunities. Accordingly, it would not be justified to allocate this site for specific employment opportunities which would impact upon the deliverability of the site, and rather incidental employment opportunities created by any non-residential uses only will be provided, and for that reason draft Policy SAP24, Part C is unsound.</p> <p>Suggested wording: Removal of “<i>Employment opportunities</i>”</p> <p>Part Q refers to financial contributions towards the required off-site infrastructure and provides a non-exhaustive list of potential contributions. The NPPF notes that planning obligations must only be sought where they meet all of the following three tests: a) necessary to make the development acceptable in planning terms; b) directly related to the development; and c) fairly and reasonable related in scale and kind to the development. We consider that any requested contributions need to be specific, relevant and appropriate to the proposed development therefore Part Q of Policy SAP24 is not justified and is considered to be unsound.</p> <p>Suggested wording: The addition of the following sentence to the end of Part Q “<i>It is acknowledged that such contributions will not always be suitable and where this is demonstrated through the submission of viability evidence, the Council will consider flexibility to ensure the viability and deliverability of the site.</i>”</p> <p>We also note that Part Q refers to the delivery of required off-site infrastructure “in accordance with Strategic Policy 8”. However, this policy relates to ‘Dover Town Centre’ rather than infrastructure contributions. We consider than Strategic Policy 8 has been referred to in error, and the correct policy reference here is ‘Strategic Policy 11- Infrastructure and Developer Contributions’.</p> <p>Suggested wording: Replace “<i>Strategic Policy 8</i>” with “<i>Strategic Policy 11</i>”</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Policy SAP24 is one of the draft Plan's major strategic housing allocations, with up to 640 new homes to be delivered on this site. Given the importance of this allocation in contributing to the District meeting its need for 10,998 dwellings over the new Local Plan period we consider it necessary to participate in the oral part of the examination in order to present key evidence in support of this allocation.
Include files	Aylesham South - Vision Document.pdf (1) 423-001-01 - Site Location Plan.pdf (1)
Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)
Rep ID	SDLP151
Rep Status	Processed
Consultee ID	1329874
Consultee Full Name	Ms Nicola Purcell
Consultee Company / Organisation	Aylesham Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24- Land to the South of Aylesham (AYL003)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Aylesham North (500 homes) has now been removed from the Draft Local Plan. Aylesham Parish Council welcomes this decision.</p> <p>In the south, site AYL003 runs from Spinney Lane (with Aylesham Road to the East and Ackholt Wood to the West) all the way to housing in the village of Snowdown. This site has a proposed development of 640 homes. The site map has been amended (as per SA[1]) to properly reflect land ownership and remove a private property from the proposed area.</p> <p>This relates to SAP24 South Aylesham.</p> <p>In addition, there is 1 smaller site (AYL001 policy SAP27) located on land on Dorman Avenue North. Initially this land was due to be windfall housing but is now allocated for 9 houses.</p> <p>Aylesham Parish Council opposes the uses of AYL001 for the development of 9 houses as this would result in the loss of registered native woodland.</p> <p>Aylesham Parish Council believes this level of development is over-bearing on the village and risks altering the character of the community. This is far beyond the original master-plan.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant	

and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)
Rep ID	SDLP337
Rep Status	Processed
Consultee ID	1259309
Consultee Full Name	Mr Peter Jull
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Inroduction
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SAP24 (DDC Note - this is the only comment made on this representation - comment only marked as processed due to soundness questions being answered)
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s)	

you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)
Rep ID	SDLP141
Rep Status	Processed
Consultee ID	1330970
Consultee Full Name	Mr Paul Henley
Consultee Company / Organisation	Womenswold Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<u>Comments on the Dover District Draft Local Plan from Womenswold Parish Council</u> Womenswold Parish Council is submitting comments based on discussion at the Parish Council meeting on 8th November 2022. The Council wishes to comment as follows on the proposed housing estate SAP 24 of 640 houses on land between Aylesham and Snowdown:-

Rural Nature

- The proposed site of the housing estate is on a greenfield site in a rural community. This proposal would severely impact on the rural nature of the area. In addition, valuable farm land will be lost to the production of food. This is clearly much needed in these difficult times

Water

- The area in question lies in a drought stricken part of the South East. This summer and most summers we have water shortages. This development can only exacerbate the problem. In addition, Canterbury City Council is planning a total of 3620 (minimum) houses in the adjacent area, adding to the burden of water shortage.

Sewage

- The whole of the South East suffers from extremely poor infrastructure for the disposal of raw sewage. There have been many recent instances whereby Water Companies have pumped raw sewage into the sea which has resulted in large fines. Clearly the addition of nearly 4000 home will only add to this problem.

Traffic

- The proposal, together with Canterbury City Council's proposal will increase the strain on the rural road infrastructure. In particular, the B2046 is already extremely busy. There have been many accidents at the junction to the entrance to Womenswold Parish. In addition the slip road on the A2 (London Bound) is far too short. The increase in traffic created by these developments will only make this worse.
- The roundabout on the A260 by the A2 was built to deal with the huge increase in traffic coming from Aylesham under the current Aylesham expansion. It does not take into account the further proposed increases.

Infrastructure

- Currently there is a major shortage of facilities which contribute to facilitate supporting the community:-
 - Doctor surgeries.
 -
 - There are no secondary schools in the area. The nearest schools are in Canterbury, Sandwich and Dover. This necessitates a bus ride on overcrowded and unreliable buses. This also contributes to increased Greenhouse gasses and increased traffic congestion. The addition of so many houses will seriously exacerbate the problem.
 - There is only one small Coop in Aylesham which hardly copes with current levels of business.

Public Transport

- Buses: The bus service is already poor with little sight of improvement
- Trains: There is a station at Snowdown but the service is slow, once an hour to London for a 2 hour journey. The stations at Snowdown and Aylesham also do not cope with current levels of use. Parking is an issue and walking is difficult along narrow country lanes with no footway.

Summation

Womenswold Parish Council objects to the proposed Housing Estate SAP 24.

It is too large, and when the adjacent Canterbury City Council plans (R20 and R1) are taken into account, it effectively creates an Aylesham/Womenswold Conurbation in a very rural area of Outstanding Natural Beauty.

There is currently little infrastructure to support existing communities. The proposal would seriously impact on this.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance

See attachment

with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	Comments on Dover Plan.docx
Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)
Rep ID	SDLP470
Rep Status	Processed
Consultee ID	1330959
Consultee Full Name	Mr Ian Hobson
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 24
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	There is very little evidence that Dover has cooperated with Canterbury. SAP 24 lies adjacent to R20 (420 (minimum) houses. This makes almost 1000 houses in a rural area. When I visited the exhibition at Aylesham. The view outside the window was very rural and attractive. The 2 plans are to submerge the are under housing I asked one of the officers why the Canterbury plan did not appear on the Dover plan. His reply was "We didnt know anything about it till it was published. Clearly no cooperation!!!
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s)	Cooperate with Canterbury to at least reduce the housing levels

you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)
Rep ID	SDLP231
Rep Status	Processed
Consultee ID	1267388
Consultee Full Name	Judith Hawarden
Consultee Company / Organisation	Hawarden farming
Agent Full Name	Judith hawarden
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	South Aylesham SAP24 - Land to the South of Aylesham (AYL003)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Comments on the Regulation 19 Submission Local Plan</p> <p>A considered approach to the Natural environment has been adequately presented in DM Policy 39 but there is a lack of research and presentation of the current role of the farmland, looking at rural employment food production, and current carbon capture. Farmland forms the greater part of the district's green areas although a photo of arable fields is used to introduce the section there has been no analysis of the impact on the local farming industry if farmland is continued to be developed.</p>

Although the district has below-average rainfall and water resources the rainwater is badly managed around Aylesham.

The B2046 is a dangerous road with a high number of accidents, Dover district has above-average accident rates. <https://www.crashmap.co.uk/Search> shows a high number of accidents on the B2046, particularly at the Spinney Lane junction with numerous fatalities and serious injuries recorded along the length of the road. The B2046 is in poor condition with vehicles frequently leaving the road and ending up in our hedgerows and fields. The road surface is folding into ruts increasing its camber to the Canterbury side under the current impact, particularly on the stretch between Aylesham and Adisham junctions.

Dover district has below-average job opportunities, we have seen London boroughs buying up batches of the new builds in Aylesham. London currently has over 87,000 empty houses. There are shortages of appointments for doctors dentists, vets and secondary school places. There is a lack of adequate buses and the local shops run low on some food daily. In Aylesham to date, 785 units have been delivered with 575 remaining.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Show a convincing argument for housing needs and employment opportunities in the District , in-depth study of B2046 ,study of flood water from Aylesham Northside development onto road and farmland

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

As local farmers of the land opposite the current new development, we have an understanding of the impact of new developments and how they could be improved to have less of an impact on the rural environment.

Include files

[Screenshot 2022-11-29 9.07.00 AM.png](#)

Local Plan Consultation Point

SAP24 - Land to the South of Aylesham (AYL003)

Rep ID

SDLP171

Rep Status

Processed

Consultee ID

1329874

Consultee Full Name

Ms
Nicola
Purcell

Consultee Company / Organisation

Aylesham Parish Council

Agent Full Name

Agent Company / Organisation

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3 Housing growth
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Aylesham Parish Council agrees that there is a need to increase housing stock both nationally and within the Dover district.</p> <p>Over recent years, Aylesham has greatly assisted in helping to increase the numbers of homes within the local community (having delivered 917 homes so far with a further 443 to come). However, it is felt that any future development should be kept to a minimum.</p> <p>This relates to SP3 – Housing Growth.</p> <p>South Aylesham (SAP24) includes a large number of positives (such as inclusion of play parks, open spaces, cycle links and protecting and enhancing wildlife) but there is a lack of firm commitments to facilities. The development makes reference to “a new small convenience shop” which is wholly insufficient for the proposed number of new homes.</p> <p>Dover District Council is looking at updating its parking policy for future developments. Currently the Kent Design Guide and the Kent Design Guide Review: Interim Guidance Note 3 to apply planning constraints. It is welcome to see this referenced in the Draft Local Plan. It is important that future developments allow for independently accessible parking spaces (as opposed to tandem spaces) and that car ports or garages are not included as parking.</p> <p>This will greatly improve parking, especially in rural developments.</p> <p>More considerate parking will greatly improve access for pedestrians as well as safety for pedestrians and cyclists.</p> <p>Aylesham Parish Council believes that a new small convenience shop in any new development would be wholly insufficient. Dover District Council should also look to adopt more stringent parking policy reform.</p> <p>It has been noted on previous planning applications that the sewerage pipes in the village may be at their capacity, so any further developments could push them past their breaking point.</p> <p>This should be addressed before any further development can be considered.</p> <p>Current plans for housing development do not go far enough in providing homes that are suitable for disabled people or homes that can be easily adapted in the future to meet the needs of home owners. An increase in the number of dwellings built to an accessible standard would be welcomed</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)
Rep ID	SDLP397
Rep Status	Processed
Consultee ID	1329546
Consultee Full Name	Richard Rush
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	AYL 003 area behind Ackholt House which has cesspit, trees and other obstacles to development. 2 years ago I sent maps of the obstacles to Dover DC with emails etc. Dover DC has ignored to information and left the obstacles off the map. The obstacles will be strong disincentive to development.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The obstacles documented in emails

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I intend to ensure that my rights are protected and that DDC errors are not repeated.
Include files	
Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)
Rep ID	SDLP176
Rep Status	Processed
Consultee ID	1329874
Consultee Full Name	Ms Nicola Purcell
Consultee Company / Organisation	Aylesham Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>In October 2021, Aylesham Parish Council supported the Climate and Ecological Emergency (CEE) Bill which address the full extent of the climate and nature crisis in the UK. As a result, any local plan should use up-to-date science to make sound recommendations.</p> <p>As the district is extremely water scarce, all possible measures should be implemented to help mitigate water scarcity. The use of Sustainable Urban Drainage systems (SUDs) is required to be prominent in all future developments. This will help to deal with surface water flooding. We welcome the Draft Local Plan's hierarchy of methods of discharge, with the use of combined sewers coming last.</p> <p>This relates to CC6 of SP1 – Surface Water Management.</p> <p>There are a number of options to ensure new homes produce the least possible carbon emissions. Aylesham Parish Council would like to see Dover District Council require the full 2025 Future Homes Standard to be delivered now (this will reduce emissions by between 75-80% compared to current standards), not at some point during the Local Plan's lifetime.</p> <p>This relates to CC1 of SP1 – Reducing Carbon Emissions.</p>

We welcome the commitment to planting trees within new developments that are native to Kent. This will help to keep the rural feel of Aylesham alive. Currently we often see newly planted trees dying within the first few years of their lives. There must be a comprehensive plan to ensure that these trees reach maturity (part d) and how this will be enforced by the local authority.

This relates to CC8 of SP1 – Tree Planting and Protection.

Aylesham Parish Council welcomes the commitment to planting larger numbers of trees but feels this must come with a long-term solution to maintaining the trees. Dover District Council must also commit to the full 2025 future homes standard now.

Aylesham Parish Council welcomes the addition and enhancement of open spaces and play areas. However, there are two points to note in the IDP: why would S106 monies from Aylesham be spent upgrading play areas in Nonington?; and play areas and open spaces are last to be delivered in developments – this must not happen in the future.

Aylesham Parish Council is identified as “Delivery Partners” on a number of projects due to be delivered: we have not been consulted on this prior to the Regulation 19 document being released.

The HRA[1] suggests that AYL003 – Land South of Aylesham is “high” suitability for the European Golden Plover, and so all measures must be taken to ensure this SPA protected bird species is still able to migrate and flourish in the area. SAP 25 (mixed use employment) is considered “moderate”.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Local Plan Consultation Point

SAP24 - Land to the South of Aylesham (AYL003)

Rep ID

SDLP427

Rep Status

Processed

Consultee ID

1331623

Consultee Full Name

Tracey Pitcher

Consultee Company / Organisation

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Increased traffic, infrastructure, public transport, rural nature, sewage and water supply
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Not to build anymore houses in this area, this area is already overstretched with not enough infrastructure done after the last lot of housing
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)
Rep ID	SDLP414
Rep Status	Processed
Consultee ID	1331607
Consultee Full Name	Mr Peter Sutcliffe

Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Land to the South of Aylesham - SAP 24 - 640 Houses
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I believe these plans are not compliant as there seems to be no agreement with the neighbouring Canterbury City Council who are also planning 420 houses on land adjoining the area where Dover District Council have planned their 640 houses ! This will be completely unsustainable.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	I believe Dover DC needs to consider the sustainability of increasing the size of Aylesham further when the new development has already put a strain on existing public services, road infrastructure & our rural environment.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I believe that people who have lived in this area all of their lives & who's lives will be hugely effected by these developments have a right to have their voices heard.
Include files	
Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)
Rep ID	SDLP263
Rep Status	Processed
Consultee ID	1331383
Consultee Full Name	Mrs

	Katie Miller
Consultee Company / Organisation	Kent Downs AONB Unit
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	As recognised in the policy, the proximity of the site and scale of proposals means the allocation has the potential to impact on the setting of the Kent Downs AONB to the west, which, at its closest, would be approximately 500m from the AONB boundary. The inclusion of criterion (I) to manage impacts on the AONB is therefore supported.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)
Rep ID	SDLP675
Rep Status	Processed
Consultee ID	1221958

Consultee Full Name	Ms Bridget Fox
Consultee Company / Organisation	The Woodland Trust
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24 - Land to the South of Aylesham (AYL003)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The Woodland Trust objects to ancient woodland areas being included in sites allocated as suitable for development. This site allocation includes Ackholt Wood ASNW (Grid reference: TR23725145),</p> <p>The National Planning Policy Framework (NPPF) (paragraph 180c) states: "When determining planning applications, local planning authorities should apply the following principles: c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists".</p> <p>We recognise the intense pressure to identify and bring forward new sites for housing and employment uses. This pressure makes it all the more important that vital protections for ancient woodland and veteran trees are upheld.</p> <p>Areas of natural woodland, in particular ancient woodland, are vulnerable to pollution, encroachment from development, and habitat fragmentation. It is important that any development is located and designed to avoid damaging ancient woodland, providing buffers for designated sites and protecting connectivity between wildlife habitats.</p> <p>Further information is available in the Trust's <i>Planners' Manual for ancient woodland</i> (2019).</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>We recommend removing this site allocation from the plan unless Ackholt Wood ASNW (Grid reference: TR23725145) can be excluded and/or a substantial buffer provided, in order to comply with the NPPF protection for ancient woodland.</p> <p>We note the proposal for a minimum 15m buffer in para k) but would ask for at least a 20m buffer.</p> <p>Where development sites are adjacent to ancient woodland, we recommend that as a precautionary principle, a minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice. A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	planners-manual-for-ancient-woodland.pdf (1)
Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)
Rep ID	SDLP494
Rep Status	Processed
Consultee ID	1259309
Consultee Full Name	Mr Peter Jull
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Monitoring & Review
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The plan was compliant until the day before the Regulation 19 consultation was authorised Canterbury City Council published their Regulation 18 consultation including significant development adjacent to the authority boundary at Aylesham.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	If this proceeds it makes some of the conditions proposed for SAP24 irrelevant and the reasons for not including proposed development north of Aylesham outdated. There needs to be significant consultation with Canterbury City Council on the future of Aylesham to ensure the provision of employment land, retail etc. in line with a masterplan that provides effective local planning.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	By the time Public Examination takes place, Canterbury's local plan will have progressed to the point that comments need to be updated/
Include files	
Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)
Rep ID	SDLP655
Rep Status	Processed
Consultee ID	1265784
Consultee Full Name	Miss Clare Delf
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 24
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Comments</p> <p>I would like to object to the Dover District Council Local Plan SAP24 Aylesham on the basis that it is not "Sound".</p> <p>The Local Plan has made a considerable number of statements. SP3 Page 36 for instance regarding Aylesham states that <i>Developments will be at a more limited scale, compatible with the more limited job opportunities, shops and services. It goes on to say that - Development which results in disproportionate growth to any of the Districts settlements which cannot be supported by the necessary infrastructure and or services or which would result in a loss of services and facilities which are considered to be key to supporting local communities will be resisted.</i></p> <p>Yet looking at the Local Plan for the area where I live it is proposed to increase the size of the village of Aylesham with proposal to build a further 650 house in addition to the 1340 already approved. This is disproportionate growth for Aylesham and cannot be supported by the infrastructure yet Dover District Council is doing the opposite of resisting this development.</p>

Dover District Council states that it is the policy to provide sustainable employment in the area where people live in order to minimise travel. In the plans the area of Snowdown Colliery is given as a potential site for employment of up to 500 people. It is stated Dover District Council intend to “*Work with local partners to enable and explore all opportunities for the redevelopment of the vacant Snowdown Colliery site. Ideas include the potential delivery of Snowdown Park to create an environmentally-friendly hub for start-up businesses and artisan producers, as well as an international centre for research and development into the health and welfare of the honey bee*”.

In fact this site is private property in private ownership, whose owner who has only one tenant - the British Coal Board. It is not a “vacant site”. It is not owned by Dover District Council.

We have been informed there are no plans by the owner to change the tenant so there is no evidence that Dover District Council can claim this is a “vacant site”. There are no plans for any employment opportunities on this site, and no financial backing for development of employment.

The plans for an International centre for research into bee health seems to have been an aspiration rather than a commitment to a tangible reality. The current owner has no plans to change the tenant. If this situation were to change, and it is not expected to do so in the foreseeable future, there are also the potential downsides to developing a former coal mine which will present considerable challenges due to the continued presence of existing underground mine workings and Grade 2 listed buildings.

For any developer this will add considerably to the cost of any redevelopment. For any potential business owner, in addition to the higher cost of rental space as the developer seeks to maximise their profits, the cost of running a business in a rural location will be heavily impacted by transport costs which will add to the carbon footprint of the business.

Therefore the inclusion of Snowdown Colliery in the list of potential areas for employment is an attempt to conflate the number of employment opportunity sites and job numbers rather than a true picture of what is available or will be available in the future. It is not a true picture of employment opportunities available in the Aylesham area at present or in the future.

The consequences of the additional housing proposed at Aylesham will be the unofficial formation of a mini town at Aylesham village, without any consideration for increased infrastructure or facilities. The in progress and planned housing will potentially grow the population from 5,000 in 2018 to 25,000 by 2030. The current expanding population has already stretched the existing infrastructure beyond what can be sustained.

The current medical centre is already working at maximum capacity and yet there does not appear to be any provision to increase capacity for medical care.

There is a lack of provision of nursery places and amenities for young people. Cultural amenities are also lacking. Despite the large number of houses already built and sold by the developers, the people of Aylesham have not seen significant enhancement of the amenities, services, retail or entertainment opportunities.

There is no secondary school in Aylesham with the result that there will be increased traffic on roads to Canterbury, Sandwich, Ramsgate, Deal and Dover with children being taken to school by car. Kent County Council has already announced it is cutting funding for almost all of its bus services and this will impact public and school bus services. In consequence more journeys will be by car. Dover District Council's stated aim is to *build houses where the need for travel for employment and education are reduced*. The plan does not meet this stated aim.

The Garden Village design model includes the statement “*should be designed to provide affordable homes close to employment*”. The number of houses proposed vastly exceeds the realistic potential for increase in employment in Aylesham.

The NPPF SECTION 9 paragraph 106 states Planning policies should

a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;

So how does Dover District Council show the proportionate evidence of where the extra 20,000 people in Aylesham will work and how they will travel to this work or where their children will be educated, where they will shop and where they will participate in leisure activities. No evidence has been produced on scenarios for potential travel routes and the numbers likely to be travelling by different modes and routes. We may speculate that some may choose to travel by train. It should be noted that there is only one accessible platform at Aylesham rail station. The platform for any return journeys from Canterbury or onward travel to Dover is inaccessible for anyone unable to climb the stairs. However the

vast majority will most probably choose to travel by car daily to and from Canterbury, Dover, Ramsgate, Deal or Sandwich with additional journeys to collect school children where the bus service does not exist or is not funded. The report by Sustrans on the cycling and walking opportunities for Aylesham, whilst welcomed, does not reflect the reality of most peoples daily lives, where the speed of travel to and from work, and the safety of their children's journey to and from school takes priority. On the small country roads in this area of Kent, cyclists contend with blind corners and speeding car motorists for most of their journeys, not to mention the small army of delivery drivers and tradesmens vans aiming to meet their latest deadline and of necessity travelling as fast as possible. How does this Local Plan meet the Dover District Council stated aim that *new developments should reduce the dominance of cars*? The answer is that it does not meet the aim.

In the plans we see no evidence that the Dover District Council has assessed the impact of the additional housing on our area with regard to the increase in traffic from Aylesham due to the lack of employment and secondary education in Aylesham. We see no evidence that there is any proposed increase in infrastructure and support services such as schools, hospitals and doctors surgeries to meet the requirements of an additional 20,000 people. We see no evidence that the Dover District Council Local Plan will address the lack of facilities, infrastructure and amenities in Aylesham for the current residents and the 20,000 new residents

In addition to the houses proposed at Aylesham there are also proposals by Canterbury City Council to allow the building of 420 houses on land near Womenswold, south of Aylesham. This development would adjoin the proposed extra 650 houses proposed by Dover District Council. The plan does not seem to meet the requirement for co-operation with other authorities if you consider the extent of the housing proposed by Canterbury City Council right up to their boundary with 3200 houses between Adisham and Aylesham. This is a total of 3620 houses proposed by Canterbury City Council almost adjacent to the Dover District Council's proposed and existing new developments for Aylesham. Where is the co-operation between these councils concerning the area on the boundary of Canterbury City Council and Dover District Council at Aylesham. There is no evidence in the local plan that Dover District Council has taken account of the impact of Canterbury City Council's Local plan, on the existing communities in this area. Their plans seem to overlap but the Local Plans do not include sufficient information on how they will work together effectively to mitigate the massive impact of the combined numbers of additional houses in such a rural area.

This is not a plan that will meet the requirements for sustainability and the social, economic and environmental costs of this unsustainable plan will fall predominantly on the residents of Aylesham and the surrounding villages.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)
Rep ID	SDLP546
Rep Status	Processed
Consultee ID	1267622
Consultee Full Name	Rosalind Cox
Consultee Company / Organisation	Womenswold Residents
Agent Full Name	Rosalind Cox
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Land to the South of Aylesham
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC note: consultee email for more information on the membership of Womenswold Residents</p> <p>I think this plan should be scrapped because:-</p> <ol style="list-style-type: none"> 1. the land proposed for this development should be for agriculture ONLY and would not be suitable for development of an enormous housing estate. Brownfield sites are available and could accommodate housing. 2. increased traffic in this area of Outstanding Natural Beauty would be unsustainable and there is no public transport whereas the Colliery at Snowdown would be far more suitable for limited housing being next to a station. The Adisham Road is already under pressure and would not be able to sustain increased traffic volumes from thousands of houses. 3. Stress on public services in an area already at its peak. There are insufficient shops, doctors, dentists and schools 4. Sewage and Water Supplies - we are already in a 'Water Stressed Area' - increased sewage into a system already unable to cope with water companies continuing to dump sewage into our seas. 5. The loss of wild flower meadows, natural woodlands and farmland would be a travesty
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will	That it be scrapped and replaced with a plan that either uses brownfield sites or does not expose the local community and area to pressures it cannot withstand; loss of wild flower meadows, natural woodlands and farmland would be a travesty

make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)
Rep ID	SDLP862
Rep Status	Processed
Consultee ID	1268408
Consultee Full Name	Mrs Jan Gray
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24 4.200, 4.201,4.203,4.204
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	This land has had some work on pipes for the sewage system. It is not effective for the current number of houses as there is a regular sewage stench coming from the corner in your development plan for morehousing. There are no places for any children who would move in to this development locally in primary schools. There will be no transport by the time this is built for children to be able to go to secondary schools . None of this housing will be financially achievable by local people or their extended families. The prospective buyers for these homes can only be the cash rich or business purchasers who can avoid many taxes to create income from rents that are unaffordable to local people. There is no infrastructure proposed for this section of the New Dormitory Town encompassing and extending both Aylesham and Adisham. No supermarket, no youth centre, no police, no focal point where communities can meet. No accomodation whatsoever for safeguarding the community. The ability of the land to absorb heavy rainfall is compromised, the ability of the land to absorb CO2 emmissions is compromised, the ability of the land to grow food for our local people is removed entirely. We are in a cost of living and coming into an availability of purchasing food for our whole population crisis

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Build on brownfield sites. build to a good sustainable standard ie passive solar heating, heat pumps etc so that the tenants of the landlords the houses are sold to are warm without draughts and with a low carbon cost to heat. Properly update the water and sewage systems to cope with the massive extra load on systems that are failing with the current load. Put in protections so that our rivers and our seas are no longer discharging fecal matter into our local rivers and the channel where so many like to swim. build a school for our teenagers so poor families don't have to struggle to pay £450 for each child each year for the privilege of going to a secular state school, then being terrified that your children can't get transport to the school anyway. Your planning has a role in the educational and health comprehensive failure for SEND children and along with them secondary school children in your villages, but all this (8k in total) extra housing without any of the vital infrastructure, will make this place like a ghetto.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	This would make the consultation process more accessible as a reasonable adjustment.
Include files	
Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)
Rep ID	SDLP849
Rep Status	Processed
Consultee ID	1330565
Consultee Full Name	Miss Jenna Murray
Consultee Company / Organisation	Carter Jonas
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy SAP24- Land to the South of Aylesham (AYL003)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	These representations are submitted on behalf of Axis Land Partnerships ('Axis') to the Regulation 19 Submission Local Plan ('the Draft Plan'). Since the Regulation 18 stage, Axis have been appointed by the landowners of the site to promote the site through the remaining stages of the Local Plan. As a land promotion and development company, Axis is experienced in delivering large strategic housing sites.

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

We confirm that Axis considers the Draft Plan to be legally compliant. However, in order for draft policy reference SAP24 to be considered sound, Axis request that the following comments and/or amendments are taken into account.

Figure 4.6 Land to the South of Aylesham- Indicative Development Strategy (Policy SAP24), Page 157: This figure illustrates the Land to the South of Aylesham strategic site allocation area. However, we note that there is an error as the site known as the 'Aylesham Development Area' which is allocated for employment use under draft Policy SAP25 has been included within this figure. As this site does not form part of draft Policy SAP24, in order for this policy to be considered sound, Axis request that the area shaded in purple labelled 'Employment Allocation' is removed from Figure 4.6 so that this accurately reflects the strategic site allocation policy area. Accordingly, it would not be effective to include this employment site within the SAP24 policy area as it would be undeliverable as part of this allocation.

As part of the submitted Dover Local Plan Regulation 18 representations, we successfully demonstrated that the site is able to accommodate circa 640 new dwellings. We therefore support draft Policy SAP24's allocation to deliver an estimated 640 new homes over the Plan period to 2040. The Government's objective to significantly boost the supply of new homes is supported by the National Planning Policy Framework (NPPF). The NPPF notes that a sufficient amount and variety of land should come forward where it is needed and that this should be underpinned by the local housing need assessment. An allocation for 640 new homes on this site would significantly contribute to the District's need for 10,998 dwellings over the new Local Plan period to 2040. Axis's Masterplan for the site demonstrates that the 640 homes can be accommodated on the site and the Vision Document has been submitted in support of these representations.

The provision of 10 permanent gypsy and traveller pitches on the land to the north of Snowdown Caravan Site has been removed from the Draft Plan. The landowners submitted Dover Local Plan Regulation 18 representations did not support this element of the proposed draft allocation due to the potential impacts on the amenity of the residents of the adjacent property and the Draft Plan supporting evidence base confirms that this site is in fact unsuitable to be taken forward to the next stage of assessment.

In terms of the detailed requirements of draft Policy SAP24:

- a) The provision of a wide mix of housing on this site has been carried forward from the Dover Local Plan Regulation 18 document and this is supported.
- b) The NPPF supports the preparation of design codes by landowners and developers in support of a planning application for sites that they wish to develop and that states that these documents should be used to guide decisions on applications in the absence of locally produced design guides or design codes. We support the use of design codes to be developed as part of, or to supplement, the masterplan for the site.
- c) Part C refers to 'employment opportunities' to be provided as part of the strategic site allocation. In error, accompanying Figure 4.6 which shows the 'Land to South of Aylesham' area has been drawn to also include the site boundary for draft Policy SAP25 (Aylesham Development Area) which is allocated for employment uses. This should be removed from Figure 4.6 as this does not accurately represent the SAP24 site allocation area. Draft Policy SAP25 refers to the "potential for this site to come forward in conjunction with the additional homes planned to the south of Aylesham to create sustainable employment opportunities". Given this proposed employment site is situated directly to the northeast of the site, the indicative development area for SAP24 is not allocated for employment uses as shown within Figure 4.6 or Table 4.4, and the 39.94 ha former Snowdown Colliery site to the southwest of the site is allocated for employment and tourism uses under draft Policy SAP26, we request that reference to "employment opportunities" is removed.

As set out in the landowners submitted Dover Local Plan Regulation 18 representations, given its size, the parcel of land to the east of Aylesham Road which sits within the developable area for Policy SAP24 could accommodate a community facility and a small convenience food store. Therefore, there would be incidental employment opportunities created by the non-residential uses associated with the site, rather than a designated employment area providing direct employment opportunities. Accordingly, it would not be justified to allocate this site for specific employment opportunities which would impact upon the deliverability of the site, and rather incidental employment opportunities created by any non-residential uses only will be provided, and for that reason draft Policy SAP24, Part C is unsound.

- d) The provision of open and informal open spaces for leisure and recreation across the site is supported.
- e) The development of the site to be well related to the existing settlement of Aylesham and respect the residential amenity of adjoining properties is supported. The location of future development within the District boundary, to the north and east of Ackholt Wood, along the Aylesham Road towards Snowdown Village and on the parcel of land to the east of Aylesham Road is also supported. Plan Ref: Site Location Plan (001) has been submitted alongside these representations. This plan shows the accurate site boundary for Land to the South of Aylesham and shows the precise location of the District boundary which runs along the west of the site.
- f) We support the provision of suitable access arrangements from Spinney Lane and Aylesham Road.

- g) We support points i-iv in relation to the wider strategic and local highway mitigation measures to be informed by a Transport Assessment. In terms of point iv, an assessment of the impact of the scheme on the A2/B2046 has been completed and this identified that the impacts were not significant. However, National Highways, who have responsibility for the junction, have not yet been consulted but will be in due course.
 - h) On and off-site sustainable transport measures including new and improved pedestrian links and cycle paths to connect the site with Snowdown Station and the services and facilities in Aylesham as well as public transport provision informed by a Travel Plan is supported.
 - i) Improvements to the Public Right of Way network to increase connectivity in the area is supported.
 - j) We support the protection and enhancement of heritage assets and their settings through appropriate mitigation measures and the submission of a Heritage Assessment and Archaeological Assessment.
 - k) We support the protection and enhancement of the area of ancient woodland as well as the submission of a tree survey and ecological survey in advance of a planning application being submitted for the site.
 - l) We support the use of a Landscape and Visual Impact Assessment to inform both the layout of the development and the detailed provision of the landscape buffer.
 - m) A Preliminary Ecological Assessment has already been carried out on site and this will be used to inform any development proposals coming forward on the site. We therefore support the instruction of appropriate species and habitat surveys to be carried out prior to the determination of a planning application and to help inform the proposed layout and design of future proposals.
 - n) We support the submission of a Flood Risk Assessment to inform the application of the sequential approach to the layout of the site.
 - o) We support the carrying out of a wintering bird survey in advance of a planning application being submitted for the site.
 - p) We support the integration of communications infrastructure to facilitate home working, the phased occupation of the development to align with the delivery of sewage infrastructure and the planning of the site layout to ensure future access to existing water and wastewater infrastructure for maintenance and upsizing purposes.
 - q) Part Q refers to financial contributions towards the required off-site infrastructure and provides a non-exhaustive list of potential contributions. The NPPF notes that planning obligations must only be sought where they meet all of the following three tests: a) necessary to make the development acceptable in planning terms; b) directly related to the development; and c) fairly and reasonable related in scale and kind to the development. We consider that any requested contributions need to be specific, relevant and appropriate to the proposed development therefore Part Q of Policy SAP24 is not justified and is considered to be unsound.
- We also note that Part Q refers to the delivery of required off-site infrastructure "in accordance with Strategic Policy 8". However, this policy relates to 'Dover Town Centre' rather than infrastructure contributions. We consider that Strategic Policy 8 has been referred to in error, and the correct policy reference here is 'Strategic Policy 11- Infrastructure and Developer Contributions'.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Figure 4.6 Land to the South of Aylesham- Indicative Development Strategy (Policy SAP24), Page 157: This figure illustrates the Land to the South of Aylesham strategic site allocation area. However, we note that there is an error as the site known as the 'Aylesham Development Area' which is allocated for employment use under draft Policy SAP25 has been included within this figure. As this site does not form part of draft Policy SAP24, in order for this policy to be considered sound, Axis request that the area shaded in purple labelled 'Employment Allocation' is removed from Figure 4.6 so that this accurately reflects the strategic site allocation policy area. Accordingly, it would not be effective to include this employment site within the SAP24 policy area as it would be undeliverable as part of this allocation.

Part C of draft Policy SAP24 refers to 'employment opportunities' to be provided as part of the strategic site allocation. In error, accompanying Figure 4.6 which shows the 'Land to South of Aylesham' area has been drawn to also include the site boundary for draft Policy SAP25 (Aylesham Development Area) which is allocated for employment uses. This should be removed from Figure 4.6 as this does not accurately represent the SAP24 site allocation area. Draft Policy SAP25 refers to the "potential for this site to come forward in conjunction with the additional homes planned to the south of Aylesham to create sustainable employment opportunities". Given this proposed employment site is situated directly to the northeast of the site, the indicative development area for SAP24 is not allocated for employment uses as shown within Figure 4.6 or Table 4.4, and the 39.94 ha former Snowdown Colliery site to the southwest of the site is allocated for employment and tourism uses under draft Policy SAP26, we request that reference to "employment opportunities" is removed.

As set out in the landowners submitted Dover Local Plan Regulation 18 representations, given its size, the parcel of land to the east of Aylesham Road which sits within the developable area for Policy SAP24 could accommodate a community facility and a small convenience food store. Therefore, there would be incidental employment opportunities created by the non-residential uses associated with the site, rather than a designated employment area providing direct employment opportunities. Accordingly, it would not be justified to allocate this site for specific

	<p>employment opportunities which would impact upon the deliverability of the site, and rather incidental employment opportunities created by any non-residential uses only will be provided, and for that reason draft Policy SAP24, Part C is unsound.</p> <p>Suggested wording: Removal of “<i>Employment opportunities</i>”</p> <p>Part Q refers to financial contributions towards the required off-site infrastructure and provides a non-exhaustive list of potential contributions. The NPPF notes that planning obligations must only be sought where they meet all of the following three tests: a) necessary to make the development acceptable in planning terms; b) directly related to the development; and c) fairly and reasonable related in scale and kind to the development. We consider that any requested contributions need to be specific, relevant and appropriate to the proposed development therefore Part Q of Policy SAP24 is not justified and is considered to be unsound.</p> <p>Suggested wording: The addition of the following sentence to the end of Part Q “<i>It is acknowledged that such contributions will not always be suitable and where this is demonstrated through the submission of viability evidence, the Council will consider flexibility to ensure the viability and deliverability of the site</i>”.</p> <p>We also note that Part Q refers to the delivery of required off-site infrastructure “in accordance with Strategic Policy 8”. However, this policy relates to ‘Dover Town Centre’ rather than infrastructure contributions. We consider that Strategic Policy 8 has been referred to in error, and the correct policy reference here is ‘Strategic Policy 11- Infrastructure and Developer Contributions’.</p> <p>Suggested wording: Replace “<i>Strategic Policy 8</i>” with “<i>Strategic Policy 11</i>”</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected “yes” to the question above.	Policy SAP24 is one of the draft Plan's major strategic housing allocations, with up to 640 new homes to be delivered on this site. Given the importance of this allocation in contributing to the District meeting its need for 10,998 dwellings over the new Local Plan period we consider it necessary to participate in the oral part of the examination in order to present key evidence in support of this allocation.
Include files	Aylesham South - Vision Document.pdf 423-001-01 - Site Location Plan.pdf
Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)
Rep ID	SDLP505
Rep Status	Processed
Consultee ID	1330820
Consultee Full Name	Mr Adrian Bennett
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24-Land to the South of Aylesham (AYL003)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is ‘unsound’, on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The proposed development is on the boundary of Canterbury where Canterbury are also planning to build housing along with another development to the east of Aylesham, making a combined new 4600 homes. A proposed site for 500 houses was dropped because of the effect on existing road infrastructure, namely the B2046.</p> <p>The B2046 which separates the two councils is the main road that AYL003 will need to be used to access any new housing and it is inconsistent to say that it can't support 500 houses but can 4600. The road has had many serious accidents in the past and bottlenecks at the Wingham end. Lorries are constantly having to mount the pavement to continue their journey. There is housing on both sides of the road at Wingham and not capable of widening.</p> <p>All the sites are greenfield and any development would materially change the nature of the downs.</p> <p>The development does not have the support of the local community.</p> <p>Aylesham is amongst the most deprived villages, with lack of facilities for the existing residents. It has seen substantial new developments without any meaningful increase in facilities.</p> <p>The local Parish Councillor advised that consultation between the two councils had not to his knowledge taken place.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Either remove this from the plan entirely or provide improved travel, health and welfare, education, and environment improvements prior to the start of development. The council do have some allocated funding already available for these purposes.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)
Rep ID	SDLP589
Rep Status	Processed
Consultee ID	1331709
Consultee Full Name	Ben Pridgeon
Consultee Company / Organisation	Emmanuel College
Agent Full Name	Ben Pridgeon
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy SAP24 (Land to south of Aylesham)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	We object to an over-reliance of the Plan to deliver dwellings in the medium and long term parts of the Plan (including at Aylesham). There appears to be little delivery of dwellings in the early part of the Plan period and this will not make a positive contribution to the Council's housing land supply. The strategic, urban extensions will take time to deliver due to the requirement for a masterplan and prolonged planning process. This will not aid 'upfront' delivery for dwellings in the district. Please see representations for further information
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The lack of housing delivery in the early part of the Plan period should be rectified by allocating new, smaller sites for development in appropriate locations in the district. This includes development at Ash, for which we have promoted a site which is cognisant with its classification as a 'Local Centre'. Please see representations for further information
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	To contribute to the assessment of housing demand and potential requirement to assess when housing across the deistrict would be delivered.
Include files	221208-Representation to Local Plan.pdf (2) 221206-Site and ownership plan.pdf (2) 221206-EAS-Access and drainage assessment.pdf (2)
Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)
Rep ID	SDLP725
Rep Status	Processed
Consultee ID	1331804
Consultee Full Name	MR Keith Berry

Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24 - Land to the South of Aylesham (AYL003) All of this plan
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Rewilding: The government has stated that rewilding is essential for preserving Wildlife and their Habitat especially in Rural areas and these additional 640+ Houses would have a devastating effect on this type of conservation.</p> <p>Waste & Sewage: The additional Sewage & Waste from this development will over whelm the existing Infrastructure which has seen the Water Company that own and run them fined for releasing current already high volumes of waste into the local Rivers and Coastline causing long term damage to Local Shellfish industry as well as all other Marine as well as the Health implications to people using the Sea and Waterways.</p> <p>Sustainable & Self sufficient Farming: If the Current War in the Ukraine has taught Us anything, it is that We must become less reliant on Food Imports and the need to rely on more Home grown produce and not to be held to Ransom by other Countries and to that end We need to preserve as much Farm and Countryside Land as possible and stop Building massive Housing developments over them. Brownfill sites MUST take priority over Countryside because once its gone its gone forever and our options for feeding Ourselves will be gone with it.</p> <p>Additional Traffic & Air Pollution: The Roads and Country Lanes in this area are not designed to cope with the huge additional volume of Traffic a development of this size will bring, as well as the lanes being very narrow and difficult for Vehicles to pass they will often freeze in Winter and because the trees shield the road from any Sunlight stopping them from Thawing out and they stay Icy for Days which has led to many accidents also the roads and lanes are very potholed which will only increase with additional wear and tear. Air pollution from all these extra cars will also have a negative effect on the local Environment.</p> <p>Job Opportunities: Aylesham already has high unemployment so by over populating the area with another Large Housing development would not only make getting a job for locals impossible but also for anybody moving into the area.</p> <p>Strain on the Power Grid: The Government is telling us to cut back on Electricity consumption so as to prevent potential necessary Power Cuts because of the current Energy crisis so a development of this scale would put a massive strain on what is already a Power Grid at breaking point and when You factor in EVs being charged 24/7 at Home and at allocated Charging points then We are absolutely Guaranteed to have Power Cuts.</p> <p>Light Pollution: Our Area is an "Dark Sky Zone" and according to the The International Dark Sky Association these areas should have very little to No light Pollution so as to be able to see Star Systems however this development would add a massive amount of light pollution negating the existing "Dark Sky Zone" status We currently have.</p> <p>Public Transport: There is very Pulic Transport Infrastructure in this Area, other than the Regular Trains to London and Dover there is also a very few Buses and they are infrequent.</p> <p>Healthcare: Aylesham Medical Practice is the only Doctors Surgery in the Area and getting an appointment now is difficult enough at present but with a massive influx of extra residents this will have a detrimental effect on those needing to see a Doctor quickly</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness	I suggest that Aylesham plan not go ahead as it's detrimental to the local area there no sound logic to building this amount of house in this area it's not needed or wanted by local people.

matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)
Rep ID	SDLP510
Rep Status	Processed
Consultee ID	1331729
Consultee Full Name	Mr Nicholas McHard
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 24 - Land to the South of Aylsham (AYL003)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The plan seems vague and uncertain on vital and necessary infrastructural improvements which would be required in order for the proposed housing expansion to be both sustainable and operable given current infrastructural limitations. We object most strongly to the above proposed further expansion of housing in the Aylsham area for the following reasons: <ul style="list-style-type: none"> • The area is needed for higher priority agricultural use given the lack of such valuable land at a local and national level; • There is insufficient water supply in the Esat Kent area which has already been categorised as 'water stressed';

	<ul style="list-style-type: none"> • The resulting traffic increase will be reach dangerous levels on the local roads, especially the B2046 which already has a poor accident record; • The increase in traffic and service provision will further increase local pollution; • The sewage system is insufficient already to cope with current demand evidenced by the regular and increasing overflows/releases into the sea; • The current infrastructure (doctors/schools/dentists/shops/etc) is already unable to cope with demand and any further increase can only exacerbate the current difficulties; • Given the poor provision of public transport car usage would inevitably be increased at a time which would clearly be in clear contradiction with national policy.
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The proposed new expansion should be abandoned given the extent that the area has already been developed which has already placed an unacceptable strain and deficiency in road, school, medical and other services which are unable to cope with the additional traffic and footfall.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>Comments on Dover District Local Plan.docx</p>
<p>Local Plan Consultation Point</p>	<p>SAP24 - Land to the South of Aylesham (AYL003)</p>
<p>Rep ID</p>	<p>SDLP677</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331814</p>
<p>Consultee Full Name</p>	<p>Jane Elliott</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>Land south of Aylesham</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified</p>

	Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The plan does not support local opinion and lives. The road structures are not able to support the level of vehicles associated with such a large development. Utilities, such as water, sewage and drainage are insufficient. This land is greenfield, and government has agreed that building on greenfield sites should be readdressed. Living locally I can advise that the level of new builds is very detrimental to heritage villages and roads which cannot cope with current levels of traffic. Land should be kept for food production.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The admission of secondary schools, local transport and other essential services such as doctors, shops.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)
Rep ID	SDLP578
Rep Status	Processed
Consultee ID	1331776
Consultee Full Name	Mrs Heather Green
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24, SAP25, SAP26, SAP27, SAP17, SAP18

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Road infrastructure will not sustain the extra housing in the area. B2046 already had a fatality in 2022, and several big accidents where it is joined by Spinney Lane, Dorman Avenue North, and the Industrial Estate. B2046 regularly closed at Wingham end causing tailbacks with queues of traffic polluting the atmosphere. Diversions through country lanes happen several times a year and cause damage to local flora and fauna on the one track country lanes leading to local towns.</p> <p>B2046 already being used by heavier lorries which are causing crumbling to the verges.</p> <p>There is no secondary school in the area so children have to travel to Dover, Sandwich and Canterbury. Bus services have recently been curtailed resulting in overcrowding, and young vulnerable children being left stranded waiting an hour or more for the next bus, or having to be collected when parents finish work.</p> <p>Train services are sporadic and the current amount of secondary school age children in the area cannot be allocated local school places.</p> <p>Sewerage, gas, broadband are nearing capacity, with regular broadband outages and lack of any FFTP in the area with the current number of houses.</p> <p>Dorman Avenue building work is still not complete, and within that plan there was provision for extra shops. Current shops are high cost and low volume, thus travel 10-15 miles to nearest superstore means more vehicles on inadequate roads.</p> <p>Local doctor's surgeries are also at capacity and many wait weeks for appointments. The local hospitals have been at bed capacity for months, with people waiting in A&E for beds overnight, sometimes for 48 hours before being treated, or going for surgery.</p> <p>The Ukraine war has shown that greenfield areas are much needed for crops so that the UK can be self-sufficient rather than relying on imports. Many local farmers have increased crop harvesting already.</p> <p>The Covid-19 pandemic has resulted in increased mental health issues, and the spread of the virus has been shown to increase in more densely housed areas, where there are limited garden spaces to breathe fresh air and exercise. Along with limited parking causing problems in the recent estates at Dorman Avenue, and assuming an extra minimum of 1 car per household the increase of cars especially at peak times on the B2046 will cause more accidents and hold ups.</p> <p>For those travelling to Sandwich or Thanet, the A257 is inadequate in terms of the junctions leading onto it. Already fatalities and severe accidents involving the use of air ambulances this year deem this road unsuitable for the current traffic levels. The Sandwich area developments will cause more disruption on these junctions, and the increase to delays on this road will cause more traffic pollution.</p> <p>The new Canterbury City Council plan has not been discussed with DDC and thus contravenes the Duty To Co-operate with both councils. Together with 640 houses in Aylesham, 3200 in the adjoining Cooting Farm Town, and another 500-800 also in close proximity, the infrastructure and the amenities cannot cope with these plans.</p> <p>The Government has recently abolished the 300,000 new homes for the next year and that was the figure on which this plan was based</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness	<p>Government has just rescinded the 300,000 new housing level, and the levels in these plans need to be modified, meaning an urgent review of this plan should be commenced.</p> <p>Lack of consultation with CCC on their forthcoming plan including Cooting Farm Town which abutts the B2046 shows failure in Duty to Co-operate with neighbouring areas, and thus this plan should be put on hold with both councils meeting to discuss both plans and redesign a way forward that benefits both councils. The area cannot sustain either at present and with no discussions both plans have been launched at similar times without knowledge.</p> <p>Highways involvement in terms of upgrading the B2046, straightening the blind bends, installing roundabouts at dangerous junctions, plus the dualing of the A257 before the Sandwich housing areas are finalised, must take place. Both roads have had fatalities this year, and with a doubling of housing in the surrounding area, the road state must be revisited.</p>

<p>matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Local fauna relies on corridors away from businesses and housing and these have already been narrowed by previous recent housing in Dorman Avenue. Rare red kites, bats, and more nest and live in the area and these must be preserved, not eradicated by housing. A secondary school is required in the area, travel to and from other schools with inadequate/extortionate price bus and train services has to be revisited before considering the increase in housing. Local shops need to be varied and increased before any more housing. With only one Post Office in five local villages, the post office in Aylesham is already over-used and other village amenities and infrastructure must be revisited. FFTP broadband is essential now with over-use and will be impossible with new housing levels, The Government agrees to supply broadband to low income households, instead this will get worse.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP24 - Land to the South of Aylesham (AYL003)</p>
<p>Rep ID</p>	<p>SDLP617</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331790</p>
<p>Consultee Full Name</p>	<p>Julie Davies</p>
<p>Consultee Company / Organisation</p>	<p>CPRE Kent</p>
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP24</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified Effective Consistent with National Policy</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Not Applicable</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Not Applicable</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as</p>	<p>We have reservations about the allocation:</p> <ul style="list-style-type: none"> We are concerned that the proposed allocation represents overdevelopment at odds with the original 2005 masterplan for Aylesham. Specifically, we consider the expansion south of the village - beyond the established natural boundary purposely created along Spinney Road - will lead to the coalescence between the settlements of Aylesham and Snowdown, that had previously been resisted.

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

- We also share the concern of local residents and Aylesham parish council that, despite the significant growth of Aylesham over recent years, the public transport offering continues to fall woefully short of what should be being provided to such a sizable rural community. We therefore consider any further allocation at Aylesham can only occur after the long-promised improvements to Aylesham's bus and rail services have been provided. Significantly, this includes the promised regular and reliable service to Dover town, which still does not exist.
- We also note and share the local community's concerns regarding the need for further social infrastructure to be included as part of this development's offering. This includes improved healthcare, supermarket provision and a pub/restaurant, all of which Aylesham continues to lack. Failure to provide such, at an early stage of the development, risks car-dependency becoming ingrained as future residents are forced to rely on the private vehicles to reach these services elsewhere.
- The site is shown on the Post Agricultural Land Classification (England) on MAGIC as approximately 50% best and most versatile agricultural land (grades 1,2, and 3a) and the remainder grade 3b. We do not believe this significant constraint has been given the due regard necessary within the site selection process. As set out within CPRE's recent report "Building on our food security" in the past 12 years England has lost over 14,000 hectares of Grade 1 and 2 agricultural land to development, the equivalent to the productive loss of around 250,000 tonnes of vegetables. It also appears that this figure is increasing, with there being a 100-fold increase in 2022 from that built on in 2010. This loss cannot continue to be ignored which is why it remains our view the selection of this site is at odds with NPPF paragraph 174(b).
- There is an ancient woodland on the western edge. Ancient woodlands are a finite national resource and once an ancient woodland has been lost it cannot be immediately replaced as any new tree planting would not provide the range and variety of habitat that has grown up in association with the woodland over a 400-year period. Every effort needs to be made to avoid any loss of ancient woodland and we are concerned that by placing such a significant new population near the woodland clearly risks there being an adverse impact. Likewise, it is also recognised that domestic pets such as cats are predators and reduce wildlife populations.
- HELAA Appendix 3A: The site is given orange status and the overall landscape summary is: 'The development of this site would have an impact on the landscape and further assessment is required to demonstrate whether this can be mitigated.'
- HELAA Appendix 3B: The site is given orange status as 'Highways concerns have been identified in relation to access and/or highway impact and further assessment is required to demonstrate whether this can be mitigated.'

Until the further assessment of whether the impact on the landscape, including dark skies, and concerns about access and highway impact can be mitigated, the site should not be included as an allocation.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

CPRE Kent would wish to participate at the examination hearings to explore these issues further.

Include files	
Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)
Rep ID	SDLP648
Rep Status	Processed

Consultee ID	1331794
Consultee Full Name	MRS Patricia Berry
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24 640 HOUSE PROPOSED LAND SOUTH OF AYLESHAM
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Your appoveing to many houses be built you going above what central goverments figure asked for across the Dover area. Your going against the goverments rewilding by building over valuable farm land and countryside and destroying wildlife habitats your also allowing additional sewage pollution into local rivers and the sea . you do not have the infrastructure ie roads , schools, doctors, dentist and hospital.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	I feel you should be utilizing brown field site frist and for most NOT BUILDING ON VALUABLE FRAMLAND AND COUNTRYSIDE . You have alot of empty run down council prooperties that could be bought back to use. I feel you should be safe guarding and preserving the small villages and countryside within DOVER. Your not building for local people you drawing people in from London and other areas and selling the social housing to inner London councils for them to of load there excess council list people.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)

Rep ID	SDLP1312
Rep Status	Processed
Consultee ID	1252081
Consultee Full Name	Planning Department
Consultee Company / Organisation	Canterbury City Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Policy SAP24 in the Regulation 19 Dover District Local Plan allocates Land to the South of Aylesham for approximately 640 new homes together with employment opportunities and community facilities. The site borders the Canterbury District boundary and the draft Canterbury District Local Plan to 2045 (Regulation 18) allocates land adjacent to SAP24 for approximately 420 new homes and a new Country Park (Policy R20). It is critical that the site allocation policies in both Local Plans enable appropriate connectivity between the two sites, particularly in terms of sustainable transport and ecology. We consider that an amendment is required to Policy SAP24 to provide a basis to secure these connections, and that this is necessary to ensure the policy is effective and consistent with national policy, and is therefore sound.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)

Rep ID	SDLP826
Rep Status	Processed
Consultee ID	1331905
Consultee Full Name	Ms Jill Baker
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Development area - housing
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The plan to build houses in this area has not taken sufficient consideration of the area and its ability to support such an expansion. This is a greenfield area of outstanding natural beauty, and will destroy habitats and farmland. As we see prices rise in the shops, surely it would be better to consider farmland to be a very valuable resource and it should be protected as such.</p> <p>Kent is one of the driest areas of the country, and adding more housing to an area which is already suffering every summer with drought conditions, will only exacerbate the issue. Unless there are plans to include a water treatment plan or reservoir for the area, the burden will create a water shortage. The neighbouring village of Aylesham has already doubled in size, and there are further plans (Canterbury City Council) to create further extensions right next to this proposal. The provision of water supplies and capacity to deal with sewage will not be sustainable.</p> <p>The proposal, together with the Canterbury City Council one will create more traffic than the rural roads can cope with, both in the building phase and once the houses are occupied. Many of the roads in the area are single track or so narrow that only cars can pass safely. Are all the local roads going to be upgraded to be suitable, i.e. widened, streetlights, potholes filled, appropriate speed restrictions? No? Thought not. When the first expansions to Aylesham were commenced, part of the plan was to add the roundabout at the junction of the A260 to join the A2. This didn't happen until a couple of years later. It created chaos with the road system at the time - this development will make things worse. It will also create pollution and the production of greenhouse gasses at a time when the pressure is on to reduce global warming is counter intuitive.</p> <p>The local area of this proposed development already suffers from a shortage of available GP surgeries, dentists, secondary schools, buses, trains, supermarkets, and leisure facilities. I used to work in the GP surgery, so I speak from experience. I now work in the Kent & Canterbury Hospital. I can't stress enough how much the health services are overstretched in this area. The nearest secondary schools are in Dover, Sandwich and Canterbury, all of which are a bus ride away, and Stagecoach have recently reduced the bus services to the area. There are no buses at all through our village.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance	<p>This proposal (and the one by Canterbury City Council right next to it) should be substantially downsized or scrapped altogether.</p> <p>See text above in point 6 for the justification of why this level of development is unsustainable.</p>

with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)
Rep ID	SDLP797
Rep Status	Processed
Consultee ID	1331883
Consultee Full Name	Mr Michael Parker
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We have chosen to live in a rural area rather than an urban one and the proposed size of the new developments will totally change the character of our villages.</p> <p>In recent years the amount of traffic travelling through our village, including HGVs is incessant and is not related to the actual community but as a short cut between Aylesham through to Thanet. There are no footpaths through a significant part of the village with areas extremely narrow and there does not appear to be any consideration to control traffic flow through these areas. I understand a survey was carried out but this was done during lockdown and did not reflect the actual reality.</p> <p>There is already flooding on large areas of the roads through the village</p>

	We have no local services except for a primary school. There are no shops, buses, doctors etc in the village and traffic will increase to access these facilities in nearby towns
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)
Rep ID	SDLP991
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails	The County Council welcomes the inclusion of reference to the PROW network. (DDC note - these are extracts from full KCC rep)

to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)
Rep ID	SDLP1651
Rep Status	Processed
Consultee ID	1331235
Consultee Full Name	Rachel Thompson
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable

<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Not Applicable</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>SAP24 - Land to the South of Aylesham (AYL003)</p> <p>4.201. The SAP 24 area towards Snowdown is already widely used as an informal open space by a large proportion of Snowdown residents. This is because there are no formal open spaces within the Snowdown area. As a resident of Snowdown, I know that it is preferred to keep the open space informal so I would like to suggest that the strip of landscape buffer be extended down to the bridleway crossroad junction (Figure 4.6).</p> <p>AYL003 (e, f, j) Development on the site should be well related to the existing settlement of Aylesham and respect the residential amenity of adjoining properties.</p> <p>Does this development intend to join the village of Aylesham to the hamlet of Snowdown? This development needs to state whether SAP 24 intends to join the two as, to do so, has a great impact upon the residential amenity of adjoining properties in Snowdown. This intention not only affects day to day life of Snowdown residents such as myself but also impacts roads and access. More importantly, to join the village of Aylesham to Snowdown impacts the history and heritage of Snowdown itself.</p> <p>If it is not intended to join Aylesham to Snowdown, then some adjustments are necessary to ensure that Snowdown can continue with its separate identity. Again, the extension of the buffer zone between SAP 24 and Snowdown would allow this.</p> <p>From a transport access point of view, I understand the Spinney Lane access but am uncertain about Aylesham Road access. Thinking from an exit point of view, where would the Aylesham Road access be going to? I'm assuming this would be towards shops in Aylesham or towards the A2. If yes, can I suggest that Aylesham Road access points, if required at all, are not close to Snowdown. Then it will be clear for the transport user that travel towards Aylesham is the sensible route.</p> <p>Walking access to train stations could be towards Aylesham or Snowdown so can I suggest good walking paths to both.</p> <p>AYL003 (g) I would like to enquire about the improvements to the Holt Street/Aylesham Road Junction. It is well known that this spot regularly floods and any increase in traffic would need to provide a long term solution to the flooding. Having previously communicated with officials on the need to fix the flooding, I am interested to hear the proposed solution. Until now, it has always been a temporary clearing on silt build-up without a long term solution ever being suggested.</p> <p>Additionally, any work done in the area of the Holt Street/Aylesham Road Junction results in a traffic light system outside of my house. This is acceptable only for necessary repair and maintenance but any traffic initiatives resulting in idling traffic would not work on a permanent basis.</p> <p>On the subject of the Railway bridge at Snowdown. This spot is narrow and without a walkway on a road where cars travel at significant speeds. It is also a blind junction. This site is already dangerous for both my mother, who is blind, and my son, who has special needs when accessing the station to and from Dover. The increase of traffic to this spot would be hazardous. Similarly, I would need to see how pedestrian and cycle access is going to be improved without traffic idling measures.</p> <p>If you are to develop SAP 24 and wish for current residents to be satisfied, my personal conclusion is as follows.</p> <ul style="list-style-type: none"> • Widen the landscape buffer between Snowdown and SAP 24 so that Snowdown can retain its hamlet heritage and history. • Ensure walkways allow easy access to Snowdown but roads are designed so that Aylesham is the preferred access option for motorised vehicles. • The Holt Street/Aylesham Road spot, including the railway bridge, must address the following: <ul style="list-style-type: none"> • Pedestrian access • Cycle routes • The current hazardous railway station access • The regular flooding in this area • The Holt Street/Aylesham Road needs a solution that does not include a transport scheme that produces long-term traffic idleness. <p>Finally, using my knowledge, and assessment of the levels of deprivation, of the Aylesham area, can I suggest a significant proportion of the development be allocated to social housing. This will allow the families of the local population to stay in the area. Successful developments create happy communities.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s)</p>	<p>If you are to develop SAP 24 and wish for current residents to be satisfied, my personal conclusion is as follows.</p> <ul style="list-style-type: none"> • Widen the landscape buffer between Snowdown and SAP 24 so that Snowdown can retain its hamlet heritage and history.

<p>you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<ul style="list-style-type: none"> • Ensure walkways allow easy access to Snowdown but roads are designed so that Aylesham is the preferred access option for motorised vehicles. • The Holt Street/Aylesham Road spot, including the railway bridge, must address the following: <ul style="list-style-type: none"> • Pedestrian access • Cycle routes • The current hazardous railway station access • The regular flooding in this area • The Holt Street/Aylesham Road needs a solution that does not include a transport scheme that produces long-term traffic idleness. <p>Finally, using my knowledge, and assessment of the levels of deprivation, of the Aylesham area, can I suggest a significant proportion of the development be allocated to social housing. This will allow the families of the local population to stay in the area. Successful developments create happy communities.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP24 - Land to the South of Aylesham (AYL003)</p>
<p>Rep ID</p>	<p>SDLP1578</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1252218</p>
<p>Consultee Full Name</p>	<p>Cllr Linda Keen</p>
<p>Consultee Company / Organisation</p>	<p>DDC WARD - Aylesham, Eythorne and Shepherdswell</p>
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP24</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified Effective Consistent with National Policy</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Not Applicable</p>

<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Not Applicable</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>1. SAP24, AYL003 South Aylesham, 640 houses – I support the Parish Council's objection that this level of development is overbearing on the village (for reasons given below) and risks altering the nature of the community here, which has already seen approval for some 1300 houses. It goes far beyond the original master plan.</p> <p>2. SAP 27 (AYL001 policy SAP27), 9 houses – I support the opposition of the Parish Council to this because it would result in the loss of registered native woodland.</p> <p>3. Over the past few years, Aylesham has seen a vast amount of development, which has put considerable strain on local amenities such as local shops, local community and leisure facilities, highways infra-structure and medical services, which are currently inadequate, as outlined below.</p> <p>4. Transport and Highways infrastructure Bus services are totally inadequate – there is no evening service to anywhere, and no bus to Dover or Whitfield, despite a recent service showing that this is what most people want, and a promise from the local bus privatised company and Kent Council that it will provide a minibus dial-up service. There is no sign of the latter so far, despite many promises – and it will be inadequate for the numbers of existing and new houses. This means over reliance on cars, and isolation from those without their own transport. The train service does not cater for people with disabilities who cannot cross between the different platforms at both Aylesham and Snowdown Stations. The IDP identifies that “passenger numbers have risen significantly” and that Network Rail are looking to increase to half-hourly services – but there are no firm commitments. There is a need for second station entrances and DDA3 compliant access; improvements to car and cycle parking; improvements to pedestrian access; and more waiting bus shelters. There are no cycle tracks – and these are badly needed to other villages, Dover and Canterbury.</p> <p>Local roads are increasingly congested – there is a knock-on effect for Nonington and Wingham where increased traffic from Aylesham through the narrow road to Sandwich through Nonington and the B2046 to Wingham will make much worse already bad problems with speeding, and long queues at the B2046 junction at Wingham. Short of a new bypass for which there is no funding, nothing can be done to significantly improve these problems. Any future developments must include a plan to make significant upgrades to key routes such as Spinney Lane and B2046 (Adisham Road). Although this is mentioned in the IDP2, there are no firm commitments to immediate improvements.</p> <p>5. Local amenities – as the Parish Council explains in detail, given the recent and ongoing development of 1300 odd houses – are already grossly inadequate, with no local supermarket, insufficient community/leisure facilities, highways infra-structure and insufficient medical services. There is no coherent youth service provision, very poor shopping facilities, no local pub or restaurant, and limited sports and community facilities which have received only a limited amount of developer contributions so far, and which have resulted in little real addition to such facilities in the village. There is a lack of pre-school education provision, excessive demand on the local medical centre, no dentist, all of which contravenes 3.8 SP2 statement that ‘ new development is well served by services and facilities. The IDP identifies a need for increased sports hall facility for which the developers’ funds allocation has still not been spent. The IDP also mention a proposed community facility/ which has yet to materialise and on which the Parish Council says it has not been consulted. Moreover KCC closed the Youth club some years ago, and, despite the tremendous increase in families and young people already happening as a result of the existing new builds, there is no coherent strategy of funds for much greater youth service provision in the village.</p> <p>6. Rural Service Centre - this is Aylesham's official designation in the Dover Council Settlement hierarchy, level with the town of Sandwich. But, although both communities have equal weighting in the settlement hierarchy, they are not getting an equal weighting in housing development or in terms of investment. The Site Allocations refer to the district's “existing larger settlements of Dover, Deal and Sandwich” but in reality Aylesham is now likely to have a larger population than Sandwich. Aylesham is receiving 649 new homes (SAP24 and SAP27), whilst Sandwich has a proposed development of just over 200 homes.</p> <p>The Draft Local Plan proposes investment in Sandwich to improve the town and protect its heritage, plus a culture investment plan. THIS IS NOT HAPPENING IN AYLESHAM. This relates to SP3 – Housing Growth and SP10 – Sandwich Town Centre. The residents of Aylesham should also see their cultural capital widened and enriched in a similar extensive Draft Local Plan. Funding should be provided for organisations such as cinemas, museums, galleries etc that will help to enrich people's lives. In addition, funding should be made to include a substantial mining heritage centre to the site at SP26 which will provide much welcome additional employment on the old Colliery site. Only two of these buildings are currently listed – more should be listed, and adapted to new cultural uses, plus the provision of shops and other leisure/cultural facilities..</p> <p>7. According to Kent County Council's childcare sufficiency analysis, Aylesham currently has a significant deficit of 0-4 yr old childcare places, 5-11 yr old breakfast club places and 3 & 4 yr old extended entitlement places in nurseries. There needs to be FIRM commitment to SPECIFIC</p>

	<p>sites and PLANS to provide these increases in this vital early years service area. As the Parish Council says, the plan must go further than listing a whole host of possible “off-site” provisions to safeguard this vital sector.</p> <p>8. In relation to secondary school provision, Secondary school age children have to travel by bus or train to Dover, Deal and Sandwich schools. Often, these buses are overcrowded or full and so do not stop at all designated stops to pick up school children leaving them stranded before school. Recently, the 96A to Dover Christ Church Academy was planned to be cut from Stagecoach’s timetable. There should be a properly funded and specific commitment to improve school transport as the numbers of children increase, and the possible need for a new Secondary School in the Dover District should be located in Aylesham.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>For a rural settlement, a further 640 houses, on top of a recent development of 1,360, is too much.</p> <p>Whatever the final number approved, the following changes should be made</p> <ul style="list-style-type: none"> • The 9 houses (AYL001) should not be built, for the reasons given above, and the further 640 houses should be reduced in number – nothing in reality can be done about the problems of significantly increased traffic on the B2046 especially.. • Buses – funding MUST be provided for adequate bus services – new ones to Dover and the local villages, and also in the evenings, to reduce car use, and avoid isolation amongst the large numbers of residents without cars. • Both train stations should be immediately upgraded to ensure DDA3 compliance, with second entrances, and train services should be increased in frequency. • Cycle track provision - there is nothing at the moment at all. • Upgrades to Spinney Lane and the B2046, and more parking provision and better traffic management in the village itself. • Guaranteed investment in local services, including generic dentist provision (not just the special dentistry service provided at the moment), enhancements to the medical centre, identification of specific sites for additional community facilities such as shops, pubs/restaurants, a sports/leisure/community Centre (for which some funding already exists which should be spent immediately, and there should be more developer funding), - and museum, cinema, library (far too small) – and a new Youth Centre with a coherent programme of events and activities. • Equal provision on the same level as Sandwich (Aylesham will be bigger in terms of population) in relation to heritage and cultural resources, and other community facilities. • Education – specifically identified funds and plans to meet the needs identified above for early years education provision, more school buses, and the building of a new secondary school in Aylesham. <p>OTHERWISE, Aylesham will be reduced from a thriving community to nothing more than an enormous housing estate.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP24 - Land to the South of Aylesham (AYL003)</p>
<p>Rep ID</p>	<p>SDLP1617</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1267860</p>
<p>Consultee Full Name</p>	<p>Mr Guy Steward</p>

Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I am writing to OBJECT to further development around Aylesham, in particular the area between Aylesham and Snowdown (ie South Aylesham).</p> <p>I apologise for not using the approved planning portal, but I had problems engaging with it.</p> <p>My grounds for OBJECTING to proposed development in the South Aylesham area are:</p> <ol style="list-style-type: none"> 1. Destruction of productive farmland. This is a finite national resource required for food security. 2. Destruction of natural habitats. Field boundaries, hedges etc support wildlife. 3. Disturbance of wildlife. Habitat destruction will endanger wild animals, birds etc. 4. Effect on infrastructure in the area in particular roads: The local roads, especially the B2046, at certain times of the day are already at capacity. The South Aylesham area is served by narrow rural roads entirely unsuited to the traffic demands likely to be imposed by the development proposed. 5. Effect on services in Aylesham: Aylesham village centre is already busy for much of the day. It will not comfortably cope with extra traffic / people that will be generated by the proposed South Aylesham development. 6. Is there a genuine LOCAL NEED for all these extra houses? Or will it just draw people out of London? Those are my thoughts. There are probably many more reasons to OBJECT to further development around Aylesham which others will tell you about.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)
Rep ID	SDLP1537
Rep Status	Processed
Consultee ID	1271535
Consultee Full Name	Jean Swan
Consultee Company / Organisation	Adisham Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Adisham Parish council welcome the removal of 500 homes from DDC Draft Local Plan, however we have concerns over the proposal to build 640 houses linking Aylesham to Snowdown.</p> <p>Particular concerns: Traffic- There is already a considerable strain on local roads particularly on the B2046 Adisham to Aylesham and further on as it joins the A257 at Wingham. Further development in the area would see a significant increase to traffic. This applies to the minor roads and lanes that connect Adisham and Aylesham. It is very likely that Adisham will be used to bypass the major routes into cant A2. The B2046 has had an increase in traffic incidents some fatal.</p> <p>Public transport - Bus and train services are limited. There are no firm proposals to improve these services. Currently one school bus, 89b, operates. The bus travels from Aylesham to Adisham, by the time it gets to Adisham there is standing room only. Children from Adisham and Bekesbourne are not provided with a safe form transport at present, with more development assurances of safe transport must be in place.</p> <p>Adisham village has limited facilities/amenities and relies on Aylesham's local facilities. Recent building has increased the demand for these amenities. Medical services, leisure facilities and early years amenities need to be increased and improved to support further development.</p>

	(DDC note - this representation is an extract of Adisham PC full representation at SDLP1535)
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)
Rep ID	SDLP1456
Rep Status	Processed
Consultee ID	1330919
Consultee Full Name	Mrs Heather Twizell
Consultee Company / Organisation	Natural England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails	SAP24 – Land South of Aylesham (Estimated 640 new homes) We are pleased to see that all the advice given in our statutory Regulation 18 response has been followed for this strategic allocation, namely: • That advice is sought from the Kent Downs AONB Unit in progressing this

<p>to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>allocation and associated policy (The AONB Unit confirmed this to be the case during a meeting on 28th November 2022). • That the Masterplan and landscape mitigation be informed by a detailed LVIA (now included as policy requirement 'l') • That direct reference is made to the allocation's location within the setting of the Kent Downs AONB (covered in supporting text). • That the allocation considers impacts on the area of ancient woodland (Ackholt Woods) that falls within the site boundary and the policy includes specific reference to the need to both protect and enhance this irreplaceable habitat (now included as policy requirement 'k') In addition we welcome requirements 'd' relating to open space, green infrastructure, access and biodiversity and 'i' relating to improved connectivity via the Public Rights of Way network. Depending on our final HRA advice it may be possible to remove policy requirement (o) requiring wintering bird surveys which is related to concerns around loss of undesignated land that is still important in supporting the bird populations of Habitats Sites (otherwise known as functionally linked land).</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Not Applicable
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	SAP24 - Land to the South of Aylesham (AYL003)
<p>Rep ID</p>	SDLP1184
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1331597
<p>Consultee Full Name</p>	Evelyn Andrews
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	SAP24
<p>2 - Do you consider this part of the Plan sound?</p>	No
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	Positively prepared Justified Effective

	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

I live in Woolage Village, which is inside the jurisdiction of Canterbury City Council, but I do all my shopping in Aylesham, my doctor's surgery is in Aylesham Medical Centre and Aylesham is my transport hub for both trains and buses. I also regularly walk on the public footpaths across the fields where the proposed development is intended to take place. Prime Minister Rishi Sunak has just announced that Central Government will not be enforcing house building targets on local councils if they are likely to have a detrimental effect on the character of a local area. He has also said that the Tory Government will prioritise building on Brownfield Sites and the preservation of Greenfield Sites. In light of these announcements, I would like to address the sustainability, viability and deliverability of the proposal to build 640 homes on the agricultural land adjacent to Aylesham Road and Spinney Lane in Aylesham South.

Rural Character of the Area.
Aylesham sits in a rural area, a farming district which makes a significant contribution to food production locally and nationally. The proposed site is prime productive fertile agricultural land. At a time when the NFU is warning that we are 'sleepwalking' into food insecurity, and advocating that the UK aim for more self-sufficiency in food production, it is completely inappropriate to be targeting agricultural land for housing development. The development of Greenfield sites such as this should be put on hold and Brownfield sites, like the Snowdown Colliery site, utilised for urban development, reusing land that has been previously developed.

The proposed site, which is adjacent to Ackholt Wood, is a haven for a variety of wildlife, including buzzards, Little, Tawney and Barn owls, ravens, sparrow hawks, skylarks and kestrels; hedgehogs, hares, foxes, badgers, butterflies and bats. Wood anemones, bluebells and wild garlic in Ackholt Wood all indicate that this is an ancient woodland and a vital ecosystem, already at risk from the climate emergency and extreme weather events, such as Storm Eunice. Ancient woodland must be protected at all costs and a fifteen-metre buffer zone around the wood really does not meet cut it.

This area is also part of a Dark Skies zone. Any development of this land for housing will result in light pollution from domestic lighting, street lighting and outdoor lighting. As well as affecting the view of the sky at night, which is exceptional in this area, this will disturb wildlife, especially bats and song birds, who are confused by urban lighting.

Infrastructure
Aylesham has already expanded to double its original size, in the last ten years, but during that time there has been little or no improvements to local infrastructure which has placed increased stress on local services, including primary schools, the GP surgery and even the local Co-op, which frequently runs out of staple foods and cannot restock quickly enough to cope with the increased demand. Since the new houses were built and occupied, it has been significantly more difficult to get a doctor's appointment. There is a minimum three week wait even for a telephone appointment and even longer for a face-to-face consultation. I recently underwent some medical tests and received a text today (7th Dec 2022) advising me to make a telephone appointment to discuss the results. The first appointment available is on 4th Jan 2023. And this isn't even for a face-to-face consultation. This started long before March 2020, well before the Pandemic.

Public Transport and Increased Traffic
Public transport in the area is very poor, with only one bus an hour into Canterbury and no direct bus service to Dover. The last bus from Canterbury to Aylesham leaves at 7 pm. Trains to Canterbury and Dover are only one an hour during the day so local people are heavily dependent on the use of cars. Every new home is potentially adding two or more cars to the local environment. The Aylesham North development has already significantly increased the volume of traffic on the B2046, between Aylesham and the A2, making it virtually impossible to turn right at the beacon, towards Wingham, during busy times, with queues frequently stretching all the way to Spinney Lane and beyond.

The Aylesham North development has direct access to the B2046 and, from there, to the A2. DDC has already discounted further development of Aylesham North because of the potential increase in traffic on the B2046. The proposed Aylesham South development has access to the B2046 and the A2 also, but via narrow, winding rural roads, including Spinney Lane, Aylesham Road, Holt Street, Forstal Road, Firs Road and Wick Lane. The unsuitability of these roads for high-density traffic is graphically demonstrated whenever there is a blockage or hold-up on the A2 and traffic is diverted onto these country lanes. It causes chaos. Holt Street, in particular, is very prone to Black Ice in the Winter and can remain frozen for weeks. These narrow lanes are lined with ancient hedgerows and mature trees so any proposal to widen or straighten them would entail the destruction of these essential habitats, which goes against the Council's declared commitment to the preservation of wildlife corridors in the area.

Water Supply

East Kent is already a water stressed area, due to over-emphasis on the South East region for house building and the failure of local water companies to invest in developing new water sources. This leaves the area hugely dependent on underground aquifers, which are a finite resource and which feed the River Stour, which changes its character to become an extremely rare Chalk Stream, one of only around 200 in the world, as it flows through the Kent Downs. Our river habitats are placed under extreme stress when water is diverted from their sources and courses for domestic consumption.

Sewage

Southern Water has made the national news headlines repeatedly over the last few years due to its frequent discharge of raw sewage into our rivers and coastal waters, even when there are no extreme weather events. The sewage system can not cope with the volume of sewage already, without adding to it with even more house-building in the South East. And that assumes that the type of housing being built meets the needs and aspirations of local people but even the statutory 30% Social or Affordable housing can not be guaranteed, putting the cost of most of these planned homes beyond the reach of local people.

The village of Aylesham, which has enjoyed the benefits of a very stable community for over a hundred years, has already changed considerably in character due to the huge amount of housing development that has taken place there over the last decade. The sense of community and local identity in Aylesham is hanging by a thread. I fear that any further expansion will be the final nail in the coffin for this former mining village as it is overwhelmed by a deluge of new-builds

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)
Rep ID	SDLP1599
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438. SAP 24 – 27 Aylesham The development of SAP 24 would only be sound if planning were granted conditional on the provision of a secondary school at Aylesham. And if Aylesham bus services cut in 2022 are reinstated (either through Community Investment Levy or through S106 agreement).
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)
Rep ID	SDLP1090
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	See below
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	The development of SAP 24 would only be sound if planning were granted conditional on the provision of a secondary school at Aylesham. And if Aylesham bus services cut in 2022 are reinstated (either through Community Investment Levy or through S106 agreement).

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
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9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)
Rep ID	SDLP1797
Rep Status	Processed
Consultee ID	1331418
Consultee Full Name	Mrs Christine Rotherham
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC NOTE: representation refers to AYL004. However, consultee subsequently has confirmed that this representation refers to AYL003 (SAP24) Introduction and Summary. I wish to put on record my strong objection to the proposed development at Aylesham (AYL004), included in the draft Dover Plan, and outline my rationale below. In accordance with the required framework for comments I have made remarks under the following headings: 1. Legal compliance, soundness and duty to cooperate; and 2. Sustainability report; In large part my comments are specific to the proposed Aylesham development referred to above but do cover more general topics.

Legal compliance, soundness and duty to cooperate

I provide comments on two specific items in this area (with specific reference to the Aylesham development); 1a.Soundness of proposals; and 1b. Meets the duty to cooperate. Effective joint working on cross boundary issues.

1.a.Soundness. i.e. does the Plan meet the “soundness” criteria required by the Inspectorate. I do not believe that it does. You state that the Plan has been devised to “provide a strategy which as a minimum seeks to meet Dover’s objectively assessed needs...and is consistent with achievable sustainable development”. But

Planned houses far exceed objectively assessed local needs

The Sustainability Appraisal Document Dec 2020 points out that a minimum of 11920 new homes are to be delivered over the plan period which equates to a 22% increase in the total number of homes in Dover District. It is encouraging to note that proposed housing numbers have been decreased by 900, but it still represents a 20% increase. Given that Central government, top down, targets are currently being challenged the question remains whether Dover DC need to build so many houses, and whether these houses meet the true needs of the district. The existing development at Aylesham is a case in point. Dover District Council’s intentions in developing Aylesham were to provide housing “To meet the needs of the community.” Despite this the local community resisted this development. I quote Kent Live 24th March 2021 “Aylesham. The Kent Village with an undeserved reputation that Londoners are flocking to.” Properties are sold to people from Sittingbourne, Medway and South London. At least 40% of purchasers are not local buyers. The Aylesham developments are far from being examples of “sustainable development”. For example- the road network is poor. Although the AYL005 proposal has been shelved I believe that AYL003 and in particular AYL004 with its 640 houses should also be dropped. These sites are identified in the Plan as “Strategic sites to deliver the Council’s housing growth”. While constraints do exist on these sites, primarily in relation to highways, work is going on to address this and develop an appropriate mitigation scheme.” All well and good but it should be noted that the AYL004 site is shown on planning documents as marginal in deliverability. Development at the nearby Snowdown Colliery (land off Holt Street) is also considered in the Plan to be questionable as access is unsuitable for HGVs. You say that a mitigation scheme could be put in place, but I would challenge that. Residents in the AYL004 development would have to use the B2064 to join the A2 to Canterbury and Dover. The B2064 is a narrow, winding and potentially dangerous road. KCC has no plans (or finance) to make improvements, other than possibly increasing signage. Access to the Dover bound A2 for many of the new residents is more likely to be via Firs Road leading to Wick Lane, a country road on which it is difficult for two cars to pass. The alternative via Woolage Village will mean using a link road which has a 6’6” width restriction. Lack of suitable water supplies. Although the Dover plan states that the Stodmarsh situation is no longer an issue for Dover District Council it remains a considerable problem for residents of the adjacent Canterbury district. It seems illogical to ignore existing problems with provision of water and disposal of sewage when the developments are so close. It would be negligent not to take this into consideration. Loss of agricultural land. AYL004 in particular will cover excellent agricultural land – Grade 3 with some Grade 2 at a time when we should be considering food security. In addition to loss of valuable arable land it will encroach on the landscape; the nearby AONB must be protected. This development will lead to loss of habitat, considerable increase in traffic, poorer air quality and light pollution. The proximity of AYL004 to Canterbury Council’s lamentable proposal for developments at Adisham and Womenswold would see the destruction of woodland and encroach on the North Downs AONB. 1b. Meets the Duty to Cooperate. “There should be evidence of effective joint working on cross boundary strategic issues” Aylesham and its hinterland straddles two Council areas. Canterbury is proposing further development directly adjacent to Aylesham in Adisham and Womenswold which would create a town with almost 4000 houses. Combined with Aylesham this would create a conurbation of some 10000 houses: all built on agricultural land, with limited local services and serviced by an extremely poor and dangerous road network. One hopes that this is not the result of “effective joint working on cross boundary issues.” 2.Sustainability Report issues The sustainability report raises a series of issues which are relevant to the Aylesham development and adversely affect it (some of which have been covered by the above comments). A1 Population Growth. “Population growth places additional demand on key services and facilities” Where are e.g. the medical facilities and road transport network to support a conurbation of over 10000 homes in Aylesham/Adisham? While the plan refers to providing infrastructure past experience suggests this does not get built or is delayed e.g. the construction of the B2046/A2 roundabout. B1. Job density in Dover district is low. Where are the job opportunities in Aylesham/Adisham, or will the residents have to make unsustainable and CO2 emitting car journeys to Canterbury and/or Dover? C1. Transport connections. “Additional traffic creating delays on the local network”. An issue which will be exacerbated by the Aylesham development. D1. Land use. “Plan is an opportunity to ensure that agricultural land is not lost or compromised by future growth”. How does this sit with the proposed Aylesham/ Adisham development particularly in light of the growing needs for food self -sufficiency? D4. And D5. Water. “Highlights water quality and quantity issues which need addressing”. Critical in this location given that the Stodmarsh/Stour water quality issues are not yet resolved. E1. “Climate change”. Given that tackling this issue is a priority for both Dover and Canterbury Councils (indeed both have declared a climate crisis) how can this be squared with massive, unsustainable housing developments on green field sites? H1. “Landscape Protection”. The proposed Aylesham/Adisham developments are in attractive countryside which borders the AONB. It is hard to believe that Dover is committed to protecting (quote from the Plan) the “wonderful world class countryside”in its area. The Dover DC V China Gateway Developments fiasco also comes to mind.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	SDLP1797 Rotherham Att1.pdf (1)
Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)
Rep ID	SDLP1404
Rep Status	Processed
Consultee ID	1333229
Consultee Full Name	Mary Cook
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails	I have tried to use your portal to lodge my comments and OPPOSITION to the above development but your website may have crashed with the number of objections or it simply is not working. I got as far as the SAP24 and it would not take me to the next page to comment.

to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

My objections are as follows:- Aylesham has already been developed to its capacity with huge increases of houses and few or no improvements to infrastructure or facilities. Even those promised by developers have not been completed.

These proposed houses will, if completed, join up to further housing been suggested at Womenswold by Canterbury City Council. This will create a completely unacceptable area of urban sprawl in an AONB. The proposed development is on prime agricultural land - we need the land to produce food. This is a greenfield site in the heart of small rural communities linked by small, narrow unlit lanes and completely unsuitable for more development.

The expanded Doctors surgery at Aylesham is already too small for the expanded Aylesham and the surrounding villages it serves. There is no dentist in Aylesham that can be accessed by residents.

The water infrastructure and pressure is already woefully inadequate to say nothing of the additional sewage problems that a development of this size will cause.

The main access road, B2046 is unlit with no footpath, cycle lane, pavement or even verge and is already congested, with 2 narrow lanes which can hardly accommodate 2 lorries passing each other. There have been numerous accidents where lorries have even been forced off the road.

Further proposed development from Aylesham to Wingham have already been abandoned due to inadequacies of the B2046. The roundabout on the A260 joining with the A2 was built to service the additional houses in Aylesham that have already been built and with more yet to come. It is already congested and with a narrow bridge over the motorway cannot be improved. The access and exit routes to and from the A2 onto the A260 are too short and already backup with local traffic at peak time making them dangerous.

There are no secondary schools in the local area and the primary schools are already at capacity and there are no plans to build new schools so children will add to the roads problem as they will have to be bussed around on buses that currently do not exit so parents will be in cars to get the children to school.

There are already inadequate shops to serve the local community with only a convenience co-op in Aylesham with very small parking area. The surrounding villages have no provision and have to drive to Aylesham or further afield. The Co-op used to be within walking distance for most people in Aylesham but with the expanded housing area this is no longer the case so yet more cars on the road.

Public Transport - Everyone wants a cleaner environment but without increases in public transport and improved local facilities residents will have to use their cars. There are no pavements or safe footpaths or cycle paths from the surrounding villages who have to access facilities in Aylesham where there is already inadequate parking.

There are no rural buses in the surrounding villages and no bus at all on Sundays even in Aylesham.

Housing - many if not most of any new housing will not be sold to local residents but to outsiders looking for cheaper housing and they will still need to commute. Aylesham train station has no disabled facilities to access all platforms, The parking is already full on a daily basis and the edges of Aylesham are so far from the station that it is already to far to walk to for many people. The trains that stop at other stations are infrequent and on a slow route so will not work for any commuters to London so they will still get in their cars to get to Canterbury to connect to fast services.

There is also the risk, as has happened in Canterbury, that the new houses will not even benefit local residents as they may simply be bought up by richer London boroughs to house those on their waiting lists adding to more cost and problems for the local authority.

There are no public leisure facilities in Aylesham - not even a pub or restaurant. The youngsters especially, have no where to go and consequently hang around the streets, especially Market Square and drive noisy off road motor cycles and quad bikes around residential streets for entertainment.

For all these reasons the proposal is inappropriate but most importantly a distinctive rural area in an AONB should not be allowed to become just another urban sprawl. Especially as there is already inadequate provision of facilities and infrastructure for the existing communities.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
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Include files	
Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)
Rep ID	SDLP1800
Rep Status	Processed
Consultee ID	1267411
Consultee Full Name	Maggie Mckenzie
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Unfortunately I have been unable to register my comments on your website. I therefore wish to give my objections as follows : Use of a greenfield site This will create a area of urban sprawl in a greenfield site which is prime agricultural land, which is needed to grow produce. Roads I understand it was originally proposed for a large development of houses to be build alongside the B2046 opposite Adisham but this was refused due to the current traffic on the B2046. The site will be on Spinney Lane, and therefore most properties when leaving Aylesham would join the B2046. As you are no doubt aware the roundabout on the A260 was built be the developers to deal with the huge increase with the current development of Aylesham, as traffic was constantly backed up to Spinney Lane during rush hours This road is totally unsuitable for such an increase in traffic and Womemenswold parish council have had meetings with KCC due to the number of traffic accidents at the junction the the B2046 an Snowdown Road. Snowdown Road has a width restriction and all the minor roads in the area are narrow unlit lanes, totally unsuitable for more development.

	<p>Trains & Buses</p> <p>The trains from Aylesham and Snowdown are the slow hourly trains. Parking at Aylesham, although improved, is usually full in the mornings and Snowdown has no parking & is dangerous in crossing the narrow bridge to the Dover bound trains. The only buses in the area are from Aylesham to Canterbury and there is currently no service on Sundays.</p> <p>Facilities in Aylesham</p> <p>Currently there are several shops around the market square in Aylesham. The small Co-op currently is unable to cope the existing number of houses in the village. There is limited parking in the area. The primary schools are at capacity and there is no secondary school provision in the area. There is one small GP practice which would not cope with the additional houses. There are no public leisure facilities or even a restaurant or pub, meaning that residents will use their cars for any entertainment</p> <p>Water supply and sewage</p> <p>East Kent is already a water stressed area. The sewage system cannot cope at the moment with regular outflows to the sea.</p> <p>For the above reasons, I consider this proposal is totally inappropriate in an rural area in an AONB.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)
Rep ID	SDLP1769
Rep Status	Processed
Consultee ID	1268452
Consultee Full Name	Ms Fiona Paterson
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I object for the following reasons: 1. The proposed sites are the other side of Spinney road to Aylesham village. Why does Aylesham need to extend beyond where it currently is? 2. Aylesham has recently increased hugely in size and population. Where is the infrastructure to support this? a) The B2046 main route from the A2 or A257 to Aylesham is dangerous and will not be able to support the development as it is. b) There are not enough doctors even if another medical centre were to be built. c) Currently there are no dental practices in Aylesham. The huge population will need their teeth looked after to help maintain general good health. d) There are not enough teachers even if more Schools are built. e) There are not enough nurseries and pre Schools to support the existing local population of pre School Children 3. The proposed sites would destroy good agricultural land. We need to be able to grow our own food. Food security is now becoming a problem in this country. 4. The proposed sites would destroy natural habitat and biodiversity which are very important in combating climate change. 5. Where would all the new inhabitants come from? Is there really a need for all the houses suggested? How many local people have been able to buy and live in the recent Aylesham expansion? From my local knowledge a lot of the properties have been purchased as 'buy to let' and the prices in Aylesham have gone up disproportionately to the village which has traditionally been more affordable. There are a lot of people from London and outside of the area. I cannot blame anyone for wanting to move out of the city but any proposed new houses really ought to be affordable and for local people. 6. Where would all the water come from for all the homes and where is the waste water and sewage infrastructure? Water is becoming a scarce resource and the proposed development would create a far greater demand for water and sewerage. I have no doubt that there will be many more objections and many of them may well be through the official portal but I have looked at the portal and find I cannot easily use it. Therefore I am using a democratic right to communicate by email and trust that my comments will be added to the official site which will list everyones comments</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	

Include files	SDLP1769 Paterson Att1.pdf
Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)
Rep ID	SDLP2036
Rep Status	Processed
Consultee ID	1274769
Consultee Full Name	Karen Phillips
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	You make it so difficult for some people to access documents, i for one are one of them, NO MORE houses in Aylesham please think of the future of our childrens children, I know that means nothing to the money people but it does the residents of the village, enough is enough play areas will be gone, dog walking areas will be gone, safe places for people to walk will be gone ALL FOR EVER
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)
Rep ID	SDLP1815
Rep Status	Processed
Consultee ID	1267457
Consultee Full Name	Marilyn Lewis
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I am a resident of Womenswold and the expansion of Aylesham will affect the area greatly. I would like to raise the following objections. 1. Aylesham has struggled to absorb the latest development into its community and a further development of this size would destroy the character of a village and the community. 2 There are no references to infrastructure in the plan i) there are very few shops at the moment, the co-op which we use is very busy and would not cope with the extra custom. There is only a mention of a small general shop in the plans ii) There is only one doctors, this is very efficient but could not cope with the extra patients as it is difficult to get appointments at the moment. iii) There is no plan to expand the B2046. This is a narrow road which is very busy with traffic at the moment, It is incredibly difficult to get out at the beacon junction with the Snowdown road at present and people become frustrated causing accidents and near misses. There is only a 60 mile restriction on that road. iv) There are no plans for extra schools and there is no secondary school at present. v) There is a very limited bus service and the trains are only once an hour. 3 The area for development is adjacent to Kent Downs AONB. There is ancient woodland and agricultural land that provides a wonderful habitat for wildlife. 4 The Government are planning that we should be self sufficient in food which will be difficult to achieve if we build over prime agricultural land.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance	

with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)
Rep ID	SDLP1826
Rep Status	Processed
Consultee ID	1272950
Consultee Full Name	Delia Webb
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Not justifiable or consistent with National Policy that you take away the Gypsy and Traveller provision, and do not give them a new site. They have lived there 50 years, having been moved from the north of the village in the 60's / 70's. They have never been any trouble, keep themselves to themselves, and deserve their homes. Sites have, and are being set up around the country for permanent sites, which this one is. You can't make a group of longstanding people homeless to build houses on the land to house others. They have family / children / grandchildren etc living in the village, which are part of our community, as they are. Has anyone from the council discussed this with them? It cannot be legal to make an established community homeless.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant	If you can remove 500 homes from north Aylesham, you can leave the Gypsy site alone. It is surrounded by trees, can hardly be seen from the road. The new houses could be built around from the outer perimeter of the site. Their way of life and ethos has steadily been eroded over the last 60/70 years, the right to travel taken away, these people have complied and are stationary. Like everyone else they deserve a roof

and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	over their head. Many in the village are related to them, to turf them off land they have lived on for over half a century, and having newcomers in, will cause much bad feeling and negativity. To make this situation compliant / sound you would have to allot another section of land as their site, if you insist on moving them, of the same size.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)
Rep ID	SDLP1812
Rep Status	Processed
Consultee ID	1333677
Consultee Full Name	Paul Luckhurst
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I would like to place on record my objection to the proposed development of "Land to the south of Spinney Lane". Policy reference: SAP 24, and site Reference AYL003b of the DDC draft Local Plan refers. The reason for my objection is: The serious effects that this development, of up to 640 new homes, will have on both Aylesham, the surrounding villages and the rural environment within which it is proposed, would be profound. This development alone would have the following irreversible effects on the area:

1. The loss of around 67 hectares of valuable high grade farming land: With the population growth experienced in the last two decades, this country will need every square inch of high grade farm land to feed our rapidly expanding population. Building on farm land should be avoided. Only after all other less productive parcels of land have been built on should farm land be considered. This farm land could be helping to feed people for centuries to come, but not if it's built on.

2. The disruption to local wild life: Building 640 new homes along with the associated infrastructure will have a seriously detrimental effect on both the native wild life and the flora/fauna. Apart from the irreversible destruction of the natural rural habitat, such effects as: a. increased light pollution at night from this new development, b. increased air pollution through out the day and night from both the homes and the many vehicles, that this development would attract. c. increased noise pollution, I moved my family to nearby Adisham over 38 years ago so that we could live and bring up our family in the country. Some of the highly valued benefits of country living are the peace, quiet and darkness at night. The recent housing developments at Aylesham along with its 24 hour floodlit industrial site has already partially ruined that idyll.

3. The reduction in the quality of life for those already living in Aylesham and its environs: The increased light, air and noise pollution, mentioned in point 2 above, will also have a detrimental effect on the quality of life for those human residents already living in and around Aylesham. To compound matters, there would also be the effect that such a large number of new residents (1300 plus), would have on local services. As an example, it is already virtually impossible to see a doctor face to face at the Aylesham Medical Centre. Getting an appointment involves telephoning the health centre, even though you are standing in front of the receptionist! Even then, you will likely be offered a telephone appointment in two weeks time! So having, 1300 plus new residents from this development alone, won't improve matters any. Unless serious investment is made in providing better services and facilities, such a development will only serve to reduce the quality of life for all local residents. Unfortunately, it seems that the common denominator with many new housing developments, up and down the country, often seems to be, that existing residents are promised the much needed infrastructure and facilities to support the new development, but they very often don't materialise.

4. The pressure on local water supplies: In this part of Kent our water is drawn from underground aquifers. It is not unusual to have hose pipe bans during the summer months due presumably, to falling levels and dwindling supplies. Which makes me question if this and other large local housing developments across East Kent, will be putting the local water supply under too much pressure? Yes, there is a planned new reservoir in the Canterbury area but that has been planned for the last four decades! Given their recent history, I have no confidence in our local water supplier coming through on that project.

5. The large increase in vehicle movements: At present, Aylesham is a growing community that is surrounded by open rural countryside. Just like Canterbury City Council's new draft local plan, the DDC's DLP mentions the term "garden town principles" or something similar in relation to this development's design. The thrust of which seems to be to enable residents to access everything they need from within the village/town, thereby cutting down vehicle movements and pollution. The emphasis seems to be on encouraging walking and cycling, which is as it should be. However, this is basically a country community and therefore bears little relationship to an urban environment. The reality is that, as is frequently the case these days, most homes will need two incomes to support both their families and their mortgage/rent payments. Since employment within Aylesham will always be fairly limited, they will have to travel for work. Again, the reality is that living in the country actually means that a car or van becomes a necessity and not a luxury. Yes, Aylesham does have both train and bus services but they are unlikely to suit most residents. The trains and buses don't run as often as they do in cities and have limited destinations. Could 640 new homes mean nearly 600 new vehicles to the area? A ratio of 1.5 cars per household would mean nearly 1000 extra vehicles. So, how many extra daily vehicle movements will this development create? And how much air pollution? These extra vehicle movements will substantially add to the daily local congestion on our already busy local roads. It also has to be remembered that this development (SAP24), cannot be looked at in isolation. As well as the other proposed developments within Aylesham and Snowdon, Canterbury City Council's proposed Draft Local Plan - 2045, details proposed developments at neighbouring Womenswold, (420 homes), and another ridiculously large "Garden Town" development at Adisham (3210 homes). Further house building is also proposed in just about every other village in the area. With every one of these developments, people would still need vehicles to get about. If each household in each of the three above mentioned developments has one vehicle, then that would be another 4270 vehicles in the immediate area. At a ratio of 1.5 per household the figure would be circa 6300 extra vehicles! And all in addition to those already attached to the 700 new homes recently built in Dorman Avenue North.

6. The long term merger of several local village communities: Whether by design or accident, when this proposed development, along with several other Aylesham situated draft planning proposals, are looked at in conjunction with the neighbouring Canterbury City Council's Draft Local Plan for 2045, the effect, will be to engulf several separate, close knit communities into one vast misplaced, urban sprawl. In doing so, those communities will lose both their identity and their geographic independence. In the case of Womenswold and Adisham they are ancient villages with history going back centuries. Adisham was even mentioned in the Dooms Day book. Aylesham is barely a hundred years old and has both a separate character and origin. This proposed Spinney lane development will fill in yet another gap on the way to turning the area into one huge sprawling housing estate. I can only speak for myself, but it saddens me that there is far too much proposed development, way more, its seems than anywhere else, and all concentrated in this immediate area, which will cause untold harm to our glorious rural environment

	and ruin current residents' quality of life. I do understand that new homes are needed but do we really need to swamp one location, more than any other in East Kent, with so many so quickly?
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP24 - Land to the South of Aylesham (AYL003)
Rep ID	SDLP1823
Rep Status	Processed
Consultee ID	1330857
Consultee Full Name	keith bibby
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>no provision has been included for more parking at the train stations for Aylesham and Snowdown, people will be parking cars in the surrounding roads to the stations, and people will not wish to walk the hills of the new developments. new roads must be built to prevent Snowdown hill and Ackholt road from becoming the rat run for Aylesham shops.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Not Applicable</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	

SAP25 - Aylesham Development Area

Local Plan Consultation Point	SAP25 - Aylesham Development Area
Rep ID	SDLP120
Rep Status	Processed
Consultee ID	1265239
Consultee Full Name	Mrs Burnett A Burnett
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP25
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Hello education for teens and activities for teens. Social places to attend. employment limited too many small businesses a need to provide bigger employers. We coal site needs to provide for local community .toursim is over prices for local community to use. housing lacks bungalors , disabled accomadation , nursery for children. Old age care needs. Taking away farming land.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	E ducation for teenage. Transport safe for school age people. Teenagers in Aylesham are disadvantaged by having to travel to town by loss of time leading to missed out of school activities and study time. place for young people to attend after school at weekends. Coffee shops study's. more inclusive for people with disabilities, bunglos , garden space for social housing needs. farm land removed were is the food production going to be provided.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP25 - Aylesham Development Area
Rep ID	SDLP142
Rep Status	Processed
Consultee ID	1330972
Consultee Full Name	MR. Aurel-Levent Cioran
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP25
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Due to the recent development road become mor busy and local structure should be taken into consideration to be adequate and to enlarge the single way carriage on adisham road as is very dangerous.</p> <p>i believe local amenities like a pub or restaurant should be taken into consideration as the need of village.</p> <p>huge issues are already with Dental service in the village which is not open to NHS which is outrageously and you need to take into consideration of offering these services before expanding the village.</p> <p>also transport for kids towards canterbury especially busses to be sustain and not withdrawn as per no secondary schools in village. Thing about 300 parents out of the new 640 homes driving their kids to primary school in aylesham or canterbury, will be full of people. As a parent and taking my child to primary school in aylesham i can see how busy is currently and add 300 more will be a very busy road which cna potentially create chaos, more crushes.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will	

make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP25 - Aylesham Development Area
Rep ID	SDLP242
Rep Status	Processed
Consultee ID	1267388
Consultee Full Name	Judith Hawarden
Consultee Company / Organisation	Hawarden farming
Agent Full Name	Judith hawarden
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP25
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Comments on the Regulation 19 Submission Local Plan</p> <p>A considered approach to the Natural environment has been adequately presented in DM Policy 39 but there is a lack of research and presentation of the current role of the farmland, looking at rural employment food production, and current carbon capture. Farmland forms the greater part of the district's green areas although a photo of arable fields is used to introduce the section there has been no analysis of the impact on the local farming industry if farmland is continued to be developed.</p> <p>Although the district has below-average rainfall and water resources the rainwater is badly managed around Aylesham.</p>

	<p>The B2046 is a dangerous road with a high number of accidents, Dover district has above-average accident rates. https://www.crashmap.co.uk/Search shows a high number of accidents on the B2046, particularly at the Spinney Lane junction with numerous fatalities and serious injuries recorded along the length of the road. The B2046 is in poor condition with vehicles frequently leaving the road and ending up in our hedgerows and fields. The road surface is folding into ruts increasing its camber to the Canterbury side under the current impact, particularly on the stretch between Aylesham and Adisham junctions.</p> <p>Dover district has below-average job opportunities, we have seen London boroughs buying up batches of the new builds in Aylesham. London currently has over 87,000 empty houses. There are shortages of appointments for doctors dentists, vets and secondary school places. There is a lack of adequate buses and the local shops run low on some food daily. In Aylesham to date, 785 units have been delivered with 575 remaining.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	As local farmers of the land opposite the current new development, we have an understanding of the impact of new developments and how they could be improved to have less of an impact on the rural environment.
Include files	
Local Plan Consultation Point	SAP25 - Aylesham Development Area
Rep ID	SDLP843
Rep Status	Processed
Consultee ID	1268408
Consultee Full Name	Mrs Jan Gray
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24
2 - Do you consider this part of the Plan sound?	No

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>This land has had some work on pipes for the sewage system. It is not effective for the current number of houses as there is a regular sewage stench coming from the corner in your development plan for more housing.</p> <p>There are no places for any children who would move in to this development locally in primary schools. There will be no transport by the time this is built for children to be able to go to secondary schools . None of this housing will be financially achievable by local people or their extended families. The prospective buyers for these homes can only be the cash rich or business purchasers who can avoid many taxes to create income from rents that are unaffordable to local people. There is no infrastructure proposed for this section of the New Dormitory Town encompassing and extending both Aylesham and Adisham. No supermarket, no youth centre, no police, no doctors, no dentist, no focal point where communities can meet. No accomodation whatsoever for safeguarding the community. The ability of the land to absorb heavy rainfall is compromised, the ability of the land to absorb CO2 emmissions is compromised, the ability of the land to grow food for our local people is removed entirely. We are in a cost of living and coming into an availability of purchasing food for our whole population crisis.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>Upgrade the housing stock you have and that housing association has to be of a decent human habitable standard. You have a lot of homes that are damp and mouldy, your relevant departments do not respond adequately nor timely to emergencies such as boiler breakdowns or water leaking through houses. You could just as easily as another authority, have been sued for harm to babies from mould and damp as another local authority was. Build on brownfield sites. build to a good sustainable standard ie passive solar heating, heat pumps etc so that the tenants of the landlords the houses are sold to are warm without draughts and with a low carbon cost to heat. Properly update the water and sewage systems to cope with the massive extra load on systems that are failing with the current load. Put in protections so that our rivers and our seas are no longer discharging fecal matter into our local rivers and the channel where so many like to swim. build a school for our teenagers so poor families don't have to struggle to pay £450 for each child each year for the privelege of going to a secular state school, then being terrified that your children can't get transport to the school anyway. Your planning has a role in the educational and health comprehensive failure for SEND children and along with them secondary school children in your villages, but all this (8k in total) extra housing without any of the vital infrastructure, will make this place like a ghetto.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I consider that this would be a reasonable adjustment to make the consultation process accessible
Include files	
Local Plan Consultation Point	SAP25 - Aylesham Development Area
Rep ID	SDLP907
Rep Status	Processed
Consultee ID	1331776
Consultee Full Name	Mrs Heather Green

Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24, SAP25, SAP26, SAP27, SAP17, SAP18
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Road infrastructure will not sustain the extra housing in the area. B2046 already had a fatality in 2022, and several big accidents where it is joined by Spinney Lane, Dorman Avenue North, and the Industrial Estate. B2046 regularly closed at Wingham end causing tailbacks with queues of traffic polluting the atmosphere. Diversions through country lanes happen several times a year and cause damage to local flora and fauna on the one track country lanes leading to local towns.</p> <p>B2046 already being used by heavier lorries which are causing crumbling to the verges.</p> <p>There is no secondary school in the area so children have to travel to Dover, Sandwich and Canterbury. Bus services have recently been curtailed resulting in overcrowding, and young vulnerable children being left stranded waiting an hour or more for the next bus, or having to be collected when parents finish work.</p> <p>Train services are sporadic and the current amount of secondary school age children in the area cannot be allocated local school places.</p> <p>Sewerage, gas, broadband are nearing capacity, with regular broadband outages and lack of any FFTP in the area with the current number of houses.</p> <p>Dorman Avenue building work is still not complete, and within that plan there was provision for extra shops. Current shops are high cost and low volume, thus travel 10-15 miles to nearest superstore means more vehicles on inadequate roads.</p> <p>Local doctor's surgeries are also at capacity and many wait weeks for appointments. The local hospitals have been at bed capacity for months, with people waiting in A&E for beds overnight, sometimes for 48 hours before being treated, or going for surgery.</p> <p>The Ukraine war has shown that greenfield areas are much needed for crops so that the UK can be self-sufficient rather than relying on imports. Many local farmers have increased crop harvesting already.</p> <p>The Covid-19 pandemic has resulted in increased mental health issues, and the spread of the virus has been shown to increase in more densely housed areas, where there are limited garden spaces to breathe fresh air and exercise. Along with limited parking causing problems in the recent estates at Dorman Avenue, and assuming an extra minimum of 1 car per household the increase of cars especially at peak times on the B2046 will cause more accidents and hold ups.</p> <p>For those travelling to Sandwich or Thanet, the A257 is inadequate in terms of the junctions leading onto it. Already fatalities and severe accidents involving the use of air ambulances this year deem this road unsuitable for the current traffic levels. The Sandwich area developments will cause more disruption on these junctions, and the increase to delays on this road will cause more traffic pollution.</p> <p>The new Canterbury City Council plan has not been discussed with DDC and thus contravenes the Duty To Co-operate with both councils. Together with 640 houses in Aylesham, 3200 in the adjoining Cooting Farm Town, and another 500-800 also in close proximity, the infrastructure and the amenities cannot cope with these plans.</p> <p>The Government has recently abolished the 300,000 new homes for the next year and that was the figure on which this plan was based</p>

<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Government has ust rescinded the 300,000 hew housing level, and the levels in these plans need to be modified, meaning an urgent review of this plan should be commenced.</p> <p>Lack of consultation with CCC on their forthcoming plan including Cooting Farm Town which abutts the B2046 shows failure in Duty to Co-operate with neighbouring areas, and thus this plan should be put on hold with both councils meeting to discuss both plans and redesign a way forward that benefits both councils. The area cannot sustain either at present and with no discussionsl both plans have been launched at similar times withour knowledge.</p> <p>Highways involvement in terms of upgrading the B2046, straigtening the blind bends, isntalling roundabouts at dangerous junctions, plus the dualling of the A257 before the Sandwich housing areas are finalised, must take place. Both roads have had fatalities this year, and with a doubling of housing in the surrounding area, the road state must be revisited.</p> <p>Local fauna relies on corridors away from businesses and housing and these have already been narrowed by previous recent housing in Dorman Avenue. Rare red kites, bats, and more nest and live in the area and these must be preserved, not eradicated by housing.</p> <p>A secondary school is required in the area, travel to and from other schools with inadequate/extortionate price bus and train services has to be revisited before considering the increase in housing.</p> <p>Local shops need to be varied and increased before any more housing. With only one Post Office in five local villages, the post office in Aylesham is already over-used and other village ameneties and infrastructure must be revisited.</p> <p>FFTP broadband is essential now with over-use and will be impossible with new housing levels, The Government agrees to supply broadband to low income households, instead this will get worse.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP25 - Aylesham Development Area</p>
<p>Rep ID</p>	<p>SDLP992</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331999</p>
<p>Consultee Full Name</p>	<p>Claire Pamberi</p>
<p>Consultee Company / Organisation</p>	<p>Kent County Council</p>
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to?Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP25</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Effective</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Not Applicable</p>

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The County Council references comments made on the IDP within this response in respect of this site. The County Council requests specific mention of connection to the PROW network within this policy.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The County Council requests specific mention of connection to the PROW network within this policy.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

SAP26 - Former Snowdown Colliery, Aylesham

Local Plan Consultation Point	SAP26 - Former Snowdown Colliery, Aylesham
Rep ID	SDLP122
Rep Status	Processed
Consultee ID	1265239
Consultee Full Name	Mrs Burnett A Burnett
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP26
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Hello education for teens and activities for teens. Social places to attend. employment limited too many small businesses a need to provide bigger employers. We coal site needs to provide for local community .toursim is over prices for local community to use. housing lacks bungalors , disabled accomadation , nursery for children. Old age care needs. Taking away farming land.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	E ducation for teenage. Transport safe for school age people. Teenagers in Aylesham are disadvantaged by having to travel to town by loss of time leading to missed out of school activities and study time. place for young people to attend after school at weekends. Coffee shops study's. more inclusive for people with disabilities, bungalos , garden space for social housing needs. farm land removed were is the food production going to be provided.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP26 - Former Snowdown Colliery, Aylesham
Rep ID	SDLP678
Rep Status	Processed
Consultee ID	1221958
Consultee Full Name	Ms Bridget Fox
Consultee Company / Organisation	The Woodland Trust
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP26 - Former Snowdon Colliery, Aylesham
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>In our response to the Reg 18 consultation we expressed concern about the proximity of the site to ancient woodland at Ruberries Wood West (Grid reference: TR2516050416).</p> <p>We generally welcome the approach to protecting the site taken in paragraphs c) and d) but are concerned that no minimum buffer size is specified.</p> <p>Whether the ancient woodland is within or outside the development site, we recommend that as a precautionary principle, a minimum 50 metre buffer should be maintained between a development and the ancient woodland in order to uphold the NPPF protections.</p> <p>We reserve the right to comment on and if necessary to object to future planning guidance or applications that do not offer such protections in practice.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	<p>A minimum size of buffer zone should be specified.</p> <p>Whether the ancient woodland is within or outside the development site, we recommend that as a precautionary principle, a minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice. A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance.</p>

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	planners-manual-for-ancient-woodland.pdf (2)
Local Plan Consultation Point	SAP26 - Former Snowdown Colliery, Aylesham
Rep ID	SDLP962
Rep Status	Processed
Consultee ID	1266351
Consultee Full Name	Dr Sharon Danby
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3 Housing growth
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Due to the governments announcement 5/12/22 the plan is not positively prepared as the development needs must be reassessed. This means it is no longer justified as there now is the room without central government pressure to find reasonable alternatives. It is also not effective as the pressure put on local communities and existing infrastructure is unreasonable and means that it is not deliverable. The plan is also not consistent with NPPF 2021 as the many landscape and heritage assets in Dover District are being compromised by the level of unsustainable overdevelopment which the current plan has allowed.</p> <p>The Housing Growth statement that the aim is to , "provide a greater choice of high-quality housing to meet the needs of Dover districts's growing population and changing demographic and address affordability issues", does not seem internally consistent with the details provided in the plan which underestimates the evidence showing a large part of district population growth is due to aging. The details thus render SP 3 and SP 5 less effective and less sound.</p>

Under the current LDP developers have shied away from the badly needed regeneration of Dover and concentrated on building maximum profit, minimum affordability developments of large homes around the more desirable town of Deal and out in Whitfield. The supposed regeneration of Dover has resulted in another generic shopping centre and a more depressed high street and has not lifted the rest of Dover. The promenade area is uplifted but there seems to be little connectivity to the rest of Dover.

The government department (DLUHC) decision that Dover needs 611 new dwellings a year and a minimum of 10,998 new homes between now and 2040 we find very incompatible with legally binding Net Zero Strategy, Climate Emergency Declaration 2019 and Climate Change Act 2008, and unsound. We should be transforming existing housing stock into zero carbon homes as is happening in East Sussex, led by Lewes DC. Combining these numbers with 3.51 and the statement '76.7% of the new homes are on greenfield sites, while 23.3% are on brownfield sites' is unsound and unacceptable to the public.

We feel that our communities are being harvested by developers and our worries are not being heard or needs met in terms of infrastructure. Thanks to certain national newspaper Sunday supplements, Deal is desired as a 2nd home location by the wealthy from London and elsewhere. Holiday homes which spend most of the year empty in Deal, Dover and coastal villages of Kingsdown and St Margarets are stopping locals from buying affordable homes in their own area from existing housing stock.

It must also be pointed out that at least one of the sites included in the 23.3% of brownfield sites is actually a site intended by SEEDA as local nature reserve having rewilded on unstable slag (only rendered stable by tree-planting, a site which DDC forgot to make a local nature reserve in 2004, and it has become a biodiversity hotspot well known to genuine ecologists nationally; Betteshanger Park.

Central government in London, according to Housing Today is imposing a disproportionate amount of housing growth on Kent and the SE.

There is a grievous lack of democratic accountability across Kent. So the chances of protecting Kent, of achieving a Growth Strategy that creates climate-friendly jobs and suitably sized, suitably-priced zero-carbon homes for the next generation of local families, are not good. The space available for infrastructure, functions well for compact coastal towns of the size that Deal / Walmer and Sandwich were 5 years ago.

The level of greenfield overdevelopment which has been disastrous under the current weak LDP is putting Deal infrastructure under strain now, so in-fill should make up the majority of the allocations for Deal and that the housing growth specified for District Centre of Deal and around its boundaries needs to be stopped or radically reduced. Either or both of SAP 15 / SAP 34 would destroy the only road access alternative for diverted traffic. (See detailed comments under SAP 15/ SAP 34 below). Housing Growth that threatens gridlock, blocking off a conurbation of 30,000 from access by emergency vehicles, commuters, school buses is not sustainable housing growth and is very unsound.

3.29 I note and welcome a degree of shift from the Reg 18 draft, in that more sites have been selected with a view to using 'existing infrastructure, facilities and services, with a greater professed purpose to ensure development contributes to the sustainability of local communities and services'.

I note with appreciation both the increase in the number of sites in Dover town SAP 6 – SAP 13, and the SAP 26 Former Snowdown Colliery, Aylesham near a rail station for example. It should be possible to state a determination to 'make best use of brownfield – non-rewilded – land) without giving developers the opt-out qualification 'wherever possible'.

On Five Year Housing Land Supply. 3.39 Having stated the Council had 6.03 years land supply plus a 5% buffer; it is not sound, effective or legally compliant to then state 'the provision of additional sites within the first 5 years of plan period is needed to ensure resilience and promote flexibility;!' Instead of ensuring resilience, it will create exactly the

destructive suburbanisation of a rural district that many, many of the resident electorate are most worried about.

3.46 It is the conspicuous lack of a secondary school in Aylesham that prevents Aylesham becoming the small garden town planners aspire to. The provision of a secondary school by 2028 should be a condition of SAP 23. There seems to be a complete lack of planning in the statement that now

3.48 Many, many of the current residents of ex mining village Elvington were / are dependent on buses that have recently (2022) been cut, (following KCC cut to bus subsidies) to get to work in Canterbury, Folkestone, Sandwich, Thanet or Dover, or to get to secondary school, or to get to doctors, or to shop. These people had environmentally sustainable public transport service that has been cut. KCC is saying it is looking at potential bankruptcy in 2023, so promises of new services and facilities are met with some disbelief. The selection of this site is ONLY sound with cast-iron conditions to provide all of the services we mention below, including new drainage infrastructure. Council housing in Elvington has been subject to flooding from the sewage system, long overdue for replacement. As in Dover deprived wards, there are unhealthy EPC EFG homes in Elvington that need to be transformed into zero carbon home to lift residents out of fuel and therefore food poverty.

3.68 Windfall. Unless existing settlement boundaries are respected, there is suburban ribbon development creep from field to field to field. To render the plan sound it should contain a statement 'Previously existing settlement boundaries will be respected, until such time as town and parish councils may have agreed changes with Dover District Council, in accordance with the principles of Localism Act 2011.' In the current economic climate, it seems very naïve to hope that 'new housing in villages can help them retain existing services such as public transport, retail (many pubs are going under because lack of staff and sky high energy bills) and schools'. Indeed we have lost a large proportion of our bus services in the district.

<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Push back to central government and demand a reduction in the housing allocation of 10,998 new homes. Now possible after announcements 5/12/22 from Prime Minister.</p> <p>Regenerate Dover as a priority, retrofitting existing housing stock to provide well insulated renewable energy powered homes. Windfall development only should be allowed in Deal, Sandwich and surrounding villages. Create a self sufficient sustainable garden village at Aylesham with secondary school and green infrastructure and homes far beyond future homes standard.</p> <p>Provide better facilities and transport links for Whitfield to ensure that homeowners are not car dependent.</p> <p>Lobby central government for changes to the rules for ownership of second homes. Priority should be given to locals.</p> <p>Make the wording in the plan stronger in favour of brownfield sites eg 3.32 <i>sufficient amount and variety of land</i> should also state that brownfield must be used before greenfield as per stated in NPPF 21.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP26 - Former Snowdown Colliery, Aylesham</p>
<p>Rep ID</p>	<p>SDLP865</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1268408</p>
<p>Consultee Full Name</p>	<p>Mrs Jan Gray</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP26 j and K</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>Yes</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>No</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>No</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as</p>	<p>Overa;l I am in favour of this development. However merely connecting it to the sewage system when there are historic probelms with the local sewage system not meeting the already massive expansion of housing locally will lead to backing up toilets and even could lead to toxic chemicals with any sewage overflow, contaminating this diverse natural habitat</p>

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Properly upgrade the sewage system or incorporate system free compost toilets with everything being water and bioverse friendly
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	A reasonable adjustment for accessibility
Include files	
Local Plan Consultation Point	SAP26 - Former Snowdown Colliery, Aylesham
Rep ID	SDLP909
Rep Status	Processed
Consultee ID	1331776
Consultee Full Name	Mrs Heather Green
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24, SAP25, SAP26, SAP27, SAP17, SAP18
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No

<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>No</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>Road infrastructure will not sustain the extra housing in the area. B2046 already had a fatality in 2022, and several big accidents where it is joined by Spinney Lane, Dorman Avenue North, and the Industrial Estate. B2046 regularly closed at Wingham end causing tailbacks with queues of traffic polluting the atmosphere. Diversions through country lanes happen several times a year and cause damage to local flora and fauna on the one track country lanes leading to local towns.</p> <p>B2046 already being used by heavier lorries which are causing crumbling to the verges.</p> <p>There is no secondary school in the area so children have to travel to Dover, Sandwich and Canterbury. Bus services have recently been curtailed resulting in overcrowding, and young vulnerable children being left stranded waiting an hour or more for the next bus, or having to be collected when parents finish work.</p> <p>Train services are sporadic and the current amount of secondary school age children in the area cannot be allocated local school places.</p> <p>Sewerage, gas, broadband are nearing capacity, with regular broadband outages and lack of any FFTP in the area with the current number of houses.</p> <p>Dorman Avenue building work is still not complete, and within that plan there was provision for extra shops. Current shops are high cost and low volume, thus travel 10-15 miles to nearest superstore means more vehicles on inadequate roads.</p> <p>Local doctor's surgeries are also at capacity and many wait weeks for appointments. The local hospitals have been at bed capacity for months, with people waiting in A&E for beds overnight, sometimes for 48 hours before being treated, or going for surgery.</p> <p>The Ukraine war has shown that greenfield areas are much needed for crops so that the UK can be self-sufficient rather than relying on imports. Many local farmers have increased crop harvesting already.</p> <p>The Covid-19 pandemic has resulted in increased mental health issues, and the spread of the virus has been shown to increase in more densely housed areas, where there are limited garden spaces to breathe fresh air and exercise. Along with limited parking causing problems in the recent estates at Dorman Avenue, and assuming an extra minimum of 1 car per household the increase of cars especially at peak times on the B2046 will cause more accidents and hold ups.</p> <p>For those travelling to Sandwich or Thanet, the A257 is inadequate in terms of the junctions leading onto it. Already fatalities and severe accidents involving the use of air ambulances this year deem this road unsuitable for the current traffic levels. The Sandwich area developments will cause more disruption on these junctions, and the increase to delays on this road will cause more traffic pollution.</p> <p>The new Canterbury City Council plan has not been discussed with DDC and thus contravenes the Duty To Co-operate with both councils.</p> <p>Together with 640 houses in Aylesham, 3200 in the adjoining Cooting Farm Town, and another 500-800 also in close proximity, the infrastructure and the amenities cannot cope with these plans.</p> <p>The Government has recently abolished the 300,000 new homes for the next year and that was the figure on which this plan was based</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Government has just rescinded the 300,000 new housing level, and the levels in these plans need to be modified, meaning an urgent review of this plan should be commenced.</p> <p>Lack of consultation with CCC on their forthcoming plan including Cooting Farm Town which abuts the B2046 shows failure in Duty to Co-operate with neighbouring areas, and thus this plan should be put on hold with both councils meeting to discuss both plans and redesign a way forward that benefits both councils. The area cannot sustain either at present and with no discussions both plans have been launched at similar times without knowledge.</p> <p>Highways involvement in terms of upgrading the B2046, straightening the blind bends, installing roundabouts at dangerous junctions, plus the dualing of the A257 before the Sandwich housing areas are finalised, must take place. Both roads have had fatalities this year, and with a doubling of housing in the surrounding area, the road state must be revisited.</p> <p>Local fauna relies on corridors away from businesses and housing and these have already been narrowed by previous recent housing in Dorman Avenue. Rare red kites, bats, and more nest and live in the area and these must be preserved, not eradicated by housing.</p> <p>A secondary school is required in the area, travel to and from other schools with inadequate/exortionate price bus and train services has to be revisited before considering the increase in housing.</p> <p>Local shops need to be varied and increased before any more housing. With only one Post Office in five local villages, the post office in Aylesham is already over-used and other village amenities and infrastructure must be revisited.</p> <p>FFTP broadband is essential now with over-use and will be impossible with new housing levels, The Government agrees to supply broadband to low income households, instead this will get worse.</p>

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP26 - Former Snowdown Colliery, Aylesham
Rep ID	SDLP813
Rep Status	Processed
Consultee ID	1331871
Consultee Full Name	Mrs Melanie Lindsley
Consultee Company / Organisation	The Coal Authority
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy SAP26 - Former Snowdown Colliery, Aylesham
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The plan, in respect of Policy SAP26, does not identify the whole of the Snowdown Colliery site, which is a brownfield site, for future re-development. This is not consistent with national policy which seeks to regenerate and bring forward brownfield sites and fails to take positive steps to support the Council's aspirations for sustainable development by including the whole of the site.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will	The Coal Authority welcomes this opportunity to comment on the Regulation 19 consultation for the New Dover District Local Plan, to which this representation relates. We are pleased to see that our previous representation in respect of the dichotomy between the Districts' Economic Growth Strategy (Consultation Draft, January 2021) and the Local Plan, specifically with regard to the prospects for rural economic development and redevelopment of the Snowdown Colliery site has been addressed, in part. We welcome the inclusion of Policy SAP26 – Former Snowdown Colliery, Aylesham, which allocates the majority of the former site for employment development in order to facilitate the re-use of the site. We are also pleased to see that the allocation notes that acceptable uses on this site will include Class E, to include offices, research and development or industrial processes (E g) (i), (ii) and (iii), B2 and B8 uses as well as some leisure, retail, food and drink, non-residential and tourism uses.

make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The allocation of this substantial brownfield site should make a significant and positive contribution to the aspirations and objectives of the Local Plan.

We are however disappointed to note that the whole of the site to which our previous representation related has not been included in the site allocation. Inclusion of the whole site, including the former bath house site on the northern side of Holt Street (which is actually mentioned specifically in the introductory text), would ensure that this brownfield site as a whole contributes to a sustainable mix of new uses. We consider that this northern part of the site provides an opportunity to support re-use of a brownfield site for housing led development which would contribute towards local housing provision aligned with the identification of Aylesham as a strategic housing growth location in the draft Local Plan. We are therefore seeking the inclusion of the colliery site to the north of Holt Street in the SAP26 site allocation, as shown edged in red on the attached plan, and for further flexibility in the uses allowed on site to enable appropriate housing development to come forward.

As this northern part of the wider Snowdown Colliery site has been omitted from the SPA26 allocation the Coal Authority is concerned that as currently drafted, the broader policies within the plan would act to limit the prospects for this brownfield site's redevelopment. We are therefore seeking suitable alterations to the draft Local Plan to ensure that its policy content in respect of the Snowdown Colliery site is fully aligned with other relevant strategies and the brownfield first agenda. The allocation of the whole site, including the northern part of the site, would be appropriate given that redevelopment of the Snowdown Colliery site is a target activity of the council's Economic Growth Strategy.

In the case of brownfield sites like Snowdown Colliery, the allocation policy needs to be sufficiently flexible to facilitate and encourage the redevelopment of these sites, which should include an element of housing, while recognising that any new use needs to be sensitive to the character and appearance of the site's context and proportionate to its location. As drafted Policy SAP26 not only excludes part of the brownfield colliery site but it is also restrictive and prevents forms of development that may be required to support the wider regeneration of this substantial site. If the northern part of the former colliery site is excluded from the allocation, as now, then the draft policies are too restrictive and would not facilitate the future redevelopment of the northern part of the site. In this case it could be considered that the policies are in conflict with paragraph 81 (d) of the National Planning Policy Framework:

"81. Planning Policies should:

1 d) be flexible enough to accommodate needs not anticipated in the plan..."

The allocation and redevelopment of the Snowdown Colliery site provides major opportunities for the rural economy, promoting diversification, sustainable development and economic growth. It will facilitate the development of a new workspace hub which will complement the district's settlement hierarchy and specifically the Local Plan's identification of Aylesham as a location for strategic housing growth (a total of 1140 houses during the plan period). A mixed-use scheme at the site would be sustainable, resilient and embrace innovation in the district while also having the potential to support the Growth Strategy for Tourism. The site provides an opportunity to fulfil the aspirations of the Local Plan and the Coal Authority requests that Policy SAP26 and the allocation boundary are amended to include the land to the north of Holt Street and to provide flexibility for an element of housing to come forward as part of the wider redevelopment of the Snowdown Colliery site during the plan period.

We note the Council's ambition to utilise previously developed land where possible to meet housing delivery targets. We also acknowledge the Council's aspiration to support and sustain rural communities and local services. The Snowdown Colliery site constitutes previously developed land and lies approximately 1 mile from Aylesham. Having reviewed the Council's settlement hierarchy it is noted that Snowdown is not included within the "smaller villages and hamlets" settlement type, where windfall development will be acceptable. However, there are occasions where brownfield sites within the countryside, outside of the defined areas, should be supported for redevelopment in order to assist in regenerating vacant and/or derelict areas; the Snowdown Colliery site is one of these areas.

Policies within the Local Plan should facilitate and support opportunities for small scale mixed-use schemes outside of defined settlements, including a limited element of housing where this will support the objectives of sustainable development and make an important contribution to housing supply. In this case redevelopment of the Snowdown Colliery site as a whole, including an element of housing provision, will assist in supporting the vitality and viability of nearby settlements. Given the close proximity of the Snowdown Colliery site to Aylesham, the provision of an element of housing within the redevelopment of the site will support both the identified housing growth strategy and the services and facilities available within this rural centre. It would also reduce pressure for the development of greenfield sites, in accordance with national planning policy.

	<p>Allocating the whole of the Snowdown Colliery site, to include an element of housing provision as part of an employment led development would assist in the viability of the site's redevelopment, which contains a range of built heritage assets including two Listed buildings. However, that will require significant investment to facilitate their reuse and conservation.</p> <p>This representation is not seeking a specific housing allocation, but rather inclusion of the whole brownfield site within the SAP26 allocation and flexibility within the policy wording to allow for a limited amount of housing development to come forward as part of the wider redevelopment of Snowdown Colliery. The Coal Authority considers that the northernmost part of the Snowdown Colliery site, the location of the former colliery bath house which is omitted for the current draft allocation, to the north of Holt Street, could facilitate a logical extension to the existing adjacent housing in Snowdown.</p> <p>We respectfully request that renewed consideration is given to:</p> <ol style="list-style-type: none"> 1 The allocation of the Snowdown Colliery site (Policy SAP26) to include the former colliery land to the north of Holt Street as shown edged red on the attached plan, and 1 For the wording of the policy to be amended to be more flexible to allow for a variety of uses included a limited amount of housing led regeneration on this part of the site.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	In order to have an opportunity to discuss our representation, and to answer any questions raised by the Council or the Inspector, in respect of the inclusion of the whole of the Snowdown Colliery site in the SAP26 allocation and further flexibility in the policy wording to allow for a limited amount of housing led regeneration.
Include files	Snowdown Colliery Site Plan_.pdf
Local Plan Consultation Point	SAP26 - Former Snowdown Colliery, Aylesham
Rep ID	SDLP1394
Rep Status	Processed
Consultee ID	1266669
Consultee Full Name	Mrs Susan Sullivan
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP26
2 - Do you consider this part of the Plan sound?	No

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SAP26 Snowdon Colliery This is a brownfield site like the Betteshanger Colliery sites and like Betteshanger it has been rewilding for decades. Has its biodiversity value been established? Have comprehensive ecological surveys been carried out recently on the whole site? Or is it assumed that whatever the site supports the effects of any development can be mitigated? It would be a tragedy if yet another site of high importance for its biodiversity value was lost to development. The NPPF says allocate sites that have the least harmful effect on the environment. Snowdon Colliery site may qualify as a Local Nature reserve of a SSSI. Thuis should be established before it is allocated for development.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	I would like to see this Policy prefaced by the following: a full ecological survey of the site will be carried out to establish the sites full biodiversity value and whether it would qualify for a conservation designation.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP26 - Former Snowdown Colliery, Aylesham
Rep ID	SDLP993
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP26
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The County Council requests specific mention of connection to the PROW network within this policy and requests that the Transport Assessment includes consideration of the PRoW network.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The County Council requests specific mention of connection to the PROW network within this policy and requests that the Transport Assessment includes consideration of the PRoW network.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP26 - Former Snowdown Colliery, Aylesham
Rep ID	SDLP1231
Rep Status	Processed
Consultee ID	1265784
Consultee Full Name	Miss Clare Delf
Consultee Company / Organisation	
Agent Full Name	

Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 24
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Comments</p> <p>I would like to object to the Dover District Council Local Plan SAP24 Aylesham on the basis that it is not "Sound".</p> <p>The Local Plan has made a considerable number of statements. SP3 Page 36 for instance regarding Aylesham states that <i>Developments will be at a more limited scale, compatible with the more limited job opportunities, shops and services.</i> It goes on to say that <i>- Development which results in disproportionate growth to any of the Districts settlements which cannot be supported by the necessary infrastructure and or services or which would result in a loss of services and facilities which are considered to be key to supporting local communities will be resisted.</i></p> <p>Yet looking at the Local Plan for the area where I live it is proposed to increase the size of the village of Aylesham with proposal to build a further 650 house in addition to the 1340 already approved. This is disproportionate growth for Aylesham and cannot be supported by the infrastructure yet Dover District Council is doing the opposite of resisting this development.</p> <p>Dover District Council states that it is the policy to provide sustainable employment in the area where people live in order to minimise travel. In the plans the area of Snowdown Colliery is given as a potential site for employment of up to 500 people. It is stated Dover District Council intend to "Work with local partners to enable and explore all opportunities for the redevelopment of the vacant Snowdown Colliery site. Ideas include the potential delivery of Snowdown Park to create an environmentally-friendly hub for start-up businesses and artisan producers, as well as an international centre for research and development into the health and welfare of the honey bee".</p> <p>In fact this site is private property in private ownership, whose owner who has only one tenant - the British Coal Board. It is not a "vacant site".</p> <p>It is not owned by Dover District Council.</p> <p>We have been informed there are no plans by the owner to change the tenant so there is no evidence that Dover District Council can claim this is a "vacant site". There are no plans for any employment opportunities on this site, and no financial backing for development of employment. The plans for an International centre for research into bee health seems to have been an aspiration rather than a commitment to a tangible reality. The current owner has no plans to change the tenant. If this situation were to change, and it is not expected to do so in the foreseeable future, there are also the potential downsides to developing a former coal mine which will present considerable challenges due to the continued presence of existing underground mine workings and Grade 2 listed buildings.</p> <p>For any developer this will add considerably to the cost of any redevelopment. For any potential business owner, in addition to the higher cost of rental space as the developer seeks to maximise their profits, the cost of running a business in a rural location will be heavily impacted by transport costs which will add to the carbon footprint of the business.</p>

Therefore the inclusion of Snowdown Colliery in the list of potential areas for employment is an attempt to conflate the number of employment opportunity sites and job numbers rather than a true picture of what is available or will be available in the future. It is not a true picture of employment opportunities available in the Aylesham area at present or in the future.

The consequences of the additional housing proposed at Aylesham will be the unofficial formation of a mini town at Aylesham village, without any consideration for increased infrastructure or facilities. The in progress and planned housing will potentially grow the population from 5,000 in 2018 to 25,000 by 2030. The current expanding population has already stretched the existing infrastructure beyond what can be sustained.

The current medical centre is already working at maximum capacity and yet there does not appear to be any provision to increase capacity for medical care.

There is a lack of provision of nursery places and amenities for young people. Cultural amenities are also lacking. Despite the large number of houses already built and sold by the developers, the people of Aylesham have not seen significant enhancement of the amenities, services, retail or entertainment opportunities.

There is no secondary school in Aylesham with the result that there will be increased traffic on roads to Canterbury, Sandwich, Ramsgate, Deal and Dover with children being taken to school by car. Kent County Council has already announced it is cutting funding for almost all of its bus services and this will impact public and school bus services. In consequence more journeys will be by car. Dover District Council's stated aim is to *build houses where the need for travel for employment and education are reduced*. The plan does not meet this stated aim.

The Garden Village design model includes the statement "*should be designed to provide affordable homes close to employment*". The number of houses proposed vastly exceeds the realistic potential for increase in employment in Aylesham.

The NPPF SECTION 9 paragraph 106 states Planning policies should

a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;

So how does Dover District Council show the proportionate evidence of where the extra 20,000 people in Aylesham will work and how they will travel to this work or where their children will be educated, where they will shop and where they will participate in leisure activities. No evidence has been produced on scenarios for potential travel routes and the numbers likely to be travelling by different modes and routes. We may speculate that some may choose to travel by train. It should be noted that there is only one accessible platform at Aylesham rail station. The platform for any return journeys from Canterbury or onward travel to Dover is inaccessible for anyone unable to climb the stairs. However the vast majority will most probably choose to travel by car daily to and from Canterbury, Dover, Ramsgate, Deal or Sandwich with additional journeys to collect school children where the bus service does not exist or is not funded. The report by Sustrans on the cycling and walking opportunities for Aylesham, whilst welcomed, does not reflect the reality of most peoples daily lives, where the speed of travel to and from work, and the safety of their children's journey to and from school takes priority. On the small country roads in this area of Kent, cyclists contend with blind corners and speeding car motorists for most of their journeys, not to mention the small army of delivery drivers and tradesmens vans aiming to meet their latest deadline and of necessity travelling as fast as possible. How does this Local Plan meet the Dover District Council stated aim that *new developments should reduce the dominance of cars*? The answer is that it does not meet the aim.

In the plans we see no evidence that the Dover District Council has assessed the impact of the additional housing on our area with regard to the increase in traffic from Aylesham due to the lack of employment and secondary education in Aylesham. We see no evidence that there is any proposed increase in infrastructure and support services such as schools, hospitals and doctors surgeries to meet the requirements of an additional 20,000 people. We see no evidence that the Dover District Council Local Plan will address the lack of facilities, infrastructure and amenities in Aylesham for the current residents and the 20,000 new residents

In addition to the houses proposed at Aylesham there are also proposals by Canterbury City Council to allow the building of 420 houses on land near Womenswold, south of Aylesham. This development would adjoin the proposed extra 650 houses proposed by Dover District Council. The plan does not seem to meet the requirement for co-operation with other authorities if you consider the extent of the housing proposed by Canterbury City Council right up to their boundary with 3200 houses between Adisham and Aylesham. This is a total of 3620

	<p>houses proposed by Canterbury City Council almost adjacent to the Dover District Council's proposed and existing new developments for Aylesham. Where is the co-operation between these councils concerning the area on the boundary of Canterbury City Council and Dover District Council at Aylesham. There is no evidence in the local plan that Dover District Council has taken account of the impact of Canterbury City Council's Local plan, on the existing communities in this area. Their plans seem to overlap but the Local Plans do not include sufficient information on how they will work together effectively to mitigate the massive impact of the combined numbers of additional houses in such a rural area.</p> <p>This is not a plan that will meet the requirements for sustainability and the social, economic and environmental costs of this unsustainable plan will fall predominantly on the residents of Aylesham and the surrounding villages.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	No
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	

SAP27 - Land at Dorman Avenue North (AYL001)

Local Plan Consultation Point	SAP27 - Land at Dorman Avenue North (AYL001)
Rep ID	SDLP26
Rep Status	Processed
Consultee ID	1255357
Consultee Full Name	Mr Jamie Pout
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP27
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Any development here will result in the loss of native woodland which is unacceptable. NPPF states that land can be used for many things other than housing and this seems to have been ignored here.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Remove this site from the local plan.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP27 - Land at Dorman Avenue North (AYL001)
Rep ID	SDLP123
Rep Status	Processed
Consultee ID	1265239
Consultee Full Name	Mrs Burnett A Burnett
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP27
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Hello education for teens and activities for teens. Social places to attend. employment limited too many small businesses a need to provide bigger employers. We coal site needs to provide for local community .toursim is over prices for local community to use. housing lacks bunglors , disabled acommodation , nursery for children. Old age care needs. Taking away farming land.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	E duation for teenage. Transport safe for school age people. Teenagers in Aylesham are disadvantaged by having to travel to town by loss of time leading to missed out of school activities and study time. place for young people to attend after school at weekends. Coffee shops study's. more inclusive for people with disabilities, bunglors , garden space for social housing needs. farm land removed were is the food production going to be provided.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP27 - Land at Dorman Avenue North (AYL001)
Rep ID	SDLP159
Rep Status	Processed
Consultee ID	1329874
Consultee Full Name	Ms Nicola Purcell
Consultee Company / Organisation	Aylesham Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24- Land to the South of Aylesham (AYL003)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Aylesham North (500 homes) has now been removed from the Draft Local Plan. Aylesham Parish Council welcomes this decision.</p> <p>In the south, site AYL003 runs from Spinney Lane (with Aylesham Road to the East and Ackholt Wood to the West) all the way to housing in the village of Snowdown. This site has a proposed development of 640 homes. The site map has been amended (as per SA[1]) to properly reflect land ownership and remove a private property from the proposed area.</p> <p>This relates to SAP24 South Aylesham.</p> <p>In addition, there is 1 smaller site (AYL001 policy SAP27) located on land on Dorman Avenue North. Initially this land was due to be windfall housing but is now allocated for 9 houses.</p> <p>Aylesham Parish Council opposes the uses of AYL001 for the development of 9 houses as this would result in the loss of registered native woodland.</p> <p>Aylesham Parish Council believes this level of development is over-bearing on the village and risks altering the character of the community. This is far beyond the original master-plan.</p>

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP27 - Land at Dorman Avenue North (AYL001)
Rep ID	SDLP211
Rep Status	Processed
Consultee ID	1330207
Consultee Full Name	Mrs Sara Garrity
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	HELAA Ref AYL001
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	The plan is not sound as it does not address the flooding that currently occurs at the junction of Dorman Avenue North, with moderate rainfall. The already completed housing development has increased the frequency of surface flooding in the area and the promised upgrade to the drainage system has not happened, currently, there are no plans from Southern Water to improve the situation.

<p>possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>The area identified for development consists of woodland that helps to control the surface water runoff, if this is removed then, as a direct result, more flooding will occur.</p> <p>This woodland contains a number of Ancient and Veteran trees (as identified by the Woodland Trust, Tree I.D. 216747, 217804, 217808, 217809) According to the 'Keepers of time: Ancient and native woodland and trees policy in England' (May 2022)</p> <p>Protection of the resource.</p> <p>1.2 Requires local planning authorities to consult with the secretary of state for Leveling up, Housing and Communities before granting planning permission for developments affecting ancient woodland.</p> <p>1.3 Consult on the protections for long-established woodlands in the planning system, recognising their high ecological and societal value.</p> <p>1.5 Update the ancient woodland inventory to cover the whole of England, 'this will include smaller ancient woodland sites of less than 0.25 hectares'</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The removal of this site (AYL 001) from the plan to preserve the Ancient woodland and remove the increased risk of flooding that would inevitably occur if the development went ahead.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Not Applicable</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>SDLP211 Garrity - Att4.pdf SDLP211 Garrity - Att1 Flooding Redacted.jpg SDLP211 Garrity - Att2 Flooding Redacted.jpg SDLP211 Garrity - Att3 Flooding Redacted.jpg SDLP211 Garrity - Att4 Woodland Trust Redacted.PNG SDLP211 Garrity - Att5 Woodland Trust Redacted.PNG SDLP211 Garrity - Att6 Woodland Trust Redacted.PNG SDLP211 Garrity - Att7 Woodland Trust Redacted.PNG SDLP211 Garrity - Att8 Woodland Trust Redacted.PNG SDLP211 Garrity - Att9 Woodland Trust Redacted.PNG SDLP211 Garrity - Att10 Woodland Trust Redacted.PNG SDLP211 Garrity - Att11 Woodland Trust Redacted.PNG SDLP211 Garrity - Att12 Woodland Trust Redacted.PNG SDLP211 Garrity - Att13 Woodland Trust Redacted.PNG SDLP211 Garrity - Att14 Woodland Trust Redacted.PNG SDLP211 Garrity - Att15 Woodland Trust Redacted.PNG flood 6 .jpg Flood 2.jpg flood 4.jpg</p>

Local Plan Consultation Point	SAP27 - Land at Dorman Avenue North (AYL001)
Rep ID	SDLP212
Rep Status	Processed
Consultee ID	1330207
Consultee Full Name	Mrs Sara Garrity
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	HELAA AYL001
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The plan is not sound as it does not address the flooding that currently occurs at the junction of Dorman Avenue North, with moderate rainfall. The already completed housing development has increased the frequency of surface flooding in the area and the promised upgrade to the drainage system has not happened, currently, there are no plans from Southern Water to improve the situation.</p> <p>The area identified for development consists of woodland that helps to control the surface water runoff, if this is removed then, as a direct result, more flooding will occur.</p> <p>This woodland contains a number of Ancient and Veteran trees (as identified by the Woodland Trust, Tree I.D. 216747, 217804, 217808, 217809) https://ati.woodlandtrust.org.uk/tree-search/tree?treeid=217809&from=3523&v=2189965&ml=map&z=18&nwLat=51.22840516018046&nwLng=1.1970068468518935&seLat=51.22665829532552&seLng=1.1990989698835097#/</p> <p>According to the 'Keepers of time: Ancient and native woodland and trees policy in England' (May 2022) Protection of the resource.</p> <p>1.2 Requires local planning authorities to consult with the secretary of state for Leveling up, Housing and Communities before granting planning permission for developments affecting ancient woodland.</p> <p>1.3 Consult on the protections for long-established woodlands in the planning system, recognising their high ecological and societal value.</p> <p>1.5 Update the ancient woodland inventory to cover the whole of England, 'this will include smaller ancient woodland sites of less than 0.25 hectares'</p> <p>Additional photos relating to the trees have been forwarded to localplan@dover.co.uk</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s)	

you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	SDLP212 Garrity - Att1.pdf
Local Plan Consultation Point	SAP27 - Land at Dorman Avenue North (AYL001)
Rep ID	SDLP680
Rep Status	Processed
Consultee ID	1221958
Consultee Full Name	Ms Bridget Fox
Consultee Company / Organisation	The Woodland Trust
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP27 - Land at Dorman Avenue
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The site includes four identified ancient and veteran trees, namely (ATI numbers): <ul style="list-style-type: none"> • Veteran Hawthorn (ATI no: 217804) • Ancient Field Maple (ATI no: 216747) • Veteran Hazel (ATI no: 217808) • Veteran Hawthorn (ATI no: 217809).

	<p>Ancient and veteran trees have the same protection in the NPPF as ancient woodland yet there is no reference to protecting these trees in the site-specific issues.</p> <p>We reserve the right to comment on and if necessary to object to future planning guidance or applications that do not offer such protections in practice.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>We request that a requirement for tree surveys and designation of Root Protection Areas is added to the site-specific requirements.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP27 - Land at Dorman Avenue North (AYL001)</p>
<p>Rep ID</p>	<p>SDLP871</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1268408</p>
<p>Consultee Full Name</p>	<p>Mrs Jan Gray</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP27 AYL001</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified Effective</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>No</p>

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	This section of Dover local plan is in collaboration with Canterbury local plan building circa 8k new houses linkinking and encompassing both Aylesham and Adisham. .There are no places for any children who would move in to this development locally in primary schools. There will be no transport by the time this is built for children to be able to go to secondary schools . None of this housing will be financially achievable by local people or their extended families. The prospective buyers for these homes can only be the cash rich or business purchasers who can avoid many taxes to create income from rents that are unaffordable to local people. There is no infrastructure proposed for this section of the New Dormitory Town encompassing and extending both Aylesham and Adisham. No supermarket, no youth centre, no police,no focal point where communities can meet. No accomodation whatsoever for safeguarding the community. The ability of the land to absorb heavy rainfall is compromised, the ability of the land to absorb CO2 emmissions is compromised, the ability of the land to grow food for our local people is removed entirely. We are in a cost of living and coming into an availability of purchasing food for our whole population crisis.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Upgrade the housing stock you have and that housing association has to be of a decent human habitable standard. You have a lot of homes that are damp and mouldy, your relevant departments do not respond adequately nor timely to emergencies such as boiler breakdowns or water leaking through houses. You could just as easily as another authority, have been sued for harm to babies from mould and damp as another local authority was. Build on brownfield sites. build to a good sustainable standard ie passive solar heating, heat pumps etc so that the tenants of the landlords the houses are sold to are warm without draughts and with a low carbon cost to heat. Properly update the water and sewage systems to cope with the massive extra load on systems that are failing with the current load. Put in protections so that our rivers and our seas are no longer discharging fecal matter into our local rivers and the channel where so many like to swim. build a school for our teenagers so poor families don't have to struggle to pay £450 for each child each year for the privelege of going to a secular state school, then being terrified that your children can't get transport to the school anyway. Your planning has a role in the educational and health comprehensive failure for SEND children and along with them secondary school children in your villages, but all this (8k in total) extra housing without any of the vital infrastructure,will make this place like a ghetto.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	In order for the process to be accessible I would like this as a reasonable adjustment
Include files	
Local Plan Consultation Point	SAP27 - Land at Dorman Avenue North (AYL001)
Rep ID	SDLP910
Rep Status	Processed
Consultee ID	1331776
Consultee Full Name	Mrs Heather Green
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to?Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24, SAP25, SAP26, SAP27, SAP17, SAP18

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Road infrastructure will not sustain the extra housing in the area. B2046 already had a fatality in 2022, and several big accidents where it is joined by Spinney Lane, Dorman Avenue North, and the Industrial Estate. B2046 regularly closed at Wingham end causing tailbacks with queues of traffic polluting the atmosphere. Diversions through country lanes happen several times a year and cause damage to local flora and fauna on the one track country lanes leading to local towns.</p> <p>B2046 already being used by heavier lorries which are causing crumbling to the verges.</p> <p>There is no secondary school in the area so children have to travel to Dover, Sandwich and Canterbury. Bus services have recently been curtailed resulting in overcrowding, and young vulnerable children being left stranded waiting an hour or more for the next bus, or having to be collected when parents finish work.</p> <p>Train services are sporadic and the current amount of secondary school age children in the area cannot be allocated local school places.</p> <p>Sewerage, gas, broadband are nearing capacity, with regular broadband outages and lack of any FFTP in the area with the current number of houses.</p> <p>Dorman Avenue building work is still not complete, and within that plan there was provision for extra shops. Current shops are high cost and low volume, thus travel 10-15 miles to nearest superstore means more vehicles on inadequate roads.</p> <p>Local doctor's surgeries are also at capacity and many wait weeks for appointments. The local hospitals have been at bed capacity for months, with people waiting in A&E for beds overnight, sometimes for 48 hours before being treated, or going for surgery.</p> <p>The Ukraine war has shown that greenfield areas are much needed for crops so that the UK can be self-sufficient rather than relying on imports. Many local farmers have increased crop harvesting already.</p> <p>The Covid-19 pandemic has resulted in increased mental health issues, and the spread of the virus has been shown to increase in more densely housed areas, where there are limited garden spaces to breathe fresh air and exercise. Along with limited parking causing problems in the recent estates at Dorman Avenue, and assuming an extra minimum of 1 car per household the increase of cars especially at peak times on the B2046 will cause more accidents and hold ups.</p> <p>For those travelling to Sandwich or Thanet, the A257 is inadequate in terms of the junctions leading onto it. Already fatalities and severe accidents involving the use of air ambulances this year deem this road unsuitable for the current traffic levels. The Sandwich area developments will cause more disruption on these junctions, and the increase to delays on this road will cause more traffic pollution.</p> <p>The new Canterbury City Council plan has not been discussed with DDC and thus contravenes the Duty To Co-operate with both councils. Together with 640 houses in Aylesham, 3200 in the adjoining Cooting Farm Town, and another 500-800 also in close proximity, the infrastructure and the amenities cannot cope with these plans.</p> <p>The Government has recently abolished the 300,000 new homes for the next year and that was the figure on which this plan was based</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness	<p>Government has just rescinded the 300,000 new housing level, and the levels in these plans need to be modified, meaning an urgent review of this plan should be commenced.</p> <p>Lack of consultation with CCC on their forthcoming plan including Cooting Farm Town which abutts the B2046 shows failure in Duty to Co-operate with neighbouring areas, and thus this plan should be put on hold with both councils meeting to discuss both plans and redesign a way forward that benefits both councils. The area cannot sustain either at present and with no discussions both plans have been launched at similar times without knowledge.</p> <p>Highways involvement in terms of upgrading the B2046, straightening the blind bends, installing roundabouts at dangerous junctions, plus the dualing of the A257 before the Sandwich housing areas are finalised, must take place. Both roads have had fatalities this year, and with a doubling of housing in the surrounding area, the road state must be revisited.</p>

matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Local fauna relies on corridors away from businesses and housing and these have already been narrowed by previous recent housing in Dorman Avenue. Rare red kites, bats, and more nest and live in the area and these must be preserved, not eradicated by housing. A secondary school is required in the area, travel to and from other schools with inadequate/extortionate price bus and train services has to be revisited before considering the increase in housing. Local shops need to be varied and increased before any more housing. With only one Post Office in five local villages, the post office in Aylesham is already over-used and other village amenities and infrastructure must be revisited. FFTP broadband is essential now with over-use and will be impossible with new housing levels, The Government agrees to supply broadband to low income households, instead this will get worse.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP27 - Land at Dorman Avenue North (AYL001)
Rep ID	SDLP1579
Rep Status	Processed
Consultee ID	1252218
Consultee Full Name	Cllr Linda Keen
Consultee Company / Organisation	DDC WARD - Aylesham, Eythorne and Shepherdswell
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP27
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible.	1. SAP24, AYL003 South Aylesham, 640 houses – I support the Parish Council's objection that this level of development is overbearing on the village (for reasons given below) and risks altering the nature of the community here, which has already seen approval for some 1300 houses. It goes far beyond the original master plan.

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

2. SAP 27 (AYL001 policy SAP27), 9 houses – I support the opposition of the Parish Council to this because it would result in the loss of registered native woodland.

3. Over the past few years, Aylesham has seen a vast amount of development, which has put considerable strain on local amenities such as local shops, local community and leisure facilities, highways infra-structure and medical services, which are currently inadequate, as outlined below.

4. Transport and Highways infrastructure Bus services are totally inadequate – there is no evening service to anywhere, and no bus to Dover or Whitfield, despite a recent service showing that this is what most people want, and a promise from the local bus privatised company and Kent Council that it will provide a minibus dial-up service. There is no sign of the latter so far, despite many promises – and it will be inadequate for the numbers of existing and new houses. This means over reliance on cars, and isolation from those without their own transport. The train service does not cater for people with disabilities who cannot cross between the different platforms at both Aylesham and Snowdown Stations. The IDP identifies that “passenger numbers have risen significantly” and that Network Rail are looking to increase to half-hourly services – but there are no firm commitments. There is a need for second station entrances and DDA3 compliant access; improvements to car and cycle parking; improvements to pedestrian access; and more waiting bus shelters. There are no cycle tracks – and these are badly needed to other villages, Dover and Canterbury.

Local roads are increasingly congested – there is a knock-on effect for Nonington and Wingham where increased traffic from Aylesham through the narrow road to Sandwich through Nonington and the B2046 to Wingham will make much worse already bad problems with speeding, and long queues at the B2046 junction at Wingham. Short of a new bypass for which there is no funding, nothing can be done to significantly improve these problems. Any future developments must include a plan to make significant upgrades to key routes such as Spinney Lane and B2046 (Adisham Road). Although this is mentioned in the IDP2, there are no firm commitments to immediate improvements.

5. Local amenities – as the Parish Council explains in detail, given the recent and ongoing development of 1300 odd houses – are already grossly inadequate, with no local supermarket, insufficient community/leisure facilities, highways infra-structure and insufficient medical services. There is no coherent youth service provision, very poor shopping facilities, no local pub or restaurant, and limited sports and community facilities which have received only a limited amount of developer contributions so far, and which have resulted in little real addition to such facilities in the village. There is a lack of pre-school education provision, excessive demand on the local medical centre, no dentist, all of which contravenes 3.8 SP2 statement that ‘ new development is well served by services and facilities. The IDP identifies a need for increased sports hall facility for which the developers’ funds allocation has still not been spent. The IDP also mention a proposed community facility/ which has yet to materialise and on which the Parish Council says it has not been consulted. Moreover KCC closed the Youth club some years ago, and, despite the tremendous increase in families and young people already happening as a result of the existing new builds, there is no coherent strategy of funds for much greater youth service provision in the village.

6. Rural Service Centre - this is Aylesham’s official designation in the Dover Council Settlement hierarchy, level with the town of Sandwich. But, although both communities have equal weighting in the settlement hierarchy, they are not getting an equal weighting in housing development or in terms of investment. The Site Allocations refer to the district’s “existing larger settlements of Dover, Deal and Sandwich” but in reality Aylesham is now likely to have a larger population than Sandwich. Aylesham is receiving 649 new homes (SAP24 and SAP27), whilst Sandwich has a proposed development of just over 200 homes.

The Draft Local Plan proposes investment in Sandwich to improve the town and protect its heritage, plus a culture investment plan. THIS IS NOT HAPPENING IN AYLESHAM. This relates to SP3 – Housing Growth and SP10 – Sandwich Town Centre. The residents of Aylesham should also see their cultural capital widened and enriched in a similar extensive Draft Local Plan. Funding should be provided for organisations such as cinemas, museums, galleries etc that will help to enrich people’s lives. In addition, funding should be made to include a substantial mining heritage centre to the site at SP26 which will provide much welcome additional employment on the old Colliery site. Only two of these buildings are currently listed – more should be listed, and adapted to new cultural uses, plus the provision of shops and other leisure/cultural facilities..

7. According to Kent County Council’s childcare sufficiency analysis, Aylesham currently has a significant deficit of 0-4 yr old childcare places, 5-11 yr old breakfast club places and 3 & 4 yr old extended entitlement places in nurseries. There needs to be FIRM commitment to SPECIFIC sites and PLANS to provide these increases in this vital early years service area. As the Parish Council says, the plan must go further than listing a whole host of possible “off-site” provisions to safeguard this vital sector.

8. In relation to secondary school provision, Secondary school age children have to travel by bus or train to Dover, Deal and Sandwich schools. Often, these buses or overcrowded or full and so do not stop at all designated stops to pick up school children leaving them stranded before school. Recently, the 96A to Dover Christ Church Academy was planned to be cut from Stagecoach’s timetable. There should be a properly

	funded and specific commitment to improve school trans[port as the numbers of children increase, and the possible need for a new Secondary School in the Dover District should be located in Aylesham.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>For a rural settlement, a further 640 houses, on top of a recent development of 1,360, is too much.</p> <p>Whatever the final number approved, the following changes should be made</p> <ul style="list-style-type: none"> • The 9 houses (AYL001) should not be built, for the reasons given above, and the further 640 houses should be reduced in number – nothing in reality can be done about the problems of significantly increased traffic on the B2046 especially.. • Buses – funding MUST be provided for adequate bus services – new ones to Dover and the local villages, and also in the evenings, to reduce car use, and avoid isolation amongst the large numbers of residents without cars. • Both train stations should be immediately upgraded to ensure DDA3 compliance, with second entrances, and train services should be increased in frequency. • Cycle track provision - there is nothing at the moment at all. • Upgrades to Spinney Lane and the B2046, and more parking provision and better traffic management in the village itself. • Guaranteed investment in local services, including generic dentist provision (not just the special dentistry service provided at the moment), enhancements to the medical centre, identification of specific sites for additional community facilities such as shops, pubs/restaurants, a sports/leisure/community Centre (for which some funding already exists which should be spent immediately, and there should be more developer funding), - and museum, cinema, library (far too small) – and a new Youth Centre with a coherent programme of events and activities. • Equal provision on the same level as Sandwich (Aylesham will be bigger in terms of population) in relation to heritage and cultural resources, and other community facilities. • Education – specifically identified funds and[plans to meet the needs identified above for early years education provision, more school buses, and the building of a new secondary school in Aylesham. <p>OTHERWISE, Aylesham will be reduced from a thriving community to nothing more than an enormous housing estate.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP27 - Land at Dorman Avenue North (AYL001)
Rep ID	SDLP1526
Rep Status	Processed
Consultee ID	1252520
Consultee Full Name	Rachel Collins Housing Development Manager
Consultee Company / Organisation	Dover District Council
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP27
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	All the sites above are Council owned sites. The intention is for these to be appraised, and if appropriate, brought forward for affordable housing within the next 5 years.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP27 - Land at Dorman Avenue North (AYL001)
Rep ID	SDLP2037
Rep Status	Processed
Consultee ID	1274769
Consultee Full Name	Karen Phillips
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP27
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	You make it so difficult for some people to access documents, i for one are one of them, NO MORE houses in Aylesham please think of the future of our childrens children, I know that means nothing to the money people but it does the residents of the village, enough is enough play areas will be gone, dog walking areas will be gone, safe places for people to walk will be gone ALL FOR EVER
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

Local Centres: Eythorne and Elvington, Eastry, Kingsdown, Shepherdswell, St Margaret's-at-Cliffe, Wingham and Ash

Local Plan Consultation Point	Local Centres: Eythorne and Elvington, Eastry, Kingsdown, Shepherdswell, St Margaret's-at-Cliffe, Wingham and Ash
Rep ID	SDLP114
Rep Status	Processed
Consultee ID	1330576
Consultee Full Name	Dr Vince Croud
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 28, 4.208-4.214
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I object to the proposal in the 2040 Local Plan that Eythorne and Elvington become a "Local Centre". I also object to the proposed building around Elvington. The reasons for both objections are set out below.</p> <p>Elvington and Eythorne, although geographically close, have their own distinct heritage, character, culture and community. Elvington was mostly built in the early 20th century to serve the nearby coal mine at Tilmanstone. Eythorne is very much older, with evidence of occupation from the stone age and in the heart of the village are many buildings from the 18th and 19th century. Eythorne is essentially a community founded on agriculture and it is not, and has never been, a mining village. The development of Tilmanstone colliery did not lead to significant housebuilding in Eythorne. In the late 1960s and early 1970s, however, small housing developments sprang up on land originally used for farming and latterly used by the local school and community.</p> <p>There are no existing problems, or conceivable future ones, that would be better served by combining these two individual communities as opposed to keeping them separate. Indeed, it might well be the case that better, more consensual, decision making would occur if the communities were kept unique (for example Coldred and its community driven management of the village centre). It is also evidentially the case that communities that keep their identities have less societal problems and better mental health because of the developed relationships and contacts within the community (people looking out for each other etc). As it stands the countryside is in easy walking or cycling distance for anyone no matter where they live in either community, young or old, and this access is enjoyed by many to the benefit of their mental wellbeing. Where there is urban sprawl, loss of green space and loss of identity, quality of life plummets (cf Thanet). Unnecessary and unsympathetic "planning" has irrevocably harmed many communities, villages and towns over the years, resulting in poor and problematic living environments for future generations to inherit.</p>

There is also no conceivable opportunity that could arise that would only be possible by combining the two communities rather than keeping them as they are now.

The issues facing these communities are many but none are due to them not being combined.

It is proposed that the two separate villages of Eythorne and Elvington are developed as a "Local Centre" based on them "having a very good range of services and facilities". This is a considerable overstatement as the two villages have, in fact, a very limited range of both.

In terms of existing GP services, the nearest is Shepherdswell which is only open between 8.30-10.30 a.m., Monday to Friday, and does not routinely offer an actual GP surgery but only "administrative" or nurse appointments. Overall, the other GP services in the area are stretched to the limit and will struggle to take up the amount of new patients that will arise with significant further new house building in this area. Additional patient numbers will introduce further frustration from the community with getting GP appointments when wanted. Unless GP provision is significantly improved, is properly delivered to time, and is written into the DDC plan then there will be a healthcare crisis in this District.

As well as insufficient GP provision, the area also suffers from inadequate response times from the Ambulance Service, SECAMB. April 2022 saw the worse response times on record for SECAMB. Although things have improved slightly since then, it is still poor and inadequate. Hospital waiting times especially for A&E are also poor. In part, the long waiting times for both hospital appointments and for A&E, as well as poor ambulance response times, are due to the inadequate GP primary care driving people to attend hospital rather than their own GP.

It is practically impossible to get an NHS dentist in this area and most surgeries are not taking on any new patients. This means new arrivals into the area are forced to go private pushing up their cost of living and ultimately leading to further degradation of the NHS provision even though we have all paid for it and it should be readily available.

Local policing is entirely absent in the main and incidences of anti social behaviour, vandalism and theft (for example frequent van break-ins for tools) that have occurred in both villages are largely not dealt with at all by the Police. Most certainly the Police are not being proactive in preventing such crimes. There is also a local drug taking and drug dealing problem, again not tackled.

The bus service for Elvington and Eythorne was always poor and inadequate for it to be used to commute to work. Now KCC has cut bus services further, there will be no public transport serving the villages. This has caused a major problem for school children attending secondary education in Canterbury, Dover and Sandwich and great difficulties for parents in trying to find alternative transport methods that also accommodate their need to attend work. Many in the village have mentioned considering moving away from this area to one that does have public transport for the school trip.

In Section 4.2.11 it mentions a range of tourist attractions available including Wingham Wildlife park, The "Historic park and Garden of Waldershare" and the EKR (East Kent (Heritage) Railway). The first is certainly an excellent attraction. Waldershare Park is, however, a private estate not open to the public. The heritage EKR line runs only one day a week (Sunday) and some bank holidays (not just "a few times a year" as stated in 4.216) from approximately April to October. Although it has a charm of its own and continues to be developed, it is currently of very limited appeal to the general public as it has a short track length and no steam engines.

In the Section on Eythorne and Elvington, and as shown in the plan in Section 4.214, land is shown "Allocated for Employment". This is all very laudable but the employment opportunities must be such that they provide opportunities, careers and suitable salaries for the local population. To date, attracting blue chip employers into this area has not met with tangible success. The Pike Road Industrial Estate businesses such as Tilmanstone Salads, which is a minimum wage employer, are not likely to be attractive to the majority of residents of employable age. More of the same is not going to adequately provide opportunities to deliver a sustainable community. The biggest employers for the communities will probably remain Dover docks and first responders, with others working for service industries from home.

Section 4.218 listing services and facilities has several errors. Eythorne does not have two village halls. It has one pre-cast concrete structure which could be considered a village hall behind Ss Peter and Pauls' Church. It is at the border of Eythorne and Elvington and hence poorly placed for Eythorne residents. It is barely used because of that and is most noted for being a polling station. Eythorne does not have a Cafe and to the best of my knowledge hasn't had one since the last century. It does have a village shop and Post Office combined (they are not separate amenities as might be supposed from the text as written in 4.218). Thus the actual "amenities" in Eythorne are one pub, one "village hall", and one Post Office/shop. It does have two churches (Baptist and CoE) but these are used by a tiny minority of residents and so can hardly be considered to be a significant amenity. According to the Church of England's own figures (2019), less than 1 % of the population attend church regularly. Over 50 % of the UK population are irreligious.

In terms of Elvington, it does not have a church as stated. The rest of the statement regarding Elvington amenities is correct. However, with the advent of services such as Uber Eats, Deliveroo and "Just Eat" etc the community attractiveness of the takeaways is diminished.

Regarding the statement in 4.219, and as clarified above, the settlements do not have much in the way of services and facilities that make them stand out as a place to create a new "Local Centre" unless the critical criteria you are using are possession of a pub, a shop, and unused churches.

Tilmanstone Colliery Welfare Sports Ground, as mentioned in 4.221, is a good facility for sports in the Eythorne and Elvington communities. As a non-profit making charity, however, it requires membership fees or hire fees for use of its facilities and the facilities are thus not freely available. These fees are not onerous however.

The entrance to the primary school which sits on the boundary between lower Eythorne and Elvington, and serves both communities, is on a corner and is a blind bend coming up Church Hill which is problematic for parents dropping off and picking up their children. Church Hill itself is narrow in parts, permitting passage of a vehicle only in one direction at a time, and is a bottle neck. Children arriving by foot from Upper Eythorne have to travel along Shooters hill which already has issues with child safety due to the narrowness of the road and traffic density, resulting in vehicles mounting the pavements to pass. Additional vehicle movements due to more house building will only exacerbate the problem. Traffic build up is also a problem at the staggered junction between Wigmore Lane, Shooters hill and Church hill which has visibility issues. If the new estate exits through Elvington, there will be a build up of traffic on Church Hill trying to exit onto Wigmore Lane using the Staggered junction. If the estate exits through Wigmore Lane then the increased traffic will cause problem trying to cross the staggered junction from Shooters Hill or Church Hill directions.

For sustainability of the community any new building must contain a large component of genuinely affordable housing. At the moment new houses are beyond the reach of the local young and are being bought up by people outside the community, diluting the community common values, or by buy-to-let investors.

It goes without saying that any new development must have searches done to ensure that subsidence and any ground contamination from the extensive Tilmanstone mining activity will not be an issue. Also the area around Elvington village has been found to contain much live WWII ordnance from troops stationed here during the war and this needs to be factored in to pre-building work.

The building on the proposed area will substantially diminish an important green corridor for wildlife movement (especially insects) and a source of food for many types of wildlife.

It is very disappointing to read in Section 4.2.11 that Dover District Council believe that "Shepherdswell, Eythorne and Elvington have their roots in the short-lived East Kent coalfields". Whilst it is certainly the case that Elvington is a (model) colliery village, the roots of both Shepherdswell and Eythorne precede the development of the coal fields by a considerable margin. Both have been occupied since the stone age, have evidence of Roman occupation, are mentioned in the doomsday book and have recorded history since then. Incidentally, it is stated in section 4.211 (and repeated in 4.216) that the EKR line was originally built to serve the Colliery at Tilmanstone. This is factually incorrect as the line was built to

	<p>serve any colliery in the area that might prove to be productive and reached as far as Wingham and also to Richborough at its peak. http://www.dover-kent.com/VILLAGES/18-Eythorne.html</p> <p>In conclusion there is clearly not the necessary infrastructure to support the proposed development and nowhere near enough amenities to justify development as a Local Centre. Progressing with the latter is wholly unnecessary. It would be much better if new villages were developed to support increased population, as was done when coal mining took off, to stop urban sprawl.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>For one, it needs to have guarantees on increases in health care, public transport, policing and schooling written in, commensurate with the increased number of houses, for it to be creditable as a plan to deliver sustainable communities.. Rather than continue "urban sprawl" by having "Local Centres" and diminishing sense of community etc, a much better policy would be to build new villages/towns to accomodate the additional housing as was done when mining started in Kent.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	No
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	Local Centres: Eythorne and Elvington, Eastry, Kingsdown, Shepherdsweil, St Margaret's-at-Cliffe, Wingham and Ash
<p>Rep ID</p>	SDLP411
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1266351
<p>Consultee Full Name</p>	Dr Sharon Danby
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	Local centres - 4.209 - 4.213
<p>2 - Do you consider this part of the Plan sound?</p>	No
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	Positively prepared Justified

	Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I would argue that the designation of Kingsdown as a local centre is unsound, unjustified, ineffective and inaccurate. Due to the unique nature of its location with AONB to the South as a border, the Sea to the East, heritage coast and cliffs to the South. The 3 narrow access roads serving Kingsdown do not link up easily to other hamlets and smaller villages to provide services. The main settlement of Ringwould is the other side of the A258 arterial road from Kingsdown and better served by Deal or Dover. There is no doctors, a recently reduced bus service, poor transport links for pedestrians and cyclists, no train station. A small village shop with post office and butchers. It is necessary to run a car to get to Deal or Dover for a food shop. It is not best served by large scale development and can only cope with a windfall developments due to its very poor but characterful roads.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Kingsdown should be designated as a larger village not a local centre.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Local Centres: Eythorne and Elvington, Eastry, Kingsdown, Shepherdswell, St Margaret's-at-Cliffe, Wingham and Ash
Rep ID	SDLP591
Rep Status	Processed
Consultee ID	1331709
Consultee Full Name	Ben Pridgeon
Consultee Company / Organisation	Emmanuel College
Agent Full Name	Ben Pridgeon
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Paragraph 4.214, Policy SP3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Paragraph 2.214 of the Plan states that the Ash Neighbourhood Plan makes a number of site allocations in Ash. Given this, no further site allocations are proposed at this settlement. The Local Plan should however be read in conjunction with the Ash Neighbourhood Plan. The period of the Neighbourhood Plan is up to 2038 and there will, no doubt be a revision to it, before then. The periods for the Neighbourhood Plan and Local Plan do not align and there is no contingency in the Local Plan for what happens to residential development in Ash beyond 2038.</p> <p>The Local Plan states that it should be read in conjunction with the Neighbourhood Plan in respect of allocations in Ash. However, the reverse is also true – That the Neighbourhood Plan should be read in conjunction with the Local Plan. That there is a Neighbourhood Plan for the settlement should not preclude new development at the settlement, particularly when there is a pressing need for development to come forward in the early part of the Local Plan period.</p> <p>Policy SP3 of the Local Plan requires that development in the 'rural areas' will be of a scale that is consistent with the relevant settlement's accessibility, infrastructure provision, level of services available, suitability of sites and environmental sensitivity. Development that would result in disproportionate growth to any of the district's settlements, which cannot be supported by the necessary infrastructure and services or would result in a loss of services and facilities which are considered to be key to supporting local communities will be resisted. Appendix E of the Local Plan classifies Ash as a 'Local Centre' which is appropriate for proportionate development. Therefore, where sites in Ash which are available, deliverable and developable and of a scale cognisant of a "Local Centre" then they should be considered for allocation by the Council.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	To inform spatial strategy and housing delivery in the district
Include files	221208-Representation to Local Plan.pdf (4) 221206-Site and ownership plan.pdf (4)

	221206-EAS-Access and drainage assessment.pdf (4)
Local Plan Consultation Point	Local Centres: Eythorne and Elvington, Eastry, Kingsdown, Shepherdswell, St Margaret's-at-Cliffe, Wingham and Ash
Rep ID	SDLP1266
Rep Status	Processed
Consultee ID	1271353
Consultee Full Name	Church Commissioners
Consultee Company / Organisation	
Agent Full Name	Mr Andrew Watson
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Land East of Eastry - Omission site
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Text Extracted from Document sent from Savills on Behalf of the Church Commissioners. Representation has been split across relevant areas of the Local Plan. Full attachment and introduction to Policy comments can be found under reference SDLP1266.)</p> <p>Introduction</p> <p>Savills has been instructed by the Church Commissioners to submit representations to the Draft Dover District Local Plan Regulation 19 Consultation. The consultation on the Local Plan commenced on 21st October and closes at 5pm on 9th December 2022. These representations focus primarily on the Land at Botolph Farm but also cover the Church Commissioners other landholdings in the district, including Land East of Eastry. These representations support the allocation of the Land at Botolph Street Farm and explain why it is suitable for additional residential development. Additionally, these representations identify why the Land East of Eastry should be considered as a site for future residential development. The Church Commissioners also own smaller land holdings within various settlements across the district which are considered suitable for conversion for residential use or via windfall housing. The Church Commissioners are promoting these sites in line with the Government agenda to deliver much needed new homes quickly and efficiently. These land holdings will guide the representations made in regards to the Regulation 19 Consultation Document. The National Planning Policy Framework (NPPF) explains that the planning system should be plan-led. Paragraph 16 sets out the Plans should:</p> <ul style="list-style-type: none"> a) be prepared with the objective of contributing to the achievement of sustainable development; b) be prepared positively, in a way that is aspirational but deliverable; c) be shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees; d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

e) be accessible through the use of digital tools to assist public involvement and policy presentation; and
f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant). At examination, a Plan will be found 'sound' if it is considered to be positively prepared, justified, effective and consistent with national policy, as set out within paragraph 35 of the NPPF. As such, ensuring that the Local Plan meets the tests of soundness is important throughout the Local Plan process - including at Regulation 19 stage.

Structure of the Representation The structure of this representation is as follows:

Section 2: Summary of the site at Botolph Street Farm: Sets out a broad outline of the Land at Botolph Street Farm, its surroundings and provides a brief description of the draft allocation.

Section 3: Summary of the site at Eastry: Sets out a broad outline of the Land East of Eastry, explaining its surroundings and potential for residential development.

Section 4: Representations on the Draft Local Plan: Makes observations on the Evidence Base Documents; Provides comments and recommendations on key elements of the Draft Local Plan.

Section 5: Conclusion: Summarises the observations within the representations and outlines the next steps in the draft Local Plan process.

Additional Documents A number of documents have been submitted in conjunction with this representation. These are listed below and labelled in regards to which site they are supporting:

Botolph Street Farm

Vision Document

Report 106578-PEF-XX-XX-TN-TR-000804 Rev P01 – Access Optioneering

Report 106578-PEF-ZZ-XX-RP-YE-000010 Rev P03 – Flood Risk and Drainage Statement

Report 106578-PEF-ZZ-ZZ-PR-Y-00001 Rev A - Preliminary Ecological Appraisal

Report AN0586_1 – Heritage Appraisal

Land East of Eastry

Vision Document

Report 104906-PEF-DO-XX-RP-Y-000004 Rev D01 – Transport and Access Strategy

Report 104906-PEF-ZZ-ZZ-RP-Y-00002 Rev A - Preliminary Ecological Appraisal

Report 104906-PFC-ZZ-XX-RP-YE-000010-S0-P01_FRDS Rev P01 - Flood Risk and Drainage Statement

Land East of Eastry - The Site, The Surrounding Area and The Proposal

The site is located in the village of Eastry. It comprises approximately 20.9 Ha of agricultural land to the east of Eastry's village envelope (see Figure 3.1.). The site is bounded by the A256 (Eastry bypass) to the east, Public Rights of Way (PRoW) footpath EE279 to the west, PRoW footpath EE241 to the north and a mixture of houses and St Mary the Virgin Church to the south.

(DDC Note - Unable to display image - see attachment for full representation)

The site has a sloped topography where it generally falls south to north. The lower areas lie adjacent to two ditches on the northern and eastern boundary. The A256 is mostly higher than the surrounding ground level other than a short section through the valley base. The Thanet Coast & Sandwich Bay Special Protection Area (SPA) and Ramsar Site, as well as Sandwich Bay to Hacklinge Marshes Site of Special Scientific Interest (SSSI), are situated within 2km of the site. As such, the site falls within a SSSI impact zone whereby development proposing 50 dwellings or more will need to consult with Natural England. Furthermore, the site falls within the 9km Zone of Influence of the Thanet Coast & Sandwich Bay SPA. The north east of the site lies within Flood Zone 3 where there is generally a high probability of flooding from rivers and sea flooding. This is due to location of two ditches which run along the northern and eastern boundary, then along the boundary between Parcel A and B. The remainder of the site falls within Flood Zone 1 which has the least probability of flooding. The majority of the site has a very low probability of surface water flooding. The northern and eastern boundary generally have a low risk, with some small areas falling into a medium or high risk category. It is also notable that two sewer lines cross the site. Access can be achieved from the A256. It is proposed to widen this access to accommodate a right-turn lane for southbound vehicles turning right into the site. Technical work has been undertaken to demonstrate that suitable visibility splays can be provided in both directions. An agricultural access is also located to the south east of the site, from Brook Street. The site lies outside of, but adjacent to, Eastry Conservation Area (see Figure 3.2.).

(DDC Note - Unable to display image - see attachment for full representation)

There are also several listed buildings in proximity to the site. Figure 3.3 shows the locations of Grade I (yellow), Grade II (red) and Grade II* (blue) listed buildings. The locations of these listed buildings have been taken into consideration when deciding the initial development capacity, illustrated in the submitted vision document.

Planning History

No planning applications have previously been made on the site.

Surrounding Area

Eastry is a medium sized village with a population of circa 2,500 (2011 Census). As such, it has several services and facilities which make it a sustainable location for development. The Settlement and Confines Topic paper (August 2022) that supports the Regulation 19 Local Plan, found Eastry to possess: a post office, 12 shops (including a bakers, butchers, general store, 2 hairdressers, a public house, and 2 takeaways), a village hall, church, scout hut, nursery, bowling green, football pitch, a primary school and 2 play areas. There are also regular bus services to Deal, Sandwich, Canterbury and Ramsgate, with buses running hourly on weekdays. The site is within walking distance of all these facilities and existing PRoWs provide pedestrian access straight to the High Street. The village of Eastry scored 32 points in the Settlement and Confines Topic paper, ranking it 3rd out of the 38 tested settlements. Paragraph 5.4 of the paper concludes that Eastry is a rural local centre and: 'given the wide range of services present in such villages each has the capability to act as a principle focus for services in its rural catchment area.'

The Proposal The site has the capacity to accommodate approximately 200 new dwellings. This unit number takes into consideration potential constraints identified in recently conducted technical work. The Church Commissioners is the sole landowner of the site and have a strong track record for bringing sites forward for high-quality and sustainable homes. The proposal of 200 new homes in a sustainable location can help provide additional housing for the district. This is in accordance with paragraph 60 of the NPPF which states that:

"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay." A vision document for the Land east of Eastry will be submitted alongside these representations.

Initial technical work has been undertaken on site and will also be submitted as part of these representations. These reports include:

- A Flood Risk and Drainage Statement;
- A Transport and Access Strategy; and
- A Preliminary Ecological Appraisal.

Conclusion

This representation to the Dover District Council (DDC) Regulation 19 Local Plan Consultation is written on behalf of The Church Commissioners in relation to the Land at Botolph Street Farm in Shepherdswell, the Land East of Eastry and a number of rural sites also in the Client's ownership. The allocation of the Land at Botolph Street Farm is supported as the site is available, developable and deliverable. The site is in a sustainable location and forms part of a logical residential extension of the local centre of Shepherdswell, according with the approach to plan-making as set out in the NPPF. The development would make a valuable contribution to the future of the village and help DDC meet its housing need. The Land East of Eastry is provided as an option for a future strategic allocation or an alternative option for the emerging Local Plan. The site is located in a sustainable location with easy walking access to a range of amenities in the local centre of Eastry. A range of technical reports have already been conducted, demonstrating significant potential for a major residential development and are submitted with this representation. This document provides representations on the Regulation 19 Local Plan and includes observations on the supporting evidence base. Several recommendations have been made throughout these representations. The most notable recommendations include:

Local Plan SP1 (Climate Change) – DDC should clarify the meaning of what constitutes as 'qualifying development' and what a 'climate change statement' constitutes. It is recommended that the proposed wording changes suggested in Section 4 are adopted.

Local Plan SP3 (Housing Growth) - DDC should reconsider their reliance on larger allocations given the delivery history in these locations. Instead, DDC should seek to allocate more smaller sites to reliably meet this housing need since these sites can be delivered earlier in the Plan Period.

Local Plan SP4 (Residential Windfall Development) – DDC should provide greater flexibility for windfall development in all locations and each site should be judged on its own merits.

Local Plan SP5 (Affordable Housing) – DDC should provide a larger buffer than 8% on the required housing need due to the over-reliance on the Whitfield Urban Expansion and to ensure that the affordable housing needs of the district are met.

Local Plan SP6 (Economic Growth) – DDC should provide evidence that the housing strategy set out in SP3 is supportive of the economic growth aspirations set out in SP6.

Local Plan SP11 (Infrastructure and Developer Contributions) - DDC to ensure that any developer contributions meet with the tests set out in paragraphs 56 and 57 in the NPPF.

Local Plan Policy SAP37 (Shepherdswell Small Housing Sites) – DDC should increase the allocation of the Land at Botolph Street Farm to 25 dwellings.

Local Plan PM1 (Design) – DDC should provide further clarification on what is meant by 'relevant and appropriate' and remove any reference to 'rhythm'.

	<p>Local Plan PM3 (Providing Open Space) – DDC should update Draft Policy PM3 to reflect that a scheme to secure long term management and maintenance of the open space must be secured via planning obligation. DDC should also provide greater flexibility for the requirement of smaller sites to provide set open space measures.</p> <p>Local Plan H2 (Rural Local Housing Needs) – DDC should adopt the wording changes suggested in Section 4 of this representation in relation to viability assessments.</p> <p>Local Plan CC8 (Tree Planting and Protection) – DDC should provide greater flexibility for smaller development sites and clarify against the requirement for tree-lined streets.</p> <p>Sustainability Appraisal (2022) – Amend the sustainability ratings of site SHE006 to match that illustrated in Figure 4.4 of this report.</p> <p>Housing and Economic Land Availability Assessment (2022) - Increase the capacity of site SHE006 and update the name of the site to 'Land at Botolph Street Farm'. This representation clearly demonstrates that there is scope to increase the dwelling capacity across the Land at Botolph Street Farm and improve its contribution to the housing needs of the district. This is supported by national policy, specifically in its emphasis on the capacity for small to medium development sites to contribute to the housing requirement of the district in the earlier part of the Plan Period.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>Eacott Savills (Land East of Eastry) Flood Risk and Drainage.pdf Eacott Savills (Land East of Eastry) Preliminary Ecological Appraisal.pdf Eacott Savills (Land East of Eastry) Transport and Access Strategy.pdf Eacott Savills (Land East of Eastry) Vision Document.pdf Eacott Savills (Botolph Street Farm)1426 Att2.pdf (1)</p>
<p>Local Plan Consultation Point</p>	Local Centres: Eythorne and Elvington, Eastry, Kingsdown, Shepherdswell, St Margaret's-at-Cliffe, Wingham and Ash
<p>Rep ID</p>	SDLP1703
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1333463
<p>Consultee Full Name</p>	Land Allocation Ltd
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	Joe O'Sullivan
<p>Agent Company / Organisation</p>	AAH Consultants

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Omission site in Ash (ASH010)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>With reference to the above document and the consultation upon its contents. Please accept this email as our response on behalf of our client Land Allocation Ltd to the above consultation. We wish to make representations upon the deletion of our clients site at land adjacent to Saunders Lane, Ash as an allocation.</p> <p>Overall, our clients site represents a deliverable, sustainable housing site that was proposed to be allocated in the emerging Local Plan for housing at the Reg 18 Stage and as such the allocation of ASH010 land adjacent to Saunders Lane, Ash for housing should be supported. The Councils reason in deleting the allocation is that outline planning permission has been granted. This doesn't make sense as the grant of outline planning permissions adds to the evidence of deliverability. There is a willing landowner and promoter to develop the site as evidenced by the submission of outline planning application reference 19/01462.</p> <p>There are no on site issues that would prevent the sites allocation for residential development as evidenced by the supporting information for application reference 19/01462. S106 contributions have all been established through the Outline Planning Application and there is no indication of any viability issues here. The Full Policy Requirements are expected to be made as evidenced by the Outline Planning Application and the legal agreement.</p> <p>There is no reason not to allocate this site for residential development. After all the site is readily available, deliverable with excellent access to services within the Council's Local Centres tier of the settlement hierarchy. There are no major infrastructure or abnormal costs to affect the overall delivery of this site. The site has readily available access to all the necessary utilities and infrastructure with a suitable access to the site. The site will form an important allocation to deliver much needed housing in the area with the full complement of s106 contributions to ensure that the allocation constitutes sustainable development.</p> <p>The site can deliver new housing within the short term and can make a significant and positive contribution towards addressing Dover's identified housing needs. The site adjoins the existing built-up and is seen in the context of the existing settlement. An attractive residential development can be achieved, which will provide significant benefits to the local community. If you need any further information or wish to discuss matters further, then please don't hesitate to contact me at this office. We trust that our representations will be taken account of in the future stages of the preparation of the Local Plan.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Local Centres: Eythorne and Elvington, Eastry, Kingsdown, Shepherdswell, St Margaret's-at-Cliffe, Wingham and Ash
Rep ID	SDLP1883
Rep Status	Processed
Consultee ID	1333840
Consultee Full Name	Jon Aldis
Consultee Company / Organisation	Barrat David Wilson Homes
Agent Full Name	Emily Harris
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Ash Omission Site - Land North of Sandwich Road
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Full Representation attached to SDLP1883. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1883.) Land North of Sandwich Road, Ash Barratt David Wilson Homes December 2022 1 1. Introduction Savills has been instructed by Barratt David Wilson Homes Kent (BDW) to submit representations to the Draft Dover District Local Plan Regulation 19 Consultation. The consultation on the Local Plan commenced on 21st October 2022 and closes on the 9th of December

2022. These representations focus on the Land North of Sandwich Road, Ash. These representations explain why the Site is suitable for residential development. BDW is working with the landowners to promote the Site in line with the Government agenda to deliver much-needed new homes quickly and efficiently. The following documents are submitted with these representations:

Vision Document;

Flood Risk and Drainage Report 2022

Ecological Appraisal Summary Report 2022

Transport Appraisal 2022 The National Planning Policy Framework (NPPF) explains that the planning system should be plan-led. Paragraph 16 sets out the Plans should:

be prepared with the objective of contributing to the achievement of sustainable development;

be prepared positively, in a way that is aspirational but deliverable;

be shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;

contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

be accessible through the use of digital tools to assist public involvement and policy presentation; and

serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant). At examination, a Plan will be found 'sound' if it is considered to be positively prepared, justified, effective and consistent with national policy, as set out within Paragraph 35 of the NPPF. As such, ensuring that the Local Plan meets the tests of soundness is important throughout the Local Plan process - including at Regulation 19 stage.

Structure of the Representation The structure of this representation is as follows:

Section 2: Summary of the Site: Sets out a broad outline of the Land North of Sandwich Road and its surroundings and provide a brief description of the proposal.

Section 3: Review of Evidence Base: Makes observation on the Evidence Base Documents;

Section 4: Representations on the Draft Local Plan: Provides comments and recommendations on key elements of the Draft Local Plan.

Section 6: Conclusion: Summarises the observations within the representations and outlines the next steps in the draft Local Plan process.

2. The Site, The Surrounding Area & The Proposal Land North of Sandwich Road lies adjacent to the settlement of Ash which is identified as a Local Centre within the DDC adopted and emerging Local Plan. The Site comprises approximately 5.73 Ha of agricultural land. Sandwich Road bounds the south of the site with residential development situated to the south of this. Several new housing developments have recently been approved which urbanises the existing character of the area. The northern boundary abuts the A257 (Ash Bypass) which forms a defensible edge to the village. A mature hedgerow provides a buffer between the site and the road. The Site is predominantly flat. It is well contained and has a sense of enclosure due to the existing hedgerows to the north. Additional planting has been introduced which helps to further limit views into and out of the Site. Suitable access can be achieved via Sandwich Road. The topography of the land is such that it is raised slightly in the middle. There is a public bridleway which runs along the north of the western boundary of the site which has hedgerows either side. The Ash NDP designates this areas as a Local Green Space. Views of the Church of St Nicholas can be seen from this Public Right of Way (PRoW) but other views are limited owing to the flat nature of the topography. The site is located entirely within Flood Zone 1 and there is one listed building within proximity to the Site which will be treated sensitively in any design. A Site location plan accompanies these representations and Figure 2.1 identifies the approximate extent of the Site.

Figure 2.1 Site Location

The Land North of Sandwich Road lies adjacent to the settlement of Ash which is identified as a Local Centre within the DDC adopted and emerging Local Plan. It is a well-served, large village to the north-west of Dover District. It is within reasonable proximity to both larger settlements of Sandwich, Deal, Dover and Canterbury. The Rural Settlement Hierarchy (SHR) (2022) that supports the Regulation 19 Local Plan, explains that Ash has regular bus services and several facilities that allow residents to meet their day to day needs. Within this, the RSH scores rural settlements in relation to the services present at the time of the assessment. Ash scores 34 which is the second highest after Aylesham. This has increased from 33 in the Regulation 18 where which was identified as the fourth highest score of the rural settlements. As such, Ash is ranked as a 'Local Centre'. Pertinently, paragraph 5.5 of the SHR notes that:

"Given the wide range of services present in such villages each has the capability to act as a principle focus for services in its rural catchment area".

Figure 2.1 The Settlement Summary for Ash in the Settlement Hierarchy and confines topic paper

Planning History One planning application has been made on the site in 2016 under ref. DOV/16/00800 for the erection of 104 residential dwellings with associated commercial (B1) and nurse (D1) units, hard and soft landscaping, and associated infrastructure. The application was recommended for approval by the Case Officer, however, was refused at Committee. The reasons for refusal were as follows:

1) The site lies outside of the settlement boundaries of Ash and the development proposed, although making a contribution towards the Councils 5 year housing supply deficit, would, if permitted, be contrary to Policy DM1 of the Core Strategy. The proposed development would fail to protect the character and appearance of the natural and built environment and would result in the significant loss of Best and Most Versatile Agricultural Land. Consequently, the adverse impacts of the development would significantly and demonstrably outweigh the benefits, when assessed against the National Planning Policy Framework read as a whole, and the proposal does not therefore constitute sustainable development.

2) The proposed development, if permitted, by virtue of its scale, density, prominent location and urbanising nature in this transitional location, would result in a severe and adverse impact on the character and appearance of the area, in particular with regard to its relationship with the village of Ash and the countryside, contrary to Policies DM15 and DM16 of the Core Strategy and the Core Principles of the National Planning Policy Framework.

3) The proposed development would result in the significant loss of Best and Most Versatile Agricultural Land, contrary to the aims and objectives, in particular of Paragraph 112, of the National Planning Policy Framework. The decision was taken to appeal where it was dismissed by the Planning Inspectorate in December 2017 (appeal ref. APP/X2220/W/17/3174842). The Planning Inspectorate concluded that:

“The significant harm to the local landscape and loss of Best and Most Versatile Agricultural Land (BMV) would conflict with these Policies and with the NPPF and would, in the presence of a 5YHLS, significantly and demonstrably outweigh the above material benefits of the scheme.”

Notably, the Inspector stated that:

“the introduction of a large new housing estate on the site would project a spur of intensive urban development into the countryside despite the substantial areas of landscaped open space around its edges. It would only be bounded on its southern side by existing village development.”

Since the Appeal, a new development at the ‘Land north of Orchard View and west of Saunders Land’ (Ref: 19/01462) was granted planning permission for 76 dwellings. This will significantly urbanise this area of the village and extend the village further to the east away from the village centre. Moreover, the future development of the ‘Land north of Orchard View’ will significantly urbanise the area, thus changing the character of the eastern edge of Ash completely. Through sensitive masterplanning and further consideration into the Site’s opportunities and constraints many of the Inspector’s comments can be overcome. BDW is committed to delivering a sympathetic and resilient development of the Site.

Seeking to ensure that the proposal is fully compatible with and supportive to the wider village. This is one of the key differences of the current scheme in relation to the dismissed appeal. Details contained within the Council’s evidence base and the supporting Vision Document demonstrate that the Inspector’s concerns can be overcome. Thus, the Site is suitable, available and achievable for residential development within the first five years of the Plan Period.

Brief Description of Proposal BDW will deliver a landscape-led development that seeks to better integrate the Site with the existing village. The Site has capacity to deliver approximately 110 dwellings alongside public open space. An indicative layout is provided within the supporting Vision Document and in Figure 2.2 below. Of these 110 dwellings a policy compliant proportion of affordable housing will be delivered. Currently Draft Policy SP5 seeks 30% of dwellings to be delivered as affordable units. Thus, this site would deliver 33 affordable homes. Access will be provided via Sandwich Road to the south west of the site. New pedestrian and cycle paths are proposed throughout the proposal and will link into the wider network to provide active routes into the village. Trees and hedgerows will be retained and enhanced where possible given their maturity and important landscape impact. Additional planting is also proposed on the site including street trees and landscape enhancements. Any additional planting will be native species. These features along with other measures will enhance the existing habitats and create new ones. As such, the proposal will seek to enhance the biodiversity net gain by at least 10% on-site. Two SUDs ponds are proposed as part of the development. The first is situated on the western edge of the site, which assists in creating a landscape buffer between the development and existing public right of way, which is designated as Green Space within the Ash Neighbourhood Plan. The second is situated to the east within the public open space. The development has been prepared to maintain important views into and out of the site. Importantly, the view of the Church from the east of the site has been used to define the southern development edge as per the Developable Areas plan set out within the supporting Vision Document. For further details on the proposed development, please refer to the supporting Vision Document.

Figure 2.2 Proposed Masterplan

3. Review of Evidence Base

As part of the Draft Local Plan consultation, DDC has published a number of Evidence Base documents. These are listed below. Comments are provided on those which are shown in bold in this representation.

- Sustainability Appraisal Reg 19 Local Plan (September 2022)
- Habitats Regulation Assessment (September 2022)
- HELAA 2022 – Housing Site Assessments

(DDC Note - Text extracted and added to relevant consultations / Parts of the plan)

4. Representations on Draft Local Plan This section provides Representations on the Regulation 19 Local Plan and includes observations regarding the supporting evidence base.

(DDC Note - sections duplicated onto relevant sections of the plan)

Observations on the Regulation 19 Draft Local Plan Policies

Draft Strategic Policy 3: Planning for Housing Growth - COMMENT Strategic Policy 3 sets out the Council's current housing supply position and shows that in order to meet the Local Housing Need for the District, the Council will need to allocate housing sites in the Local Plan to deliver 3,316 homes over the Plan period. This number has been reduced since the Regulation 18 draft which made allocation of 5,288 homes. Draft Strategic Policy 3 confirms that in total the provision is made for at least 11,924 additional homes across the Plan Period (2020 – 2040) – the baseline growth. Dover Council makes provision of a buffer between needs and supply of approximately 8% which is not considered to be sufficiently large enough to ensure that needs are met over the plan period, especially given that around half of the homes will come from urban expansions. BDW agrees with the representations submitted by the Housing Building Federation (HBF) which states that a buffer of around 20% would be more appropriate, including the allocation of smaller sites which will deliver earlier in the plan period. This would also provide an additional buffer in overall supply should there be delays in the delivery of the larger sites in Dover. The council should actively be seeking to boost housing in accordance with NPPF paragraph 60. NPPF paragraph 69 explains the important role that small and medium sized site can make in meeting the housing need and that they are often brought forward quickly. Thus, to ensure that sufficient housing can come forward within the early years of the Plan Period, further small and medium scale sites should be allocated. This will alleviate the risk of the larger allocations under-delivering within the Plan Period which is historically documented in the District. NPPF Paragraph 11 sets out that a Local Plan should apply a presumption in favour of sustainable development and this means that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses. This is unless the protection of areas or assets restrict development or there would be adverse impacts that demonstrably outweigh the benefits of the development. It is considered that Regulation 19 Local Plan is not ambitious enough in the planning for the baseline of housing growth, especially given that the housing target is less than that which was provided for under Regulation 18. Paragraph 3.45 of (page 31) of the Regulation 19 Document states that housing delivery in Deal and Sandwich is constrained by a number of factors including: flood risk, wildfire sites, heritage and highways. As such it is claimed that the potential growth of these settlements are considered to be limited. BDW considered the Land North of Sandwich Road to be a logical option for additional development, outside of Sandwich and the listed constraints, whilst still in close proximity. Paragraph 3.47 also states that a key part of the Council's growth strategy is to promote the sustainable development of rural areas, to support the vitality of rural communities in line with national policy. At the same time national policy advises that a balance must be achieved between allowing new housing and the need to protect the character and heritage of the settlements themselves, as well as the surrounding countryside. Within SP3 there are several allocated sites that are not confined by the listed constraints and are capable of delivering more housing across the District. This should include the Land North of Sandwich Road, where BDW has a firm commitment to delivering a high quality proposal of circa 110 dwellings.

Recommendation: DDC seek to meet their higher housing growth target, taking into account small and medium sized sites that are unconstrained and able to meet the overarching vision for the district. The housing requirement of 10,998 over the plan period 2022 to 2040 is consistent with the minimum number of homes the Council should plan for using the standard method. However, what is not clear from the Council's evidence is whether this level of growth will be sufficient to meet the growth aspirations of the Council. The current housing strategy seeks to distribute housing across the District but with the majority in and around Dover Town. A secondary focus will be in Deal, Sandwich and Aylesham. The housing strategy is reliant on the delivery of major allocations which have historically been slow to deliver new homes. This is acknowledged by DDC at paragraph 6.7 where it is stated: "the proportion of housing development in Dover Town has been significantly less than the 70% envisaged in the Core Strategy. There does not currently appear to be any evidence to demonstrate that the delivery of the major allocations will improve. Paragraph 060 (Ref: 61-060-20190315) of the Planning Practice Guidance explains that:

"Should issues arise which would adversely affect the delivery of the adopted strategy then the authority should consider alternative strategies, through a plan review, if these issues are unlikely to be resolved." There is clear evidence that there are issues with the delivery the major allocations. At paragraph 6.8 DDC states that there are issues with the existing housing growth strategy. DDC appears to be dismissing alternative strategies including the allocation of small/medium scale site alongside the major allocation as part of the preparation of this new Local Plan. Alternative strategies should be considered otherwise the Local Plan will fall short of the tests of soundness.

Recommendation: DDC reconsider their reliance on major allocations and alternative strategies are considered.

Draft Strategic Policy 4: Residential Windfall Development - COMMENT Given the poor delivery at major allocations over the adopted Plan period, DDC has recognised at paragraph 6.8 that there have been higher levels of windfall development in the district. Further to this, paragraph 6.84 notes that windfall allowance accounted for 45% of housing delivery across the district in the adopted Plan period. From year 4, the Housing Trajectory makes allowance for 70 windfall sites a year. As there is currently no evidence for the delivery of larger strategic allocations, it is likely that this windfall allowance will be larger and account for a large percentage of housing delivery in the District. It is likely that windfall development will come forward in the early stages of the Plan period resulting in housing growth that is not genuinely plan-led in accordance with NPPF paragraph 15. DDC should allocate further sites that are deliverable within the first five years of the Plan period to ensure that the number of windfall sites does not conflict with the objectives of the Local Plan. By allocating further deliverable sites in the early stages of the Plan period, the over-reliance of delivery at large strategic sites is less. This will alleviate the risk of windfall development leading development

in the area and risking the delivery of the overarching objectives. BDW consider that the Land North of Sandwich Road can deliver a high quality housing development efficiently within the early stages of the Plan period. Further consideration for sites such as the Land North of Sandwich Road should be given to ensure a plan-led approach is delivered.

Recommendation: DDC consider the housing delivery within the early years of the Plan period and seek to allocate quickly deliverable sites to ensure a plan-led approach is adopted.

Draft Site Allocation Policy 1: Non-Strategic Housing Allocations- COMMENT NPPF Paragraph 69 sets out small and medium sized sites can make an important contribution to meeting housing requirement. These sites are often built-out quickly. It is noted that non-strategic sites have been allocated through Draft Policy SA Policy 1. However, there are few sites of 100 – 200 units whereby additional benefits can be accommodated and delivered as part of planning consent. As set out above, it is considered that the DDC's Spatial Strategy is too reliant on the delivery major allocations and other larger sites. Therefore, it does not meet the requirement (b) set out at NPPF paragraph 16 which states that plans should be: "Prepared positively, in a way that is aspirational but deliverable". Instead, the Local Plan should identify further medium sized sites of 100-300 units which are able to be deliver quickly and provide wider community benefits. These type of development could be provide across Local Centres and Larger Villages allowing for gaps in housing and infrastructure needs to be met across the District.

Recommendation: DDC reassess their Spatial Strategy and provide more medium sized sites across Local Centres and Larger Villages. This will ensure that the housing need is deliverable. The Local Plan does not seek to allocate any sites within Ash and instead DDC is relying on housing allocations in the neighbourhood plan. NPPF paragraph 30 states:

Once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan covering the neighbourhood area, where they are in conflict; unless they are superseded by strategic or non-strategic policies that are adopted subsequently. The Ash Neighbourhood Plan was Made in 2021 and prepared with the currently Adopted Local Plan. Once adopted, the Local Plan will supersede the policy within the Ash Neighbourhood Plan. DDC needs to ensure that the sites allocated within the Ash Neighbourhood Plan do not conflict with the newly proposed policies within this draft Local Plan or updated national policy to ensure the allocated sites are deliverable. Therefore, DDC should undertake a comprehensive assessment of all sites available within Ash to ensure the most suitable and deliverable sites are allocated within Local Plan.

Recommendation: DDC undertake an assessment of all sites within Ash and allocated site that are able to deliver housing and employment opportunities to meet the needs of the district in accordance with the draft policies set out in the Local Plan Review.

Draft Policy PM1 – Achieving High Quality Design placemaking and provision of Design Codes.- COMMENT BDW is generally supportive of the overarching vision set out within Chapter 4 of the Draft Local Plan. They support DDC's ambition to make Dover District a: "place of aspiration, providing outstanding opportunities for sustainable living". The determination to create places that are well-design and well-built is also supported and should be the basis of new development proposals coming forward in the District. BDW maintain a firm commitment that their development at the Land North of Sandwich Road will be a high quality, landscape-led development that provides a healthy and sustainable environment for future residents. Concern is raised regarding the reference to local design codes. Whilst the notion behind a local design code is supported to ensure that development is seamlessly integrated into the existing built form, it should be noted that design code can also be overly restrictive. This can result in a loss of architectural freedom resulting monotonous design if there is not enough flexibility. It can also negatively affect the viability of a scheme. As such, any design codes should allow for flexibility. It is noted that the Draft Design Policies do not include reference to design codes and instead reference a Local Design Guide which is considered more appropriate.

Recommendation: Design codes are not taken forward and instead a Local Design Guide is produced which is used to inform development proposals but not restrict them.

Draft Policy PM3 – Providing open space - COMMENT PM3 sets out the requirements for the creation, enhancement and management of open space in new development, including parks and gardens, amenity greenspaces, allotments and equipped play spaces. Part C of the policy requests that a 'Governance Strategy' should support developments that propose open space which seeks to set out how the open space will be managed and maintained. BDW agree with the importance to ensure the management and maintenance of open space and would normally detail how it will be managed via a planning obligation. It would be premature to enter into such agreements with the potential stakeholders before a planning application is determined and as such, it is recommended that this policy is updated to reflect that a scheme to secure long term management and maintenance of the open space must be secured via planning obligation.

Recommendation: Draft Policy PM3 is updated to reflect that a scheme to secure long term management and maintenance of the open space must be secured via planning obligation. Draft Policy CC1 – reducing Carbon Emissions - COMMENT Draft Policy CC1 states:

In the event that the Future Homes Standard is required to be delivered through the planning system, all new residential dwellings must achieve, as a minimum, a reduction in carbon as required by this Standard The Government's response to The Future Homes Standard (January 2021) sets out that the Future Homes Standard will be delivered through amendments to the Building Regulations. In June 2022, some of these amendments came into force. Given this, it is not justified or effective to include a policy that is covered by other relevant legislation. The reference to the Future Homes Standard should be removed from the policy.

Recommendation: Reference to the Future Homes Standard is removed from Draft Policy CC1.

Draft Policy CC8 – Tree Planting and Protection - COMMENT Draft Policy CC8 requires a minimum of two new trees to be planted for each new dwelling with a presumption of these to be planted on site. Where it is demonstrated that the new trees cannot be provided on site a financial contribution will be required. BDW support the delivery of new trees on site and respect the requirements of NPPF paragraph 131. However, concern is raised over the impact to design, landscape character and viability in relation to such a prescriptive requirement. It is also not clear whether these trees are sought over and above the national requirement for tree-lined streets. In respect of design, incorporating large amounts of trees on small - medium scale development with limited strategic open space, could directly impact the developable area and consequently, impact on placemaking aspects. Furthermore, significant tree cover within a residential area can have impacts to daylighting levels and residential amenity. When considering landscape character, the NPPF paragraph 130 (c) states that planning policies should ensure that developments “are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)”. Trees make an important contribution to the landscape setting and have the ability to significantly change the character of an area. Thus, Draft Policy CC8 should take this into account. Whilst the Whole Plan Viability Study (2020) notes the two tree requirement at paragraph 8.52, the viability assessment is not clear how the inclusion of these impacts the development costs. BDW have concerns that this level of planting could impact the viability of a development alongside other policy requirements. Finally, where a financial contribution is sought, the contribution should be in accordance with the tests set out in NPPF paragraph 57. With the above in mind, it is considered that the policy should be updated to encourage two trees to be planted where there will be no design, landscaping, viability or other issues caused by doing so. A reasonable and proportionate contribution for off-site planting will be requested where on-site planting cannot be achieved on site unless there are viability issues which prohibit this.

Recommendation: Draft Policy CC8 is updated to read:

- a) A minimum of two new trees will be required encouraged to be planted for each new dwelling (this does not apply to applications for conversions and changes of use to residential), and one new tree will be required encouraged to be planted for every 500sqm of new commercial floorspace created.
 - b) The planting of these trees should not impact the design quality or landscape character of the area.
 - c) Trees should be native Kent species, of local provenance from a bio-secure source, and should be standard size in specification as a minimum.
 - d) A presumption that the trees will be planted on-site rather than off-site will apply. For major development where it is demonstrated that new trees cannot be provided on-site, a proportionate financial contribution will be required towards the planting of trees off-site in accordance with the requirements of the Council's Green Infrastructure Strategy unless there are demonstrable viability concerns.
- Additionally, the Council should seek to clarify the relationship of these trees to the national requirement to deliver tree-lined streets.

Conclusion These representations to the Dover District Council (DDC) Regulation 19 Local Plan Consultation is written on behalf of BDW Developments Plc in relation to the North of Land Sandwich Road in Ash. This Site is available, developable and deliverable. This Site is an entirely sustainable medium sized, residential extension to the urban area of Ash and will make a valuable contribution to the village in the long term. This document provides representations on the Regulation 19 Local Plan and includes observations on the supporting evidence base. Several recommendations have been made throughout these representations. Notably, it is considered that DDC should reconsider their reliance on larger allocations given the delivery history in these locations. Instead, DDC should seek to allocate further small to medium sites for that can be delivered quickly whilst also providing additional benefits to the local area. A reassessment of the Land North of Sandwich Road (ASH006) should be undertaken as part of an updated Housing and Economic Land Availability Assessment (HELAA). This reassessment should take note of potential improvements, intensification and change. It should be positively prepared and take into account new planning permissions, changing legislation, the technical information submitted with this representation and the Council's own evidence Base. Savills and BDW reserve the right to comment on any further local plan consultation (if required). Once at examination, BDW request to attend and speak at the relevant hearing sessions.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p> Watson Savills (Barratt David Wilson) 1644 Em Att1.pdf Watson Savills (Barratt David Wilson) 1644 Em Att2.pdf Watson Savills (Barratt David Wilson) 1644 Em Att3.pdf Watson Savills (Barratt David Wilson) 1644 Em Att4_Redacted.pdf Watson Savills (Barratt David Wilson) 1644 Em Att5.pdf Watson Savills (Barratt David Wilson) 1644 Em Att7.pdf Watson Savills (Barratt David Wilson) 1644 Em Att8.pdf </p>

Eythorne and Elvington

Local Plan Consultation Point	Eythorne and Elvington
Rep ID	SDLP90
Rep Status	Processed
Consultee ID	1330809
Consultee Full Name	Ian PHL Bull
Consultee Company / Organisation	Pentland Homes Ltd
Agent Full Name	Ian Bull
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Paragraph 4.215, Figure 4.7 and table 4.5
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The Regulation 18 Local Plan identified 'Land at Monkton Court Lane, Eythorne as a residential allocation, with estimated capacity of 20 dwellings.' (Policy EYT001)</p> <p>The reason for the allocation were;</p> <p>"Eythorne and Elvington are currently identified as villages in Policy CP1 of the Core Strategy (2010). However the recent Settlement Hierarchy Review conducted by the Council shows that both these settlements score well in relation to the number of services and facilities provided. Given this, as part of the Council's strategy for the rural area it is proposed to grow the villages of Eythorne and Elvington to create a new local centre in the District.</p> <p>EYT001, EYT008 and EYT019 have also been identified as suitable sites in the HELAA that would provide a logical extension to the existing settlement and are also proposed as housing</p>

	<p>allocations in line with the housing growth strategy."</p> <p>The site was removed from the Regulation 19 Local Plan. The sole reason was;</p> <p>"EYT001 – Land at Monkton Court Lane. Site was proposed for 20 units. The site is covered by a surface water flow path which constrains development here so has been removed."</p> <p>No evidence was given to justify the removal of the site.</p> <p>The promoters of the site have commissioned a Flood Risk Assessment of the site which concludes;</p> <p>"It is proposed to construct 20 new dwellings on this greenfield site with associated accesses and hardstandings.</p> <p>Surface water will be discharged to a series of swales and soakaways on the site.</p> <p>The main flood risks are assessed to be from overland flow from land to the rear of the site, and exceedance of the on-site sewer systems</p> <p>Construction of a cut-off drain along the eastern boundary and regular maintenance of this and the other soakaways on the site should result in a low residual risk of these events happening.</p> <p>No additional flood risk will be created off-site, and indeed the development may contribute some betterment to the situation</p> <p>It is concluded therefore that the site can be satisfactorily drained and maintained flood free."</p> <p>A copy of the Flood Risk Assessment is appended to these representations.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>It is requested that Land at Monkton Court Lane Eythorne be re-instated as a residential allocation, with an estimated capacity of 20 dwellings. Draft policy as follows;</p> <p>"EYT... - Monkton Court Lane, Eythorne. Planning permission will be granted for proposals that:</p> <p>a) Accord with the policies in the Local Plan; and</p> <p>b) Address the site-specific issues and requirements for the site set out below.</p> <ul style="list-style-type: none"> - Site Estimated Capacity - 20 dwellings. - Boundary planting to create a landscape buffer, - Flood Risk Assessment required, due to risk of surface water flooding. - SuDs should be provided. - Transport Assessment, - Heritage Assessment and Archaeological Assessment required."
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>It is submitted that the decision to remove draft allocation EYT 001 from the regulation 19 Local Plan was arbitrary and unjustified. There is no evidence to support the sites removal. It is submitted that attendance at the examination allow a detailed consideration of the merits of the site and will assist the inspector in his/her deliberations.</p>
<p>Include files</p>	<p>38367C-R-001 FRA (1).pdf</p>
<p>Local Plan Consultation Point</p>	<p>Eythorne and Elvington</p>
<p>Rep ID</p>	<p>SDLP932</p>

Rep Status	Processed
Consultee ID	1261008
Consultee Full Name	Dr John Garcia-Rodriguez
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Developments of land around Aylesham, Nonington and Elvington
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>What planning discussions have happened with Nonington Parish Council and equivalents for Aylesham and Elvington? Exhibitions and requests for comments but not proper conversations and discussions. You cannot call this cooperation. The Duty to Cooperate has not been fulfilled - also evidenced by the councils' objections and surprise at these plans.</p> <p>Despite the plan strategically saying that most development is needed in Dover and that it has an imbalance of housing and is unattractive, DDC has decided to inappropriately "promote" Aylesham now a large village, isolated with few amenities, to the status equivalent to Sandwich, a town that has developed over centuries and has many facilities and bus routes based on it. This is not justified and so the plan is not positively prepared.</p> <p>Roads around Aylesham, Nonington and Elvington have already too much traffic. Where are the assessments? The attached map shows how poor the road infrastructure is. the roads are narrow, bendy and almost all without pavements. There are v few bus services - none in Nonington. The plan is not sound as there would be far too much new traffic. So the plan is ineffective, not positively prepared and not justified.</p> <p>Where is the employment to come from? We do not need more space - there are empty units. Snowdown Colliery site is going to remain leased to the NCB Residuary Body and not developed - as confirmed by the owner. Even if it were to be released, the costs of development, whilst preserving key buildings and on this brownfield site, would not be economic. In the plan, this is a pillar of justifying the developments and the need for more housing but it is very tenuous to say the least - so the plan is unjustified and unsound.</p> <p>The population of Dover District and surrounding districts is pretty static. There is not the robust evidence to justify the degree of planned housing expansion. The plan is not justified or positively prepared. Large developments in East Kent provide housing which looks cheap to London boroughs which can place people they are responsible for into East Kent. We have seen this already in several places. Those placed are unlikely to bring prosperity to the region given their dependence on local authorities for housing. This is not serving the needs or wishes of the existing local population so on these two counts the plan is not positively prepared, evidenced or has there been cooperation with locally elected bodies like parish councils who are only too aware of relatively large influxes from London into new developments. It is also not effective as many of these people will not have the skills to fill employment needs.</p> <p>The description of one of the areas as a "Country Park' yet it has 420 houses allocated is disingenuous. It this an attempt to allay concerns? The areas around Aylesham are also earmarked by Canterbury City Council for major development. It would turn the whole area into an isolated</p>

	<p>housing estate, most people commuting for work elsewhere. The lack of facilities risks widening inequalities as it would be not be attractive to people with the resources to live elsewhere.</p> <p>Given the lack of soundness of this plan, I doubt that it is legally compliant.</p> <p>This is not just nimbyism - we should be planning something that we ourselves could well imagine being keen to move into. I really doubt many DDC planners or councillors or plan inspectors would wish to move into the new estates in the proposed locations and with he lack of facilities that this plan envisages. From the heart - do you really think that this is what you want to do? Create a big housing estate of poorer people? Almost an East Kent ghetto? Large housing estates carefully and optimistically planned and built elsewhere have gone quite wrong for similar reasons - poverty and isolation.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>I cannot see how the current plans can go ahead. There needs to be a rethink, ideally abandoning plans to turn this area predominantly into a large housing estate.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>IMG_3811.jpeg</p>
<p>Local Plan Consultation Point</p>	<p>Eythorne and Elvington</p>
<p>Rep ID</p>	<p>SDLP960</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1266351</p>
<p>Consultee Full Name</p>	<p>Dr Sharon Danby</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SP3 Housing growth</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared</p>

	<p>Justified</p> <p>Effective</p> <p>Consistent with National Policy</p>
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Due to the governments announcement 5/12/22 the plan is not positively prepared as the development needs must be reassessed. This means it is no longer justified as there now is the room without central government pressure to find reasonable alternatives. It is also not effective as the pressure put on local communities and existing infrastructure is unreasonable and means that it is not deliverable. The plan is also not consistent with NPPF 2021 as the many landscape and heritage assets in Dover District are being compromised by the level of unsustainable overdevelopment which the current plan has allowed.</p> <p>The Housing Growth statement that the aim is to , “provide a greater choice of high-quality housing to meet the needs of Dover districts’s growing population and changing demographic and address affordability issues”, does not seem internally consistent with the details provided in the plan which underestimates the evidence showing a large part of district population growth is due to aging. The details thus render SP 3 and SP 5 less effective and less sound.</p> <p>Under the current LDP developers have shied away from the badly needed regeneration of Dover and concentrated on building maximum profit, minimum affordability developments of large homes around the more desirable town of Deal and out in Whitfield. The supposed regeneration of Dover has resulted in another generic shopping centre and a more depressed high street and has not lifted the rest of Dover. The promenade area is uplifted but there seems to be little connectivity to the rest of Dover.</p> <p>The government department (DLUHC) decision that Dover needs 611 new dwellings a year and a minimum of 10,998 new homes between now and 2040 we find very incompatible with legally binding Net Zero Strategy, Climate Emergency Declaration 2019 and Climate Change Act 2008, and unsound. We should be transforming existing housing stock into zero carbon homes as is happening in East Sussex, led by Lewes DC. Combining these numbers with 3.51 and the statement ‘76.7% of the new homes are on greenfield sites, while 23.3% are on brownfield sites’ is unsound and unacceptable to the public.</p> <p>We feel that our communities are being harvested by developers and our worries are not being heard or needs met in terms of infrastructure. Thanks to certain national newspaper Sunday supplements, Deal is desired as a 2nd home location by the wealthy from London and elsewhere. Holiday homes which spend most of the year empty in Deal, Dover and coastal villages of Kingsdown and St Margarets are stopping locals from buying affordable homes in their own area from existing housing stock.</p> <p>It must also be pointed out that at least one of the sites included in the 23.3% of brownfield sites is actually a site intended by SEEDA as local nature reserve having rewilded on unstable slag (only rendered stable by tree-planting, a site which DDC forgot to make a local nature reserve in 2004, and it has become a biodiversity hotspot well known to genuine ecologists nationally; Betteshanger Park.</p> <p>Central government in London, according to Housing Today is imposing a disproportionate amount of housing growth on Kent and the SE. There is a grievous lack of democratic accountability across Kent. So the chances of protecting Kent, of achieving a Growth Strategy that creates climate-friendly jobs and suitably sized, suitably-priced zero-carbon homes for the next generation of local families, are not good. The space available for infrastructure, functions well for compact coastal towns of the size that Deal / Walmer and Sandwich were 5 years ago.</p> <p>The level of greenfield overdevelopment which has been disastrous under the current weak LDP is putting Deal infrastructure under strain now, so in-fill should make up the majority of the allocations for Deal and that the housing growth specified for District Centre of Deal and around its boundaries needs to be stopped or radically reduced. Either or both of SAP 15 / SAP 34 would destroy the only road access alternative for diverted traffic. (See detailed comments under SAP 15/ SAP 34 below). Housing Growth that threatens gridlock, blocking off a conurbation of 30,000 from access by emergency vehicles, commuters, school buses is not sustainable housing growth and is very unsound.</p> <p>3.29 I note and welcome a degree of shift from the Reg 18 draft, in that more sites have been selected with a view to using ‘existing infrastructure, facilities and services, with a greater professed purpose to ensure development contributes to the sustainability of local communities and services’.</p> <p>I note with appreciation both the increase in the number of sites in Dover town SAP 6 – SAP 13, and the SAP 26 Former Snowdown Colliery, Aylesham near a rail station for example. It should be possible to state a determination to ‘make best use of brownfield – non-rewilded – land) without giving developers the opt-out qualification ‘wherever possible’.</p>

	<p>On Five Year Housing Land Supply. 3.39 Having stated the Council had 6.03 years land supply plus a 5% buffer; it is not sound, effective or legally compliant to then state 'the provision of additional sites within the first 5 years of plan period is needed to ensure resilience and promote flexibility;'.! Instead of ensuring resilience, it will create exactly the destructive suburbanisation of a rural district that many, many of the resident electorate are most worried about.</p> <p>3.46 It is the conspicuous lack of a secondary school in Aylesham that prevents Aylesham becoming the small garden town planners aspire to. The provision of a secondary school by 2028 should be a condition of SAP 23. There seems to be a complete lack of planning in the statement that now</p> <p>3.48 Many, many of the current residents of ex mining village Elvington were / are dependent on buses that have recently (2022) been cut, (following KCC cut to bus subsidies) to get to work in Canterbury, Folkestone, Sandwich, Thanet or Dover, or to get to secondary school, or to get to doctors, or to shop. These people had environmentally sustainable public transport service that has been cut. KCC is saying it is looking at potential bankruptcy in 2023, so promises of new services and facilities are met with some disbelief. The selection of this site is ONLY sound with cast-iron conditions to provide all of the services we mention below, including new drainage infrastructure. Council housing in Elvington has been subject to flooding from the sewage system, long overdue for replacement. As in Dover deprived wards, there are unhealthy EPC EFG homes in Elvington that need to be transformed into zero carbon home to lift residents out of fuel and therefore food poverty.</p> <p>3.68 Windfall. Unless existing settlement boundaries are respected, there is suburban ribbon development creep from field to field to field. To render the plan sound it should contain a statement 'Previously existing settlement boundaries will be respected, until such time as town and parish councils may have agreed changes with Dover District Council, in accordance with the principles of Localism Act 2011.' In the current economic climate, it seems very naïve to hope that 'new housing in villages can help them retain existing services such as public transport, retail (many pubs are going under because lack of staff and sky high energy bills) and schools'. Indeed we have lost a large proportion of our bus services in the district.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Push back to central government and demand a reduction in the housing allocation of 10,998 new homes. Now possible after announcements 5/12/22 from Prime Minister.</p> <p>Regenerate Dover as a priority, retrofitting existing housing stock to provide well insulated renewable energy powered homes. Windfall development only should be allowed in Deal, Sandwich and surrounding villages. Create a self sufficient sustainable garden village at Aylesham with secondary school and green infrastructure and homes far beyond future homes standard.</p> <p>Provide better facilities and transport links for Whitfield to ensure that homeowners are not car dependent.</p> <p>Lobby central government for changes to the rules for ownership of second homes. Priority should be given to locals.</p> <p>Make the wording in the plan stronger in favour of brownfield sites eg 3.32 <i>sufficient amount and variety of land</i> should also state that brownfield must be used before greenfield as per stated in NPPF 21.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>Eythorne and Elvington</p>
<p>Rep ID</p>	<p>SDLP642</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331648</p>
<p>Consultee Full Name</p>	<p>Robert Stevenson</p>
<p>Consultee Company / Organisation</p>	<p>Canterbury Diocesan Enterprises Limited</p>

Agent Full Name	Robert Stevenson
Agent Company / Organisation	Canterbury Diocesan Enterprises Limited
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Paragraph 4.215, Figure 4.7 Map of Site Allocations in Eythorne and Elvington, Table 4.5 Site Allocations in Eythorne and Elvington.
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The Plan fails to allocate Site EYT016 Land at Church Hill, Eythorne for housing development. Site details are submitted in the Maps, Plans and Images document accompanying these comments. The Council's Evidence Base shows that the site was omitted for one reason only, namely the assessment of a heritage officer who said it would harm the setting of the Listed Church. In reality, there is scope to accommodate 17 dwellings whilst safeguarding the setting of the church and, moreover, ensuring that it has a viable long term future. The following facts are pertinent:</p> <ul style="list-style-type: none"> • Site EYT016 extends to 0.8 hectares of which approximately 0.6 hectares could be developed to provide 17 dwellings. • The location enjoys all of the sustainability credentials of the settlement and lies very close to the village primary school. • Although identified by the LPA as a greenfield site it has in fact been in use for many years. There are three elements: the Rectory and its very large garden, the dilapidated hall/resource centre, and open space used for ancillary purposes, including car parking and events. • The Church is hidden from the site by a dense screen of trees with a minimum depth of 17 metres. • The LPA granted planning permission in 2018 for the development of 9 detached houses on land immediately south east of the church (PP Ref 17/00246/DOV). The development was deemed to be wholly consistent with NPPF and the local policy framework. <p>The hall on the site is in very poor condition and at the same time the church is in need of significant investment. It is a special building being a complete C12th structure which has not been extended apart from a small porch. It is Listed Grade II*. The strategic response is to upgrade the space within the church to provide a community hub capable of meeting a vast range of community support activities, ranging through mother and baby groups, pre-school groups, cafe for retired people, bereavement support, community meeting spaces, brownies/cubs, etc. Such an undertaking would demand very substantial resources, so the concept is to develop social housing on the EYT016 site with an element of market housing which would deliver the funding for the community hub. The effect on the Listed Building would be to give it a new lease of life by bringing strengthening sustainable long term usage.</p> <p>So, the benefits may be summarised as:</p> <ol style="list-style-type: none"> 1) Efficient and appropriate use of previously developed land. 2) Delivery of social housing. 3) Delivery of market housing. 4) Safeguarding the setting of the Listed Building. 5) Upgrading the Listed Building into a community hub, thereby providing it with a long-term sustainable future. 6) Strengthening the social infrastructure of the village.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Allocate Site EYT016 Land at Church Hill Eythorne for residential development with an indicative capacity of 17 dwellings. The normal range of S106 obligations would be required together with a very substantial contribution towards church works to deliver a community hub within the Listed Building.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	Eythorne Maps Plans and Images Reg 19 Dover Local Plan Dec 2022.pdf
Local Plan Consultation Point	Eythorne and Elvington
Rep ID	SDLP902
Rep Status	Processed
Consultee ID	1331884
Consultee Full Name	Mr Andy Tee
Consultee Company / Organisation	Nonington Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Eythorne and Elvington
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	There were a broiad range of concerns about the Evidence base used in the Settlement Hierarchy change and in the absence of detailed traffic modeling data on traffic from Adelaide Rd heading north to the A2.

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

DDC 'restructured' the settlement hierarchy in December 2020, to reclassify Elvington as suitable for Greenfield development. DDC confirm this is informed by NPPF guidance that 'in the first instance, the principle of sustainable development, and which requires local planning authorities to ensure that, wherever possible, new development is located in the most sustainable locations'. The evidence for sustainable transport delivery in out of town greenfield sites overwhelming shows greenfield developments are highly environmentally destructive, car use reliant and land hungry. This reclassification ignores large sections of (applicable at time of exercise) NPPF 2019 guidance including paragraph 84 and 102 which states 'Transport issues should be considered from the earliest stages of plan-making and development proposals, so that: a) the potential impacts of development on transport networks can be addressed; d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account' ONS journey to work Census data for Elvington shows that 95.8% of journeys were made in cars, vans and motorbikes while only 2.7% were by bus, DDC fail to comply with this NPPF guidance.

1.0 Summary

Top down housing targets, geography and an historic underinvestment in the strategic road network have created genuine constraints in the Dover District. Nevertheless, an LDP where 76% of all proposed housing is on greenfield sites is inherently unsustainable.

From the loss of irreplaceable agricultural land and habitat, to reinforcing the district's car dependency by creating greenfield sprawl that will significantly change the rural character of the north west of Dover District, DDC's Reg 19 LDP DDC's will deliver the wrong houses in the wrong locations. It won't improve the environment or mitigate climate change. If the purpose of the planning system is (as set out in the NPPF) to ensure that sustainable development is pursued in a positive way, we believe this plan cannot be considered to be justified and it will not enable the delivery of sustainable development.

1.1 Objective

Overarching concerns about the sustainability of the adopted land allocation strategy were raised in our Reg 18 comments (see attached). Our Reg 19 response is focuses on mitigating the traffic impacts from the proposed development that (as a small village located on one of the 2 main rural routes between the A256 / 7 and the A2) will have a direct, severe and devastating impact on our community. These impacts are outlines in Section 2.0 below.

Based on our experience on Aylesham (DOV/07/01081 and DOV/13/0120), Nonington Parish Council believe that the site-specific impact focus of S106 means it is not an effective framework for mitigating cumulative impacts from multiple spatially distributed developments on a rural road network. It is impossible to disaggregate traffic flow to attribute the increase to specific site.

We note that Reg 19 Housing Policy 4.21 states that cumulative impact all sites allocated in this Plan on common road links must be considered. However, in judging how this might work in practice, we reviewed how the cumulative traffic impacts from the current plan period developments (in Aylesham, Sholden, Woodnesborough, Sandwich, Sholden, Eastry, Betteshanger, Discovery Park) have been considered in relation to the C195 route on which the village is located. To date only Aylesham has been required to measure traffic impacts (DOV/13/0120 – Variation of Conditions 76 of Planning Permission DOV/07/01081)' to identify the traffic impact arising from the cumulative occupation'. Conducted in April 2018 with 380 of 447 units occupied, the traffic consultants, MLM, concluded that no impact could be attributed to the development because the identified increases were in line with ONS data showing road traffic increased by 29% from 1990 to 2018. It is noteworthy that greenfield housing, like that Aylesham, with unrealistic assumptions of self- containment were – in turn – identified as a key driver national car use increases.

Combined with our concerns about the robustness of the employment, sustainability and traffic baseline evidence (outlined below), we are seeking effective mitigation enshrined in a Local Plan policy rather than deferring this to a S106 negotiation at the planning application stage.

1.2 Basis for Objecting

1.2.1 Inconsistent and Insufficient Traffic Evidence undermining Plan Soundness and Sustainability

MHCLG's guidance states that an LDP should be based on robust transport evidence base collected in advance that should encompass: the cumulative impacts of existing and proposed development on transport networks, a review journey purpose and accident records as well contextual data such as travel to work areas in order to measure the impact on the locality in economic, social and environmental terms.

I. Detailed traffic evidence has been collected for the DDTM area in the REGULATION 19 TRANSPORT MODELLING FORECASTING REPORT but the strategic housing and employment sites outside the DDTM area have only been modelled 'in significantly less detail'.

The result is that the area bounded by A2, B2046, A256 and A257 has significantly less robust traffic evidence, undermining the scope for an effective analysis of cumulative impacts of existing and proposed development on transport networks in this area. This area includes Sandwich, Aylesham, Elvington, Eythorne, Eastry, Wingham, Shepherdswell and Ash and has 1554 of the Reg 19 plan new dwellings allocated within it (Source: Distribution of Housing Site Allocations by Settlement). This accounts for 78% of all Dover District's Reg 19 housing allocations outside Dover and Whitfield. This area also encompasses the strategic employment sites at Discovery Park and the Aylesham Development Area. Detailed Analysis of Traffic Evidence is set out in Section 4.1

II. The sustainability evidence base uses 'unrealistic assumptions about self-containment' and unfounded onsite employment assumptions that are not supported by contextual travel and commuting pattern data. For example in SA 7.51 LUC incorrectly include Snowdown Colliery as a strategic site inflating site employment sustainability and under estimating outbound commuting from Aylesham.

III. There are inconsistencies in the sustainability evidence base. For example SA Section 6.207 states that Eythorne (and Elvington) has 'relatively good access to existing local rail...services'. Eythorne railway station closed to passenger traffic in 1948.

IV. The Office of Road and Rail passenger data for Aylesham between 01/01/2016 – 01/01/2020 show rail journeys per head of population in Aylesham fell as the first phases of the 'garden village' were occupied. Transport in Aylesham has actually become less, not more sustainable.

1.2.2 The Duty to Co-operate

DDC were only made aware of Canterbury City Council's (CCC's) Reg 18 plan for 3200 houses north of B2046 and the 420 dwellings on land contiguous to SW Aylesham in September 2022, shortly before the publication of their Reg 19 plan.

We haven't seen a statement of common ground or any evidence of the active ongoing constructive engagement and co-operation required to maximise the effectiveness of local plan in the context of strategic cross boundary matters or of any coherent strategy based on agreements between them.

As all authorities are required to reach agreement on strategic matters before submission we expect this is under review but – based on the absence of co-operation evident to date – we question whether the legal duty to co-operate can be complied with in a meaningful way.

1.2.3 Scale of Cross Boundary Development Impact on DDC Reg 19 Evidence Base and Plan Soundness

Although DOV/07/01081 and DOV/13/0120 promoted Aylesham as a 'Garden Village', in their Reg 19 plan Dover District Council propose that Aylesham becomes a small Garden Town of 15,000 (LDP 4.196 and 4.199). Canterbury City Council propose another 3,620 dwelling adjoining Aylesham to create a single 'new town' or Freestanding Garden City with a population of 25-30,000 people. A development of this scale requires realistic assumptions about self-containment, a strong foundation of employment and appropriate infrastructure to avoid creating an unacceptable severe cumulative impact on adjacent road network.

The consideration and mitigation of transport impacts is an essential part of Government's wider policy objectives for sustainable development. The objectives set out in NPPF para 111, DDC's Reg 19 Policy T12

10.8 can only be effectively delivered against a robust evidence base that provides the clear benchmarks and thresholds that a planning application can be measured against.

Canterbury City Council's stated Reg 18 position is that the traffic impacts of their proposed new town joining Adisham to Aylesham are mitigated by the planned south Canterbury bypass which, they claim, will reduce traffic impacts as measured across their district. No evidence has been provided to establish how this will mitigate the impact of 3,620 additional dwellings on the rural road network in Dover District.

As highlighted in 1.2.1 (i) above, in relation to DDC's Reg 19 plan, we have existing concerns regarding the absence of a robust transport evidence base for the area bounded by A2, B2046, A256 and A257, collected in advance and benchmarking existing traffic levels so the cumulative impacts of proposed developments on transport networks can be subsequently measured.

The additional scale of Canterbury's proposed development and proximity to Aylesham and the District's boundary, means that DDC's Reg 19 plans is not positively prepared as it is not informed by agreements with other authorities or consistent with achieving sustainable development.

It is not justified as it is clearly not based on proportionate traffic or sustainability evidence.

We would argue that this also compromises plan efficacy given the absence of effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.

2.0 Location - Background

Nonington is set along a 1.2 mile stretch of a rural road with constrained widths, a number of single lane pinch points and long stretches (including in the heart of the Easole Conservation area) with no pavements. This route connects Sandwich and the A257 to the A2. A 'rat run', the C195 is badly impacted by the cumulative impact of traffic from Sandwich, Deal, Eastry, Woodnesborough, Sholden (via Drainless Road, Heronden Rd and Thornton Road), Elvington and Aylesham, with pre-pandemic baseline traffic of 90,800 vehicles a month. (MLM / K & M SURVEYS 2018 - 7 day total (East and West) = 20,888 traffic movements)

KCC Highways confirm Holt Street, Easole Street and Sandwich Road route (Linking B2046 and Sandwich) is classified as the C195 and is "not a secondary route, as defined in our road hierarchy, and 'for reasons of various highway constraints along the corridor". It should, therefore, be protected from the cumulative or inappropriate traffic impacts. However, as detailed in item 1.1 above, in the current plan period no actual measures have been put in place to mitigate development traffic impacts on the C195 route.

We have had several accidents, 6 road accident deaths on the C195 since 2014 and multiple crashes in the village mostly unrecorded by the police.

Multiple single lane pinch points with no pavements. On street parking and private driveways used as passing points

We have a problem with speeding in excess of the speed limit of 30mph. MLM's s106 surveys 2014 and 2018 showed Holt Street Nonington speeds heading SE 38 mph and NW 37 mph.

Applications directly increasing C195 local traffic in the current LDP:

Aylesham 1320 dwellings (DOV/07/01081), Sholden 230 residential dwellings (DOV/10/01065), Sandwich 120 residential dwellings (DOV/19/00243), Hammil 29 residential dwellings (DOV/16/01026). Woodnesborough 24 residential dwellings (DOV/11/00965) with a number of application to be decided including a 120 bedroom hotel and 210 residential dwellings in Betteshanger Country Park.

3.0 TI1 - Sustainable Transport and Travel

Item 10.1 seeks to 'facilitate a shift away from petrol and diesel powered vehicles over the lifetime of the Plan and promote sustainable forms of transport and travel'.

The evidence doesn't support the deliverability of this goal on a Reg 19 housing allocation with over 76% of all new dwellings on greenfield sites. These are known to have significantly higher car dependency than brownfield sites. If we take Aylesham as an example, DOV/07/01081 and DOV/13/0120 committed to the expansion of Aylesham Garden Village and promoting sustainable transport predicated on the rail service. Yet, the Office of Road and Rail passenger data show rail journeys per head of population in Aylesham dropped between 01/01/2016 – 01/01/2020. Despite the 'garden village' aspirations, transport in Aylesham has actually become less, not more sustainable.

Public transport, cycling and walking uptake is highest in metropolitan and dense urban areas where use of public transport is typically 35%-50%. This falls dramatically in greenfield developments in ex-urban and rural sites. Research also shows significant sustainable transport adoption variations exist within settlement types driven by socio-economic and topographical factors. (Source - Bennett Institute for Public Policy at the University of Cambridge 2020.) None of this appears to be considered.

KEY FACTS

Elvington and Whitfield don't have rail connections. Stagecoach have cancelled the 38 bus service.

ONS Travel to Work Census data for Elvington showing 95.8% of journeys were made in cars, vans and motorbikes while only 2.7% were by bus.

ONS Travel to Work Census data for Whitfield, Elvington and Aylesham combined: 82.5% of all journeys were in a Car. Only 5.8% on public transport.

The 'Dover Fast Track' represents the largest infrastructural investment in the district. At £50-£70 million, is it an effective use of scarce capital investment or a white elephant?

ORR Passenger entries and exits for Aylesham data shows passenger numbers per head of population dropping Jan 2016- Dec 2020.

o Passenger entries and exits increased by 19.6%. 2016-17 to 2019-20.

o Aylesham Population increased by 30% over the same period.

NOTE _ 20-21 data discounted because of Covid. 2016 Population=4,980. By March 2018, 493 new dwellings had been completed. Estimated mean new dwelling occupied by 2019- 2020 = 500. Estimated population increase = 1,500.

Aylesham Elvington Whitfield Combined

Train 74 (4.1%) 60 (3.06%) 29 (1.4%) 2.3%

Bus 66 (3.6) 49 (2.5) 86 (4.3) 3.5%

Car/Van 1130 (62.0) 1544 (84.9) 1411 (69.7) 72.2%
Passenger in car/van 163 (8.9) 141 (7.8) 182 (9.0) 8.6%
Motorcycle 18 (1.0) 45 (2.5) 30 (1.5) 1.7%
Bicycle 29 (1.6) 19 (1.0) 34 (1.7) 1.4%
Taxi 0 (0) 9 (0.5) 6 (0.3) 0.26%
On foot 201 (11.0) 89 (4.9) 110 (5.4) 7.1%
Source ONS Census Data Travel to Work 2001

Conclusion

This policy cannot be said to be 'positively prepared' when the evidence shows it is not consistent with achieving sustainable development;

This policy cannot be said to be 'justified' as it is not based on proportionate evidence if we accept the PAS definition as 'evidence obtained with an understanding of the way in which issues arise within a plan area to enable an understanding of the issue/topic in question thereby leading to clear analysis and a consequential strategic or policy position within the plan'.

As non-planners, we are struck by the fact that plan making appears to focus on assigning 'sustainability' labels to plan policies without evaluating the evidence for how well these deliver in the real world. What is the local evidence that garden villages or towns actually deliver improvements in sustainable travel? Has the 900 house garden village expansion of Aylesham delivered the expected uptake of cycling and public transport use? Has the provision of employment space delivered the expected expansion in the local employment base, in shops, services, and local business employment (within new office space) capable of accommodating supporting 40% of the population? Or does the evidence show that it is a dormitory commuter suburbs – the antithesis of the Garden City idea.

Failure to assess the performance of policies risk creating confirmation bias and recycle poor policies that deliver poor outcomes. So is this plan policy 'consistent with national policy'? Does it enable 'the delivery of sustainable development in accordance with the policies in this Framework? Based on the evidence and judged against the policies set out in NPPF para7,8, 9 and 10 then the answer is no.

The absence of evidence is not evidence of absence. PAS state good evidence should contain reliable, objectively collected recent data and will not contain unjustified assumptions. If the evidence shows assumptions about 'self-containment' are unrealistic and that the offer of plentiful land for industry has not delivered the expected employment, then these are unjustified assumptions.

4.0 Reg 19 T12 - Transport Statements, Assessments and Travel Plans

In item 10.7 set out their goal of 'promoting the delivery of sustainable development' stating that 'Traffic generated by development should normally be targeted towards the primary and secondary route network in the District. Other routes should not be subject to inappropriate levels of traffic generation or unsuitable traffic movements'.

Although KCC Highways consulted with DDC on policy (T12) they haven't published benchmark traffic levels or defined 'inappropriate' or 'unsuitable' traffic impacts because 'baseline conditions vary considerably from location to location'. Nor does NPPF para 111 provide a definition of 'severe' or 'unacceptable'. DDC also seek discretionary power over:

When or whether Transport Assessments and Travel Plans are required.

And to decide what constitutes a severe residual cumulative impact on the local highway on a case by case basis.

Without the robust benchmark data on existing traffic (as required by MHCLG and DDC's Sustainability Appraisal of Growth Options), it unclear how this will work in practice. Especially given the pressure to deliver on housing targets and the local government financial incentives to facilitate housing inherent the New Homes Bonus which we understand paid £1,728,587 to DDC in 2019.

The Reg 19 proposed Aylesham South and Snowdown sites are accessed directly from the C195 / Holt Street, which is also the direct route to the A2 from Elvington. This will increase our traffic issues.

While recognising the 'porosity' of the contiguous rural road network the traffic impacts from the proposed Aylesham site on to Holt Street, WSP data and modelling is restricted to the observation that 'Holt Street is not modelled but anticipated trips for Aylesham Development will leave the network here'.

No ACT data has been collected or for traffic heading North on Adelaide Road from Elvington to the A2 or from Aylesham heading south east to Sandwich, Discovery Park and South Thanet

PAS state good evidence should contain reliable, objectively collected recent data and will not contain unjustified assumptions. For the area bounded by the A2, B2046, A256 and A257, we believe the patchy 2018 ACT traffic evidence fails this test as it does not include:

1. Disaggregated SERTM data.
2. Node Impedance Calculation (ICA)
3. VISUM Network Map of existing and proposed roads
4. Detailed benchmark capacity PCU per Lane per lane data for Links types including for Rural Roads and Minor Road Rural Village (30mph).
5. Education Cat Trips prior matrices .

In assessing whether the Reg 19 sites in Aylesham and Elvington likely to result in inappropriate levels of traffic generation or unsuitable traffic movements' on the C195 route, we reviewed the following data to establish the likely impact:

2011 ONS Census data,
 ONS - Nomos data, labor market statistics and DataShine ESRC BODMAS conclusions in the Sustainability Assessment,
 WSP's DDTM and Reg 19 traffic data,
 the Office of rail and Road Estimates of station usage and
 Onsite employment assumptions
 Education commuting data.
 AA Route Planner

The key findings are itemised in Section 4.1 below.

Reg 19 TI2 - Conclusions

Reg 19 SA Appendix B confirms the District's residents 'rely heavily on cars to...access employment, education, amenities and services' and predicts an increase of commuting from Aylesham to Sandwich (the district's 2nd commuting hub) as well as to Thanet and Deal. In addition to reduced onsite employment at Aylesham (reduced in WSP modelling from 1013 in Reg 18 to 263 in Reg 19) and the absence of any direct public transport links to Discovery Park, Deal or Thanet; the absence of Secondary education facilities and the primary education capacity issues in Aylesham will also continue to drive increases in commuting road traffic on the C195.

The conclusions are clear, Aylesham will increase traffic on the surrounding rural road network but what is not clear is how DDC propose to deliver their goal of 'promoting the delivery of sustainable development' or ensure 'Other routes should not be subject to inappropriate levels of traffic generation or unsuitable traffic movements'.

DDC have failed to engage with the conclusions from existing evidence base or commission a sufficiently robust traffic data for the area bounded by A2, B2046, A256 and A257 containing >78% of all Dover Districts Reg 19 housing allocations outside Dover and Whitfield. Consequently there are no clear thresholds against which future applications can be measured. If, as a result, unsound policies are included in the LDP, then no subsequent s106 developer contribution led mitigation will be achievable.

Therefore, we conclude the policy is unsound because:

1. This plan is not consistent with achieving sustainable development and therefore cannot be called positively prepared.
2. Ignoring the area-specific evidence itemized in 4.0 and below, this policy cannot claim to be based on proportionate evidence and., so, cannot be considered justified.

4.1 Traffic Evidence Summary

1. Despite the Ministry of Housing, Communities & Local Government 2020 LDP guidance stressing the importance of contextual data such as travel to work areas (and that evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively). Although referenced at a District level in the Sustainability Assessment, none of this contextual or empirical evidence has been considered in the LDP strategic site allocation process in relation to the impact of Aylesham and Elvington on the road network.

2. From ONS data to SA commuter patterns and to SHMA 2017 all highlight a strong trend of out-commuting. ONS data shows high car reliance in all major strategic site locations.

3. WSP's DDTM (Reg 18 Traffic Plan Assessment 2020 / Regulation 19 Transport Modelling Forecast Main Report or Appendices) report conducted detailed modelling of the Dover and Deal traffic. Other areas were 'modelled in significantly less detail'.

4. Despite recognising the LDP will 'lead to large increases in flow' in Aylesham, WSP's analysis is limited to a handful of ATC's (automatic traffic counters) on the B2046 1n 2019. WSP's report offered no conclusions on the area north of the A256 as it was outside the DDTM area. Although concerns were raised at Reg 18 no new traffic data or modelling has been introduced at Reg19.

We understand KCC Highways have 'requested projected development flows leaving the currently modelled areas in that direction to sense check on any need to extend the models'. However, given the site-specific impact focus of S106 means it is not an effective framework for

mitigating cumulative impacts from multiple spatially distributed developments on a rural road network, we believe an specific LDP policy is required.

5. 'Critical locations on the road network with poor accident records should be identified in order to determine if the proposed land allocations will exacerbate existing problems and whether highway mitigation works or traffic management measures will be required to alleviate such problems. The accident records should be compared with accident rates on similar local roads'. (MHCGL guidance on traffic evidence for LDP)

There have been 4 deaths on Holt / Easole Street within 1.5 miles of the Aylesham Road junction. How many deaths are required in order for Holt Street to qualify as having a poor accident record and to be included in the detailed traffic modelling?

6. The Elvington data consists of ATC and manual data counts. By citing proximity to A256, the implicit study assumption is that the A256 is the primary route used. No empirical data collected on the traffic heading to the A2 / M2 / M26 or M25 from Elvington.

7. WSP recognised the porosity between the B2046 and the adjacent rural road network, yet provided no analysis of (1) the rural road capacity restrictions or (2) of baseline cumulative traffic from development to date or (3) the projected increase on the road network from the LDP.

8. According to WSP, Highways England approved matrix information from the South East Regional Transport Model (SERTM) used by WSP in Deal was only disaggregated using the 2011 Census data for the DDTM area. As noted in 2.2.13 of WSP's 2018 DDTM the SERTM data is very coarse and with no disaggregation would provide little insight into Elvington and Aylesham commuting patterns via the rural road network

9. There is an extensive resource of rural road network ATC data from Aylesham's s106 TA's (2007/ 2014/2018 etc.) that could have been consulted. KCC Highways confirm the ACT data used for Phase 2b of the Aylesham Village Expansion has not been considered.

10. WSP's observation on likely traffic impacts of proposed Aylesham Development on the rural road network is restricted to 'Holt Street is not modelled but anticipated trips for Aylesham Development will leave the network here'. WSP implicitly assumed all traffic for Aylesham will access and leave the site form Dorman Ave North. ATC and modelling evidence shows this assumption to be unsound.

11. In their Reg 18 comments on Aylesham KCC raised concerns over 'the impact of the development on the highway network, particularly as Aylesham has no secondary education provision so the need for travel by private vehicle for secondary school age children may be higher than in other areas of the district'. No modelling of the associated traffic impacts has been provided.

Note - During the development of the 2015 DTM and 2018 DDTM car trips which are made to schools were modelled by WSP. Despite the absence of a Secondary School no similar exercise has been conducted on

12. By highlighting the need to expand St Joseph's primary, KCC's Reg 19 comment identify the shortfall of primary places in Aylesham. Unlike in the DDTM area WSP has not modelled car trips which are made to schools for Aylesham or Elvington. There are 378 primary places in Aylesham for a current population of 6,000 with a further 630 houses proposed in this LDP. This is below the national average. As a result the pupils attend schools across the area. For example at Goodnestone & Nonington CE Primary School 43% of pupils come from Aylesham and 30% Elvington creating up to 4 car trips of 1-3 miles each per day.

13. KCC Highways informs us that education commuting will be dealt in a Transport Assessment. We have been unable to locate any education commuting evidence in the Transport Assessment evidence for (App no 07/01081) for either Phase 1 or 2 in Aylesham or a School Travel Plan as recommended in Managing Our Roads (DfT, 2003) and The Future of Transport – a Network for 2030 (DfT) White Paper, 2004.

14. In Reg 18 comments, KCC raised concerns regarding the additional flow anticipated on Shepherdswell Road due to the narrow, rural nature of the road. Holt Street / Easole St / Sandwich Rd are similar in terms of their physical constraints and traffic levels. Both are 'rat runs' between the A2 A256 and significant coastal settlements. In relation to application 19/00381, Richard Smith (Senior Development Planner - KCC Highways) accepted a reduced vision splay from 45m to 25 metres on Easole Street based on an independent highways report describing Easole Street as being a narrow road, 'in a rural location with a tight bend to the west and a junction to the east. The road has no footways, with high hedges bordering each side of the road, creating an extremely constrained environment. There is evidence of vehicles crossing the centre line; the markings are very worn and hardly visible'.

15. ORR Passenger entries and exits for Aylesham data shows passenger numbers per head of population dropping Jan 2016- Dec 2020.
o Passenger entries and exits increased by 19.6%. 2016-17 to 2019-20.
o Aylesham Population increased by 30% over the same period.

NOTE _ 20-21 data discounted because of Covid. 2016 Population=4,980. By March 2018, 493 new dwellings had been completed. Estimated mean new dwelling occupied by 2019- 2020 = 500. Estimated population increase = 1,500.

16. WSP's Reg 19 Traffic Report is based on the 2018 DDTM study which undertook a detailed analysis of the rural road network the other (western) side of the A256 using disaggregated SERTM data, Node Impedance Calculation (ICA), mapped out on a VISUM Network map. This established benchmark capacity PCU per Lane data for a range of defined link types including 'Rural Roads' and 'Minor Road Rural Village (30mph)'.

17. In their Sustainability Appraisal of Growth Options in the Dover District Council Local Plan Topic Paper: Overarching Strategy (Part 1) point 1.5. DDC undertook to 'assess growth options in terms its likely effects on environmental...using available evidence including commuting patterns, transport infrastructure, traffic congestion (and related air quality and carbon emissions issues)'. Although some data was considered, the detailed data was not considered when evaluating the impact of the Aylesham or Elvington sites

18. In the SA LUC use ONS - Nomos data, labor market statistics and DataShine ESRC BODMAS (using 2011 ONS Census data) to establish commuter patterns. Based on this the Reg 19 SA Appendix B confirms the District's residents 'rely heavily on cars to...access employment, education, amenities and services' and predicts an increase of commuting from Aylesham to Sandwich (the district's 2nd commuting hub) as well as Thanet and Deal.

19. DDC's LDP Sustainability Appraisal identifies Sandwich as the District's key centre for inbound commuting. The Reg 19 provision of employment sites in Aylesham have been reduced by 85% from 1013 jobs in Reg 18 to 263 jobs in Reg 19. (source WSP main Report (i) Reg 18 and (ii) Reg 19. Reduced onsite employment will increase site generated commuting traffic.

(NOTE The Reg 19 Sustainability Assessment has not been revised to reflect the 85% reduction of onsite jobs, calling its conclusion about Aylesham site sustainability into question).

20. The Local Plan (Reg 18 and Reg 19) Sustainability Appraisal for the proposed sites in Aylesham and Elvington is – for traffic purposes - limited to recording the proximity of proposed dwellings to a bus stop and / or train station. The ONS - Nomos data, labor market statistics and DataShine ESRC BODMAS conclusions in the Sustainability Assessment, analysis of car dependency and commuting patterns or journey to work data was considered on the site assessments. This appears to limit real world applicability.

21. None of the evidence base on car dependency in Greenfield ex-urban developments nor car-dependency and the commuting pattern evidence appears to have been considered.

22. SA Section 6.207 states that Eythorne and Elvington already have 'relatively good access to existing local rail and bus services'. However Eythorne railway station closed to passenger traffic in 1948. In response to our Reg 18 RFI DDC stated that the SA did not claim Elvington 'already have relatively good access to existing local rail and bus services'. However, this is a direct quote from the SA - 6.207. This claim is factually false but is a base assumption used to justify Aylesham and Elvington's compliance with SA 4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles.

23. MHCGL guidance on traffic evidence for LDP states 'Critical locations on the road network with poor accident records should be identified in order to determine if the proposed land allocations will exacerbate existing problems and whether highway mitigation works or traffic management measures will be required to alleviate such problems. The accident records should be compared with accident rates on similar local roads'. There have been 4 deaths on Holt / Easole Street within 1.5 miles of the Aylesham Road junction. How many deaths are required in order for Holt Street to qualify as having a poor accident record?

4.2 Base Data Availability

One problem we encountered is availability of the granular base data that forms the building blocks for the LDP traffic and commuting evidence. We can't find base data. For example

The Dover Transport Model (DTM) Local Model Validation Report November 2016 is not available. So we have to rely on DDTM for the base modelling data for additional trips zonal distribution.

In the SA LUC use ONS - Nomis data, labour market statistics and DataShine ESRC BODMAS (using 2011 ONS Census data) to establish commuter patterns. However, this data set is not available for review.

The SA conclusions suggest a data granularity (e.g. the availability of Aylesham to Deal commuting numbers), that is absent from the methodology employed in LUC's site-specific sustainability assessments. This would matter less were LUC's Reg 19 report not used inflated employment assumptions for Aylesham creating unsound sustainability conclusions.

4.3 Employment Evidence Driving Commuting

1. The Reg 19 SA 7.51 (Reg 19 Strategic employment allocation policies) and Table 7.6 include former Snowdown Colliery as a strategic site. This incorrect. Aylesham site employment has been reduced from 1,013 onsite jobs in Reg 18 to 267. The sustainability conclusions have not been reassessed. This clearly undermines the deliverability NPPF para 72 b.

2. DDC provided site employment estimates to both LUC and WSP for SA and Traffic modelling purposes. Aylesham's employment modelling conclusions in the 2022 SA are contradictory and misleading. They don't align with the WSP's modelling numbers, which reduced by 84% from 1,013 onsite jobs in Reg 18 to 267 on site jobs in Reg 19.

	<p>3. In the Reg 19 SA main report (3: 4.75, SA 3 - 7.160 and table Table 7.6) still cite Aylesham as a 2nd largest employment hub with Land off Holt Street identified as ++ positive effect against. Also true for Reg 19 Appendix B growth and spatial options findings by SA objective, which offer conclusions based on inflated on site employment numbers numbers In Appendix F Snowdown employment drops to a 'Minor positive (+)'. This looks like a revised assessment that hasn't then been added into the main report.</p> <p>4. Trip generation for employment sites (approach agreed with NH and KCC) the potential jobs were calculated using the SQM area of the site and dependant on the land use type an employment number was provided have not been used in the SA. As onsite employment is a key indices of sustainability:</p> <p>a. Why is the discrepancy in Aylesham employment number in the SA?</p> <p>b. Has the South Aylesham site's sustainability been reassessed by LUC to reflect the reduction in onsite employment?</p> <p>c. Why is WSP using a different employment assumption to LUC?</p> <p>5. Has the council assessed the financial viability of the development proposal for Snowdown Colliery? The land owner informs us their existing tenant has a substantial remediation liability and is unaware of any ongoing discussions about reassigning this not have they aware of any detailed financial backing that would fund the redevelopment of this site. Obviously a site needs to be deliverable. Has it passed deliverability benchmarking test to justify the site's continued inclusion in the LDP?</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Use robust evidence that is reliable, objectively collected recent data based on an understanding of the data collected and the characteristics of the plan area without relying on unjustified assumptions or unsupported assertions.</p> <p>Engage with the significant body of evidence that clearly shows that Greenfield sites is inherently unsustainable. From the loss of irreplaceable agricultural land and habitat, to reinforcing the district's car dependency by creating greenfield sprawl that will significantly change the rural character of the north west of Dover District, DDC's Reg 19 LDP DDC's will deliver the wrong houses in the wrong locations. It won't improve the environment or mitigate climate change. If the purpose of the planning system is (as set out in the NPPF) to ensure that sustainable development is pursued in a positive way, we believe this plan cannot be considered to be justified and it will not enable the delivery of sustainable development.</p> <p>Base the plan on a properly resourced and deliverable employment strategy that engages with local businesses to ensure that the plan can deliver the right employment, community facilities to make the Garden Village label actually signify a sustainable community rather than just sustainability washing to gerrymander an environmentally harmful planning outcome that will lead to a loss of irreplaceable agricultural land and habitat, reinforce the district's car dependency by creating greenfield sprawl that will significantly change the rural character of the north west of Dover District, DDC's Reg 19 LDP DDC's and deliver the wrong houses in the wrong locations.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>Nonnington PC LDP Reg 19 Comments_Dec22_V1.0.pdf (4)</p>
<p>Local Plan Consultation Point</p>	<p>Eythorne and Elvington</p>
<p>Rep ID</p>	<p>SDLP1330</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1274099</p>
<p>Consultee Full Name</p>	<p>Rebekah Bates</p>
<p>Consultee Company / Organisation</p>	

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 37
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The recent policy change on mandatory numbers for new housing means that individual developments for houses should be reviewed and that current plans are not sound, they do not comply with policy.</p> <p>The South east is under pressure and does not have the infrastructure to cope with the demands that new housing developments bring. It is one of the driest counties and so water stress will become a more serious issue.</p> <p>In shepherdswell access from the A2 is by two narrow lanes. Both are unsafe for pedestrians, cyclists and horses. There is nowhere local for people to ride. I often struggle to walk the 50 m from the village hall to the shop with my two dogs. There is no traffic calming and cars do not slow down.</p> <p>The many extra houses expected at Elvington will increase this traffic as will the houses planned for the village itself. This is a major concern. I support the Green Party proposal for safe, well lit cycle lanes to link villages with stations but this does not help dog walkers.</p> <p>People move to the countryside to be able to access and enjoy green spaces but this is difficult with so many cars. We don't see children playing out as they used to.</p> <p>I am concerned about the destruction of hedges for new build projects. Tho the plan proposes to maintain as many as possible we have recently seen the ripping out of a perimeter hedge for the community trust housing next to the village hall. I do not trust that hedges and trees will be maintained and emphasise that mature hedging and trees offer so much more habitat than new planting which would need to be on a much greater scale if it is to offer the same benefits in terms of carbon capture as well as habitat.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Policy on housing has changed and so plans should change to comply with this. The housing which our village needs is sheltered housing for the elderly, many of whom are single, living alone, wanting to stay in the village. Providing purpose built accommodation for them would free up many houses for families. Have the needs of the often ageing population of villages been considered? A limited number of affordable housing is included in larger developments but this does not meet the needs of our ageing villagers.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

Local Plan Consultation Point	Eythorne and Elvington
Rep ID	SDLP1740
Rep Status	Processed
Consultee ID	1271717
Consultee Full Name	Quinn Estates
Consultee Company / Organisation	Quinn Estates Ltd
Agent Full Name	Nicholas Pellegram
Agent Company / Organisation	Iceni projects
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Omission Site in Eythorne
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Full Representation attached to SDLP1740. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1740.)</p> <p>REPRESENTATIONS TO THE DOVER DISTRICT LOCAL PLAN REGULATION 19 CONSULTATION IN RESPECT OF LAND AT SHOOTERS HILL, EYTHORNE</p> <p>Iceni Projects, on behalf of Quinn Estates, welcomes the opportunity to submit further representations to the Dover District Local Plan (Regulation 19 Consultation) in respect of land at Shooters Hill, Eythorne (hereafter referred to as 'the Site'). A Site location plan showing the extent of the Site is contained at Appendix 1 of this representation.</p> <p>Quinn Estates is disappointed to see that the Site has not been included as a housing allocation at this stage in the plan making process. Quinn believes that the Site would be a unique and attractive addition to the Eythorne Settlement and is an important opportunity that should be positively identified for residential redevelopment in the Plan. It is considered that the land should be allocated for residential development of approximately 10 self-build homes with associated access and parking, within a landscaped setting. The site is sustainably located within a settlement earmarked for growth by Dover District Council.</p> <p>It is Quinn's view that the current suite of allocations in the draft Plan would fail to provide a sufficient level of growth in and around the main settlements within the Dover district, and that the draft plan is over reliant upon a single urban extension to meet local housing needs. To ensure the soundness of the plan, further Sites, such as the one advocated in this representation, should be allocated to enable the Plan's ambitions for Dover to be delivered.</p> <p>a. Land at Shooters hill, Eythorne ('The Site')</p>

The site is located within Eythorne and comprises approximately 0.5ha of land. The site is bound in the north and east by residential ribbon developments along Shepherdswell Road and Shooters Hill Road respectively. Eythorne Railway Station and the associated railway line (in use for recreational railway trips only) borders the south and south east of the site. The western edge of the site is partially hemmed in by a row of conifers, and gives way to open land. The site consists of greenfield land and is currently in use as a grazing paddock, sloping gently from north to south.

The site is located entirely within Flood Zone 1. It is not located within or in close proximity to any ecological designations. The site is not subject to any specific landscape designations and is not within a conservation area. There are heritage designations in proximity to the site, including three Grade II listed buildings associated with Eythorne Court to the west of the site, and three Grade II listed buildings on Church Hill and Wigmore Lane to the north/northeast. Eythorne Railway Station is identified as a non-designated heritage asset in the Dover District Local Plan. A Public Right of Way cuts through the site from the north to the southernmost corner

b. Sustainability

Quinn Estates considers that the approach taken to the delivery of housing in Dover as set out within Table 4.1 of the Regulation 19 Submission Version of the Draft Local Plan is not a result of sound plan-making. It is considered that further Sites, including the Site subject of this representation, should be allocated to secure steady growth in the Dover District.

Eythorne is identified as a village in the current adopted Local Plan offering a good and sustainable range of facilities including all key services. However, the emerging Local Plan (supported by the updated Settlement Hierarchy Review (2020)) upgrades Eythorne to a local centre. This change in categorisation within the settlement hierarchy will change the growth strategy for the settlement. The Council's emerging vision, as set out in emerging Local Plan, is to support the existing sustainability credentials of the village and encourage further growth of a suitable scale to support its continued sustainability (in accordance with draft Strategic Policy 2). The closest bus stop adjoins the northeastern boundary of the appeal site and offers services to major places of employment and facilities including Aylesham, Dover, Sandwich and Canterbury. Eythorne Elvington Community Primary School is located c.300m walking distance to the north-west of the site. In addition, Eythorne village centre, including a village shop, pub and post office, is c.400m to the south-east of the site.

Ensuring the delivery of new homes

For a plan to be considered effective, the objectives and identified requirements must be deliverable and achievable. It is considered that, in its current form, the plan fails to accord with this part of the soundness test, due to over reliance on the Whitfield (SAP1) Strategic Allocation to provide the District's projected housing needs over the plan period. Therefore, to ensure the balanced and steady delivery of housing over the plan period, further Sites should be allocated to ensure that the needs of the district are met.

Whitfield Urban Extension (SAP1) is the largest allocation in the plan and it is expected to deliver over 5,750 dwellings. Of the 5,750 dwellings proposed for the Site, 3,483 dwellings are considered deliverable in the emerging Plan period. The Council acknowledges that the 2010 Core Strategy included provision for the Site to deliver 5,750 dwellings. Phase 1 of the SAP1 allocation (Dover ref. 10/01010) is underway and as of the 2020/2021 monitoring year, 185 dwellings had been completed with a delivery rate of approximately 50dpa for the past three years. Given this slow progress, it seems likely that although the existing outline planning permission should be completed over the Plan period, a more cautious approach should be taken in terms of the remaining dwellings allocated for the Site given its proven issues in delivering housing to date. Without clear evidence by way of a planning application for these additional dwellings, it is questioned whether Whitfield will ramp up to delivery of 120dpa from 2023/24 and then up to 200dpa from 2026/27 for the remainder of the Plan period. More consideration should therefore be made to the current planning position of the Site and the length of time it has taken so far to deliver housing. Paragraph 73D of the NPPF recommends the inclusion of realistic delivery rates within Local Plans, and DDC should therefore review those proposed for Whitfield and consider building more flexibility and more volume into the pipeline to be able to respond to delivery issues.

It is considered that, particularly with the deliverability issues of the Whitfield Urban Extension to date, additional Sites should be allocated for housing to ensure that there is sufficient choice and flexibility in the supply so that DDC can meet its housing requirement throughout the Plan period, as well as to meet the Government's objective to significantly boost the supply of housing as set out in Paragraph 60 of the NPPF. Land at Shooters Hill, Eythorne would be an appropriate allocation which would assist in ensuring a variety of housing Sites are allocated in accordance with NPPF Paragraph 68.

(DDC Note - section DUPLICATED onto H5)

Self and custom build

Policy H5 of the Draft Local Plan states that the Council will support self-build and custom house building schemes on housing sites allocated in the Local Plan and on non-allocated windfall developments subject to compliance with the other Policies in the Local Plan, and where overall this would not result in an over-provision of this type of housebuilding when compared to the Council's supply/demand evidence. The Self-Build and Custom Housebuilding Act 2015 requires relevant authorities, including District Councils, to keep a register of individuals and associations of individuals who are seeking to acquire serviced plots of land for self-build and custom housebuilding. Council's are also required under sections 2 and 2A of the Act to have regard to this and to give enough suitable development permissions to meet the identified demand. The benefits of self and custom build housing are recognised as diversifying the housing market and increasing customer choice. The NPPF supports the delivery of a variety of land coming forward to meet the needs of groups with specific housing requirements including for those wishing to commission to build their own homes.

The Self-Build and Custom House building need as identified from the Council's register is reported annually through the Authority Monitoring Report. The latest Authority Monitoring Report (2019-20) states that since the introduction of the self-build and custom house building requirements in 2015, there has been 1 plot allowed at appeal, where at appeal it was identified as self-build (planning reference 16/01101). There have also been 18 plots marketed as self-build since April 2020 by the developer from planning application 16/01026, however these were not identified as self-build on the planning application. On 31st October 2020, there has only been one planning application identified as including self-build and customhouse building, reference 20/00419, which is also a Quinn site, for which a reserved matters application (ref: 22/01379) is currently pending determination.

The Self-Build Need Assessment submitted as part of the application (22/01379), points towards a very strong relative demand for self-build plots in Dover and also identifies Dover as being one of the authorities with the highest demand per capita in the country. Moreover, it is important to highlight that when considering demand in the context of the Local Authority's self-build register; an Ipsos Mori poll undertaken for NaCSBA in 2016 found that only one in eight people interested in self-build were aware of the introduction of Right to Build Registers in England. As a result, the number of expressions of interest on a Local Authority's self-build register may substantially underestimate demand.

Crucially, the Council's method of updating the self and custom build register, and resultant understanding of demand within the District, is flawed. The Council reviewed and updated its register in March 2020. All persons and organisations on the first (2016) version of the register were invited to re-register in February 2020, with reminders sent out in March 2020. Those who re-registered and passed the local connectivity and financial solvency tests, had their interest back dated to their original registration date and were placed on part 1 of the register. Those who did not pass the tests but still wished to register their interest in self-build customhouse building were placed on part 2 of the register. It is not clear from the Council's Authority Monitoring Report and evidence base for the draft Local Plan whether additional independent survey work has been undertaken to fully understand the demand for self and custom build housing in the District. As mentioned previously, public knowledge and understanding of Right to Build in England is generally low. The method of the Council to understand demand has wholly relied upon people who had joined the register in 2016 and has not sought to further publicise Right to Build or develop a clearer understanding of demand in the District through additional surveys. This results in an incomplete picture of demand in the local area and resultant lack of allocations for self-build sites within the draft Local Plan.

	<p>Quinn Estates are the leading provider of self-build in Kent and have assembled their own database of interested self-builders. Having facilitated self-build development in East Kent, the company is ideally positioned to understand the market requirements and best placed to assist the District in meeting its growing demand for plots. Quinn Estates propose the land subject to this representation as suitable for a self-build site of approximately 10 dwellings which would assist with addressing the Council's underestimated demand for this housing type.</p> <p>c. Conclusion</p> <p>Quinn Estates wishes to support Dover in bringing forward a successful, effective and sound Local Plan that can serve the District across the Plan period. In its current form, it is considered that improvements can be made and that the allocation of land at Shooters Hill (the land subject of this representation) for self or custom-build residential redevelopment will strengthen the soundness of the Plan and the sustainability of the spatial strategy.</p> <p>Quinn would welcome the opportunity to participate in the forthcoming Examination-in-Public into the Plan and contribute to the debate to ensure that the best strategy for the District is found.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>Pellegram Icen (Quinn Shooters Hill) 1721 Att1_Redacted.pdf Pellegram Icen (Quinn Shooters Hill) 1721 Att2.pdf Pellegram Icen (Quinn Shooters Hill) 1721 Att3_Redacted.pdf</p>
<p>Local Plan Consultation Point</p>	Eythorne and Elvington
<p>Rep ID</p>	SDLP1624
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1333382
<p>Consultee Full Name</p>	Mr Colin and Linda Tearle
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	Gurdev Moore

Agent Company / Organisation	Rubix Estates
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Omitted Site Elvington (EYT002)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Representation submitted by Rubix Estates. Full Representation attached to SDLP1624. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1624.)</p> <p>INTRODUCTION</p> <p>1.1 Rubix Estates Ltd (hereafter, the Promoter) is submitting this representation to the Regulation 19 Submission Draft of the Dover District Local Plan 2040 for land in Elvington (the Plan).</p> <p>1.2 The Plan outlines the scale and distribution of new development which is required to meet Dover District's needs to 2040. It further identifies the planning principles and policies to guide decisions on all new developments, including through a series of site allocations and detailed development management policies against which development proposals will be assessed during the plan period to 2040.</p> <p>1.3 This response offers the Promoter's view on why this additional parcel of land (the Site) could be considered as an additional option for sustainable residential development.</p> <p>1.4 It makes specific reference to the Promoter's land interests in Elvington and advocates for consideration of this land for sustainable residential development.</p> <p>1.5 It should be noted that the Promoter is currently working with third party landowners including Dover District Council (DDC) to secure an alternative access point into the land. The current access is through Eythorne Parish Council's land.</p> <p>1.6 The following comments are therefore set out in a positive and constructive manner intended to aid the clarity and implementation of the Plan, structured around the following sections:</p> <p>Section 2 of this Statement describes the representation site and its surroundings. Section 3 sets out commentary our Vision, Objectives, and key policies; Section 4 summarises the case for the inclusion of this land for sustainable residential development.</p> <p>1.7 As Promoter and on behalf of the Landowner's we strongly advocate for further land to be included for sustainable residential development in Elvington and Eythorne.</p> <p>1.8 We welcome the opportunity to further assist or provide comment on the preparation of the Plan which will help shape future development in the area; and we look forward to the opportunity to participate at later hearing sessions where appropriate.</p> <p>SITE DESCRIPTION AND PLANNING CONTEXT</p> <p>2.1 The Site comprises arable land measuring 6.16 ha with access from Adelaide Road. The Site is well-related to the existing built form of Elvington and Eythorne and falls adjacent to existing amenities of the village.</p>

- 2.2 The Site is not within the Area of Outstanding Natural Beauty, Green Belt, any other landscape designation and is not susceptible to flooding.
- 2.3 Sustainable development of this land will therefore allow easy access by foot and bicycle to existing services, facilities and employment opportunities.
- 2.4 Public transport is good for the local community and new residents, with regular bus services to Dover, Canterbury and Sandwich. Given the wide range of services present in Elvington we believe it can act as a principle focus for more development.
- 2.5 Nearby residential development is of a mixed appearance and vernacular, rising generally to two storeys in height.
- 2.6 Topography of the Site is generally flat and will have little impact on the surrounding landscape. Careful and sensitive design of this area of land will provide a positive contribution for Elvington & Eythorne.
- 2.7 Within the Site, its current configuration is characterised by the existing arable use. Built development is concentrated at present to eastern part of the Site.
- 2.8 The Site benefits from boundary treatment to the north west including existing trees and hedges which are established and offer in places year-round screening to the wider countryside.
- 2.9 The Site benefits from an existing access to Adelaide Road via a private gated access over Eythorne Parish Council land to the highways network, providing wider connectivity thereafter.
- 2.10 An existing Byway runs along the north western boundary and a Footpath runs through the Site.
- 2.11 It is noted that the Site sits within the immediate context of the as one of the Strategic Housing Allocation for 350 homes, SAP28 - Land Between Elvington and Eythorne

Planning Policy Context

- 2.12 Eythorne and Elvington were previously identified as "Villages" in the previous Dover District Council Local Plan.
- 2.13 The recent Settlement Hierarchy study conducted by DDC explains that both these settlements score well concerning the number of services and facilities available. Therefore, as part of DDC's strategy for the rural area, it is proposed to grow the villages of Eythorne and Elvington to create a new "Local Centre" in the District.
- 2.14 Upgrading and reclassifying Eythorne and Elvington from "Village" to "Local Centre" within the new Local Plan confirms that this area is among the largest of the district's rural settlements. It will therefore be the focus of sustainable development.
- 2.15 As mentioned earlier, an urban extension is proposed on land between Eythorne and Elvington to deliver 300 new homes, employment space and a mix of ancillary uses (see plan below). The extension planned to Eythorne and Elvington will create a new sustainable community, incorporating garden village principles

The Site was identified In DDC's Housing and Economic Land Availability Assessment (HELAA). This considered the Site for sustainable development and deemed it "Available" and "Achievable", and potentially suitable for housing.

- 2.17 With the revised classification to Local Centre and the strategic allocation for residential and employment in Elvington and Eythorne, the area has the capacity to grow further.
- 2.18 Eythorne and Elvington has several services and facilities, including two village halls, a primary school, two churches, one public house, a café, a post office, a village shop and a playground.
- 2.19 Elvington has a village hall and church, a small parade of shops (with hairdressers and takeaways) and a recreation ground. With the urban extension proposed, the sustainability and appeal of Elvington will further be enhanced.

REPRESENTATIONS TO REGULATION 19 LOCAL
PLAN CONSULTATION

3.1 As stated above the Dover District Local Plan to 2040 Regulation 19 Submission (The Plan) establishes the scale and distribution of new development which is required to meet Dover District's needs to 2040, identifying a series of site allocations and detailed development management policies against which development proposals will be assessed during the plan period.

3.2 This follows a period of extensive evidence-gathering, and previous consultation on the Regulation 18 Draft Local Plan in 2020.

3.3 Detailed commentary is provided below on the Vision, Objectives, and Policies of the Plan. Commentary is not provided for all policies and is instead reserved for those considered of most relevance to the Site.

3.4 However, supplementary commentary is provided elsewhere, namely on emerging policies as follows:

SP3 – Housing Growth

SP5 – Affordable Housing

CC8 – Tree Planting and Protection

PM1 - Achieving High Quality Design, Place Making and the provision of Design Codes

PM2 – Quality of Residential Development

H1 – Type and Mix of Housing

TI1 – Sustainable Travel and Infrastructure

TI3 – Parking on New Developments

OVERARCHING VISION & OBJECTIVES

(DDC Note - Section duplicated against Strategic Objectives)

3.5 The Overarching Vision for the District in providing “outstanding opportunities for sustainable living” is supported as a high level principle underpinning the aspirations of the Plan.

3.6 The ambition of the Plan to position the District as a destination of choice for people to make their home, achieved “...through careful stewardship of its world class landscapes, thriving natural environments and wealth of historic sites” is also supported as a matter of principle as a reasonable basis for the Plan.

3.7 The Vision goes on to outline aspirations for ‘Vibrant Communities’, which emphasises how “new developments will blend seamlessly with existing townscapes to embody the best of local distinctiveness and will have created places that are well-designed and well-built. Built to local design codes, they will respect the spectacular natural environments and rich heritage of the District achieves significant progress to becoming net zero carbon”.

3.8 It further underscores how the Plan should seek to provide greater choice of high-quality housing to meet the needs of Dover District’s growing population and changing demographic, and address affordability issues, as well as highlighting the focus of new development at accessible and sustainable locations which can utilise existing infrastructure, facilities and services, and to ensure development contributes to the sustainability of local communities and services. This objective is consistent with the thrust of the National Planning Policy Framework in its pursuit of sustainable development. Again, this is supported overall at the District-wide level as an appropriate and realistic vision for Dover over the Plan period.

3.10 Whilst commentary is not provided for each of these objectives, due regard has been had to their content.

3.11 It is considered that the objectives are generally appropriate in supporting the implementation of the Vision, and that the objectives themselves are adequately reflected across the strategic policies as proposed, albeit subject to any refinement that may follow during the Examination process and later ‘Main Modifications’.

3.12 In this regard the Promoter supports to the overarching Vision for Elvington & Eythorne.

3.13 In accordance with the relevant Local Plan policies and development of the site and wider

area would provide:

- A wide mix of housing typologies including affordable housing, housing for the older demographic and plots of land to contribute to meeting the demand for self and custom build housing.

- Design Codes will be developed to guide and ensure the delivery of beautiful, eco friendly homes that are affordable for local people;

- Formal and informal open spaces for leisure and recreation, including play areas, sports fields, allotments and community orchards, or enhancements to nearby facilities, to meet the needs of the development

Open spaces will be multi-functional contributing to the wider public networks with sustainable drainage. All new and existing residents will have access to upgraded routes for walkers and cyclists. This sustainable development will improve connections between and enhancements to existing habitats; provide safe routes for wildlife, protecting and enhancing wildlife assets

- Sustainable access arrangements will be in place from Adelaide Road with associated improvements and traffic calming measures to Adelaide Road and where necessary improvements to the Public Right of Way network to increase connectivity in the area.

STRATEGIC AND DEVELOPMENT MANAGEMENT POLICIES

POLICY SP3 – Housing Growth

(DDC Note - Section Duplicated against SP3)

3.14 This policy deals with the housing strategy for the Plan period. It expresses clear linkages to the overarching vision for the Plan, and its objectives in focusing growth at sustainable locations providing greater choice of high quality and sustainable housing to meet identified needs.

3.15 Need is derived from household projections and targets set by central government, here identified as at least 611 dwellings per annum, with a minimum of 10,998 new dwellings over the Plan period.

3.16 The housing growth strategy at SP3 is geared towards delivery of such. This baseline position of meeting identified need is wholly supported.

It is noted that the policy wording recognises 'a minimum of 10,998 dwellings over the Plan period'. It is considered that this wording is most appropriate in encouraging sustainable growth; a cap should not be applied.

3.18 The Plan allocates a number of sites to ensure a consistent supply of housing to facilitate demonstration of a continuous five-year housing land supply. Again, it is pleasing that the Plan seeks to clearly satisfy this basic requirement. It is essential that the Plan is able to meet identified need, and the allocation of multiple sites across the Plan area at different scales should enable a reliable supply of dwellings to meet need – again as a minimum target only, rather than a capped 'ceiling' figure.

3.19 The Settlement Hierarchy is supported, particularly as far as it concerns the higher order settlements as a Local Centre alongside Eastry, Wingham, Ash, Shepherdswell, St Margarets, Kingsdown.

3.20 In recognition for its sustainability and its role as a Local Centre, Elvington & Eythorne is ranked highly within the district. It benefits from high connectivity and a range of services and facilities.

3.21 It is a highly sustainable location for development and it is agreed that its place in the Settlement Hierarchy sufficiently recognises this.

3.22 It is considered that the apportionment of growth across the hierarchy is appropriate in distributing sustainable growth to support communities in multiple locations in the District.

Table 3.3. of the Plan identifies that over 300 dwellings and employment land will be delivered in Elvington and Eythorne under the Plan.

3.23 As an indicative figure, this ambitious level of growth is supported in realising the

overarching vision for the District. Detailed commentary on the precise quantum of development to the settlements is not provided here, though it is emphasised that the aspiration of meeting growth in sustainable locations such as Elvington and Eythorne gains significant support from the Promoter.

3.24 Assessment of precise scale and quantum of development will be undertaken at the application stage following a housing allocation, though the indicative capacity of over 300 dwellings across multiple sites in Elvington and Eythorne is supported.

3.25 It should be noted however that revision to SP3 should look to clarify the meaning of 'disproportionate growth', which at present is too subjective to rely upon in the policy wording as drafted. Minor amendment may simply refer to [amendments in bold text]: "development that would result in disproportionate growth to any of the District's settlements, which cannot be supported by the necessary infrastructure and services or would result in a loss of services and facilities which are considered to be key to supporting local communities will be resisted".

POLICY SP5 – Affordable Housing

3.26 This policy sets out the Local Planning Authority's (LPA) position on affordable housing. It is derived from an extensive evidence base.

3.27 The provisions of SP5 are generally supported, though refinement to the policy should be made to ensure that its application does not become a barrier to delivery.

It is welcomed that criterion (3) allows for flexibility in the provision of affordable housing.

3.29 This policy should introduce an additional criterion to maximise its application and implementation, with the underlying objective to encourage viable development delivery.

This amendment should include for the following clarifications [amendments in bold text]:

- 3 Should independently verified viability evidence establish that it is not possible to deliver the affordable housing as required by part 1 of this policy, and the viability position is agreed by the Council, the Council will consider, on a case by case basis, flexibility in the provision of affordable housing, including through the following options:
- a Change in the tenure mix required; or
 - b Reductions in the overall proportion of affordable housing; or
 - c Provision of an off-site financial contribution in lieu of affordable housing provision on site, to secure equivalent provision of affordable housing off site, including 25% to secure First Homes; or
 - d A combination of the above; or
 - e Deferred contributions; or

if Any other suitable alternative as may be agreed with the Council, taking account of site specific circumstances.

POLICY SP11 – Infrastructure and Developer Contributions

POLICY PM1 – Achieving High Quality Design, Place Making and the provision of Design Codes

(DDC Note - Section duplicated against PM1)

3.30 PM1 deals with high quality design. Its contents are not repeated here, though it is noted that the policy wording includes for a large number of criteria across seven topic areas spanning context, built form, and movement, among others.

3.31 This is useful in guiding development, though care must be taken to ensure that this volume of criteria is not unduly onerous in the planning application process. There are already references to the aspirations of the Plan to achieve high quality design, place making and the provision of Design Codes elsewhere in the Plan's Vision and Strategic Objectives. As drafted, a number of PM1's criteria add little else to this information, and the granular level of detail alluded to might otherwise be best sought in Design Codes applied to specific areas, as also referenced in PM1 itself.

3.32 To ensure the effectiveness of the Plan – by way of its effective implementation in the

application process - consideration should be given to a reduction in the volume of criteria attached to PM1, which is otherwise addressed in the overarching Vision and Objectives as drafted.

POLICY PM2 – Quality of Residential Accommodation

(DDC Note Section Duplicated against PM2)

3.33 PM2 refines the aspirations of the Plan to reflect the quality of proposed residential development. It outlines the base criteria required in demonstrating how residents can expect to achieve a good quality of living, with regard to space standards, accessibility, and amenity space.

3.34 The intention of this policy is supported in full in realising the Vision and Strategic Objectives set out elsewhere in the Plan.

3.35 That said, there is refinement required in the policy wording. In particular, there should be greater recognition of the possibility that not all sites can deliver the full extent of PM2's

requirements. This is best illustrated through Criterion (D) which requires a set percentage mix of dwellings to be built to Part M4(2) / M4(3) standards. It should be revised to recognise that not all sites will be capable of achieving such, sometimes owing to site-specific circumstances. Whilst retaining the aspiration and expectation of this policy to provide for accessible housing, amendment is proposed as follows [amendments in bold text]:

(i) On schemes of up to 19 dwellings, the Council will expect all new build development to be built in compliance with building regulation part M4(2).

ii On schemes of 20 or more dwellings, the Council will require where reasonably possible 5% of the development to be built in compliance with building regulation M4(3)(wheelchair accessible homes), with the remaining development to be built in compliance with building regulation part M4(2).

POLICY H1 – Type and Mix of Housing

3.36 Type and Mix of Housing is important in responding to the needs of the District over the Plan Period. It is essential that the mix is not prescriptive or otherwise onerous in what it seeks to impose on new development.

3.37 As drafted, H1 provides a clear objective for new development in responding to need.

3.38 However, to support the implementation of Policy H1 it is essential that the LPA retains an updated SHMA and is able to clearly direct Applicants to readily available information at any given period.

3.39 It is recommended that the LPA commits – in the final wording of Policy H1 – to a signposting to the SHMA as the appropriate record of up to date housing need in the District.

3.40 Without further clarity, the smooth implementation of Policy H1 is at risk given what otherwise ascribes too much uncertainty to applicants. It is unrealistic to expect applicants to prepare commercially viable proposals without sufficient direction as to what type and mix of dwellings the LPA expects to be delivered, and therefore what it may support. To better facilitate the implementation of the housing delivery mechanisms of the Plan, certainty must be better provided.

POLICY T13 – Parking on New Developments

(DDC Note - section duplicated against T13)

3.41 Parking on new development will be a product of a site-specific proposal. It is important that this is better reflected in the policy wording itself. It must not prescribe unrealistic or broad brush assumptions to all sites, as to do so may inadvertently restrict the capacity of sites to delivery on contextually appropriate schemes. This is particularly important in the settlements atop the settlement hierarchy which benefit from range of sustainable travel options, such as those in Elvington and Eythorne.

3.42 As drafted, T13 is supported by the Promoter in seeking a viable and implementable balance of parking provision that reflects local character and site conditions.

	<p>3.43 It is agreed that – as drafted – TI3 is capable of satisfying the objectives of the Plan.</p> <p>4. CONCLUSION</p> <p>4.1 Rubix Estates Ltd and the Landowner's strongly advocate for the consideration of this land for sustainable residential development.</p> <p>4.2 Overall, these representations conclude that given the future direction of growth in Elvington and Eythorne further land could come forward for sustainable residential development in the short to medium term.</p> <p>4.3 Specific to the Promoter's interests for this Site, we would support the inclusion of the Site for housing. As part of Dover District Council's strategy for the rural area, it is proposed to grow the villages of Eythorne and Elvington to create a new Local Centre in the District, with new services and facilities to be delivered alongside new sustainable and affordable homes.</p> <p>The local highway network has capacity to accommodate the additional traffic associated with the development, without adverse impact; The Sites falls within the EA Flood Risk Zone 1 (i.e. land assessed as having a less than 1 in 1,000 annual probability, or <0.1% chance of flooding); The land is not within Area of Outstanding Natural Beauty (AONB) or Green Belt; The land is not within an area of high landscape sensitivity; There are no designated heritage assets within or immediately adjacent to the site, and the development is not considered to affect the setting of any Listed Buildings.</p> <p>4.4 We welcome the opportunity to further assist or provide comment on the preparation of the Plan which will help shape future development in the area; and we welcome look forward to the opportunity to participate at later hearing sessions where appropriate.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>Moore Rubix Estates 1626 (Elvington) att2_Redacted.pdf Moore Rubix Estates 1626 (Elvington) att3.pdf</p>
<p>Local Plan Consultation Point</p>	Eythorne and Elvington
<p>Rep ID</p>	SDLP2026
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1274701

Consultee Full Name	Mark Heath
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Eythorne
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	You have plans for Whitfield and Dover that Eythorne will be helping to fund, but no plans to allow safe travel for cyclists leaving Eythorne via Kennel hill or Barville rd. Both of these roads are too dangerous for safe cycling or walking. Barville road is also unsuitable for the number and size of trucks currently using it. Those of us using it regularly find trucks crossing the centre line whilst trying to negotiate the bends on this narrow road. Do we need to block it like the idiots from the eco groups do to get something done?
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Eythorne and Elvington
Rep ID	SDLP1807

Rep Status	Processed
Consultee ID	1330508
Consultee Full Name	Mrs linda symes
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Elvington and Eythorne
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>SAP28/29/30 at Eythorne and Elvington face even larger scale developments . These will undoubtedly have the effect of increasing traffic going through Shepherdswell making a dangerous situation even worse. Allowing for 50% of their homes coming through our village twice a day that is a further 350 traffic movements.</p> <p>Speedwatch , authorised and run in association with Kent Police, have undertaken sessions along Coxhill when in a period from 7.30am-9am 255 vehicles were observed going out of the village , and on another occasion between 4,30pm-6pm 211 coming back into the village.</p> <p>DDCs own document highlights potential issues with this site such as :States the cumulative impact on of this AND OTHER developments on common road use.</p> <p>.</p> <p>Some widening works may be required at the access point Coxhill Road is narrow, and is particularly constrained to the east of the site by on-street parking. Any proposals coming forward on the site should seek the views of KCC Highways at an early stage to ensure that the cumulative impacts of development can be accommodated by the surrounding roads.</p> <p>No footway serving site.</p> <p>Concern regarding cumulative impact from potential allocation sites on wider highway network, particularly routes through to A2/A256 (issues with width, on-street parking and significant increase in use of junctions)</p>

	<p>. More than recommended 400 metre walking distance to nearest bus stops in Mill Lane, but limited services and no footway.</p> <p>It would be wise to note a recently agreed and yet to be built Community Land Trust development of 13 dwellings is about to start construction within 50 metres of the proposed site at Botolph Farm The effect of this has yet to be assessed . The impact of additional vehicle movements and the removal of on road parking for existing residents may well increase the speeds of traffic heading for the A2.</p> <p>Speedwatch group carried out an observation this morning (25/11/22) on Coxhill Rd by Oast House . between 07:30-09:00</p> <p>A total of 336 vehicles were counted heading SW towards the A2. A similar number travelled into the village. This indicates about 200 vehicle movements an hour in each direction. There was considerable congestion, due to a number of lorries, which slowed traffic, but 69 vehicles (1 in 5 - 20%) was exceeding 30mph, of which 7 will be reported for travelling in excess of 34mph (3 at 40/41mph)</p> <p><i>(DDC note: This representation was originally made against the Infrastructure Delivery Plan consultation document but has been duplicated in relevant places against the Local Plan due to the specific site allocation/policy references made)</i></p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Not Applicable
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	Eythorne and Elvington
<p>Rep ID</p>	SDLP1641
<p>Rep Status</p>	Processed

Consultee ID	1333394
Consultee Full Name	Shelley Miller (Clerk)
Consultee Company / Organisation	Tilmanstone Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Elvington
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Tilmanstone will be affected by the expansion of Elvington. Doubling the size of Elvington which already scores highly on the indices of deprivation will put a great strain on existing services and infrastructure. New housing without adequate local infrastructure puts significant strain on local amenities such as medical services, school and playgroup places as well as increasing traffic on our roads. The existing sewerage system is already overloaded and any future developments will only exacerbate this problem.</p> <p>It should be noted with some concern that the expansion of the employment opportunities at Pike Road Industrial Estate is not substantiated by figures - it's marked N/A in the document. Barville Road was identified for improvement even before the A256 was built - improvements to this very busy, nominated HGV route have never been done and the increase in domestic traffic accessing the A256 as a result of the Elvington expansion will need to be addressed.</p> <p><i>(DDC note - this is an extract from representation SDLP1639)</i></p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

SAP28 - Land between Eythorne and Elvington (EYT003/EYT009/EYT012)

Local Plan Consultation Point	SAP28 - Land between Eythorne and Elvington (EYT003/EYT009/EYT012)
Rep ID	SDLP60
Rep Status	Processed
Consultee ID	1330576
Consultee Full Name	Dr Vince Croud
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 28, 4.208-4.214
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I object to the proposal in the 2040 Local Plan that Eythorne and Elvington become a "Local Centre". I also object to the proposed building around Elvington. The reasons for both objections are set out below.</p> <p>Elvington and Eythorne, although geographically close, have their own distinct heritage, character, culture and community. Elvington was mostly built in the early 20th century to serve the nearby coal mine at Tilmanstone. Eythorne is very much older, with evidence of occupation from the stone age and in the heart of the village are many buildings from the 18th and 19th century. Eythorne is essentially a community founded on agriculture and it is not, and has never been, a mining village. The development of Tilmanstone colliery did not lead to significant housebuilding in Eythorne. In the late 1960s and early 1970s, however, small housing developments sprang up on land originally used for farming and latterly used by the local school and community.</p> <p>There are no existing problems, or conceivable future ones, that would be better served by combining these two individual communities as opposed to keeping them separate. Indeed, it might well be the case that better, more consensual, decision making would occur if the communities were kept unique (for example Coldred and its community driven management of the village centre). It is also evidentially the case that communities that keep their identities have less societal problems and better mental health because of the developed relationships and contacts within the community (people looking out for each other etc). As it stands the countryside is in easy walking or cycling distance for anyone no matter where they live in either community, young or old, and this access is enjoyed by many to the benefit of their mental wellbeing. Where there is urban sprawl, loss of green space and loss of identity, quality of life plummets (cf Thanet). Unnecessary and unsympathetic "planning" has irrevocably harmed many communities, villages and towns over the years, resulting in poor and problematic living environments for future generations to inherit.</p> <p>There is also no conceivable opportunity that could arise that would only be possible by combining the two communities rather than keeping them as they are now.</p> <p>The issues facing these communities are many but none are due to them not being combined.</p>

It is proposed that the two separate villages of Eythorne and Elvington are developed as a "Local Centre" based on them "having a very good range of services and facilities". This is a considerable overstatement as the two villages have, in fact, a very limited range of both.

In terms of existing GP services, the nearest is Shepherdswell which is only open between 8.30-10.30 a.m., Monday to Friday, and does not routinely offer an actual GP surgery but only "administrative" or nurse appointments. Overall, the other GP services in the area are stretched to the limit and will struggle to take up the amount of new patients that will arise with significant further new house building in this area. Additional patient numbers will introduce further frustration from the community with getting GP appointments when wanted. Unless GP provision is significantly improved, is properly delivered to time, and is written into the DDC plan then there will be a healthcare crisis in this District.

As well as insufficient GP provision, the area also suffers from inadequate response times from the Ambulance Service, SECAMB. April 2022 saw the worse response times on record for SECAMB. Although things have improved slightly since then, it is still poor and inadequate. Hospital waiting times especially for A&E are also poor. In part, the long waiting times for both hospital appointments and for A&E, as well as poor ambulance response times, are due to the inadequate GP primary care driving people to attend hospital rather than their own GP.

It is practically impossible to get an NHS dentist in this area and most surgeries are not taking on any new patients. This means new arrivals into the area are forced to go private pushing up their cost of living and ultimately leading to further degradation of the NHS provision even though we have all paid for it and it should be readily available.

Local policing is entirely absent in the main and incidences of anti social behaviour, vandalism and theft (for example frequent van break-ins for tools) that have occurred in both villages are largely not dealt with at all by the Police. Most certainly the Police are not being proactive in preventing such crimes. There is also a local drug taking and drug dealing problem, again not tackled.

The bus service for Elvington and Eythorne was always poor and inadequate for it to be used to commute to work. Now KCC has cut bus services further, there will be no public transport serving the villages. This has caused a major problem for school children attending secondary education in Canterbury, Dover and Sandwich and great difficulties for parents in trying to find alternative transport methods that also accommodate their need to attend work. Many in the village have mentioned considering moving away from this area to one that does have public transport for the school trip.

In Section 4.2.11 it mentions a range of tourist attractions available including Wingham Wildlife park, The "Historic park and Garden of Waldershare" and the EKR (East Kent (Heritage) Railway). The first is certainly an excellent attraction. Waldershare Park is, however, a private estate not open to the public. The heritage EKR line runs only one day a week (Sunday) and some bank holidays (not just "a few times a year" as stated in 4.216) from approximately April to October. Although it has a charm of its own and continues to be developed, it is currently of very limited appeal to the general public as it has a short track length and no steam engines.

In the Section on Eythorne and Elvington, and as shown in the plan in Section 4.214, land is shown "Allocated for Employment". This is all very laudable but the employment opportunities must be such that they provide opportunities, careers and suitable salaries for the local population. To date, attracting blue chip employers into this area has not met with tangible success. The Pike Road Industrial Estate businesses such as Tilmanstone Salads, which is a minimum wage employer, are not likely to be attractive to the majority of residents of employable age. More of the same is not going to adequately provide opportunities to deliver a sustainable community. The biggest employers for the communities will probably remain Dover docks and first responders, with others working for service industries from home.

Section 4.218 listing services and facilities has several errors. Eythorne does not have two village halls. It has one pre-cast concrete structure which could be considered a village hall behind Ss Peter and Pauls' Church. It is at the border of Eythorne and Elvington and hence poorly placed for Eythorne residents. It is barely used because of that and is most noted for being a polling station. Eythorne does not have a Cafe and to the best of my knowledge hasn't had one since the last century. It does have a village shop and Post Office combined (they are not separate amenities as might be supposed from the text as written in 4.218). Thus the actual "amenities" in Eythorne are one pub, one "village hall", and one Post Office/shop. It does have two churches (Baptist and CoE) but these are used by a tiny minority of residents and so can hardly be considered to be a significant amenity. According to the Church of England's own figures (2019), less than 1 % of the population attend church regularly. Over 50 % of the UK population are irreligious.

In terms of Elvington, it does not have a church as stated. The rest of the statement regarding Elvington amenities is correct. However, with the advent of services such as Uber Eats, Deliveroo and "Just Eat" etc the community attractiveness of the takeaways is diminished.

Regarding the statement in 4.219, and as clarified above, the settlements do not have much in the way of services and facilities that make them stand out as a place to create a new "Local Centre" unless the critical criteria you are using are possession of a pub, a shop, and unused churches.

	<p>Tilmanstone Colliery Welfare Sports Ground, as mentioned in 4.221, is an good facility for sports in the Eythorne and Elvington communities. As a non-profit making charity, however, it requires membership fees or hire fees for use of its facilities and the facilities are thus not freely available. These fees are not onerous however.</p> <p>The entrance to the primary school which sits on the boundary between lower Eythorne and Elvington, and serves both communities, is on a corner and is a blind bend coming up Church Hill which is problematic for parents dropping off and picking up their children. Church Hill itself is narrow in parts, permitting passage of a vehicle only in one directon at a time, and is a bottle neck. Children arriving by foot from Upper Eythorne have to travel along Shooters hill which already has issues with child safety due to the narrowness of the road and traffic density, resulting in vehicles mounting the pavements to pass. Additional vehicle movements due to more house building will only exacerbate the problem. Traffic build up is also a problem at the staggered junction between Wigmore Lane, Shooters hill and Church hill which has visibility issues. If the new estate exits through Elvington, there will be a build up of traffic on Church Hill trying to exit onto Wigmore Lane using the Staggered junction. If the estate exits through Wigmore Lane then the increased traffic will cause problem trying to cross the staggered junction from Shooters Hill or Church Hill directions.</p> <p>For sustainability of the community any new building must contain a large component of genuinely affordable housing. At the moment new houses are beyond the reach of the local young and are being bought up by people outside the community, diluting the community common values, or by buy-to-let investors.</p> <p>It goes without saying that any new development must have searches done to ensure that subsidence and any ground contamination from the extensiveTilmanstone mining activity will not be an issue. Also the area around Elvington village has been found to contain much live WWII ordnance from troops stationed here during the war and this needs to be factored in to pre-building work.</p> <p>The building on the proposed area will substantially diminish an important green corridor for wildlife movement (especially insects) and a source of food for many types of wildlife.</p> <p>It is very dissapointing to read in Section 4.2.11 that Dover Dictict Council believe that "Shepherdswell, Eythorne and Elvington have their roots in the short-lived East Kent coalfields". Whilst it is certainly the case that Elvington is a (model) colliery village, the roots of both Shepherswell and Eythorne precede the development of the coal fields by a considerbale margin. Both have been occupied since the stone age, have evidence of Roman occupation, are mentioned in the doomeday book and have recorded history since then. Incidentally, it is stated in section 4.211 (and repeated in 4.216) that the EKR line was originally built to serve the Colliery at Tilmanstson. This is factually incorrect as the line was built to serve any colliery in the area that might prove to be productive and reached as far as Wingham and also to Richborough at its peak. http://www.dover-kent.com/VILLAGES/18-Eythorne.html</p> <p>In conclusion there is clearly not the necessary infrastructure to support the proposed development and nowhere near enough amenities to justify development as a Local Centre. Progressing with the latter is wholly unnecessary. It would be much better if new villages were developed to support increased population, as was done when coal mining took off, to stop urban sprawl.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>For one, it needs to have guarantees on increases in health care, public transport, policing and schooling written in, commensurate with the increased number of houses, for it to be creditable as a plan to deliver sustainable communities.. Rather than continue "urban sprawl" by having "Local Centres" and diminishing sense of community etc, a much better policy would be to build new villages/towns to accomodate the additional housing as was done when mining started in Kent.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	

Include files	
Local Plan Consultation Point	SAP28 - Land between Eythorne and Elvington (EYT003/EYT009/EYT012)
Rep ID	SDLP29
Rep Status	Processed
Consultee ID	1259309
Consultee Full Name	Mr Peter Jull
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP28
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	This allocation is unacceptable without direct vehicle access to Wigmore Lane. If it's necessary to reduce indicative numbers by 50 on traffic grounds then it's still inappropriate to direct the traffic generated by 300 homes past the primary school on a road which is single lane with self-prioritising alternate working.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Policy wording at f. should be amended to substitute Wigmore Lane for Terrace Road and the second sentence deleted. The landscape buffers adjacent to existing woodland and trees along the old railway line should be removed from the indicative masterplan. If this site cannot be delivered then the submitted Aylesham north site rejected as in excess of requirements can be substituted.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	To answer any questions not anticipated by the written response and hear argument why this site is acceptable and rebut those arguments.

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP28 - Land between Eythorne and Elvington (EYT003/EYT009/EYT012)
Rep ID	SDLP464
Rep Status	Processed
Consultee ID	1259309
Consultee Full Name	Mr Peter Jull
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP28
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	This allocation is unacceptable without direct vehicle access to Wigmore Lane. If it's necessary to reduce indicative numbers by 50 on traffic grounds then it's still inappropriate to direct the traffic generated by 300 homes past the primary school on a road which is single lane with self-prioritising alternate working.
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8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	To answer any questions not anticipated by the written response and hear argument why this site is acceptable and rebut those arguments.
Include files	
Local Plan Consultation Point	SAP28 - Land between Eythorne and Elvington (EYT003/EYT009/EYT012)
Rep ID	SDLP320
Rep Status	Processed
Consultee ID	1267641
Consultee Full Name	Mr Charles Baynes
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	EYT003
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>EYT003</p> <p>I believe the Dover Local Plan is unsound.</p> <p>I would vehemently like to oppose the proposed development of Elvington namely the EYT003 development and any other large development in this village, my reasons are given below.</p> <p>SERVICES</p> <p>Can only be said to be practically non existent and the Planners should take another look at what is actually available round here.</p> <p>HERITAGE</p> <p>The effect of the proposed development of the land EYT003 would be catastrophic to the character of the neighbourhood.</p> <p>As you may know the village is essentially a mining village with many of the older occupants having worked for the mining company or are or were related to someone who worked for the mining company. Slowly housing developments have depleted from the ambiance of the area and it is in danger of loosing its Heritage.</p> <p>VISUAL AMENITY</p>

EYT003 covers an area of land that whilst not intrinsically beautiful, adds to the harmony of village life.

People are constantly walking past it along Terrace Road which overlooks the EYT003 proposed site, taking their dogs for walks, going about their business, taking the kids to school and bringing them home and horse riders exercise/ride their horses along Terrace Road.

The land is a visual amenity in as much as it is enjoyed by just being there for all to plainly see as they go by. If a housing development were to go through you would destroy that visual amenity and less people would be inclined to go out for a stroll round the block, as who wants to go out and look over the rooftops of a housing development? This would inevitably result in more people staying indoors and becoming stagnant, causing all sorts of medical and mental problems and costing the public purse a lot of money caring for the people who succumb to the medical and mental problems. Possibly the one good thing that Covid-19 has done for everybody is, in the resulting lockdowns people have been inclined to go out and use their public space for exercise and enjoyment. Exercise can be said to be good for the body and the enjoyment can be said to be good for the mind, think what you will have once you take that away.

At the moment the site is used for Agricultural use which fits in with the everyday ambiance of the village and the outlook to the hills beyond.

Last year I had an assessor from Keypointing come round to my house in Terrace Road to assess my property for pointing of the brickwork, his name is Michael and after he introduced himself he said "you've got a good view here", "in fact I'd say it is a beautiful view". This is a view shared by many delivery drivers who have said similar things to me, as well as the general public. So please reassess this site for that reason alone.

ENVIRONMENTAL

From an environmental perspective EYT003 covers an area of land that resides in a frost hollow i.e. it is at the base of a slope, water and indeed frost collect at the base of slopes if there is nowhere for it to go. In frost hollows minimum temperatures can be tens of degrees below the surrounding landscape temperature. So now you have got a housing estate that is sitting in damp and is using a lot of power to keep the dwellings habitable and warm, as hot air rises and cold air sinks. I don't think the proposed development of EYT003 could be regarded as environmentally friendly and therefore it would be more expensive to build houses that would comply with the Standard Assessment Test (SAP) test prelim to Building Controls test to ensure new builds meet the Part L1a Building Regulations. I believe after 2025 new regulations come into force called the Future Homes and Buildings Standard requiring new homes to produce 75-80% less carbon emissions than homes delivered under the old regulations, again this will have a knock on effect on the cost of building these homes because they will be built in the wrong place.

Luckily the fact that water runs downhill to the lowest point is in favour of the site EYT003 being used for agriculture, as there is less need to irrigate crops growing in the field, which is only needed in very dry conditions, therefore there is less strain on the local water supply, which I understand comes from aquifers around here, and there is only a finite amount of water in them that takes a long time to replenish as they are not bottomless pits full of water. Affinity Water which is the Water Company that supplies drinking water around here have recently sent me an email stating that the underground aquifers are at a low point after this years (2022) long hot summer and there may be restrictions on the use of water in the near future. They have plans to bring in more water by various means but that is a plan that is way in the future for completion. So I ask you, how are you going to supply water to not only the developers for building houses, roads & pavements as they all take water to build, and then how are you going to supply the 300+ new households with water while maintaining the existing households water supply? Are you going to bring it in by tanker or perhaps bottled water? It's ludicrous, No thought has gone into this plan.

The fact that EYT003 is a frost hollow is not a problem for agriculture as farmers adjust the crops they grow to the conditions of the land used, as has been going on for centuries.

I have been informed by a long time resident that not only do we have fairly frequent sewage blockages due to the low drop in elevation of the said sewage/drains pipes (Southern Water are the Sewage company), there are also infrequent times when the pumping station in the woods not half a mile away from the proposed development blocks up and you get a sewage overflow in the wood. So I ask you, if the pumping station can't handle the current amount of sewage at high usage rates, how will it cope with an additional 300+ houses sewage?

HEALTH & SAFETY

EYT003 has National Grid power lines travelling the whole length of the site, apart from any perceived health issues linked to electricity and the human body, who in their right mind is going to want to live in a house with a pylon and power lines carrying massive amounts of electricity overhead?

I don't know the occurrence of how many power cables break and consequently fall to the ground or touch other cables causing sparking but it is known to happen, both of which would have life threatening consequences. A Health & Safety nightmare. We have very strong Southerly winds around here which can affect properties and structures alike.

TRAFFIC

I understand that you intend to place approximately 300 dwellings on the site known as EYT003, that in itself means there would be approximately 600 additional vehicles associated with the village in one fell swoop. At least one car per household is required but usually two, as there is no other option for residents that need to travel for their work (many on shift/unsociable hours), shopping run, school run, trips to the doctors, waste disposal and finally pleasure outings.

Apparently the buses have been stopped and the ones that used to run were not easy to join up for trips around the county let alone trying to do trips for work purposes, and the last time I was on them they stopped running about 6.00 p.m. I speak from bitter experience.

Also you have got all the associated delivery vans coming and going. This all builds up to a lot of vehicles traveling down roads that were not designed to take that amount of traffic.

At the best of times Adelaide Road is a single lane carriageway from the junction of Adelaide Road, Church Hill, Barfrestone Road and down Adelaide road to just past the new houses on the left. Once you have added an entrance/exit road to the proposed new estate it will be hell trying to get up and down that part of the road. In winter the route up Church Hill and down Adelaide Road and vice versa is barely navigable and personally I wouldn't try unless I had to. The roads to exit the village to the West of the village namely Tye Wood and Kelk Hill are single lane roads where you have to pull in to let people pass and vice versa. Wigmore Lane is a two lane carriageway until you get near the junction of Church Hill, Wigmore Lane, Shooters Hill and Shepherdswell Road where the parking in Wigmore Lane brings it down to a single lane carriageway. Shepherdswell Road is OK until you get to Shepherdswell and then it is single lane carriageway on and off on the way out to the A2. Going up and down Shooters Hill to and from Eythorne is mainly single lane carriageway. Coldred Road has places of single lane carriageway especially in the vicinity of the Eythorne Roundabout.

Not to mention all the air pollution resulting from these additional vehicles trapped in traffic jams of their own making. The resulting traffic jams will also make it nigh on impossible for emergency vehicles to make a timely appearance, (they have a hard enough time as it is due to distance related issues) most of which can be life or death situations.

In my opinion any large addition to the Elvington settlement will result in chaos on the surrounding entrance and exit roads to the village.

PUBLIC SAFETY

At the present time children can relatively safely walk to the primary school with their parents or sometimes by themselves or a group, you will not have that amount of safety once you have the amount of extra vehicles on the roads around here associated with the proposed developments.

There is only pavement on one side of Adelaide Road running the width of the proposed EYT003 development, this pavement is on the same side of the road as the proposed EYT003 development, therefore the clash of pedestrians and motor vehicles is inevitable as children and their parents will be trying to get to school while drivers are trying to edge their way out so they can see if the road is clear enough to get out from the estate into Adelaide Road. When there is heavy rain Adelaide road floods slightly at the lowest point. I have only seen it flood enough to slow cars down and make them travel down the centre of the road, but it is enough to disrupt traffic at peak times, along with which is the danger to the general public because they have to try and get past the flooding to take the kids to school and then come back. So once there are more cars along Adelaide Road the clash of motorist and pedestrians is inevitable.

The proposal to have vehicle entrances and exits to the estate in Terrace Road will only add to the danger concerning children and the public in general as well as motorists who use Terrace Road to get to and from their abode, in other words it's a bit of a rat run and you often get speeding cars down here. As said previously horse riders exercise/ride their horses along Terrace Road.

CONSTRUCTION WORK

The work needed to complete such a venture will in itself cause chaos on the surrounding roads and consequently on the safety of the villages residents. Any construction of slip roads to provide entrances and exits to the EYT003 proposed estate will need to be properly surveyed to ensure stability of the ground of Terrace Road as Terrace Road resides on a bank approximately four and a half metres to 6 metres above the EYT003 proposed development.

PLANNING

As I understand it there would be problems if I were to apply for Planning Permission to build an extension or a dwelling that overlooked another persons dwelling to the detriment of their privacy. So how does that differ from the proposed development of multiple dwellings on a field in a hollow that is overlooked by the multiple houses of Terrace Road and passers by?

CONCLUSION

So given the arguments above and the fact that the Covid-19 virus has ripped through our population and is yet to stop, they say we will have to live with it for the foreseeable future, economically it has caused businesses, shops and pubs to close, with the loss of many jobs. The high streets were already in decline, as were pubs and Post Offices. Many more people now use the Internet as a means of working from home and getting things that they want or need for everyday life, it has become a way of life, more so now than before covid-19. Therefore it is my belief that the high streets will have to evolve and you will find that more buildings will need to be Repurposed into Dwellings/Flats, high streets will be bulldozed and made into more appealing locations. It just needs the foresight to see this. So in time with the dwindling population comes the exchange of property ownership and also change of use of various properties. So is there really any need to build on any bit of food producing land especially as the world is facing a food producing problem in the future? Once you have built on agricultural land you will not be able to revert it back to agricultural land.

GENERAL NOTES

Statement of Community Involvement (SCI)

It has been noted that Dover District Council has pushed forward with the Draft Local Plan whilst we have all been in lockdown due to Covid-19 and community communication has been at its lowest level, the villages free papers that were delivered to every door in the village has been stopped due to the fear of catching or passing on Covid-19, thus making it hard for the community to come together as a whole to protest at this wilful destruction of our countryside let alone know of the Draft Local Plan in the 1st place.

When I complained about this on the last webinar that Dover District Council held regarding the Draft Local Plan, I was told they had done all that was legally required. What about morally?

Furthermore the Dover District Council Draft Local Plan website for lodging your opposition to the various developments was not fit for purpose and only useable to those that have PC's, as the hand held devices such as iPads and mobile phones can't use the site in the way it should be usable, case of point the size of print and general layout of the tables that show the allocated sites and the proposed infrastructure and the general design of the site made it unusable, therefore once again you have less people able to communicate their protest at the proposed developments.

Prior to this, In this General Notes section I noted what had happened 2020-2021. We are now in December 2022 and the lucky few of us (residents) that are fairly computer/new technology ways savvy have previously received emails from Dover District Council telling us there are Local Plan Exhibitions and telling us the Locations and Times these Exhibitions are taking place and not one of them was planned for taking place in Elvington, which is where they plan to build these 300+ houses. It is only due to the fact that resident's complained to the Parish Council and they consequently brought up the residents complaint with Dover District Council that they decided to have an Exhibition in Elvington, otherwise there would have been even less people residing in Elvington able to see what is planned for Elvington. The fact that the residents had barely been made aware of their plans in 2020-2021 and had the chance to object bears no credence as this time is the last time for objections to be placed and we have to re-submit our objections even though we have placed them in 2021 (I was told this by a Dover District Council official at one of the Exhibitions).

Yours Sincerely

Charles Baynes

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination? Not Applicable

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files [SAP28.jpg](#)

Local Plan Consultation Point SAP28 - Land between Eythorne and Elvington (EYT003/EYT009/EYT012)

Rep ID SDLP198

Rep Status Processed

Consultee ID	1331163
Consultee Full Name	Mr Matthew Cook
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP28 Development between Elvington & Eythorne
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Infrastructure - rural roads unable to cope with 700+ more vehicles</p> <p>Environmental - bats, skylark, woodpecker, buzzard to name but a few are all active within this area. Development means habitat loss</p> <p>Education - One small school already to capacity, How are so many new families expected to source schooling? This will mean travelling into nearby towns. Stress on road and further environmental impact via pollution</p> <p>Health - No available GP surgeries. Again, requires travel to nearby towns. Shepherdswell surgery is not viable as has very limited operating hours</p> <p>Integrity of village heritage - This development connects Elvington & Eythorne. Individual village status will be lost. How are the villages to be named?</p> <p>Buses - Local services recently withdrawn. Proposed community will be isolated for non-drivers</p> <p>Green space - the area is used by hundreds of local residents per week. Exercise, dog walking and leisure via open space and connecting footpaths. Where are they supposed to go? Through a housing estate?</p> <p>Landscape - Views from surrounding properties (Elvington, Lower Eythorne) all compromised by the development. Countryside surroundings sought by these residents, lost.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	To develop one of the many derelict areas around the district or closer to towns and their amenities. Many area in Dover town with crumbling, disused buildings where the investment/spending would be better placed. Develop in already built-up areas that have the services to cope. The solution to the need for more housing shouldn't be to concrete the countryside - especially when there are so many run down areas in need of the investment.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP28 - Land between Eythorne and Elvington (EYT003/EYT009/EYT012)
Rep ID	SDLP200
Rep Status	Processed
Consultee ID	1331164
Consultee Full Name	Miss Leanne Turner
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP28 Development between Elvington & Eythorne
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Lack of Amenities - Busses have been stopped to our area due to spend cuts. isolating many villagers already, before the proposal to bring hundreds more people here.</p> <p>Closest GP surgery is Shepherdswell. Due to GP shortages their opening hours have been reduced. More potential patients will not enable them to magic GPs that aren't there.</p> <p>Roads - I myself have moved from Thanet where it can take an hour to get from one side to the other, to live in the countryside. Many people living here have done the same, having bought houses to live here, they would now be plagued by 700 + more cars than we currently have living in the area. Not only that the roads through the villages are small and where historical old buildings line them cannot be widened.</p> <p>Quality of life - People who live here use the proposed area for excersize, walking dogs, running, cycling close to their homes where they do not need to drive to get there. Should this area become houses, they will be forced to travel further to do this which many may not do, or will find themselves having to drive to a green space.</p> <p>Schools. Local schools are small and full to capacity. Secondary schools are only in the towns which is a long drive for families.</p> <p>People who buy houses in the new development will likely need to comute. meaning likely driving to Dover and parking near the train station all day. overloading roads and carparks there.</p> <p>We are currently in a cost of living crisis. the houses proposed would not be affordable by the people already living in the area and only by people who are already wealthy.</p>

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	I would recomend redeveloping areas in the towns where building have fallen into disrepair or derelict land. Pottentialy for appartments mixed with small houses for people of lower incoms and first time buyers. where he build would put less strain on wildlife. roads and amenities are already bigger and can be made to better cope with the increased population.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP28 - Land between Eythorne and Elvington (EYT003/EYT009/EYT012)
Rep ID	SDLP484
Rep Status	Processed
Consultee ID	1331589
Consultee Full Name	Ms Joanne Pannell
Consultee Company / Organisation	Eythorne Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Eythorne Parish Council's attached representation relates to Strategic Policy SAP28 on pages 166 to 169.
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails	The unsoundness of the Plan is as set out in the attached representation by the Parish Council in relation to SAP28 and SAP29.

to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

DDC Edit: Detailed representation with analysis, photographs and table attached. Comment summary reproduced below.

3.6 Concluding Summary

3.6.1 In consideration of the above and other representations made by the Parish Council during the Regulation 18 consultation, Eythorne Parish Council strongly objects to the District Council's Regulation 19 submission containing the future development of local plan areas SAP28 and SAP29 on the following grounds and therefore calls for the Planning Inspectorate to remove both areas from the approved local plan document:

- a) the development areas contradict the District Council's intentions to promote sustainable growth
- b) the development areas, without good reason, contravenes the District Council's policy and NPPF objectives of achieving sustainable development and protecting the open countryside
- c) the development areas are wholly outside the existing settlement confines and will erode valuable open countryside without any overwhelming reason or justification
- d) the consequence of the local plan proposals in respect of SAP28 and SAP29 conflicts with the Governments food strategy as it removes existing productive agri-land and weakens our national food security position
- e) the development areas will place significant demand on services which are already oversubscribed or unavailable to the existing community
- f) there are no local employment opportunities to sustain any further demand for jobs
- g) the existing local highway network features many hazards and sub-standard geometric elements which will develop into a greater compromise on highway safety given the substantial increase in traffic movements generated
- h) parts of the existing local highway network already suffer from excessive vehicle speeds and as such this problem will be significantly exacerbated by the substantial increase in traffic movements generated
- i) the existing highway network characteristics of on street parking and additional traffic calming will promote greater traffic conflict and the potential for driver rage, as a result of the higher incidence of conflict from the additional traffic generated
- j) the local plan suggestion of traffic calming to roads not currently traffic calmed is suggested without foundation as the following criteria, applicable to any proposed traffic calming scheme, has not been proven: i) to contribute to casualty reduction ii) to reduce excessive speeding iii) to improve environment and quality of life issues
- k) the existing local highway infrastructure simply cannot sustain a 53% increase in traffic whilst avoiding the unacceptable consequent dangers to the travelling public as a result
- l) given the absence of any sustainably recognised transport facilities in and around Eythorne and Elvington none of the proposed development areas can meet the local plan aspirations of sustainable development or sustainable transport being realised

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Eythorne Parish Council suggests SAP28 is removed from the Dover Local Plan for the reasons given in the attached representation.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	EPC Reg 19 Submission FINAL.pdf
Local Plan Consultation Point	SAP28 - Land between Eythorne and Elvington (EYT003/EYT009/EYT012)
Rep ID	SDLP428
Rep Status	Processed
Consultee ID	1331624
Consultee Full Name	Mrs Patricia Smith
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP28 - Land between Eythorne and Elvington (EYT003/EYT009/EYT012)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Development proposals in villages such as those proposed for Eythorne, Elvington and Shepherdswell should be considered very carefully therefore I OBJECT to this application for the following reasons:</p> <ol style="list-style-type: none"> 1 Infilling the areas of green fields around Eythorne, Elvington and Shepherdswell will ruin the character of the villageS. 2 The proposed building of this huge number of additional new homes in these developments along with its inhabitants would overwhelm the villages and the limited amenities they have to offer. The village amenities, providing basic needs are already oversubscribed. The adequacy of these amenities to accommodate future demand should have been determined- I do not believe they are in any way adequate. 3 The protection of villages' visual, historic, archaeological and environmental qualities are at serious risk should these developments go ahead. 4 The developments, both during construction and once completed will result in a significant increase in traffic and the noise and pollution associated with this increase. Road widening to reduce the inevitable congestion is not an option in the roads leading in and out of the villages. 5 The proposed siting of the developments are particularly ill-considered: being on a greenfield sites, and building here would both diminish the striking views from the villages and have an irreversible impact on flora and fauna and the local biodiversity. I think it's fair to say that many villagers are proud, if not very protective of the many and varied wildlife that choose to make these villages their home. 6 The importance of protecting our rural communities and the benefits that they provides in terms of both our physical and mental well-being should not be underestimated. 7 We need to make it our priority to protect the natural environment and habitats so that they remain undisturbed and thriving for future generations to enjoy.

	<p>8 The development in Eythorne with some 350+ new homes on top of the proposed 39+ at St Andrews Gardens will have a significant impact on the roads in Shepherdswell especially the main routes in and out of the village. I have personally abandoned my journey exiting the village via Coxhill due to congestion on numerous occasions. Our village roads simply cannot accommodate this significant increase in traffic. Traffic, particularly at peak times already causes major problems; a) sufficient pedestrian/vehicle segregation due to a lack of suitable foot paths and, b) speed and volume of traffic.</p> <p>9 Being able to comment on the Local Plan has been quite difficult. This process should have been made far more straightforward than this. Similar to how objections can be made on the planning portal.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Look at using former brownfield sites before carving up and concreting over virgin agricultural land. Far too many new houses are being built in Kent at this time. Our roads, water/waste infrastructure is already overstretched. There are insufficient amenities available to accommodate the additional inhabitants of these small villages.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Not Applicable</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP28 - Land between Eythorne and Elvington (EYT003/EYT009/EYT012)</p>
<p>Rep ID</p>	<p>SDLP536</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1330320</p>
<p>Consultee Full Name</p>	<p>Richard Ledger</p>
<p>Consultee Company / Organisation</p>	<p>J.Scott, Finn's</p>
<p>Agent Full Name</p>	<p>Jane Scott</p>
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>Policy SAP28, paragraphs 4.216 to 4.223 and Figure 4.8</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Not Applicable</p>

<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Not Applicable</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>Some amendments to policy wording and delivery trajectory need to be made to make this part of the Plan sound.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Finn's, working jointly with Catesby Estates, represent the landowners of land reference EYT009 proposed to be allocated under Emerging Policy SAP28 situated between Evington and Eythorne to be allocated for a residential led scheme. We write to support the proposed allocation and the Policies aims for quality place making.</p> <p>The Emerging Policy includes an Indicative Development Strategy referenced as Figure 4.8 which identifies indicative development areas, landscape buffers and an area for open space provision. This Indicative Development Strategy appears well-considered taking into account the known opportunities and constraints of the land.</p> <p>The policy promotes joint working with between landowners to prepare a masterplan for the site set out the quantum of distribution of land uses, access, sustainable design and layout principles and this is agreed and also encouraged. Initial work leading on from Figure 4.8 has determined that the proposed allocation area is capable of accommodating a minimum of between 300 and 350 dwellings, in line with the Policies aims over the Plan period. It is suggested that the policy should either propose a range for the housing provision or promote a higher figure to ensure the best use of this land. The trajectory for the build out is envisaged as set out below, based on the assumed adoption of the Plan at end of 2023, and pre-app discussions running alongside:</p> <ul style="list-style-type: none"> • Adoption of Local Plan – December 2023 • Submission of outline planning application – Q1 2024 • Outline permission issued – Q3 2024 • Reserved Matters permission issued – Q2 2025 • Commencement on site – Q4 2025 • First units delivered – Q3 2026 • Delivery 50-60 units per year <p>A first stage initial concept Masterplan has been produced in conjunction with the Council's representatives as owners of adjoining site reference EYT003 which identifies areas suggested to be developed, access, convenience facilities provision and amenity/landscape areas within the site. A copy of this initial concept Masterplan, which builds further on Figure 4.8, is submitted alongside this representation to aid further discussions.</p> <p>Land parcel EYT012 is already allocated for 50 residential units under Policy LA36 of the Land Allocations Local Plan 2015 and can be accessed off Sweetbriar Lane within internal site connections into site reference EYT009 to link the land parcels together.</p> <p>The main site access into sites EYT003 and EYT012 has been found most suitable from Adelaide Road with potential for a secondary/emergency access provision from Terrace Road. Consideration has been given to access from Wigmore Lane, however this Lane is narrow and heavily treed to both sides and discussions between both parties have found that Wigmore Lane is unlikely to offer suitable access opportunity into the site. Reference to this within the Policy at (f) is therefore requested to be removed.</p> <p>The land is very well placed in relation to existing community and sports facilities at the Tilmanstone Colliery Sports and Welfare Club which is situated adjacent to the south of the site. The Emerging Policy, part (d), promotes the provision of sports fields or the enhancement of nearby facilities. Whilst no discussions with the Tilmanstone Colliery Sports and Welfare Club have yet taken place, it would seem most beneficial to the local community to support the ongoing enhancement and provision of this existing valuable facility which is already well located between Evington and Eythorne and offers a good variety of sports pitches and activities, rather than provide a new range of separate facilities within the allocated site.</p> <p>Adjacent to the north and north-east lies a proposed employment allocation on the former colliery tip ground which has been undergoing cleaning and filling since granted planning consent in 2013. Given the close location of this land to the proposed allocated sites, the existence of established paths between the land and the proposed residential allocations, together with the size of the employment allocation adjacent to a range of existing employment facilities, it is considered that additional employment facilities within the Policy area, with the exception of maintenance employment regarding maintenance of highways, the operation of the new convenience store and similar jobs, cannot be justified. It is therefore requested that reference within the policy wording is clarified to explain what employment the Council envisage upon this site.</p>

	<p>We would envisage employment on site to be related to the convenience offering along with the possibility of flexible work hub/ small office space within the development and suggest that the policy wording should make clear that employment uses falling within light industrial/ industrial categories are not suitable on this site.</p> <p>The policy requests provision of a new convenience store to meet day-to-day shopping needs of new residents. In discussions with the Council and its Representatives, there is also an aim that this facility should serve existing residents as well as new residents and it is suggested an amendment to the wording in part (c) would be helpful to reflect this. Whilst at an early stage, the initial concept Masterplan suggests a suitable location close to the site entrance from Adelaide Road which would provide ease of access to both existing and new residents.</p> <p>With particular regard to the convenience use, it should be clarified within the emerging Policy that such provision sought should sit within Use Class E or Use Class F, depending upon the identified needs following further work supporting this policy.</p> <p>The Policy also seeks consideration to be given to the undergrounding of power cables which cross the site in a south-west to north-east direction. Initial work separately by Catesby Estates and the Council's Representatives has suggested this would most likely be unviable due to the extensive costs involved. However, the alternative suggested in part (p) of the Emerging Policy, to provide separation between residential properties and overhead pylons, does seem a reasonable option and would enable the provision of the required number of dwellings on the site. It is therefore suggested that reference to the undergrounding of power cables in part (p) of the Emerging Policy be removed.</p> <p>Part of the site is recognised as being subject of surface water flooding. This area lends itself to open space and amenity provision as suggested in Figure 4.8. Initial findings of representatives of both land parcels EYT003 and EYT009 suggest that available data may be out of date and we expect that the surface water flooding area will be reduced when assessments are fully carried out and there will be no impact on achieving the numbers of dwellings expected to be provided at this site.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	To support the Council's proposed allocation and to discuss the proposed changes to the policy wording.
Include files	AI04a - SAP 28 Concept Plan.pdf
Local Plan Consultation Point	SAP28 - Land between Eythorne and Elvington (EYT003/EYT009/EYT012)
Rep ID	SDLP896
Rep Status	Processed
Consultee ID	1273833
Consultee Full Name	Linda Nash
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP28
2 - Do you consider this part of the Plan sound?	No

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Very few facilities in the village. Bus service suspended. GP surgery 3 miles away. Settlement survey - services and facilities out of date. Traffic single file. Church Hill and Chapel Hill and road to school - traffic problems. No capacity at the school. Not enough infrastructure. Our objections are to do with lack of facilities and very difficult traffic management problems. The nearest doctor is three miles away. No bus services locally. One local shop with one day a week post office, majority collected data out of date. Primary school too small for an influx of pupils. These new houses will bring horrendous traffic problems, Most of the area is single file traffic as the roads are choked with parked cars. By the school, Church Hill and Chapel Hill at Eythorne are very problematic. Any queue of cars could be dangerous for small and vulnerable children.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Delete allocation
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP28 - Land between Eythorne and Elvington (EYT003/EYT009/EYT012)
Rep ID	SDLP590
Rep Status	Processed
Consultee ID	1331709
Consultee Full Name	Ben Pridgeon
Consultee Company / Organisation	Emmanuel College
Agent Full Name	Ben Pridgeon

Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP28
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We object to an over-reliance of the Plan to deliver dwellings in the medium and long term parts of the Plan. There appears to be little delivery of dwellings in the early part of the Plan period and this will not make a positive contribution to the Council's housing land supply. The strategic, urban extensions will take time to deliver due to the requirement for a masterplan and prolonged planning process. This will not aid 'upfront' delivery for dwellings in the district. Please see representations for further information</p> <p>We do not consider that this settlement is appropriate for a strategic allocation. The villages are classified as a 'Local Centre' and the definition given in Appendix E of the Plan does not tally with the number of dwellings proposed at this location. It is contrary to the broad thrust of the Plan and paragraph 3.29 which states that that new development should be focused at accessible and sustainable locations which can utilise existing infrastructure, facilities and services, and to ensure development contributes to the sustainability of local communities and services. We are not convinced that this draft allocation seeks the purposes of the Plan and is not in accordance with the part of Policy SP3 which seeks to focus development of such a scale in the larger settlements in the district.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Development of this scale should not be located at draft allocation SAP28. The lack of housing delivery in the early part of the Plan period should be rectified by allocating new, smaller sites for development in appropriate locations in the district. This includes development at Ash, for which we have promoted a site which is cognisant with its classification as a 'Local Centre'. Please see representations for further information
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	To contribute to the assessment of housing demand and potential requirement to assess when housing across the deistrict would be delivered.
Include files	221208-Representation to Local Plan.pdf (3) 221206-Site and ownership plan.pdf (3) 221206-EAS-Access and drainage assessment.pdf (3)
Local Plan Consultation Point	SAP28 - Land between Eythorne and Elvington (EYT003/EYT009/EYT012)
Rep ID	SDLP619

Rep Status	Processed
Consultee ID	1331790
Consultee Full Name	Julie Davies
Consultee Company / Organisation	CPRE Kent
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP28
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We object to the scale of development proposed at Eythorne and Elvington:</p> <ul style="list-style-type: none"> • These are two distinct settlements separated by the proposed allocation. • The Agricultural Land Classification Map indicates that the site is likely to be grade 2 (best and most versatile agricultural land). • The 2011 Census indicates that 80% residents travelled to work by car, either as a driver or passenger. Public transport was used by a lowly one in twelve (8.2%). Given the limited public transport service provision – and that the funding subsidy has recently been removed - it is unlikely that new residents in employment will choose to travel by public transport. The site is a significant distance from the railway station and involves an uphill walk from Eythorne to Elvington. • With regard to sites EYT003 and EYT009 the Landscape Consultants Assessment in HELAA Appendix 3a states: 'Development conflicts with many landscape characteristics and some significant landscape/visual impacts are likely to occur. Site identified as medium high sensitivity'. • HELAA Appendix 3B: The site is given orange status as 'Highways concerns have been identified in relation to access and/or highway impact and further assessment is required to demonstrate whether this can be mitigated.' <p>The purported commensurate scale development in rural areas will result, in the case of Eythorne and Elvington, in the coalescence of two separate villages – with the intention that these two villages become one combined, larger, local centre. It is noted that these two separate villages are subject to environmental and highway constraints.</p> <p>With facilities being shared between the two existing communities, CPRE Kent is very concerned that opportunities for active travel will be hazardous – particularly when the narrow pavement flanking one side of the Adelaide Road would not seemingly allow two-way pedestrian traffic to safely pass (including mobility scooters, prams/buggies and children's scooters); and changes in topography across the allocation will make connectivity that avoids Adelaide Road exceptionally challenging.</p> <p>While development that would facilitate the retention and strengthening of existing services and community facilities is welcomed, it is not clear how – in the case of Eythorne and Elvington - this fits with climate change aspirations, when interconnectivity using Adelaide Road does not offer an safe/welcoming travelling environment; such that reliance on car travel is likely to be the norm.</p> <p>The growing (ie merging) of the adjacent villages of Eythorne and Elvington will mean a loss of their individual communities/character, which could have a major impact on social cohesion. The strategy of placing roughly half of all local centre development at these two villages – which currently sit below the level of local centre in the settlement hierarchy is likely to lead to devastating impacts. That is, of the 774 dwellings</p>

	<p>proposed at local centres, 355 (46%) would be provided at Eythorne and Elvington – which will outperform Deal as a district centre, which is set to accommodate just 223 dwellings.</p> <p>In fact, the breakdown of housing numbers in reveals the extent to which the spatial strategy which seeks to distribute development in accordance with the settlement hierarchy, doesn't actually pay regard to the settlement hierarchy, as a proxy for sustainable development.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	CPRE Kent would wish to participate at the examination hearings to explore these issues further.
Include files	
Local Plan Consultation Point	SAP28 - Land between Eythorne and Elvington (EYT003/EYT009/EYT012)
Rep ID	SDLP915
Rep Status	Processed
Consultee ID	1331862
Consultee Full Name	Sindy Denyer
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	Section 1. Category Infrastructure Delivery Plan Reference: Infrastructure Delivery Plan – Draft for Consultation October 2022 PART 1: Physical Infrastructure Theme 1: Transport SP12 - Strategic Transport Infrastructure- Local Road Network 3.39 As part of the Local Plan modelling work, the impacts of Local Plan growth on the Local Highway Network were assessed however site specific mitigation and policies need to be considered . The plan must address the adequacy of the Coxhill, Eythorne Road, Shepherdswell Roads, local road network and public transport services supporting the proposed SAP 36,37 , 28, 29 and 30 developments.
<p>2 - Do you consider this part of the Plan sound?</p>	No
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	Justified Consistent with National Policy
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	Yes

<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Not Applicable</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>The draft local plan regulation 19 states under TI2 - Transport Statements, Assessments and Travel Plans section 10.7 the objective to ensure that traffic generated from new development can be accommodated on the highway network to promote the delivery of sustainable development. Section 10.8 states that traffic generated by development should normally be targeted towards the primary and secondary route network in the District. However other routes should not be subject to inappropriate levels of traffic generation or unsuitable traffic movements.</p> <p>In the event SAP 36,37, 28, 29 and 30 developments are implemented the Coxhill, Eythorne Road, Shepherdswell Roads will be the main route by car from Shepherdswell, Eythorne and Elvington to the A2 road network, we believe this will place significant pressure on local road traffic which needs to be addressed however there is no material consideration to implementing road improvements and assign funding in either the Dover Local Plan or SP12.</p> <p>Access to Shepherdswell , Eythorne and Elvington from the A2 involves narrow single track road with passing place. Access at the top end of Shepherdswell village via Mill Lane connects to the lower end of the Shepherdswell Road restricted by road width, parked vehicles, speed humps and traffic. All access roads currently suffer from significant traffic congestion during peak commuter periods.</p> <p>Shepherdswell has limited parking facilities around the village hall and local shop and heavy reliance on road parking further limits the width of Coxhill to single file traffic. Traffic bound for the Eythorne industrial estates includes a significant flow of large articulated lorries that regularly lead to partial/ temporary road blockages and significant road congestion.</p> <p>The Local Plan SP12 - Strategic Transport Infrastructure focusses on improvements to the A2 highway network and key junctions only and decisions around improvements to the local road network are deferred. Regulation 19 Transport Modelling Forecasting Report, forecasts that traffic leading from the A2 through Coxhill, Shepherdswell and Eythorne, is projected to grow at 15-19% as a minimum scenario, our independent assessment based independent analysis of development proposals is this will be nearer 60%.</p> <p>Analysis of Coxhill peak traffic flow conducted by Shepherdswell Speedwatch (in collaboration with the Metropolitan Police) in June and July 2022 recorded traffic flow of circa 550 vehicles per hour.</p> <p>The Draft Local Plan Regulation 19 states that approved development must account for the cumulative impact of all developments allocated in the Plan on common road links. SAP 36,37, 28, 29 and 30 proposed developments will add 425 houses to the local area served by the A256 with residents needing to commute regularly to work, schools etc. during peak commuting periods. Shepherdswell has circa 700 houses so combined with the proposed plan increase of 425 houses in Shepherdswell, Eythorne and Elvington, this represents a 60% increase in property numbers which we project will be mirrored by an equivalent increase in road traffic. An increase of 60% on current commuter peak traffic flow translates to circa 590 vehicles per hour or 10 vehicles per minute along largely single-track road with road speed impacted by slow moving heavy goods traffic.</p> <p>Compounding significant road congestion there is a lack of pedestrian footways in Shepherdswell leading to key routes i.e. school, local shop, health centre and village hall, peak footfall along pavement less roads occurs when traffic flow is at its highest presenting a significant road safety concern.</p> <p>There are specific road access concerns relating to St Andrews Gardens (SAP 36 SHE004) a development of 57 houses served by one road access and exit point. The Local Plan Reg 19 proposes to increase the number of properties by 50 on this estate effectively doubling its size without addressing & mitigating emergency access and road safety design.</p> <p>KCC's Kent Design, Creating the design, Step 3- Design recommends that minor access roads generally serving up to 100 dwellings, including those in other residential areas which feed on to it should either be a through road or, if a cul-de-sac, serve no more than 50 dwellings unless an alternative access route, to serve motorists, pedestrian and cyclists, can be provided. Previous development surveys of SHE004 access points used the Housing and Economic Land Availability Assessment traffic light system which rated this site as Amber with an assessment proviso that "secondary emergency access is required however this does not appear achievable".</p>

	<p>St Andrews Gardens access road links into Mill Lane which is restricted at points to single track road with passing places. Mill Lane is heavily used constituting one of the main access routes to the Shepherdwell Health Centre, School and Church.</p> <p>The Draft Local Plan Regulation 19 states under section E1 that for designated industrial settlements new employment development will be supported within existing employment sites as identified on the Policies Map or on land within or immediately adjoining the settlement confines of designated settlements. While employment for villagers is essential it should be considered without a viable public transportation network such development will further challenge the stressed A256 local road network.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The Draft Local Plan Regulation 19 must propose improvements that address the adequacy of the A256 and local road network and public transport services supporting the proposed SAP 36,37, 28, 29 and 30 developments and ensure funding for these needs is addressed in the final plan.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP28 - Land between Eythorne and Elvington (EYT003/EYT009/EYT012)</p>
<p>Rep ID</p>	<p>SDLP994</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331999</p>
<p>Consultee Full Name</p>	<p>Claire Pamberi</p>
<p>Consultee Company / Organisation</p>	<p>Kent County Council</p>
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP28</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Effective</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Not Applicable</p>

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The County Council requests specific mention of connection to the PROW network including upgrades for walkers and cyclists within this policy.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The County Council requests specific mention of connection to the PROW network including upgrades for walkers and cyclists within this policy.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP28 - Land between Eythorne and Elvington (EYT003/EYT009/EYT012)
Rep ID	SDLP1494
Rep Status	Processed
Consultee ID	1272945
Consultee Full Name	Malcolm Whitehead
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP28
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I object to SAP 28 and SAP 29 being included in the DDC local plan for the following reasons:- As prime agricultural land these sites should never be built on. The sites are outside the settlement confines. The topography of the area means that local roads flood which then extends into adjacent fields. The infrastructure is not suitable now for the amount of local traffic. Raw sewage is frequently discharged onto these fields. The water supply from the acquirers is limited. There is no capacity for new patients at any local GP surgery. There is no public transport. Submitted by Malcolm Whitehead
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	SDLP1494 Whitehead Att1.pdf
Local Plan Consultation Point	SAP28 - Land between Eythorne and Elvington (EYT003/EYT009/EYT012)
Rep ID	SDLP1580
Rep Status	Processed
Consultee ID	1252218
Consultee Full Name	Cllr Linda Keen
Consultee Company / Organisation	DDC WARD - Aylesham, Eythorne and Shepherdswell
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP28
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>As a Dover District Cllr (Linda Keen) for this ward, I fully support the views of Eythorne Parish Council, as summarised briefly below.</p> <ol style="list-style-type: none"> Both SAP28 and SAP29 areas are currently open countryside and consequently would be classed as greenfield development. Brownfield sites should be used instead - a brownfield land stock of some 174 hectares already exists within the Dover district which would support some 5000 new homes. The expansion of the built up areas proposed by SAP28 and SAP29 are both outside of the Settlement Confines defined and reviewed in 2021. The large scale development in respect of SAP28 and SAP29 are located wholly outside the settlement confines and consequently contradict the expressed will of DDC to protect open countryside. The current local amenities listed in the local plan are wrong in a number of respects as clearly shown in the Parish Council's table. Moreover, the Plan does not identify the services and facilities which do not exist nor are available in close proximity, and thus ignores the negative outcome on the sustainability, and indeed suitability, of SAP28 and SAP29. There is no GP surgery, no conveniently located secondary education or higher education, no nearby supermarket outlet and no public transport. Consequently, the major services required by families e.g. education, health and food shopping, and in particular those of any new developments, all will need to be accessed using non sustainable forms of transport. There are no local employment opportunities to sustain any further demand for jobs. The limited Developer Contributions which would be requested cannot overcome these deficiencies – they cannot be used, for example, to fund ongoing bus services which are outside the control of Dover Council, and which are provided by Kent Council and privatised bus companies which are completely outside the control of Dover Council. The extra houses will also place significant demand on services which are already oversubscribed or unavailable to the existing community. The existing local highway network features many hazards and sub-standard features which will develop into a greater compromise on highway safety given the substantial increase in traffic volumes generated by the extra houses. Especially with regard to the main road between the Sandwich/Dover Rd and the A2 (heavily used as a rat run between these two roads), there will be significant adverse effects on the already heavily congested and dangerous Cox hill crossroads by the Co-op and Coxhill road running through Shepherdswell. This road is already totally inadequate for current traffic volumes and will simply get worse. Nothing can be done about this, unless you build a by-pass, for which funding will simply never be available. <p>The Parish Council shows clearly in detail, that various possible traffic calming measures will not alleviate these and other problems such as on-street car parking. It is impossible to resolve the problems to road safety and traffic flows by tinkering with a few junction layouts and traffic calming measures, as these rural roads are simply too narrow and bendy to cope already – and there is no cash proposed for any widening of them – which would not be possible in most cases anyway.</p> <p>Moreover, given the absence of any sustainably recognised public transport facilities in and around Eythorne and Elvington none of the proposed development areas can meet the local plan aspirations of sustainable development or sustainable transport.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant	No more than a very small number of houses should be built in Eythorne/Elvington because of the insoluble problems outlined in Box 6 – especially the inadequate road infrastructure – of at the most, say, 50 new houses.

and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	No new houses should be built anywhere in the Dover/rural area until the A2 is dualized and a proper bridge or underpass constructed to relieve the already very congested Whitfield roundabout – for which no funds are currently available, nor likely to be in the foreseeable futures.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP28 - Land between Eythorne and Elvington (EYT003/EYT009/EYT012)
Rep ID	SDLP1289
Rep Status	Processed
Consultee ID	1259368
Consultee Full Name	Ms Paulette Butcher
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 28
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The plan does not take into account the impact of increased traffic through the village roads past a local school, a blind bend and roads which are already suffering from unacceptable motoring speeds.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s)	No further large developments in a small village with limited amenities using current roads for access.

you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP28 - Land between Eythorne and Elvington (EYT003/EYT009/EYT012)
Rep ID	SDLP1525
Rep Status	Processed
Consultee ID	1252440
Consultee Full Name	Martin Leggatt
Consultee Company / Organisation	Dover District Council
Agent Full Name	Grace Martin
Agent Company / Organisation	Hume Planning Consultancy Ltd
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP28
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	(DDC Note - Representation submitted by Hume Planning. Full Representation attached to SDLP1525. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1525.)

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

Eythorne and Elvington: Policy SAP 28 Dover Local Plan Reg. 19

We write to you on behalf of our client, Dover District Council (DDC) Estates department, in relation to the Dover District Council Regulation 19 consultation on its Local Plan. Specifically, we write in support of the proposed allocation at the land between Eythorne and Elvington (Policy SAP 28).

Our client owns part of the land within the allocation (broadly speaking the north-western half). The masterplan showing the full extent of combined ownership is enclosed at Appendix 1. The remaining part of the land is owned by the Ledger Family, represented by Catesby Estates. Both parties are working positively together and are committed to delivering this allocation in a holistic manner to deliver a sustainable extension to the existing settlements of Elvington and Eythorne.

SP3: Housing Growth

We welcome DDC's commitment to meeting its housing need, with Strategic Policy SP3 committing to providing at least 10,998 net additional homes over the Plan period. Within the Policy, reference is made to the Council's overall spatial strategy i.e. the majority of growth will be focused towards the principal town, Dover, and the further expansion of Whitfield. Reference is made to growth then being focusing on the next layer of settlements, Deal (district centre), Sandwich and Aylesham (both rural service centres). It is noted that Eythorne and Elvington, as a designated local centre, will be allocated for up to 300 dwellings under Policy SAP 28. Accordingly, we consider it would provide greater transparency if Policy SP3 made reference to the growth proposed in this location within the spatial hierarchy referenced at Policy SP3.

We consider it is appropriate to direct development towards the land between Eythorne and Elvington which will be separated by the central playing fields and open space known as the Tilmanstone Colliery Sports and Welfare Club which is situated adjacent to the south of the allocation. Housing along with community facilities and local convenience store in this central position separated by the open space will enhance the sustainable credentials and degree of containment of the adjoining settlements. Both Eythorne and Elvington are well served by local facilities including, amongst other things, village halls, a primary school, public house, post office and local shops. There is also an established employment area to the east. The growth proposed, along with the expansion of Pike Industrial Estate, will also create a sustainable expanded settlement within the district. As well as improved cycleway and footpath linkages delivered by the allocations bus linkages will be improved and the villages are also served by the nearby railway stations 2 miles away at Shepherdswell and 2.3 miles away at Snowdown.

SAP28- Land between Eythorne and Elvington

DDC Estates confirms its support for this allocation and its intention to deliver this site at an early stage of the Plan period. Please see our comments below on the proposed housing trajectory for information on assumed delivery rates.

The allocation is in two landownerships and both parties are already working closely together to progress the initial masterplan for the delivery of this allocation in line with the Policy requirements. This requirement is acknowledged, and supported, by both parties to ensure the site is delivered as a whole, in the most sustainable and appropriate manner. This work is already underway, and a draft high level initial masterplan is enclosed at Appendix 1.

This masterplan is based on a high-level review of the site's constraints and opportunities, and it is acknowledged by both parties that further work is needed to develop the masterplan. However, at this stage it provides a good level of certainty to both landowners and the Council that the site can provide a net developable area of at least 10.4 ha, along with providing a good level of open space and biodiversity opportunities in line with the policy requirements, and adequate areas for surface water drainage. This would facilitate the delivery of between 300-350 dwellings, depending on the average density per hectare applied (30 dph and 35 dph respectively). Further design work on the character areas within the allocation and the range of densities that could be possible will be finalised in advance of the Local Plan Examination.

This draft masterplan should provide sufficient comfort to the Council that the allocation, as envisaged, can be delivered. As noted above, further work will be carried out by both parties in conjunction with the Planning Department to further refine this masterplan ahead of the Local Plan Examination and later planning application stage. This additional work will include detailed drainage work. It is acknowledged that the site is located within an area at risk of surface water flooding. This has been considered in the enclosed high level masterplan using data available from the Environment Agency. However, further work will be carried out to understand the drainage strategy for the site and determine the net developable area. There is some confidence from the work being done to date that the developable area may be expanded beyond that shown, and that in excess of 300-350 dwellings may be accommodated on this site. We expect to be in a position to update the Inspector on this at Examination when the additional technical modelling evidence has been undertaken and an agreed position reached with statutory consultees. Whilst in broad terms we are supportive of the allocation, we do consider some minor amendments to the policy as worded is required to ensure the policy is sound. We deal with each in turn.

First, we consider the requirements of the masterplan can be strengthened to ensure it serves the purposes as envisaged i.e. that, even if the site is bought forward separately by the two landowners that the principles embodied by the masterplan framework for the totality of the landholding would still be secured and delivered. The inclusion of a requirement for a phasing and implementation plan to be submitted on the first application will mean the infrastructure requirements stemming from the site as a whole will be understood, and the triggers and development contributions calculated in a fair way regardless of the timing of any application within the allocation. This will ensure the effectiveness of the Policy.

It is acknowledged in the Sustainability Appraisal (SA) to the Local Plan, that whilst the existing villages are well served by a number of local facilities, there are also higher order services located further away. Notwithstanding this, the SA, having taken this into full consideration, concludes that the allocation is likely to have significant positive effects when taken as a whole, largely in part due to the scale of the housing allocation delivering new local services and facilities at the centre of the expanded community it creates. We support the conclusions of the SA in this regard. It follows that we support the requirement of the policy to provide community and local retail facilities to provide a sustainable new settlement where trips can be internalised as far as possible. It is recognised the provision of sustainable transport links will also be key to ensure residents can use sustainable modes of travel, and the policy requirements towards sustainable transport measures including public transport will ensure this is delivered.

Whilst there is general agreement that to create a sustainable new place, local employment facilities should be provided, it is anticipated that the need for Class B employment uses will be met through the large employment allocation to the east (Policy ELR 5a and b). Any employment provision within the SAP28 site is likely to be small scale office development/work hubs etc (Use Class Eg). The Council may wish to amend the wording to ensure this is clear and therefore effective.

Housing Trajectory

We confirm that DDC Estates will be looking to deliver this site, along with the adjoining landowner, early on in the Plan period. Work being undertaken to develop a more detailed masterplan will be undertaken in conjunction with the Council's Planning Department, which will allow for an early stage of pre-application discussions so a planning application can be submitted upon receipt of an Inspector's letter or upon adoption of the Plan. In broad terms it is anticipated development could commence within 2 years following adoption, and first units delivered 6-9 months later. For example, if the Plan is adopted in December 2023, the first units could be delivered Autumn 2026. It is anticipated this site could deliver 50-60 units a year.

The proposed rewording or reinforcement of the policy wording of Policy SAP28 is set out below. It is also noteworthy that this omits the referencing of the undergrounding of the pylons across the site which has been investigated, but the cost would make this option unviable and on this basis the masterplan shows a generous 20m buffer on either side of the line of pylons.

Policy SAP28 - Land between Eythorne and Elvington (EYT003/EYT009/EYT012)

An extension is planned to Eythorne and Elvington to create a new sustainable community, incorporating garden village principles. Land is allocated to the east of Adelaide Road to deliver approximately 300 new homes over the Plan period.

A masterplan is required for the site to set out the quantum and distribution of land uses, access, sustainable design and layout principles. This should be prepared jointly by the landowners/developers, working with key stakeholders. This masterplan should be submitted and agreed by the Council before the submission of the first planning application, along with a phasing and implementation plan to agree the key infrastructure requirements and their trigger points for delivery. Any application for development should be preceded by, and consistent with, the agreed Masterplan. The masterplan shall be subject to a design review in accordance with Policy PM1.

In accordance with the relevant Local Plan policies, the masterplan and development of the site should provide:

- a. A wide mix of housing types, sizes and tenures, including affordable housing in line with the requirement of Policy SP5; housing for older people and serviced plots of land to contribute towards meeting evidenced demand for self-build and custom housebuilding;
- b. Design codes shall be developed as part of or to supplement the masterplan for the site in accordance with Policy PM1;
- c. Community facilities (Use Class E) and a new small convenience shop in an accessible location to meet the day-to-day convenience shopping needs of new residents;
- d. Formal and informal open spaces for leisure and recreation, including play areas, sports fields, allotments and community orchards, or enhancements to nearby facilities, to meet the needs of the development following community engagement and an assessment of the existing open space provision immediately adjoining the site. Where possible open spaces should be multi-functional contributing to wider ecological networks and the provision of sustainable drainage, and should be accessible to new and existing communities; provide upgraded routes for walkers and cyclists; improve connections between and enhancements to existing habitats; provide safe routes for wildlife, protecting and enhancing wildlife assets;
- e. Development on the site should be well related to the existing settlement of Elvington and respect the residential amenity of adjoining properties;
- f. Suitable access arrangements will be provided from Adelaide Road and Terrace Road, with associated improvements and traffic calming measures to both Adelaide Road and Terrace Road. NB Both landowners have reviewed the site access and do not consider access to be achievable from Wigmore Lane and on this basis referencing to the investigation of access from Wigmore Lane should be deleted from Policy SAP28;
- g. The following will be required in relation to wider strategic and local highway mitigation measures, to be informed by a Transport Assessment in accordance with Policy TI2:
 - i Consideration of the need for traffic management improvements to Church Hill, including a review of parking restrictions;
 - ii A review of the impact on the surrounding rural road network, and mitigation where necessary;

h. On and off-site sustainable transport measures including new and improved pedestrian links and cycle paths to connect the site with the services and facilities in Eythorne and Elvington; and public transport provision, informed by a Travel Plan which will be required in accordance with Policy T12;

i. Improvements to the Public Right of Way network to increase connectivity in the area;

j. Protection and where possible, enhancement of heritage assets and their settings through appropriate mitigation measures, to be informed by a Heritage Assessment and Archaeological Assessment.

k. A generous landscape buffer to the north/north-west of the site, determined by a Landscape Visual Impact Assessment, to minimise visual impact on the surrounding landscape. Existing landscape features such as hedgerows, trees and field boundaries shall be maintained and incorporated into the design and layout of the development, except to provide suitable access. l. Sustainable Drainage Systems should be integrated into on-site multi-functional green space and landscape provision;

m. A site-specific Flood Risk Assessment, including a comprehensive investigation into surface water flood risk, must be carried out in accordance with Policy CC5. This should inform the Sequential Approach which should be applied to the layout of the site by locating the most vulnerable elements in the lowest risk areas;

n. A wintering bird survey must be undertaken in advance of a planning application on the site. If the bird survey identifies that the development will exceed the threshold of significance, mitigation will be required. A suitable scheme of mitigation will need to be submitted with the planning application for the site;

o. Necessary utilities, including integrated communications infrastructure to facilitate homeworking. The developer should consult the relevant water authority at an early stage to ensure that there will be sufficient capacity in the wastewater system to accommodate the development and any upgrades are carried out where necessary. The occupation of the development should be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider. The site layout should be planned to ensure future access to existing water and wastewater infrastructure for maintenance and upsizing purposes;

p. The layout should be designed to ensure necessary separation between residential properties and the overhead pylons. This should be informed by consultation with The National Grid; and

q. Financial contributions towards the delivery of required off-site infrastructure including, but not limited to, primary, secondary and SEN education provision, libraries, community facilities, youth services, social care, waste provision and local bus services in accordance with Strategic Policy 11 .

In order to ensure that each site is planned and delivered comprehensively, any application for development on part of the site will be assessed against its contribution to the approved masterplan and will not prejudice the implementation of the site as a whole.

Summary

With specific reference to the proposed allocation and Eythorne and Elvington (SAP 28), we confirm the site is available for residential development, and the policy aspirations for the site can be achieved, it is therefore an achievable and deliverable allocation.

DDC and Catesby Estate, (the latter on behalf of the Ledger Family), will be working together on progressing a more detailed masterplan with the Council in advance of the Local Plan Examination which when approved will guide the preparation of later planning application(s).

Given the good range of services within both the existing villages of Eythorne and Elvington, it is considered to be appropriate to allocate this available land which because of its siting will serve to link the expanded settlements together and in conjunction with further community consultation will deliver uses and benefits that will make the settlement more self-contained and enhance its local centre status. Hume Planning Consultancy welcomes the opportunity to comment on this stage of the Council's Pre-Submission Local Plan and would like to reserve the right to attend the Examination in Public in due course.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	Martin Hume Planning (Eythorne and Elvington) 1520 Att1_Redacted.pdf Martin Hume Planning (Eythorne and Elvington) 1520 Att2.pdf
Local Plan Consultation Point	SAP28 - Land between Eythorne and Elvington (EYT003/EYT009/EYT012)
Rep ID	SDLP1223
Rep Status	Processed
Consultee ID	1331627
Consultee Full Name	Mr Michael Godfrey
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP28
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	As a resident of Eythorne, I must voice my complaint to the proposed Plan for housing on the Eythorne and Elvington site. As SAP28 and SAP29.I write with concern about the local plan development within our two small village areas. The two villages, Elvington/ Eythorne has an estimated population of around 2,500 to 3,000 people depending on what source you get you figures from. Your proposed development is in access of 350houses to be built, 300 in one area and 50 in another. These residents will be capable of housing 700to 1000 people. This ratio can easily be seen to overwhelm the little facilities that are in the area. There are about 6 lock up type shops, a small infant school that cannot expand its facilities, a bus route that the local council have reduced its service to non existence. The roads are already causing concern to ALL residents and the Parish Council. I cannot see how this LOCAL PLAN can be allowed to exist as it stands, the area cannot take the increase in population.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s)	

you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP28 - Land between Eythorne and Elvington (EYT003/EYT009/EYT012)
Rep ID	SDLP1530
Rep Status	Processed
Consultee ID	1252520
Consultee Full Name	Rachel Collins Housing Development Manager
Consultee Company / Organisation	Dover District Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP28
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	All the sites above are Council owned sites. The intention is for these to be appraised, and if appropriate, brought forward for affordable housing within the next 5 years.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s)	

you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP28 - Land between Eythorne and Elvington (EYT003/EYT009/EYT012)
Rep ID	SDLP1492
Rep Status	Processed
Consultee ID	1267957
Consultee Full Name	Mrs Annette Whitehead
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP28
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails	Regulation 19 Consultation Response on SAP28 & SAP29: I strongly oppose the proposals for development of the above sites for the following reasons :- The sites are areas of open countryside which should be protected. The agricultural land must be retained for food production & any housing development should be limited to existing brownfield sites.

<p>to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>These sites are outside of the settlement confines.</p> <p>There are no existing medical facilities in Eythorne or Elvington and Kent & Medway NHS Trust recently commented on a nearby planning application for 39 houses that there is no capacity at any GP surgery in the area for new patients and that they objected to the application. The suggestion that the same Trust could provide care for the residents of over 300 houses is therefore ludicrous.</p> <p>The very limited bus services are unlikely to continue beyond the end of the current academic year. Pupils will be unable to travel to any secondary school by public transport & residents have already had to give up their employment as they had relied on public transport. To suggest that hundreds of people would want to live in an area with no public transport, limited employment opportunities, no school places or medical facilities is seriously underestimating the needs of local families.</p> <p>The existing road infrastructure is already unsuitable. The access route to the proposed sites includes a single carriageway road with a passing place. Any increase in traffic, including construction traffic would only exacerbate the current, unacceptable situation. Southern Water have already written to local residents asking them to reduce their water consumption as the aquifers are very low on capacity and are drying up. Any additional housing & the amount of water required during any construction stage would have a detrimental effect on the availability of water in the future.</p> <p>Kindest Regards Annette Whitehead</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Not Applicable
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>SDLP1492 Whitehead Att1.pdf</p>
<p>Local Plan Consultation Point</p>	<p>SAP28 - Land between Eythorne and Elvington (EYT003/EYT009/EYT012)</p>
<p>Rep ID</p>	<p>SDLP1457</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1330919</p>
<p>Consultee Full Name</p>	<p>Mrs Heather Twizell</p>

Consultee Company / Organisation	Natural England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP28
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Natural England's advice in our statutory Regulation 18 response was that the policy wording should be strengthened so that both the Masterplan and landscape mitigation are informed by a detailed LVIA and that advice should be sought from the Kent Downs AONB Unit in progressing this allocation and associated policy. We are pleased to hear from the AONB Unit that you have indeed engaged with them while progressing this policy but we are concerned that the only reference in the policy to LVIA is under requirement 'k' which states: A generous landscape buffer to the north/north-west of the site, determined by a Landscape Visual Impact Assessment, to minimise visual impact on the surrounding landscape. Existing landscape features such as hedgerows, trees and field boundaries shall be maintained and incorporated into the design and layout of the development, except to provide suitable access; Unless you have received specific advice to the contrary from the AONB Unit (in which case we would be happy to discuss) our advice would be that the whole Masterplan for the site should be informed by a detailed LVIA (not just the landscape buffer). The policy should be re-worded to reflect this and we would suggest something along the following lines: A masterplan (based on a detailed Landscape and Visual Impact Assessment) is required for the site to set out the quantum and distribution of land uses, access, sustainable design and layout principles. This should be prepared jointly by the land owners/developers, working with key stakeholders. Any application for development should be preceded by, and consistent with, the agreed Masterplan. The masterplan shall be subject to a design review in accordance with Policy PM1. We further note that this strategic allocation policy does not include the requirement to "ensure appropriate species and habitat surveys are carried out prior to determination" while many other site Page 5 of 8 allocation policies in this plan do. Our overarching comments on this requirement notwithstanding we would query whether this is an oversight in this case. We welcome the expectation set out in the supporting text that while this site allocation is comprised of several parcels of land it should be designed and implemented as one contiguous scheme, established through a jointly prepared masterplan. We also welcome requirements 'd' and 'i' which relate to open space, green infrastructure, access, biodiversity and Sustainable Drainage Systems (SuDSs). Depending on our final HRA advice it may be possible to remove policy requirement (o) requiring wintering bird surveys which is related to concerns around loss of undesignated land that is still important in supporting the bird populations of Habitats Sites (otherwise known as functionally linked land).
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The policy should be re-worded to reflect this and we would suggest something along the following lines: A masterplan (based on a detailed Landscape and Visual Impact Assessment) is required for the site to set out the quantum and distribution of land uses, access, sustainable design and layout principles. This should be prepared jointly by the land owners/developers, working with key stakeholders. Any application for development should be preceded by, and consistent with, the agreed Masterplan. The masterplan shall be subject to a design review in accordance with Policy PM1.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP28 - Land between Eythorne and Elvington (EYT003/EYT009/EYT012)
Rep ID	SDLP1449
Rep Status	Processed
Consultee ID	1331661
Consultee Full Name	Chloe Rose
Consultee Company / Organisation	RSPB
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP28
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We have overlaid Turtle Dove territory data with the proposed sites in the Dover Draft Local Plan (using data from the 2021 National Turtle Dove survey and supporting data from BTO BirdTrack), to see if any developments pose a risk to known Turtle Dove territories.</p> <p>Two proposed sites for development contain recent records of Turtle Dove territories within a 1km area; SAP28 - Land between Eythorne and Elvington and Elvington and SAP52 - Prima Windows, Nonington. While we welcome the consideration of protecting trees and hedgerows within the site, further consideration needs to be provided for Turtle Doves, see below mitigation guidance.</p> <p>Turtle Dove Mitigation Guidance</p> <ol style="list-style-type: none"> Detailed proposals should aim to protect areas of scrub and mature hedgerows suitable for nesting habitat. If destroyed, this habitat can take up to 20 years to establish and become suitable for nesting. Detailed proposals should aim to ensure foraging habitat is available and managed correctly (food shortage is the main factor triggering it's decline on their breeding grounds). Alongside this, fresh water sources should be retained and managed sympathetically. Where known breeding birds occur, detailed proposals should feature; nesting habitat, foraging areas and a freshwater source within 350 metres. Studies have shown that recently fledged turtle doves will rarely venture more 350 metres from the nest site (Dunn et al. 2016) and at this stage are likely to:

	<p>I. be very vulnerable to predation. With increased human habitation it is possible there may be adverse effects from generalist predators (e.g. cats) that tend to congregate near to human habitat. (Dunn et al. 2016) and</p> <p>II. incur poor body condition if there is insufficient food nearby in the form of natural arable plant species (as opposed to anthropogenic food resources such as garden bird seed mixes and brassicas) (Dunn et al. 2018). As well as maintaining what habitat is already present for Turtle Doves within the Dover TDFZs, we recommend looking at opportunities to further expand/create areas of suitable habitat to ensure the long-term preservation and prosperity of this species within the Dover district. Further information can be found; www.operationturtledove.org ('helping your turtle doves'). The RSPB can assist with this advice on a case-by-case basis.</p> <p><i>(DDC note - this is an extract from full RSPB representation reference SDLP1435)</i></p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP28 - Land between Eythorne and Elvington (EYT003/EYT009/EYT012)
Rep ID	SDLP1091
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared

	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SAP28: Elvington desperately needs services. There is no doctors' surgery near since the Eastry surgery closed. Drains / sewage infrastructure are inadequate for current number of dwellings, bus services were drastically cut in 2022. A better, more affordable retail outlet is also needed. 300 houses surrounding Tilmanstone Colliery Welfare Club with access also on to Wigmore Lane and Barville Road are proposed with natural landscaping buffers.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Nearby, highways are crying out to be made safe and widened with pavements and pedestrian crossings. For this site to be sound, also the 30% affordable housing SP must be rigorously implemented. Then this would be a sound and effective choice of site; conditional on the provision of all the services above, the reinstatement of the bus services cut in 2022 and conditional on 3 engineered cycle paths to connect to Aylesham and Snowdown Station, Shepherdswell station and Walmer rail station.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	SAP28 - Land between Eythorne and Elvington (EYT003/EYT009/EYT012)
Rep ID	SDLP1239
Rep Status	Processed
Consultee ID	1332975
Consultee Full Name	Ms Sarah Bates
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP28
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Re housing; These numbers of houses should not be built on agricultural land and the transport issues involved with the various roads etc make it especially unviable due to congestion and environmental concerns. The villages are small and there is little in the way of shops and other facilities. Car-use would be high – and a big increase on currently. Has the relative value of the land concerned been assessed in terms of value through agriculture and carbon capture versus covering with concrete.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP28 - Land between Eythorne and Elvington (EYT003/EYT009/EYT012)
Rep ID	SDLP1229
Rep Status	Processed
Consultee ID	1332965
Consultee Full Name	Miss Yazmin Godfrey

Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP28
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I am writing to object to the following housing development applications - 50 houses to the east of Roman Way, and the development of a further 300 between Eythorne and Elvington which I believe are referenced as SAP 28&29. Given the fact that the existing infrastructure barely supports the number of houses already in this area, I was shocked to hear the proposal of a further 350+ houses being built. The roadways in to, out of, and around the estate are constantly congested with huge volumes of parked cars lining both sides of the road. The junction between Adelaide Road, Roman Way, Tye Wood and Kelk Hill and the bend between Roman Way and Sweetbriar Lane have near-miss incidents multiple times a day, especially in late summer when the hedges overgrow and make them entirely blind bends. Further to this, the area between Adelaide Road and Church Hill is also often impassable, especially with the volumes of traffic caused by the primary school, which has no parking facility of its own, and Woodpecker Court's facility. Wigmore Lane is equally troublesome with the commuting traffic and Tilmanstone Salads lorries passing through essentially single-track roads given the volume of cars lining the streets at all times. Adding a further 300-700+ cars to the area would be an utter catastrophe, especially given the public transport routes have all been closed. It is my understanding that the primary school is already at capacity and there are no other primary or secondary schools within a reasonable distance, again given the lack of public transport. Even when public transport did exist, the number of buses passing through each day was so minimal that it could not replace people's needs for cars, so reinstating these would now only add to the traffic problem. There is one small convenience store in Elvington and one in Eythorne, again with no parking facilities, with the next larger store being miles up the road in Shepherdswell - again with no parking facilities and in a village with a congestion problem of its own given it's the main pass-through route from the A2. This is also where the closest doctor's surgery is. I am sure there are many more suitable locations for such a development near already established towns and cities rather than imposing it on villages already ill-equipped to deal with existing residents. All residents in the area are very concerned about this proposal and are all utterly opposed to it. I trust our voices will be heard.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	I am sure there are many more suitable locations for such a development near already established towns and cities rather than imposing it on villages already ill-equipped to deal with existing residents.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP28 - Land between Eythorne and Elvington (EYT003/EYT009/EYT012)
Rep ID	SDLP1836
Rep Status	Processed
Consultee ID	1260061
Consultee Full Name	David Nash
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP28
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Our objections are to do with lack of facilities and very difficult traffic management problems. The nearest doctor is three miles away. No bus services locally. One local shop with one day a week post office, majority collected data out of date. Primary school too small for an influx of pupils. These new houses will bring horrendous traffic problems, Most of the area is single file traffic as the roads are choked with parked cars. By the school, Church Hill and Chapel Hill at Eythorne are very problematic. Any queue of cars could be dangerous for small and vulnerable children.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP28 - Land between Eythorne and Elvington (EYT003/EYT009/EYT012)
Rep ID	SDLP1600
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP28
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438. SAP 28 – 30 Elvington and Eythorne SAP 28: Elvington desperately needs services. There is no doctors' surgery near since the Eastry surgery closed. Drains / sewage infrastructure are inadequate for current number of dwellings, bus services were drastically cut in 2022. A better, more affordable retail outlet is also needed. 300 houses surrounding Tilmanstone Colliery Welfare Club with access also to Wigmore Lane and Barville Road are proposed with natural landscaping buffers. Nearby, highways are crying out to be made safe and widened with pavements and pedestrian crossings. For this site to be sound, the 30% affordable housing SP should also be rigorously implemented. Then this would be a sound and effective choice of site; conditional on the provision of all the services above, the reinstatement of the bus services cut in 2022 and conditional on 3 engineered cycle paths to connect to Aylesham and Snowdown Station, Shepherdswell station and Walmer rail station.

	<p>DDC Note: additional relevant text from P5 of original rep:</p> <p>3.48 Many, many of the current residents of ex mining village Elvington were / are dependent on buses that have recently (2022) been cut, (following KCC cut to bus subsidies) to get to work in Canterbury, Folkestone, Sandwich, Thanet or Dover, or to get to secondary school, or to get to doctors, or to shop. These people had an environmentally sustainable public transport service that has been cut. Kent CC is saying it is looking at potential bankruptcy in 2023, so promises of new services and facilities are met with some disbelief.</p> <p>SAP 28 is planned on the cricket field next to the Tilmanstone Welfare club, The selection of this site can only be sound if cast-iron conditions to provide all of the services mentioned , are included as well as new drainage infrastructure. Council housing in Elvington has been subject to flooding from the sewage system, long overdue for replacement. As in Dover deprived wards, there are unhealthy EPC EFG homes in Elvington that need to be transformed into zero carbon home to lift residents out of fuel and therefore food poverty.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	SAP28 - Land between Eythorne and Elvington (EYT003/EYT009/EYT012)
<p>Rep ID</p>	SDLP1964
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1272716
<p>Consultee Full Name</p>	John Horsfall
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	SAP28
<p>2 - Do you consider this part of the Plan sound?</p>	No

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The plan provides for up to 600 more cars using Adelaide Road. Apart from blocking a single track road, it puts the school children in more danger from car impacts and they will have to breathe more co2 pollution on the way to school, in the playground and going home. Any risk assessment would show the plan endangers children and the outcome could be death. The plan is not sound as it endangers children it is not national policy to endanger children The plan is not legally compliant as it is not legal to endanger children DDC do not have to co-operate with endangering children, by shortening their lives. Could the risk assessment be made public.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The entrance to the new estate could come from Wigmore Lane. This avoids the school this will spare the children health issues later in life. Children's wellbeing should be the heart of all council decisions.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP28 - Land between Eythorne and Elvington (EYT003/EYT009/EYT012)
Rep ID	SDLP1945
Rep Status	Processed
Consultee ID	1333910
Consultee Full Name	Mr David Jones
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Eythorne and Elvington
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Dear Sir/Madam</p> <p>I am writing to object to comment on the above plan.</p> <p>I am very concerned about the amount of developments scheduled in and on the outskirts of villages, as opposed to the government's dictum that Brownfield sites should be the main focus for developments.</p> <p>I note that many of the proposals in towns are designated as medium timescale whereas many in the villages are designated short term.</p> <p>I feel that the brownfield sites in towns should be developed first then, if needed, the villages should be considered.</p> <p>As I live in Shepherdswell, naturally, I am very concerned about proposals for housing here.</p> <p>Shepherdswell is very unique in that every road into the village is narrow and we cannot see any way of improving the infrastructure except at major cost.</p> <p>The arguments by which the proposal for houses in Westcourt Lane were rejected also apply to the proposal at the end of St Andrews Gardens.</p> <p>Mill Lane narrows considerably going out of the village and there have been quite a few accidents (mainly minor so will not have been reported) and we know of at least two of our neighbors who have had quite serious collisions leading to write offs of their vehicles.</p> <p>Also, as the landowner near Mill Lane does not wish to sell, all traffic (including construction traffic) will come down St Andrews Gardens and one of the access points designated is round a hairpin bend.</p> <p>The school run time is one to avoid even now as cars are parked all the way up Mill Lane to past Millfields, all round the Green and down Church Hill. It is naïve to suppose that people will walk or cycle to school. They will not, especially when it is raining. Also, the school is oversubscribed even now with families having to take their children elsewhere (by car)</p> <p>Transport in the village is very poor and I believe more cuts are on the way. Only the smaller buses are used due to access. There can be no possibility of cycle lanes, the roads are too narrow to allow for this.</p> <p>There are very few facilities in the village. We have a Co-op which is well used but has no designated parking and at busy times cars park illegally, a beauty salon and a pub which, as we all know, is probably under pressure from the financial crisis.</p> <p>The sewage system is constantly under pressure and the system cannot be fit for purpose with foul waste appearing in gardens in Eythorne and The Glen</p>

	<p>The train station is an asset to commuters but not so much so for shoppers, especially if you live in the top of the village. Walking up steep Church Hill and Approach Road with heavy shopping bags is not an option.</p> <p>To conclude, I feel that because of the above arguments, Shepherdswell is not the place for large-scale developments, and I hope you will take this into consideration.</p> <p>I also wish to express my concern about developments at Eythorne and Elvington. Eythorne Road in Shepherdswell is very busy during the rush hour and this will only get worse.</p> <p>If builders wish to build estates, they must be prepared to improve the infrastructure at their expense.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	SAP28 - Land between Eythorne and Elvington (EYT003/EYT009/EYT012)
<p>Rep ID</p>	SDLP1949
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1334247
<p>Consultee Full Name</p>	Mrs Christina Isherwood
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	SAP28

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The road structure of Elvington and the plans to put 350 houses. No buses or trains. No medical facilities.</p> <p>The infrastructure of the roads are not good enough now, there are not enough parking places. The cars are parked on the road making most of them single lane in Elvington. Building 350 houses which will have one car or more so adding to the problem of congestion. Also heavy vehicles and machinery adding to the traffic, mud and dirt on the roads all coming by the school and Adelaide Road, which is very dangerous for the children going and coming from school.</p> <p>In Elvington we have no bus services, so you need a car to get anywhere. We have no train station to get anywhere at all.</p> <p>There are not enough places in the school here. Elvington and Shepherdswell are full up which leaves Nonington, and you need a car to get there.</p> <p>We have no doctors or medical facilities in the village at all. The nearest doctors is Shepherdswell, Aylesham or Lydden</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP28 - Land between Eythorne and Elvington (EYT003/EYT009/EYT012)
Rep ID	SDLP1749
Rep Status	Processed
Consultee ID	1273338

Consultee Full Name	Steve Skinner
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP28
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I believe this plan to be not sound and this is for the following reasons: Nowhere in your plans do you address the major concerns that myself and all the local people are asking about. Such as the road infrastructure, which is already at capacity, Doctors surgeries, where are they? Then of course the schools and shops. I am quite sure that you adhere to the law regarding planning but how can we as local people be expected to make a judgement when you are ill prepared to provide the answers to the above questions. Is the present sewage system able to cope with the additional demand of housing, I don't believe it is. Public transport including children attending the secondary schools. With the bus situation as it is, locals were expected to let the children walk to Shepherdswell station (from Elvington and Eythorne) I believe this to be very dangerous and if you knew these roads, how busy and fast the traffic is, I am sure you would agree to it being very unsafe for children or adults for that matter to walk. If 300 houses are being built, there would be a minimum of 1.5 cars per household as this is a rural area so with a few social visits this would be at least 1000 car movements per day. As far as most locals are concerned whilst the process may be legal, the actual planning is flawed in as much as you "put the cart before the horse" or so to speak. We need answers to all these questions before we can agree/comment.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	

SAP29 - Land on the south eastern side of Roman Way, Elvington (EYT008)

Local Plan Consultation Point	SAP29 - Land on the south eastern side of Roman Way, Elvington (EYT008)
Rep ID	SDLP485
Rep Status	Processed
Consultee ID	1259368
Consultee Full Name	Ms Paulette Butcher
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 28
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The plan does not take into account the impact of increased traffic through the village roads past a local school, a blind bend and roads which are already suffering from unacceptable motoring speeds.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	No further large developments in a small village with limited amenities using current roads for access.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP29 - Land on the south eastern side of Roman Way, Elvington (EYT008)
Rep ID	SDLP443
Rep Status	Processed
Consultee ID	1330320
Consultee Full Name	Richard Ledger
Consultee Company / Organisation	J.Scott, Finn's
Agent Full Name	Jane Scott
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy SAP29
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	See Box 7
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>Finn's, as Planning Agent are working with Catesby Estates, as Promoter, to bring this site forwards. The proposed allocation of site EYT008, Land to south-east of Roman Way, Elvington is supported. The land is available and in a single ownership and is deliverable in the first 5 years of the Plan. The site, at 1.65 hectares, can be accessed off Beech Drive. Secondary access for emergency vehicles, bicycles and pedestrians can be provided via Byway EE335 at the western corner of the site, which is within the same landownership and can be improved to provide access suitable for a fire appliance.</p> <p>In continuity with the larger emerging allocation reference SAP28 in Elvington/Eythorne, it is suggested that the supporting text should be amended to state that there should be no ransom strips between the site and the highway in Beech Drive to ensure the site can be brought forward swiftly.</p> <p>The site forms an indent within the established settlement boundary and due to its location, being screened along the north-western boundary with a high established tree screen along the byway and fields to the west together with established housing to the south and east, the site benefits from good screening and enclosure.</p> <p>There is opportunity to provide a new hedged boundary along the north-eastern edge which will provide a biodiversity net gain through the provision of an additional habitat corridor to provide an improved link with the foliage and boundary treatment to the north of Ash Grove and linkage with the western boundary of the former colliery land to the east which is proposed to be allocated for employment use.</p>

	<p>The site can deliver up to 50 dwellings and playspace in accordance with the policy requirements which delivers a suitable density of development which reflects the local character and form. The site is located within easy walking distance of the community centre and sport facilities on Sweetbriar Lane to the south and other local services and facilities. The requirement for funding support for nearby community/leisure facilities is recognised and accepted as the increase in residential units is likely to result in greater use of local facilities and therefore It is considered a sustainable extension to housing provision in Elvington. It is requested that the site be allocated for residential development for 50 units.</p> <p>In terms of the proposed trajectory for delivery within Appendix Di, this has been listed as being built out between 2031-2035. This is incorrect. The site is available in single ownership with the main access from Dover District Council controlled land and a promoter on board and is expected to be built out within the first 5 years of the plan. The trajectory should therefore be amended to reflect this.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	To fully explain the benefits of the site and confirm deliverability within the first 5 years of the Plan
Include files	AI05a - SAP 29 Concept Plan.pdf
Local Plan Consultation Point	SAP29 - Land on the south eastern side of Roman Way, Elvington (EYT008)
Rep ID	SDLP486
Rep Status	Processed
Consultee ID	1331589
Consultee Full Name	Ms Joanne Pannell
Consultee Company / Organisation	Eythorne Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Eythorne Parish Council's attached representation relates to Strategic Policy SAP29 on page 170.
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The unsoundness of the Plan is as set out in the attached representation by the Parish Council in relation to SAP28 and SAP29.</p> <p>DDC Edit: Detailed representation with analysis, photographs and table attached. Comment summary reproduced below.</p> <p>3.6 Concluding Summary</p>

	<p>3.6.1 In consideration of the above and other representations made by the Parish Council during the Regulation 18 consultation, Eythorne Parish Council strongly objects to the District Council's Regulation 19 submission containing the future development of local plan areas SAP28 and SAP29 on the following grounds and therefore calls for the Planning Inspectorate to remove both areas from the approved local plan document:</p> <ul style="list-style-type: none"> a) the development areas contradict the District Council's intentions to promote sustainable growth b) the development areas, without good reason, contravenes the District Council's policy and NPPF objectives of achieving sustainable development and protecting the open countryside c) the development areas are wholly outside the existing settlement confines and will erode valuable open countryside without any overwhelming reason or justification d) the consequence of the local plan proposals in respect of SAP28 and SAP29 conflicts with the Governments food strategy as it removes existing productive agri-land and weakens our national food security position e) the development areas will place significant demand on services which are already oversubscribed or unavailable to the existing community f) there are no local employment opportunities to sustain any further demand for jobs g) the existing local highway network features many hazards and sub-standard geometric elements which will develop into a greater compromise on highway safety given the substantial increase in traffic movements generated h) parts of the existing local highway network already suffer from excessive vehicle speeds and as such this problem will be significantly exacerbated by the substantial increase in traffic movements generated i) the existing highway network characteristics of on street parking and additional traffic calming will promote greater traffic conflict and the potential for driver rage, as a result of the higher incidence of conflict from the additional traffic generated j) the local plan suggestion of traffic calming to roads not currently traffic calmed is suggested without foundation as the following criteria, applicable to any proposed traffic calming scheme, has not been proven: i) to contribute to casualty reduction ii) to reduce excessive speeding iii) to improve environment and quality of life issues k) the existing local highway infrastructure simply cannot sustain a 53% increase in traffic whilst avoiding the unacceptable consequent dangers to the travelling public as a result l) given the absence of any sustainably recognised transport facilities in and around Eythorne and Elvington none of the proposed development areas can meet the local plan aspirations of sustainable development or sustainable transport being realised
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Eythorne Parish Council suggests SAP29 is removed from the Dover Local Plan for the reasons given in the attached representation.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>EPC Reg 19 Submission FINAL.pdf (1)</p>

Local Plan Consultation Point	SAP29 - Land on the south eastern side of Roman Way, Elvington (EYT008)
Rep ID	SDLP917
Rep Status	Processed
Consultee ID	1331862
Consultee Full Name	Sindy Denyer
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Section 1. Category Infrastructure Delivery Plan Reference: Infrastructure Delivery Plan – Draft for Consultation October 2022 PART 1: Physical Infrastructure Theme 1: Transport SP12 - Strategic Transport Infrastructure- Local Road Network 3.39 As part of the Local Plan modelling work, the impacts of Local Plan growth on the Local Highway Network were assessed however site specific mitigation and policies need to be considered . The plan must address the adequacy of the Coxhill, Eythorne Road, Shepherdsweil Roads, local road network and public transport services supporting the proposed SAP 36,37, 28, 29 and 30 developments.
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The draft local plan regulation 19 states under TI2 - Transport Statements, Assessments and Travel Plans section 10.7 the objective to ensure that traffic generated from new development can be accommodated on the highway network to promote the delivery of sustainable development. Section 10.8 states that traffic generated by development should normally be targeted towards the primary and secondary route network in the District. However other routes should not be subject to inappropriate levels of traffic generation or unsuitable traffic movements.</p> <p>In the event SAP 36,37, 28, 29 and 30 developments are implemented the Coxhill, Eythorne Road, Shepherdsweil Roads will be the main route by car from Shepherdsweil, Eythorne and Elvington to the A2 road network, we believe this will place significant pressure on local road traffic which needs to be addressed however there is no material consideration to implementing road improvements and assign funding in either the Dover Local Plan or SP12.</p> <p>Access to Shepherdsweil , Eythorne and Elvington from the A2 involves narrow single track road with passing place. Access at the top end of Shepherdsweil village via Mill Lane connects to the lower end of the Shepherdsweil Road restricted by road width, parked vehicles, speed humps and traffic. All access roads currently suffer from significant traffic congestion during peak commuter periods.</p> <p>Shepherdsweil has limited parking facilities around the village hall and local shop and heavy reliance on road parking further limits the width of Coxhill to single file traffic. Traffic bound for the Eythorne industrial estates includes a significant flow of large articulated lorries that regularly lead to partial/ temporary road blockages and significant road congestion.</p> <p>The Local Plan SP12 - Strategic Transport Infrastructure focusses on improvements to the A2 highway network and key junctions only and decisions around improvements to the local road network are deferred. Regulation 19 Transport Modelling Forecasting Report, forecasts that traffic leading from the A2 through Coxhill, Shepherdsweil and Eythorne, is projected to grow at 15-19% as a minimum scenario, our independent assessment based independent analysis of development proposals is this will be nearer 60%.</p>

	<p>Analysis of Coxhill peak traffic flow conducted by Shepherdswell Speedwatch (in collaboration with the Metropolitan Police) in June and July 2022 recorded traffic flow of circa 550 vehicles per hour.</p> <p>The Draft Local Plan Regulation 19 states that approved development must account for the cumulative impact of all developments allocated in the Plan on common road links. SAP 36,37, 28, 29 and 30 proposed developments will add 425 houses to the local area served by the A256 with residents needing to commute regularly to work, schools etc. during peak commuting periods. Shepherdswell has circa 700 houses so combined with the proposed plan increase of 425 houses in Shepherdswell, Eythorne and Elvington, this represents a 60% increase in property numbers which we project will be mirrored by an equivalent increase in road traffic. An increase of 60% on current commuter peak traffic flow translates to circa 590 vehicles per hour or 10 vehicles per minute along largely single-track road with road speed impacted by slow moving heavy goods traffic.</p> <p>Compounding significant road congestion there is a lack of pedestrian footways in Shepherdswell leading to key routes i.e. school, local shop, health centre and village hall, peak footfall along pavement less roads occurs when traffic flow is at its highest presenting a significant road safety concern.</p> <p>There are specific road access concerns relating to St Andrews Gardens (SAP 36 SHE004) a development of 57 houses served by one road access and exit point. The Local Plan Reg 19 proposes to increase the number of properties by 50 on this estate effectively doubling its size without addressing & mitigating emergency access and road safety design.</p> <p>KCC's Kent Design, Creating the design, Step 3- Design recommends that minor access roads generally serving up to 100 dwellings, including those in other residential areas which feed on to it should either be a through road or, if a cul-de-sac, serve no more than 50 dwellings unless an alternative access route, to serve motorists, pedestrian and cyclists, can be provided. Previous development surveys of SHE004 access points used the Housing and Economic Land Availability Assessment traffic light system which rated this site as Amber with an assessment proviso that "secondary emergency access is required however this does not appear achievable".</p> <p>St Andrews Gardens access road links into Mill Lane which is restricted at points to single track road with passing places. Mill Lane is heavily used constituting one of the main access routes to the Shepherdswell Health Centre, School and Church.</p> <p>The Draft Local Plan Regulation 19 states under section E1 that for designated industrial settlements new employment development will be supported within existing employment sites as identified on the Policies Map or on land within or immediately adjoining the settlement confines of designated settlements. While employment for villagers is essential it should be considered without a viable public transportation network such development will further challenge the stressed A256 local road network.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The Draft Local Plan Regulation 19 must propose improvements that address the adequacy of the A256 and local road network and public transport services supporting the proposed SAP 36,37, 28, 29 and 30 developments and ensure funding for these needs is addressed in the final plan.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	

Include files	
Local Plan Consultation Point	SAP29 - Land on the south eastern side of Roman Way, Elvington (EYT008)
Rep ID	SDLP1582
Rep Status	Processed
Consultee ID	1252218
Consultee Full Name	Cllr Linda Keen
Consultee Company / Organisation	DDC WARD - Aylesham, Eythorne and Shepherdswell
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP29
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>As a Dover District Cllr (Linda Keen) for this ward, I fully support the views of Eythorne (Parish Council, as summarised briefly below.</p> <ol style="list-style-type: none"> Both SAP28 and SAP29 areas are currently open countryside and consequently would be classed as greenfield development. Brownfield sites should be used instead - a brownfield land stock of some 174 hectares already exists within the Dover district which would support some 5000 new homes. The expansion of the built up areas proposed by SAP28 and SAP29 are both outside of the Settlement Confines defined and reviewed in 2021. The large scale development in respect of SAP28 and SAP29 are located wholly outside the settlement confines and consequently contradict the expressed will of DDC to protect open countryside. The current local amenities listed in the local plan are wrong in a number of respects as clearly shown in the Parish Council's table. Moreover, the Plan does not identify the services and facilities which do not exist nor are available in close proximity, and thus ignores the negative outcome on the sustainability, and indeed suitability, of SAP28 and SAP29. There is no GP surgery, no conveniently located secondary education or higher education, no nearby supermarket outlet and no public transport. Consequently, the major services required by families e.g. education, health and food shopping, and in particular those of any new developments, all will need to be accessed using non sustainable forms of transport. There are no local employment opportunities to sustain any further demand for jobs. The limited Developer Contributions which would be requested cannot overcome these deficiencies – they cannot be used, for example, to fund ongoing bus services which are outside the control of Dover Council, and which are provided by Kent Council and privatised bus companies which are completely outside the control of Dover Council. The extra houses will also place significant demand on services which are already oversubscribed or unavailable to the existing community. The existing local highway network features many hazards and sub-standard features which will develop into a greater compromise on highway safety given the substantial increase in traffic volumes generated by the extra houses. Especially with regard to the main road between

	<p>the Sandwich/DoverRd and the A2 (heavily used as a rat run between these two roads), there will be significant adverse effects on the already heavily congested and dangerous Cox hill crossroads by the Co-op and Coxhill road running through Shepherdswell. This road is already totally inadequate for current traffic volumes and will simply get worse. Nothing can be done about this, unless you build a by-pass, for which funding will simply never be available.</p> <p>The Parish Council shows clearly in detail, that various possible traffic calming measures will not alleviate these and other problems such as on-street car parking. It is impossible to resolve the problems to road safety and traffic flows by tinkering with a few junction layouts and traffic calming measures, as these rural roads are simply too narrow and bendy to cope already – and there is no cash proposed for any widening of them – which would not be possible in most cases anyway.</p> <p>Moreover, given the absence of any sustainably recognised public transport facilities in and around Eythorne and Elvington none of the proposed development areas can meet the local plan aspirations of sustainable development or sustainable transport.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>No more than a very small number of houses should be built in Eythorne/Elvington because of the insoluble problems outlined in Box 6 – especially the inadequate road infrastructure – of at the most, say, 50 new houses.</p> <p>No new houses should be built anywhere in the Dover/rural area until the A2 is dualized and a proper bridge or underpass constructed to relieve the already very congested Whitfield roundabout – for which no funds are currently available, nor likely to be in the foreseeable futures.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	No
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	SAP29 - Land on the south eastern side of Roman Way, Elvington (EYT008)
<p>Rep ID</p>	SDLP1493
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1267957
<p>Consultee Full Name</p>	Mrs Annette Whitehead
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	SAP29

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Regulation 19 Consultation Response on SAP28 & SAP29:</p> <p>I strongly oppose the proposals for development of the above sites for the following reasons :-</p> <p>The sites are areas of open countryside which should be protected. The agricultural land must be retained for food production & any housing development should be limited to existing brownfield sites.</p> <p>These sites are outside of the settlement confines.</p> <p>There are no existing medical facilities in Eythorne or Elvington and Kent & Medway NHS Trust recently commented on a nearby planning application for 39 houses that there is no capacity at any GP surgery in the area for new patients and that they objected to the application. The suggestion that the same Trust could provide care for the residents of over 300 houses is therefore ludicrous.</p> <p>The very limited bus services are unlikely to continue beyond the end of the current academic year. Pupils will be unable to travel to any secondary school by public transport & residents have already had to give up their employment as they had relied on public transport. To suggest that hundreds of people would want to live in an area with no public transport, limited employment opportunities, no school places or medical facilities is seriously underestimating the needs of local families.</p> <p>The existing road infrastructure is already unsuitable. The access route to the proposed sites includes a single carriageway road with a passing place. Any increase in traffic, including construction traffic would only exacerbate the current, unacceptable situation.</p> <p>Southern Water have already written to local residents asking them to reduce their water consumption as the aquifers are very low on capacity and are drying up. Any additional housing & the amount of water required during any construction stage would have a detrimental effect on the availability of water in the future.</p> <p>Kindest Regards Annette Whitehead</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	SDLP1492 Whitehead Att1.pdf
Local Plan Consultation Point	SAP29 - Land on the south eastern side of Roman Way, Elvington (EYT008)
Rep ID	SDLP1495
Rep Status	Processed
Consultee ID	1272945
Consultee Full Name	Malcolm Whitehead
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP29
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I object to SAP 28 and SAP 29 being included in the DDC local plan for the following reasons:- As prime agricultural land these sites should never be built on. The sites are outside the settlement confines. The topography of the area means that local roads flood which then extends into adjacent fields. The infrastructure is not suitable now for the amount of local traffic. Raw sewage is frequently discharged onto these fields. The water supply from the acquirers is limited. There is no capacity for new patients at any local GP surgery. There is no public transport. Submitted by Malcolm Whitehead
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	SDLP1494 Whitehead Att1.pdf
Local Plan Consultation Point	SAP29 - Land on the south eastern side of Roman Way, Elvington (EYT008)
Rep ID	SDLP1224
Rep Status	Processed
Consultee ID	1331627
Consultee Full Name	Mr Michael Godfrey
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP29
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	As a resident of Eythorne, I must voice my complaint to the proposed Plan for housing on the Eythorne and Elvington site. As SAP28 and SAP29. I write with concern about the local plan development within our two small village areas. The two villages, Elvington/ Eythorne has an estimated population of around 2,500 to 3,000 people depending on what source you get your figures from. Your proposed development is in excess of 350 houses to be built, 300 in one area and 50 in another. These residents will be capable of housing 700 to 1000 people. This ratio can easily be seen to overwhelm the little facilities that are in the area. There are about 6 lock up type shops, a small infant school that cannot expand its facilities, a bus route that the local council have reduced its service to non existence. The roads are already causing concern to ALL residents and the Parish Council. I cannot see how this LOCAL PLAN can be allowed to exist as it stands, the area cannot take the increase in population

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP29 - Land on the south eastern side of Roman Way, Elvington (EYT008)
Rep ID	SDLP1389
Rep Status	Processed
Consultee ID	1332965
Consultee Full Name	Miss Yazmin Godfrey
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP28
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>I am writing to object to the following housing development applications - 50 houses to the east of Roman Way, and the development of a further 300 between Eythorne and Elvington which I believe are referenced as SAP 28&29. Given the fact that the existing infrastructure barely supports the number of houses already in this area, I was shocked to hear the proposal of a further 350+ houses being built. The roadways in to, out of, and around the estate are constantly congested with huge volumes of parked cars lining both sides of the road. The junction between Adelaide Road, Roman Way, Tye Wood and Kelk Hill and the bend between Roman Way and Sweetbriar Lane have near-miss incidents multiple times a day, especially in late summer when the hedges overgrow and make them entirely blind bends. Further to this, the area between Adelaide Road and Church Hill is also often impassable, especially with the volumes of traffic caused by the primary school, which has no parking facility of its own, and Woodpecker Court's facility. Wigmore Lane is equally troublesome with the commuting traffic and Tilmanstone Salads lorries passing through essentially single-track roads given the volume of cars lining the streets at all times. Adding a further 300-700+ cars to the area would be an utter catastrophe, especially given the public transport routes have all been closed. It is my understanding that the primary school is already at capacity and there are no other primary or secondary schools within a reasonable distance, again given the lack of public transport. Even when public transport did exist, the number of buses passing through each day was so minimal that it could not replace people's needs for cars, so reinstating these would now only add to the traffic problem. There is one small convenience store in Elvington and one in Eythorne, again with no parking facilities, with the next larger store being miles up the road in Shepherdswell - again with no parking facilities and in a village with a congestion problem of its own given it's the main pass-through route from the A2. This is also where the closest doctor's surgery is. I am sure there are many more suitable locations for such a development near already established towns and cities rather than imposing it on villages already ill-equipped to deal with existing residents. All residents in the area are very concerned about this proposal and are all utterly opposed to it. I trust our voices will be heard.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>I am sure there are many more suitable locations for such a development near already established towns and cities rather than imposing it on villages already ill-equipped to deal with existing residents.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP29 - Land on the south eastern side of Roman Way, Elvington (EYT008)</p>
<p>Rep ID</p>	<p>SDLP1230</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1332965</p>
<p>Consultee Full Name</p>	<p>Miss Yazmin Godfrey</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	

Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP29
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I am writing to object to the following housing development applications - 50 houses to the east of Roman Way, and the development of a further 300 between Eythorne and Elvington which I believe are referenced as SAP 28&29. Given the fact that the existing infrastructure barely supports the number of houses already in this area, I was shocked to hear the proposal of a further 350+ houses being built. The roadways in to, out of, and around the estate are constantly congested with huge volumes of parked cars lining both sides of the road. The junction between Adelaide Road, Roman Way, Tye Wood and Kelk Hill and the bend between Roman Way and Sweetbriar Lane have near-miss incidents multiple times a day, especially in late summer when the hedges overgrow and make them entirely blind bends. Further to this, the area between Adelaide Road and Church Hill is also often impassable, especially with the volumes of traffic caused by the primary school, which has no parking facility of its own, and Woodpecker Court's facility. Wigmore Lane is equally troublesome with the commuting traffic and Tilmanstone Salads lorries passing through essentially single-track roads given the volume of cars lining the streets at all times. Adding a further 300-700+ cars to the area would be an utter catastrophe, especially given the public transport routes have all been closed. It is my understanding that the primary school is already at capacity and there are no other primary or secondary schools within a reasonable distance, again given the lack of public transport. Even when public transport did exist, the number of buses passing through each day was so minimal that it could not replace people's needs for cars, so reinstating these would now only add to the traffic problem. There is one small convenience store in Elvington and one in Eythorne, again with no parking facilities, with the next larger store being miles up the road in Shepherdswell - again with no parking facilities and in a village with a congestion problem of its own given it's the main pass-through route from the A2. This is also where the closest doctor's surgery is. I am sure there are many more suitable locations for such a development near already established towns and cities rather than imposing it on villages already ill-equipped to deal with existing residents. All residents in the area are very concerned about this proposal and are all utterly opposed to it. I trust our voices will be heard.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	I am sure there are many more suitable locations for such a development near already established towns and cities rather than imposing it on villages already ill-equipped to deal with existing residents.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP29 - Land on the south eastern side of Roman Way, Elvington (EYT008)
Rep ID	SDLP1946
Rep Status	Processed
Consultee ID	1333910
Consultee Full Name	Mr David Jones
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Eythorne and Elvington
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Dear Sir/Madam I am writing to object to comment on the above plan. I am very concerned about the amount of developments scheduled in and on the outskirts of villages, as opposed to the government's dictum that Brownfield sites should be the main focus for developments. I note that many of the proposals in towns are designated as medium timescale whereas many in the villages are designated short term. I feel that the brownfield sites in towns should be developed first then, if needed, the villages should be considered. As I live in Shepherdswell, naturally, I am very concerned about proposals for housing here. Shepherdswell is very unique in that every road into the village is narrow and we cannot see any way of improving the infrastructure except at major cost. The arguments by which the proposal for houses in Westcourt Lane were rejected also apply to the proposal at the end of St Andrews Gardens.

Mill Lane narrows considerably going out of the village and there have been quite a few accidents (mainly minor so will not have been reported) and we know of at least two of our neighbors who have had quite serious collisions leading to write offs of their vehicles.

Also, as the landowner near Mill Lane does not wish to sell, all traffic (including construction traffic) will come down St Andrews Gardens and one of the access points designated is round a hairpin bend.

The school run time is one to avoid even now as cars are parked all the way up Mill Lane to past Millfields, all round the Green and down Church Hill. It is naïve to suppose that people will walk or cycle to school. They will not, especially when it is raining. Also, the school is oversubscribed even now with families having to take their children elsewhere (by car)

Transport in the village is very poor and I believe more cuts are on the way. Only the smaller buses are used due to access. There can be no possibility of cycle lanes, the roads are too narrow to allow for this.

There are very few facilities in the village. We have a Co-op which is well used but has no designated parking and at busy times cars park illegally, a beauty salon and a pub which, as we all know, is probably under pressure from the financial crisis.

The sewage system is constantly under pressure and the system cannot be fit for purpose with foul waste appearing in gardens in Eythorne and The Glen

The train station is an asset to commuters but not so much so for shoppers, especially if you live in the top of the village. Walking up steep Church Hill and Approach Road with heavy shopping bags is not an option.

To conclude, I feel that because of the above arguments, Shepherdswell is not the place for large-scale developments, and I hope you will take this into consideration.

I also wish to express my concern about developments at Eythorne and Elvington. Eythorne Road in Shepherdswell is very busy during the rush hour and this will only get worse.

If builders wish to build estates, they must be prepared to improve the infrastructure at their expense.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

SAP30 - Chapel Hill, Eythorne (TC4S039)

Local Plan Consultation Point	SAP30 - Chapel Hill, Eythorne (TC4S039)
Rep ID	SDLP744
Rep Status	Processed
Consultee ID	1331855
Consultee Full Name	Levi Goodey
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP30(TC4S039) page 171
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Specific to TC4S039 (the area off Chapel Hill Eythorne) the area does not appear to have been fully appraised. this area is already used for majority of parking and garage spaces. There is also limited access via an approx 8 foot wide concrete access between the adjacent houses. This also provides the only access for the 2 bungalows located behind the crescent. The worry is that any major building works with the associated ground works would cause major disruption given the amount of heavy plant vehicles that would require access. There is also the worry of the rear gardens of the crescent being overlooked with new dwellings. There is also worry as to how utilities would be provided given the aforementioned concrete pathway and hardstanding. There is also concern that from the councils initial scoping of the area on document appendix-2c-tc4s-sites-landscape-assessment.pdf highlights this area as a yellow and notes "development of this site would have and impact on the landscape and further assessment is required to demonstrate whether this can be mitigated". Why was this site chosen over more suitable areas?
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Scrapping site TC4S039 and re-exploring more suitable sites

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	to have an open conversation to allow opposing viewpoints to be fairly explored
Include files	appendix-2c-tc4s-housing-sites-landscape-assessment.pdf
Local Plan Consultation Point	SAP30 - Chapel Hill, Eythorne (TC4S039)
Rep ID	SDLP918
Rep Status	Processed
Consultee ID	1331862
Consultee Full Name	Sindy Denyer
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Section 1. Category Infrastructure Delivery Plan Reference: Infrastructure Delivery Plan – Draft for Consultation October 2022 PART 1: Physical Infrastructure Theme 1: Transport SP12 - Strategic Transport Infrastructure- Local Road Network 3.39 As part of the Local Plan modelling work, the impacts of Local Plan growth on the Local Highway Network were assessed however site specific mitigation and policies need to be considered . The plan must address the adequacy of the Coxhill, Eythorne Road, Shepherdswell Roads, local road network and public transport services supporting the proposed SAP 36,37, 28, 29 and 30 developments.
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The draft local plan regulation 19 states under TI2 - Transport Statements, Assessments and Travel Plans section 10.7 the objective to ensure that traffic generated from new development can be accommodated on the highway network to promote the delivery of sustainable development. Section 10.8 states that traffic generated by development should normally be targeted towards the primary and secondary route network in the District. However other routes should not be subject to inappropriate levels of traffic generation or unsuitable traffic movements.</p> <p>In the event SAP 36,37, 28, 29 and 30 developments are implemented the Coxhill, Eythorne Road, Shepherdswell Roads will be the main route by car from Shepherdswell, Eythorne and Elvington to the A2 road network, we believe this will place significant pressure on local road traffic which needs to be addressed however there is no material consideration to implementing road improvements and assign funding in either the Dover Local Plan or SP12.</p> <p>Access to Shepherdswell , Eythorne and Elvington from the A2 involves narrow single track road with passing place. Access at the top end of Shepherdswell village via Mill Lane connects to the lower end of the Shepherdswell Road restricted by road width, parked vehicles, speed humps and traffic. All access roads currently suffer from significant traffic congestion during peak commuter periods.</p>

Shepherdswell has limited parking facilities around the village hall and local shop and heavy reliance on road parking further limits the width of Coxhill to single file traffic. Traffic bound for the Eythorne industrial estates includes a significant flow of large articulated lorries that regularly lead to partial/ temporary road blockages and significant road congestion.

The Local Plan SP12 - Strategic Transport Infrastructure focusses on improvements to the A2 highway network and key junctions only and decisions around improvements to the local road network are deferred. Regulation 19 Transport Modelling Forecasting Report, forecasts that traffic leading from the A2 through Coxhill, Shepherdswell and Eythorne, is projected to grow at 15-19% as a minimum scenario, our independent assessment based independent analysis of development proposals is this will be nearer 60%.

Analysis of Coxhill peak traffic flow conducted by Shepherdswell Speedwatch (in collaboration with the Metropolitan Police) in June and July 2022 recorded traffic flow of circa 550 vehicles per hour.

The Draft Local Plan Regulation 19 states that approved development must account for the cumulative impact of all developments allocated in the Plan on common road links. SAP 36,37, 28, 29 and 30 proposed developments will add 425 houses to the local area served by the A256 with residents needing to commute regularly to work, schools etc. during peak commuting periods. Shepherdswell has circa 700 houses so combined with the proposed plan increase of 425 houses in Shepherdswell, Eythorne and Elvington, this represents a 60% increase in property numbers which we project will be mirrored by an equivalent increase in road traffic. An increase of 60% on current commuter peak traffic flow translates to circa 590 vehicles per hour or 10 vehicles per minute along largely single-track road with road speed impacted by slow moving heavy goods traffic.

Compounding significant road congestion there is a lack of pedestrian footways in Shepherdswell leading to key routes i.e. school, local shop, health centre and village hall, peak footfall along pavement less roads occurs when traffic flow is at its highest presenting a significant road safety concern.

There are specific road access concerns relating to St Andrews Gardens (SAP 36 SHE004) a development of 57 houses served by one road access and exit point. The Local Plan Reg 19 proposes to increase the number of properties by 50 on this estate effectively doubling its size without addressing & mitigating emergency access and road safety design.

KCC's Kent Design, Creating the design, Step 3- Design recommends that minor access roads generally serving up to 100 dwellings, including those in other residential areas which feed on to it should either be a through road or, if a cul-de-sac, serve no more than 50 dwellings unless an alternative access route, to serve motorists, pedestrian and cyclists, can be provided. Previous development surveys of SHE004 access points used the Housing and Economic Land Availability Assessment traffic light system which rated this site as Amber with an assessment proviso that "secondary emergency access is required however this does not appear achievable".

St Andrews Gardens access road links into Mill Lane which is restricted at points to single track road with passing places. Mill Lane is heavily used constituting one of the main access routes to the Shepherdswell Health Centre, School and Church.

The Draft Local Plan Regulation 19 states under section E1 that for designated industrial settlements new employment development will be supported within existing employment sites as identified on the Policies Map or on land within or immediately adjoining the settlement confines of designated settlements. While employment for villagers is essential it should be considered without a viable public transportation network such development will further challenge the stressed A256 local road network.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful

The Draft Local Plan Regulation 19 must propose improvements that address the adequacy of the A256 and local road network and public transport services supporting the proposed SAP 36,37, 28, 29 and 30 developments and ensure funding for these needs is addressed in the final plan.

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP30 - Chapel Hill, Eythorne (TC4S039)
Rep ID	SDLP1584
Rep Status	Processed
Consultee ID	1252218
Consultee Full Name	Cllr Linda Keen
Consultee Company / Organisation	DDC WARD - Aylesham, Eythorne and Shepherdswell
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP30
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	As a Dover District Cllr (Linda Keen) for this ward, I fully support the views of Eythorne Parish Council, as summarised briefly below. 1. Both SAP28 and SAP29 areas are currently open countryside and consequently would be classed as greenfield development. Brownfield sites should be used instead - a brownfield land stock of some 174 hectares already exists within the Dover district which would support some 5000 new homes. 2. The expansion of the built up areas proposed by SAP28 and SAP29 are both outside of the Settlement Confines defined and reviewed in 2021. The large scale development in respect of SAP28 and SAP29 are located wholly outside the settlement confines and consequently contradict the expressed will of DDC to protect open countryside.

	<p>3. The current local amenities listed in the local plan are wrong in a number of respects as clearly shown in the Parish Council's table. Moreover, the Plan does not identify the services and facilities which do not exist nor are available in close proximity, and thus ignores the negative outcome on the sustainability, and indeed suitability, of SAP28 and SAP29. There is no GP surgery, no conveniently located secondary education or higher education, no nearby supermarket outlet and no public transport. Consequently, the major services required by families e.g. education, health and food shopping, and in particular those of any new developments, all will need to be accessed using non sustainable forms of transport. There are no local employment opportunities to sustain any further demand for jobs. The limited Developer Contributions which would be requested cannot overcome these deficiencies – they cannot be used, for example, to fund ongoing bus services which are outside the control of Dover Council, and which are provided by Kent Council and privatised bus companies which are completely outside the control of Dover Council. The extra houses will also place significant demand on services which are already oversubscribed or unavailable to the existing community.</p> <p>4. The existing local highway network features many hazards and sub-standard features which will develop into a greater compromise on highway safety given the substantial increase in traffic volumes generated by the extra houses. Especially with regard to the main road between the Sandwich/DoverRd and the A2 (heavily used as a rat run between these two roads), there will be significant adverse effects on the already heavily congested and dangerous Cox hill crossroads by the Co-op and Coxhill road running through Shepherdswell. This road is already totally inadequate for current traffic volumes and will simply get worse. Nothing can be done about this, unless you build a by-pass, for which funding will simply never be available.</p> <p>The Parish Council shows clearly in detail, that various possible traffic calming measures will not alleviate these and other problems such as on-street car parking. It is impossible to resolve the problems to road safety and traffic flows by tinkering with a few junction layouts and traffic calming measures, as these rural roads are simply too narrow and bendy to cope already – and there is no cash proposed for any widening of them – which would not be possible in most cases anyway.</p> <p>Moreover, given the absence of any sustainably recognised public transport facilities in and around Eythorne and Elvington none of the proposed development areas can meet the local plan aspirations of sustainable development or sustainable transport.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>No more than a very small number of houses should be built in Eythorne/Elvington because of the insoluble problems outlined in Box 6 – especially the inadequate road infrastructure – of at the most, say, 50 new houses.</p> <p>No new houses should be built anywhere in the Dover/rural area until the A2 is dualized and a proper bridge or underpass constructed to relieve the already very congested Whitfield roundabout – for which no funds are currently available, nor likely to be in the foreseeable futures.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP30 - Chapel Hill, Eythorne (TC4S039)</p>
<p>Rep ID</p>	<p>SDLP1534</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1252520</p>

Consultee Full Name	Rachel Collins Housing Development Manager
Consultee Company / Organisation	Dover District Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP30
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	All the sites above are Council owned sites. The intention is for these to be appraised, and if appropriate, brought forward for affordable housing within the next 5 years.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP30 - Chapel Hill, Eythorne (TC4S039)
Rep ID	SDLP1281
Rep Status	Processed
Consultee ID	1331775

Consultee Full Name	Miss Linda Burton
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP30
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Sap 30 tc4so39 objection I park my car in a garage daily as there is no parking up my road.the road access to the crescent is very narrow enough for one car only with a blind bend going down with no scope to make the road any wider.No dustcart can drive down or any other emergency vehicles or any land to make a pedestrian path.The properties in the crescent rely on the parking Outside there fences as there is no where to park.the new houses would over look the existing bungalows and houses.where will the cars park for these houses as it could be at least another minimum of 10 cars.a very poor site to build houses.will you be knocking down the trees currently on the site.if it does go ahead how on earth will any materials lorries get to the site as it is in consent use and access can not be blocked for the current residents.there is No other access to this site.will you be paying for the removal of all the garages and what notice will you give or will you be providing an alternative parking / garage space for me.the access out of the crescent is vey dangerous as cars park either side of the junction limiting the views onto the main road as it is the main route through the village.I don't expect these houses will be affordable to any local person and bungalows are most needed for the elderly.why would anyone want to move to Eythorne /elvington now that the stagecoach has removed the bus service not everyone drives.Hope that the plans do not go ahead as very unsuitable area to proceed
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP30 - Chapel Hill, Eythorne (TC4S039)
Rep ID	SDLP1241
Rep Status	Processed
Consultee ID	1332975
Consultee Full Name	Ms Sarah Bates
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP30
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Re housing; These numbers of houses should not be built on agricultural land and the transport issues involved with the various and roads etc make it especially unviable due to congestion and environmental concerns. The villages are small and there is little in the way of shops and other facilities. Car-use would be high – and a big increase on currently. Has the relative value of the land concerned been assessed in terms of value through agriculture and carbon capture versus covering with concrete.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP30 - Chapel Hill, Eythorne (TC4S039)
Rep ID	SDLP1968
Rep Status	Processed
Consultee ID	1334301
Consultee Full Name	Mr Michael Spain
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP30
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	With reference to the proposed allocation of land behind the crescent at Chapel Hall, Eythorne. It seems to be a thoroughly bad idea to build a further five houses on a development plot which has such a narrow access. Local vehicles already park in the access road and what will probably happen is that the Council will paint double yellow lines and force vehicles to park on Chapel Hill. But where will people park as the hill is already virtually at full capacity with vehicles parked from the roundabout right down to the Chapel. Any development in this area will increase the bottleneck at the top of Chapel Hill.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant	

and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP30 - Chapel Hill, Eythorne (TC4S039)
Rep ID	SDLP1947
Rep Status	Processed
Consultee ID	1333910
Consultee Full Name	Mr David Jones
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Eythorne and Elvington
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	Dear Sir/Madam

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

I am writing to object to comment on the above plan.

I am very concerned about the amount of developments scheduled in and on the outskirts of villages, as opposed to the government's dictum that Brownfield sites should be the main focus for developments.

I note that many of the proposals in towns are designated as medium timescale whereas many in the villages are designated short term.

I feel that the brownfield sites in towns should be developed first then, if needed, the villages should be considered.

As I live in Shepherdswell, naturally, I am very concerned about proposals for housing here.

Shepherdswell is very unique in that every road into the village is narrow and we cannot see any way of improving the infrastructure except at major cost.

The arguments by which the proposal for houses in Westcourt Lane were rejected also apply to the proposal at the end of St Andrews Gardens. Mill Lane narrows considerably going out of the village and there have been quite a few accidents (mainly minor so will not have been reported) and we know of at least two of our neighbors who have had quite serious collisions leading to write offs of their vehicles.

Also, as the landowner near Mill Lane does not wish to sell, all traffic (including construction traffic) will come down St Andrews Gardens and one of the access points designated is round a hairpin bend.

The school run time is one to avoid even now as cars are parked all the way up Mill Lane to past Millfields, all round the Green and down Church Hill. It is naïve to suppose that people will walk or cycle to school. They will not, especially when it is raining. Also, the school is oversubscribed even now with families having to take their children elsewhere (by car)

Transport in the village is very poor and I believe more cuts are on the way. Only the smaller buses are used due to access. There can be no possibility of cycle lanes, the roads are too narrow to allow for this.

There are very few facilities in the village. We have a Co-op which is well used but has no designated parking and at busy times cars park illegally, a beauty salon and a pub which, as we all know, is probably under pressure from the financial crisis.

The sewage system is constantly under pressure and the system cannot be fit for purpose with foul waste appearing in gardens in Eythorne and The Glen

The train station is an asset to commuters but not so much so for shoppers, especially if you live in the top of the village. Walking up steep Church Hill and Approach Road with heavy shopping bags is not an option.

To conclude, I feel that because of the above arguments, Shepherdswell is not the place for large-scale developments, and I hope you will take this into consideration.

I also wish to express my concern about developments at Eythorne and Elvington. Eythorne Road in Shepherdswell is very busy during the rush hour and this will only get worse.

If builders wish to build estates, they must be prepared to improve the infrastructure at their expense.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Eastry

Local Plan Consultation Point	Eastry
Rep ID	SDLP854
Rep Status	Processed
Consultee ID	1331137
Consultee Full Name	Mr Hugh OBrien
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	4.228 "The following site allocations are proposed in Eastry"
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I believe the additional site options at Statenborough House should be factored into the local plan to make it sound. The site has had previous structures and still contains extensive evidence of use and contamination from prior buildings in the ground that is consistent with the categorisation of a brownfield site. Addition of the site noted in the attached document also has the potential to elevate the environmental conditions for local flora and fauna at the site. As a footnote I personally think the local plan is otherwise good.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The addition of the site at Statenborough House to section (4.228) of this document (the DDC Local plan). The details of the site are in the attached document for consideration.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	To allow the Inspector / Examiner to ask for further clarification that may not have been covered in the attached documentation.
Include files	Regulation 19 Consultation DDLP Statenborough House 9Dec2022 Sub.pdf
Local Plan Consultation Point	Eastry
Rep ID	SDLP1153
Rep Status	Processed
Consultee ID	1330769
Consultee Full Name	Mr Beat Hochstrasser
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	P. 260, para 6.81: "..facility which demonstrably provides a net benefit to the community"
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>To allow a small loss of Open Space as outlined below will provide a greater net benefit to the community as it will enable a larger area of Open Space to be restored and improved. The Evidence Base does not justify the current designation which will prevent recommended site improvements (see DDC Evidence Base OPEN SPACE AND PLAY STANDARDS PAPER Dec. 2019 p.17 Table 4.1.4: Rural Analysis Area Quality Summary).</p> <p>The site Off Mill Lane Eastry (site ref 393) is quite large at 0.53 ha and is designated as Amenity Greenspace but with the exception of several trees towards the north of the site. Visually (see pictures attached) this former builders yard and tile manufacturing site is more akin to a brown field site. The site is overgrown by brambles and covered with roof tiles and slag heaps of several tons of building rubble. We argue that while the trees must be protected, the rest of the site has been wrongly classified. This position is also supported by the DDC Evidence Reports: out of all the 120 Open Space sits assessed in the 2019 Open Space Assessment Report, this site is identified as the very lowest scoring amenity green-space in terms of quality (34.4%) and second lowest in terms of value (28.0%).</p> <p>Additional text insert by DDC from comment SDLP468</p> <p>This comment is an amendment to my previous comment in relation to PM5:</p> <p>If the proposed amendment to the Local Plan is approved and subsequent planning application to Dover district Council for a single dwelling is also authorised, provisions will be made to alleviate the current congestion on Mill Lane traffic by providing a car parking space for the adjacent property to the site's East access road, Bushley house. This will result in a further measurable and concrete net benefit to the community.</p>

<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>This representation seeks to remove a small area from the open space designation of that site. This would enable a single dwelling unit to come forward (self build) under Strategic Policy 3 and taking account of all other Development Management Policies at the time of making the application. Living on site would enable us to restore, improve and manage the remaining open space, improve the quality of the overall site, including both access roads belonging to the site and tree maintenance, resulting in a measured enhancement to Eastry's open space provision and in a net benefit to the community.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>The Open Space and Play Standards Paper (2019, page 17, table 4.1.4) rates 10 Amenity Greenspace sites, including the site "Off Mill Lane Eastry" as being "below quality" and recommends "Enhancing site quality should be explored where possible (e.g. exploring options for improved maintenance, drainage and enhancement of general appearance)."</p> <p>We wish to participate in the oral part of the examination to present how this amendment to the Plan will enhance the site quality and appearance of the area.</p>
<p>Include files</p>	<p>Pics for Land off Mill Lane Eastry.docx Eastry.docx (5)</p>
<p>Local Plan Consultation Point</p>	<p>Eastry</p>
<p>Rep ID</p>	<p>SDLP1809</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1273745</p>
<p>Consultee Full Name</p>	<p>Roy Marshall</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>Eastry</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified Effective Consistent with National Policy</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>No</p>

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I am totally dumbfounded with the Dover District revised Draft Local Plan as the number of dwellings now being proposed has now been increased by an additional 95, which will lead to the loss of more of 'Dover's world class landscapes'. Surely there is a policy conflict here, where the government seeks to protect and enhance our domestic production so as to maintain our food security? How does building on agricultural land help with global warming? The scale of this revised Local Plan is out of proportion to the size of the village and is out of character. Please re-read my original comments regarding the original Local Plan as they are still pertinent (although I am aware that dwelling numbers have increased). Please see below: I understand the fundamental philosophy, aims and aspirations of the Local Draft Plan. However, when it comes to the over-development of the ancient village of Eastry, which has been predominantly developed using the original generic plan, small roads and paths where they exist, I feel that some of this has not been fully considered. Local residents have already formulated a campaign with regards to vehicles speeding throughout the village. This problem will only become worse with all the added cars and their movements. There are already two developments which have planning permission (130 dwellings). If the Draft Local Plan is adopted, this will add a further 120 dwellings. With the hospital site (which already has planning permission) and ESA002 in close proximity to each other, this will mean 160 dwellings bordering up to an existing conservation area and a natural habitat area. The total number of new dwellings will be 250. Comparing the EAS002 site size and estimated 80 dwellings, with that of EAS012, 35 dwellings, it appears that EAS002 will have high density smaller housing. This is a concern especially with the area having a significantly lower job density than that of Kent and the South East region. Where will all the new employment come from? There is also an issue for the wellbeing of local residents, following the loss of spectacular landscape views, habitats and agricultural land and the demise of the present flora and fauna. How do these developments in Eastry provide significant environmental, social and economic benefits for local residents and visitors? There will be added pressure on local amenities, a small school, limited shops and no Doctors surgery. The use of a car or public transport will be needed to access Primary Shopping areas, as they cannot be accessed safely by pedestrians. Therefore, some key issues need to be carefully considered and resolved: Amenities. Infrastructure: provision and connectivity. Utilities. Roads and Paths, Health and Safety issues. Size, speed and volume of traffic using the narrow roads. Parking for Residents. Pathways (some unsafe or do not exist at all). Loss of areas of natural beauty. Noise and Air pollution (during and after developments). Ancient village. Roads and paths cannot be widened. Over Development. Loss of Agricultural Land. Wellbeing of present local residents. Community facilities. Damage to present buildings by traffic movement (already identified). Allocation of building density and diversity on plots. Flora and Fauna. Present wildlife habitats etc. Bats, birds and reptiles. Listed property and Conservation area. Quality of each site for proposed Development...access, flooding, impact on area and residents. Will Eastry Parish Council receive any SO16 money if the plan is approved? I strongly object to the proposed Developments in Eastry shown in the revised Local Draft Plan.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Eastry

Rep ID	SDLP2012
Rep Status	Processed
Consultee ID	1267243
Consultee Full Name	Mr Patrick Clarke
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Eastry
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Eastry is a rural village with roads, without footpaths, that are already hazardous to pedestrians. Main culprits are speeding vehicles. At the same time selfish parking causes hazards on many roads but especially in the High Street. While I accept the need for development particularly on the Old Hospital site to do it without considerable improvements to the infrastructure will just cause mayhem. Finally the proposed 50 house development on Gore Lane, which is basically a single track road with many lorries and buses on it regularly, without any footpath or road widening is an accident waiting to happen. How are children supposed to cross this road safely to get to school? Insist on road improvements before granting permission for the safety of all village residents. Do not wait for it to happen before doing the job properly.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Eastry
Rep ID	SDLP2017
Rep Status	Processed
Consultee ID	1334457
Consultee Full Name	Clive Harris
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Eastry
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>I have just been onto the get-involved part of the website to comment on the local plan for new housing in Eastry. I note it states that there are only 3 areas allowed for comment, namely; Legal Compliance, Soundness and Duty To Cooperate. I am certain that you have all these wrapped up very soundly and it just furthers my view that consultations when applied to local or national government are no such thing and are just statements of intent.</p> <p>With regard to Eastry no one should suggest that no housing should be built. Obviously, the old hospital site, being brown field is an obvious place to build and there are others - some as you have listed. However I cannot see the justification for a large number of houses being built in Lower Street Eastry on prime agricultural land.</p> <p>We are all aware of the type of housing that will be built. It will be expensive properties built for maximum profit to the building companies. Being honest, it costs more or less the same to build a property in Eastry as it does in Middlesborough but it will sell for probably 5-10 times as much. So much for levelling up. The need, where a demand exists in this area, is for affordable housing for young people and I have previously been told by a councillor that this cannot be insisted upon.</p> <p>In addition, I have heard absolutely nothing about improvements in basic infrastructure such as: Schools – how will Eastry Primary School cope with the extra children from the proposed 273 new homes.</p> <p>Doctors- surgeries have been closing throughout the area and there is a national shortage of GPs anyway.</p> <p>Sandwich Medical Practise appears to be at full capacity regardless of the recent new building.</p> <p>Public transport- buses throughout the area have been dramatically scaled back and indeed I believe there are no buses running through Eythorne at all and they are apparently going to have 900 new houses.</p> <p>I suspect that your local plan is a box ticking exercise that the council can pass to their national government colleagues for some “brownie” points.</p> <p>As I mentioned earlier I don’t expect any action from “consultative “documents as they are really only for a legal compliance on what they are going to do regardless of any local opinion.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>Eastry</p>

Rep ID	SDLP2007
Rep Status	Processed
Consultee ID	1268546
Consultee Full Name	Ms Denise Bottle
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Eastry
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I've been on the Local plan to have my say and how they expect people to negotiate the minefield and leave your objections or comments heaven oly knows. I feel fir older folk. How do I submit my comments please? I think it's utter madness that there are plans submitted to build so many unaffordable houses around the village. We have no Dr Surgery, Cooks Lea cannot cope with the amount of traffic that currently goes up to the School. The road needs traffic calming measures as it is. People speed up the road with no care for people's pets, cats have been run over, my neighbours cat was run over and left in the road. I've lived in Eastry all my life and it's a beautiful village which is sadly being ruined by all the unaffordable houses. The trees and hedgerows are being cut down and destroyed. Unless we are going to take a pill which is a three course meal (like Charlie and the chocolate factory) how are the wildlife and the Bees supposed to survive. There is too much farmland being sold to developers.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Eastry
Rep ID	SDLP1810
Rep Status	Processed
Consultee ID	1273743
Consultee Full Name	Alison Marshall
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Eastry
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I have lived in Eastry and Lower Street for 34 years. I have lived in both the lower part (Buttsole end) and upper part of Lower Street where I live currently. I therefore feel I am well placed to comment on The Dover District revised draft Local Plan as I have a long term knowledge of the workings of both the Eastry village and Lower Street. I am somewhat surprised that the Local Plan for Eastry is still under consultation with two major housing development sites (the old Hospital site and Gore Lane and Lower Gore Field) already having received planning permission for such an incredibly large number of houses in such a small historic village. It also appears that Dover District Council is considering even more housing than in the original plan: TC4S0231 (SAP 33). With the 178 houses already granted planning permission, how can the Council even consider an additional 95 new houses? I chose to live in Eastry as it is a small historic village in the countryside. I did not choose a town which it will soon be if the Council continue.</p> <p>My main objections are:</p> <p>1) Infrastructure Eastry is an ancient village with even the central main road being extremely narrow. There is currently a major speeding issue, both night and day, which the village residents have already raised with the Council (particularly in Lower Street) and an issue with heavy load and large vehicles. The road is extremely dangerous for existing residents, even the double yellow no parking road signs are being ignored. With the proposed increased number of dwellings at EAS002 and TC4S0231 (90 dwellings) in addition to the EAS010 site (hospital –planning already approved) which run almost back to back, it seems highly likely that the traffic load will increase further, with further risk. In Lower Street the pathways are extremely narrow, poorly maintained (despite this being raised with the Council) and there are sections where there is no pathway at all. The road is too narrow for widening without narrowing the road further due to the room needed for pathways. With Lower Street</p>

being extremely narrow, with residents parking on the road outside their houses (which they should be able to do for their own safety) vehicles already use the narrow path and driveways as part of the roadway when passing. How will the new residents of EAS002 and TC4S0231 access the centre of the village safely and existing residents be safe? Safe access to the EAS002 and TC4S0231 site on Lower Street is of concern especially with the speeding issue and large, heavy vehicles, as visibility is extremely restricted. If safe access cannot be achieved in Lower Street, it would mean access via the centre of the village, which would then mean increased traffic and further safety issues.

2) Existing Historic Buildings Eastry has many old and listed buildings, especially through the main central road (Lower Street and upwards). There is already damage being caused to these buildings by the volume and heavy traffic. Increased traffic flow will only exacerbate this problem. Eastry has a conservation area, how can increasing the damage to this historic village be approved? The scale of the allocation of new housing is totally out of proportion to the size of the village and totally out of character.

3) Existing Habitats Between EAS010 (already approved) and EAS002 sites, there is land which has a number of species of plants, birds and animals. This is home to bats and adders and a large variety of birds including: wrens, partridges, woodpeckers, jays, robins, owls and kestrels plus a whole range of other species of birds. There is also a range of wild flowers e.g cowslips. This area is an asset to the village and enhances the well-being of the local community with the area being used by many for pleasure walks and for the siting of these species. An increase in residents at EAS002, alongside those in EAS010, as well as an increase in traffic could have a significant negative impact on these species and the wellbeing of existing residents. If a road is put in place that crosses this land to improve the infrastructure (which has been suggested) would these species actually remain here and how would the well-being of local residents be improved?

4) Agriculture, Landscape and Resident Well-being Many residents of Eastry enjoy the landscape of the edge of the village that looks over the valley of Eastry, to view the agricultural and natural landscapes especially when walking the public footpath that runs between the proposed EAS002 site and the already approved EAS010 site. Many residents also walk the narrow country lanes to enjoy the views across the fields where EAS012 site is. With these areas covered in new dwellings, this existing beautiful landscape which brings a sense of well-being to local residents and the existing character of this village will be destroyed. There is also a clear policy conflict within government which seeks to protect and enhance our domestic production to maintain food security.

5) Amenities Amenities in Eastry have already been reduced over recent years. Residents have to now travel to Sandwich to the doctors and dentist. If unwell and travelling by bus, this is an extremely unpleasant experience. How can parents with young children, the elderly and disabled residents manage such an ordeal? There is also no footpath all the way to Sandwich. Eastry Primary School has limited space for the possible increase in the number of children. Where will they go to school? Worth Primary school is extremely small and Ash has limited space. Sandwich Infant and Sandwich Junior School also have limited space. All of these villages are not easy to access on the bus with children. Sandwich has no large superstores and Eastry has limited shops. How will families or those residents with disabilities manage the journey on the bus or by foot to Whitfield, the Primary Shopping area? Many existing residents still have the copper broadband internet connection which can be intermittent. Will this be updated to ensure an efficient service for both existing residents and the additional 273 dwellings? With so many Eastry residents now working online from home, this would need an essential upgrade.

6) Noise and Pollution The noise and pollution of the village is of concern with the current traffic volume and speed of traffic. With an increase of 95 planned houses on top of the 178 already with planning permission, this situation can only worsen. The health and well-being of existing residents can only be worsened by such a plan.

7) Flooding As a resident who has lived in Eastry for many years, flooding is a concern in relation to site EAS002. How will this be addressed without destroying the village pond and landscape?

8) Employment The Dover area has a lower job density than that of Kent and the South East region. With the proposed number of dwellings in addition to those already planning approval, where will the new employment be found?

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Eastry
Rep ID	SDLP2030
Rep Status	Processed
Consultee ID	1334467
Consultee Full Name	Rebecca Redworth
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Eastry
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I am very against the proposed new builds in our village. This is too much for the limited infrastructure of the village, the school is over subscribed, the local doctors surgery is now in sandwich and virtually impossible to get an appointment as it is. Traffic through the village is forever growing and speeding has been an issue over recent times. Buses have trouble getting around and through the parked cars. I have lived in this village for over 30 years and feel I must speak out against this proposal , this was a small, rural community and I do not wish it to become a town.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance	

with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Eastry
Rep ID	SDLP2008
Rep Status	Processed
Consultee ID	1334449
Consultee Full Name	Mitchell Ferrier
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Eastry
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>I email you in response to the above as to which I am opposed. Eastry is meant to be a village in the country, which is slowly being eroded away. Unless we are not careful the village of Tilmanstone, Woodnesborough, Betteshanger and the hamlet Hamill will all join up with Eastry, and it shall become one "Big Suburbia" Where is the infrastructure to cope? new schools? doctors? need I go on? 178 houses have already been proposed that will already cause major disruption, especially in Gore lane between Albion road and Gore Farm, tipper trucks, cement lorries, where the road is already very narrow and only 2 small cars can pass. On the approach to Eastry from Dover the beautiful view of the countryside and the devastation of the habitats of the existing wildlife is going to be sacrificed for 90 houses all on Lower Street.. There is too much new building going on generally in the South-East, it is already overcrowded, Soon all we will be looking on is concrete ,a sad prospect for the current and future generation So to clarify I would like to repeat, I am strongly against the go ahead of these houses being built...</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>Eastry</p>
<p>Rep ID</p>	<p>SDLP2002</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1334442</p>
<p>Consultee Full Name</p>	<p>Jane Brain</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Eastry
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I am writing, as an Eastry village resident, to register my very strong objection to the above revised local plan. This plan is proposing additional housing of 95 dwellings plus some 130 houses that have already received planning permission to be erected in the village.</p> <p>Eastry is a very pretty and historic village nestling in the heart of some staggeringly beautiful countryside. The countryside immediately surrounding and adjacent to Eastry with rolling tree studded meadows, windmills and leafy lanes is unique to this part of Kent, and contributes to and compliments Eastry itself.</p> <p>The sleepy quiet village with its different styles of housing, that all somehow seem to blend, and it's beautiful ancient Church, steeped in history often brings people to visit. That however, thanks to Dover District Council, would seem to be a thing of the past since permission is likely to be given for some 225 house to mushroom up ringing round the village.</p> <p>Eastry was built to fit and sustain itself and up until now has managed to maintain that status quo, even though, with the advent of so many cars per household the narrow roads are now somewhat crowded.</p> <p>Eastry simply does not have the infrastructure to sustain the huge number of proposed new houses, each with possibly two cars on average per household thrown into the mix. It does not appear that any thought or regard to safety and likelihood of flooding has been factored into this decision to sink Eastry under concrete. No consideration either, appears to have been given to the truly devastating effect on the environment and our already dwindling wildlife.</p> <p>Indeed it would be nice to know why this whole area of South East Kent generally has been singled out for such excessive over development. Are these decisions made specifically by the various Councils Planning Department or, are they following a directive from Westminster.</p> <p>I am appealing to the Planning Department of Dover District Council to reconsider this whole very disturbing and unsettling proposal.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	

<p>if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	

SAP32 - Land at Buttsole Pond, Eastry (EAS002)

Local Plan Consultation Point	SAP32 - Land at Buttsole Pond, Eastry (EAS002)
Rep ID	SDLP125
Rep Status	Processed
Consultee ID	1330948
Consultee Full Name	Jim Wilson
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Local Planning Site Allocations
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SAP 32 will raise traffic levels in an already troublesome spot. Along with SAP 33 the addition of 90 homes will make Lower Road even more treacherous than it is now, or will be after the hospital development is complete. Older residents of the village have pointed out that the area designated as SAP 32 has flooded historically in bad weather.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Remove SAP 32 from the plan along with the Cross Farm plot.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP32 - Land at Buttsole Pond, Eastry (EAS002)
Rep ID	SDLP417
Rep Status	Processed
Consultee ID	1266501
Consultee Full Name	Mr Alex Child-Villiers
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Land at Buttsole Pond, Eastry (EAS002)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note: Document titled 'Facebook: Eastry Community Watch – Lower Street Traffic Complaints' was removed from objective for Data Protection reasons. It contains comments from Facebook and names. The comments relate to traffic on Lower Street (18 pages) and will be made available to the Inspector on request.</p> <p>1. These additional houses will put huge stress on the village resources, given that it has limited schooling and no medical practices, and all roads within the village are single lane due to parked cars.</p> <p>2. With the 178 houses that have been granted planning permission, Eastry will already be There is no room for a further 10 houses or the 95 in this Local Plan - see the attached 175 comments on the Eastry Community Watch Facebook page about traffic congestion and the danger to lives on Lower Street.</p> <p>3. The whole Local Plan consultation process is unsound and probably illegal. (a) The public exhibition events were poorly promoted and occurred prior to the village receiving an excellent leaflet from the Parish Council, so very few people knew about them as is evidenced by just 300 people attending. (b) Most of the marketing has been web based, excluding many people from participating, such as my parents. (c) The web-based mechanism for providing feedback is over complicated and beyond most people's ability, including mine, to raise objections or comment.</p> <p>4. Given that the government is no long setting targets for numbers of houses built by local authorities, there is no need for this development which will have a detrimental impact on Lower Street and Eastry.</p>

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Exclude the land at Land at Buttsole Pond, Eastry (EAS002) from the Local Plan. In Section 6, I have commented on why I think the Local Plan is not legally compliant but I'm not a lawyer and am not qualified to comment on changes that would make it legally compliant.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP32 - Land at Buttsole Pond, Eastry (EAS002)
Rep ID	SDLP433
Rep Status	Processed
Consultee ID	1266672
Consultee Full Name	Dr Graham Baker
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP32
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	Whilst I have read the plans for Eastry SP32 (and SP33) and appreciate that various waste water, run off water, ecological and heritage surveys will be done I still have serious reservations with regards the flow of additional traffic through the narrow road from Lower Street past Buttsole Pond and poor observation for vehicle drivers. There are no pavements for pedestrians and too many parked cars outside of the existing building to support 90+10 additional houses proposed. Consideration needs to be made to take parked cars off the road, where possible widen the road

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>and put in proper pavements for pedestrians to make the road safer for pedestrians and slower moving road users like cyclists and horse riders of which there are many. This is a really dangerous road in the village, traffic travels way too fast given the poor line of sight and lack of pavements and the council needs to the impact on public health if non-car users (walkers, runners, cyclists, horse riders) are forced off the roads due to the extra traffic.</p> <p>It should also be noted that Buttsolde Pond lies in the log term flood risk area so additional run off will only add to the problems already experienced where 3 hillside roads converge and this will only get worse if the only means of drainage (the conduit across to Brook Street) is put under additional strain / when flooding starts to take place.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>Widen lower street to junction of Northbourne Road junction, add a pavement and improve sightlines to keep non-vehicle users safe, provision of off road parking for the residents in Lower Street. Develop a roundabout at the junction of Lower Street and Northbourne Road so that traffic to the Buttsolde Pond development (and even hospital site) have an alternative entrance other than driving up Lower Street. Improve the drainage of surface water from Buttsolde Pond through to Brook Street and beyond.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP32 - Land at Buttsolde Pond, Eastry (EAS002)
Rep ID	SDLP430
Rep Status	Processed
Consultee ID	1268179
Consultee Full Name	Mr Gary Ransley
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	EAS002 (SAP 32)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective

	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>1.No further sighting of Kent Highway report on traffic volume & road conditions through Lower Street which was on the original local plan to be actioned.</p> <p>2.No mention of drainage system in Buttssole Pond which is a heritage site,breached in 2014 which subsequently led to gas main pipes under Lower Street,pond site collapsed which led to major gas pipes repairs and remedial work to road.Further flooding from here to properties in Lower Street.Buttssole pond also filters water from the underground stream from Tilmanstone through the pond under fields to Brook Street and out to Stour.</p> <p>3.Unsustainable location because there is no footway and it is too from the village</p> <p>4.Lack of pedestrian access to bus stops and poor connectivity to the main village</p> <p>5.Narrow road making it unsuitable and potentially unsafe for the additional traffic expected</p> <p>6.Very poor visibility because of the sharp blind bend of the road</p> <p>7.the scale of the allocation is out of proportion to the size of the village and so out of character</p> <p>8.No connectivity to a railway station.</p> <p>9.Very few shops & areas of employment to sustain such a large allocation of houses.</p> <p>10.Better locations within Dover for the allocations of this scale – larger settlements elsewhere</p> <p>11.Traffic flow in village particularly through Lower Street has already increased</p> <p>12.Title deeds ref K60861 shows right of way to Halcyon & building restrictions are in place over this piece of land which has been suggested as access to the site at Lower Street.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The site to be removed from Local Plan - 130 houses already approved in Easty village on 2 sites which all run onto the same road structure.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I would like my comments/objections submitted from Regulation 18 taken into account,
Include files	
Local Plan Consultation Point	SAP32 - Land at Buttssole Pond, Easty (EAS002)
Rep ID	SDLP442
Rep Status	Processed
Consultee ID	1331256
Consultee Full Name	Mrs

	Kirsty Bell
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP32
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We have very recently moved to Eastry and now live very close to the housing site proposed in SAP32. This has allowed us the "luxury" of observing the practical realities of living near to the proposed development.</p> <p>It is obvious that the proposed development would be a very real danger in making worse what is already a very serious road safety issue at the south end of the village.</p> <p>I am afraid that very few people observe the 30 speed limit up to the clearly marked "red 30" sign as you enter/leave the village. Indeed I would strongly suggest that some drivers seem to feel that the red marking zones are used as the starting line to a drag race to the bypass.</p> <p>The irony is that the entrance to the proposed development is exactly where some drivers seem to take a "run up " to the sign to see how fast they can enter/exit the village. You only have to stand at the junction of Northbourne Road/Pike Road/Dover Road/Lower Street for a few minutes in the day for this to be very obvious. This makes turning out of both Northbourne Road and Pike Lane very dangerous as there is very limited visibility to see cars either coming down the hill or out of the village at such speeds.</p> <p>This objection is not about noise or objecting just for the sake of it. I am genuinely worried someone will be killed as the road becomes ever busier as villages like Eastry are pushed towards ever more development often at the expense of the existing residents.</p> <p>This safety issue is also compounded by the lack of any pedestrian walkway between the bus stop at Buttshole pond and the main village. We walk this route regularly and can assure you it is not safe for pedestrians to walk towards or out of the village.</p> <p>There is especial danger walking towards the village as you walk in to a blind corner which drivers approach at speed. This blind corner IRONICALLY is by the entrance to the proposed development. I wonder if anyone from DDC has stood at the entry point of the proposed development and put any thought into what the implications are of the development - a national department for planning cannot appreciate or understand these safety concerns, which frankly NEED to be understood and appreciated for the safety of local residents.</p> <p>Having spoken to one of the Rural Task Force Police Officers last week, he acknowledged that traffic is travelling far too quickly, and he witnessed numerous people in cars, Ovenden lorries, delivery drivers only slowing as they saw his blue lights which were flashing on his car parked at the junction of Dover Road/Pike Lane. He wants to organise speed tests and is going to speak to his boss.</p> <p>You would be welcome to come to our house and witness the traffic as we are slightly elevated and people would not know anyone was watching them. We also have a concealed driveway facing the traffic for speed cameras.</p> <p>I also object from the perspective of surface water coming from the roads in the area. By removing fields which absorb water, and concreting them to provide housing, more and more surface water will converge at Buttshole Pond. This pond takes the water from Eastry's road and holds it effectively. When we moved in to our house in late October the pond was empty. By the end of November the pond was half full. It is</p>

	<p>not maintained and therefore its capacity is diminished. By putting hard surfaces on a local field, the surface water will have nowhere else to go except to Buttshole Pond.</p> <p>I would also like to highlight that Kent County Council are proposing to remove the bus route serving Eastry, leaving people without a means to leave the village especially school children. Whilst this has been postponed until the end of this school year it is by no means guaranteed to be reinstated after this. How can another two hundred homes be built and then a bus route removed?</p> <p>Please see two photos showing the blind corner near the proposed entrance, and the lack of visibility from Pike Lane on to Lower Street/Dover Road.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Removal of site allocation SAP32
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	SDLP442 Kirsty Bell 1.jpg SDLP442 Kirsty Bell 2.jpg
Local Plan Consultation Point	SAP32 - Land at Buttsole Pond, Eastry (EAS002)
Rep ID	SDLP581
Rep Status	Processed
Consultee ID	1267183
Consultee Full Name	Mr Jonathan Russell
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP32 Land at Buttsole Pond, Lower Street, Eastry (EAS002)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified

	Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<ol style="list-style-type: none"> 1. Local Infrastructure is likely to be put under increasing strain. KCC's Kent Water for Sustainable Growth Study October 2017, Project Number 60487848, highlights a projected shortfall of water supply of 4.31 Mega litres per day in relation to proposed development in Southern Water's Kent - Thanet Water Resource Zone, within which SAP32 falls. 2. There has been no further sighting of Kent Highway report on traffic volume & road conditions through Lower Street which was on the original local plan to be actioned. 3. There is no mention of the drainage system in Buttsole Pond which is a heritage site, breached in 2014 which subsequently led to the collapse of gas main pipes under Lower Street pond site resulting in major gas pipe repairs and remedial work to the road. Further flooding from here to properties in Pike Road and Lower Street. Buttsole pond also filters water from the underground stream from Tilmanstone through the pond under fields to Brook Street and out to Stour. 4. This is an unsustainable location because there is no footway and it is too far from the village 5. There is lack of pedestrian access to bus stops and poor connectivity to the main village 6. Lower Street is a narrow road making it unsuitable and potentially unsafe for the additional traffic expected. There is very limited off-road parking available. 7. There is very poor visibility because of the sharp blind bend of the road. 8. The scale of the allocation is out of proportion with the size of the village and therefore out of character. 9. There is no connectivity to a railway station. 10. There are very few shops & areas of employment to sustain such a large allocation of houses. 11. There are better locations within Dover for allocations of this scale – larger settlements elsewhere 12. Traffic flow in the village, particularly through Lower Street, has already increased. There was yet another accident at the lower end of Lower Street on 03/12/2022. 13. The Title Deeds ref K60861 show a right of way to Halcyon & building restrictions are in place over this piece of land which has been suggested as access to the site at Lower Street.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	This site should be removed from the local plan. 130 additional houses have already been approved at 2 sites in Eastry.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	

Include files	
Local Plan Consultation Point	SAP32 - Land at Buttssole Pond, Eastry (EAS002)
Rep ID	SDLP621
Rep Status	Processed
Consultee ID	1331790
Consultee Full Name	Julie Davies
Consultee Company / Organisation	CPRE Kent
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP32
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	We object to this allocation: <ul style="list-style-type: none"> • The site is not connected to the village. • The Agricultural Land Classification Map indicates that land around Eastry is likely to be in grades 1 and 2 – the best and most versatile agricultural land. • The site is given orange status and the overall landscape summary in HELAA Appendix 3A and the Landscape Consultants Assessment states: • Development conflicts with many landscape characteristics and some significant landscape/visual impacts are likely to occur. Site identified as medium high sensitivity. The overall landscape summary is: • The development of this site would have an impact on the landscape and further assessment is required to demonstrate whether this can be mitigated. • There are no footways from the site to the village and the HELAA Appendix 3B gives the site orange status as 'Highways concerns have been identified in relation to access and/or highway impact and further assessment is required to demonstrate whether this can be mitigated.'
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will	

make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	CPRE Kent would wish to participate at the examination hearings to explore these issues further.
Include files	
Local Plan Consultation Point	SAP32 - Land at Buttsole Pond, Eastry (EAS002)
Rep ID	SDLP860
Rep Status	Processed
Consultee ID	1331926
Consultee Full Name	Mr Mark Gleave
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 32 Land at Buttsole Pond (EAS002)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I consider the proposal in respect of the land at Buttsole Pond to be unsound as, other than a vague requirement for a Flood Assessment Risk, it contains no specific provision for the fact that the development of this site will materially add to the volume of run-off water from the site into Buttsole Pond. Any ability of the land to absorb heavy rain will be vastly reduced by covering the site with buildings/driveways/estate roads etc.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	The existing overflow drainage pipe, which runs from Buttsole Pond into a drain on the north side of Brook Street, is not functioning properly; this needs to be restored and additional drainage needs to be specified in any development brief for the site to ensure that the effect of any development of this site does not result in the pond being unable to cope with the extra surface water which would inevitably run into it.

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP32 - Land at Buttsole Pond, Eastry (EAS002)
Rep ID	SDLP762
Rep Status	Processed
Consultee ID	1331848
Consultee Full Name	Mrs Tanya Jaynes
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP32 - Land at Buttsole Pond, Eastry (EAS002)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	In section 4.232 the buildings in the road near the site are described as 'a sporadic residential development that is a mixture of two storey victorian terraced housing and large detached dwellings' - it omits to mention the historic age of these large detached dwellings - our own cottage being one of these and dating 400 years old. The new housing is therefore not in keeping or sensitive to the character of the surrounding area and street scene. 80 houses in an area on of sporadic buildings in a tree lined road surrounded by fields is not a low density addition to the road.

	<p>The vehicular access point proposed for the site onto Lower Street has been poorly considered it adjoins a narrow road that narrows further - this is unsuitable and potentially dangerous for the volume of additional traffic from 80 dwellings - a road narrowing sign is located just before the proposed vehicular access entrance location.</p> <p>Very poor visibility because of the sharp blind bend of the road - there is also another blind bend further up the road heading into the village, with the speeding traffic and cars frequently forced to drive on the wrong side of the road due to parked cars on both sides of the road - this entrance is a potential deathtrap.</p> <p>It is also on a busy bus route, buses already struggle to pass traffic in this part of Lower Street adding this amount of traffic in this part of the road is going to exacerbate the problem.</p> <p>There is a speeding problem in this part of the road monitored by Eastry Parish Council's Speed watch - earlier in the year we had our car written off parked in this part of Lower Street due to a speeding car. Police incident number 01-1536</p> <p>The current amount of traffic regularly cannot pass/flow down the road due to the parked cars in Lower Street on both sides of the road.</p> <p>The scale of the development is out of proportion to the size of the village</p> <p>No connectivity to a railway station.</p> <p>The village amenities are not suited to sustain such a large allocation of houses.</p> <p>Title deeds ref K60861 shows right of way to Halcyon & building restrictions are in place over this piece of land which has been suggested for vehicular access to the site at Lower Street.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>That this development site is removed from the local plan. There has already been 130 houses approved at 2 other sites in Eastry.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP32 - Land at Buttsole Pond, Eastry (EAS002)</p>
<p>Rep ID</p>	<p>SDLP1645</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1267747</p>
<p>Consultee Full Name</p>	<p>Joanna Jones</p>
<p>Consultee Company / Organisation</p>	<p>Eastry Parish Council</p>
<p>Agent Full Name</p>	

Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP32
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	1. Location unsuitable - on narrow, busy road into village, already has problems with speeding and congestion, largely single lane due to the parked cars from the terraced houses. Within the last year there have been several accidents/damage to property from buses and speeding cars on Lower Street. 2. Unsustainable location - No footpath to the village or bus stops, poor connectivity to the village 3. Buttssole Pond - issues with previous flooding, underground stream leads to it. 4. Existing habitats for nature and wildlife in EAS002 will be destroyed by build and increased traffic, negative effect on species and well-being of residents. 4. 178 houses in the process of being built/have permission to be built, an extra 80 houses will put a strain on the village resources and lead to over-development. No Doctor's surgery in the village. 5. Section 106 money would be required for Highways improvements, play area, parish room and sports pavilion provision/improvement.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Take SAP32 out of the Plan.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP32 - Land at Buttssole Pond, Eastry (EAS002)
Rep ID	SDLP1092
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah

	Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SAP32: 100 houses at Buttsole pond nature reserve (a small local biodiversity hotspot). The pond acts as a flood sponge as does the arable land all around it. Rudimentary geography suggests that if the arable land is replaced by a housing development there will be a dramatic increase in the run-off to the pond area. And the Landscape Sensitivity Assessment should have ruled this site as being unsound.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	SAP32 - Land at Buttsole Pond, Eastry (EAS002)
Rep ID	SDLP1209
Rep Status	Processed

Consultee ID	1272187
Consultee Full Name	William Armstrong
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 32 - Land at Buttssole Pond, Eastry (ESA002)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>1.No further sighting of Kent Highway report on traffic volume & road conditions through Lower Street which was on the original local plan to be actioned.</p> <p>2.No mention of drainage system in Buttssole Pond which is a heritage site, breached in 2014 which subsequently led to gas main pipes under Lower Street, pond site collapsed which led to major gas pipes repairs and remedial work to road. Further flooding from here to properties in Lower Street. Buttssole pond also filters water from the underground stream from Tilmanstone through the pond under fields to Brook Street and out to Stour.</p> <p>3.Unsustainable location because there is no footway and it is too far from the village</p> <p>4.Lack of pedestrian access to bus stops and poor connectivity to the main village</p> <p>5.Narrow road making it unsuitable and potentially unsafe for the additional traffic expected</p> <p>6.Very poor visibility because of the sharp blind bend of the road</p> <p>7.the scale of the allocation is out of proportion to the size of the village and so out of character</p> <p>8.No connectivity to a railway station.</p> <p>9.Very few shops & areas of employment to sustain such a large allocation of houses.</p> <p>10.Better locations within Dover for the allocations of this scale – larger settlements elsewhere</p> <p>11.Traffic flow in village particularly through Lower Street has already increased</p> <p>12.Title deeds ref K60861 shows right of way to Halcyon & building restrictions are in place over this piece of land which has been suggested as access to the site at Lower Street.</p> <p>As a local who has lived in Eastry for more than 20 years I find this latest application for more housing will spoil the whole look on the approach to the village from the Dover end. A TOTAL EYESORE.</p> <p>Having spoken to other residents in the village it seems many were unaware of this planning application until very recently including me leaving little time to discuss and respond with others during COVID lockdown.</p> <p>Pond cottages are on the DEFRA list due to flooding which then goes on to affect Brook Street and Ham Fens. With climate change this will happen again, so the last thing we need is more tarmac low maintenance gardens with block paving and little or no thought given to wildlife.</p> <p>There is no pavement from proposed site until Site cottage and very little room to put one. I feel this would endanger pedestrians from the proposed housing estate as this is the main route through Eastry.</p> <p>Constant threats of huge developments is unsettling and disrupts the lives of people who have chosen to live here. Please don't turn villages into towns.</p>

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	This site to be removed from the local plan,130 house already approved at 2 sites in Eastry.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP32 - Land at Buttsole Pond, Eastry (EAS002)
Rep ID	SDLP1181
Rep Status	Processed
Consultee ID	1332922
Consultee Full Name	Anne Adam
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to?Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 32 - Land at Buttsole Pond,Lower Street, Eastry (EAS002)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	1.No further reference to Kent Highway report on traffic volume & road conditions through Lower Street which was on the original local plan to be actioned. 2.No mention of drainage system in Buttsole Pond, which is a heritage site and breached in 2014 subsequently leading to collapse of gas main pipes under Lower Street by the pond resulting in major repairs to the gas pipe and remedial work to road. Further flooding was caused to

<p>possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>properties in Lower Street. Buttsole pond also filters water from the underground stream from Tilmanstone through the pond under fields to Brook Street and out to the Stour.</p> <p>3.Unsustainable location because there is no footway and it is too far from the village</p> <p>4.Lack of pedestrian access to bus stops and poor connectivity to the main village</p> <p>5.Narrow road making it unsuitable and potentially unsafe for the additional traffic expected by such a large development.</p> <p>6.Very poor visibility because of the sharp blind bend of the road - other development on same road, 500m from proposed site, rejected by highways due to the lack of visibility and blind bend.</p> <p>7.The scale of the allocation is out of proportion to the size of the village and so out of character</p> <p>8.No connectivity to a railway station.</p> <p>9.Very few shops & areas of employment to sustain such a large allocation of houses.</p> <p>10.Better locations within Dover for the allocations of this scale – larger settlements elsewhere</p> <p>11.Traffic flow in village particularly through Lower Street has already increased</p> <p>12.Title deeds ref K60861 show right of way to Halcyon & building restrictions are in place over this piece of land which has been suggested as access to the site at Lower Street.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>This site to be removed from the local plan,130 house already approved at 2 sites in Eastry.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>I would like my comments/objections under Regulation 18 and 19 submissions, taken into account,</p>
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP32 - Land at Buttsole Pond, Eastry (EAS002)</p>
<p>Rep ID</p>	<p>SDLP1427</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1333260</p>
<p>Consultee Full Name</p>	<p>Jane Marsden, Andrew Mollart and Sarah Wells</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	<p>Grace Martin</p>
<p>Agent Company / Organisation</p>	<p>Hume Planning Consultancy Ltd</p>

<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP 32 (Intro / Summary / Attachments)</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>Yes</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Yes</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Yes</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>(DDC Note - Representation submitted by Hume Planning. Full Representation attached to SDLP1427. This document has been split across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1427.)</p> <p>Introduction</p> <p>Dover Local Plan Regulation 19 Consultation: Policy SAP 32 Land at Buttshole Pond, Lower Street, Eastry We write to you on behalf of our client, Jane Marsden, Andrew Mollart and Sarah Wells (all members of the same family), in relation to the Dover District Council Regulation 19 consultation on its Local Plan. Specifically, we write in support of the proposed allocation at Land at Buttshole Pond, Lower Street, Eastry, under Policy SAP 32, which is proposed to deliver around 80 dwellings. Our client owns the site which is proposed to be allocated. Detailed pre-application discussions (LPA Ref PAP/2019/221) have already taken place on this scheme with officers in the planning department at Dover District Council and a detailed planning application is currently being prepared.</p> <p>(DDC Note: Comments on SP3 and SAP23 on relocated)</p> <p>Summary</p> <p>With specific reference to the proposed allocation in Eastry (SAP 32), we confirm the site is available for residential development, and is a suitable site for residential development. It is therefore an achievable and deliverable allocation. Hume Planning Consultancy welcomes the opportunity to comment on this stage of the Council's Pre-Submission Local Plan and would like to reserve the right to attend the Examination in Public in due course.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	

Include files	Martin Hume Planning (Buttshole Pond) 1524 Att1_Redacted.pdf
Local Plan Consultation Point	SAP32 - Land at Buttsole Pond, Eastry (EAS002)
Rep ID	SDLP1432
Rep Status	Processed
Consultee ID	1333260
Consultee Full Name	Jane Marsden, Andrew Mollart and Sarah Wells
Consultee Company / Organisation	
Agent Full Name	Grace Martin
Agent Company / Organisation	Hume Planning Consultancy Ltd
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP32
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Representation submitted by Hume Planning. Full Representation attached to SDLP1427. This document has been split across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1427.)</p> <p><u>Policy SAP 32: Land at Buttshole Pond, Lower Street, Eastry</u></p> <p>Our client fully confirms its support for this policy which seeks to allocate 80 residential units on this site. The proposed site is in a sustainable location. Eastry is a Local Centre, and in line with our comments on Policy SP3, it is appropriate that growth is directed towards Eastry given it has a good range of services for a settlement of this size. This is evident from its high placement in the settlement hierarchy. The site is also very well connected to the centre of Eastry which provides a range of local services and facilities; Lower Street runs directly up to the High Street.</p> <p>The site itself is in single family ownership which would facilitate early delivery. Pre-application discussions have taken place with both Dover District Council and Kent County Council (Highways) to deliver an 80-unit scheme in this location. This commitment to early delivery is evident in the preparations currently underway toward submission of a detailed planning application in mid-2023. On this basis, it is considered that the Council's anticipated trajectory for this site at Appendix D of the Local Plan could be brought forward by one or two years.</p> <p>The site is unconstrained by any policy or environmental designations. For example, it is not affected by any recognised landscape designations, not in close proximity to any heritage assets, not affected by Flood Risk and not the highest quality agricultural land. Whilst the site is currently open and cultivated, all trees and hedgerows within the site can be retained. Further, proposed landscaping can be controlled at planning application stage to ensure that any scheme will enhance the existing landscape structure complimented by the proposed built form which responds to the changes in levels within the site.</p> <p>This site lies immediately to the south of the Eastry Hospital site, which is consented for a mixed development comprising housing plus community and business floorspace, pursuant to planning permission LPA ref. 19/00572. Construction has not yet commenced; however various pre-commencement conditions are in the process of being discharged. Whilst immediately to the south, the approved scheme for the hospital site shows a landscape buffer to the south, providing SUDs and recreational facilities, and accordingly any built development would be broken up. The site represents a logical extension of built development, adjoining the settlement confines at the southern end which is considered to</p>

	<p>be the least constrained direction of growth and is the most easily accessible to the village centre. The site is considered to be visually contained by surrounding topography and existing ribbon development and will be seen against the backdrop of the proposed residential development at the former Eastry Hospital site which is elevated relative to the application site.</p> <p>On this basis, the site is considered suitable for development given the sustainability of the site and its relationship to the services in Eastry, and given it is a relatively unconstrained site.</p> <p>Our client is comfortable with the proposed requirements of Policy SAP 32 and has been preparing an application on this basis. For example, it has been agreed through discussions with KCC highways that the site will be accessed via an existing vehicle access off Lower Street and KCC has agreed that the visibility splays of this existing access are acceptable.</p> <p>In terms of the pedestrian connectivity at the site, we have several options under consideration to ensure formal pedestrian connections can be made between the site and the village. It is relevant that there is a footway on both sides of Lower Street to the north of the site and a Public Rights of Way which runs through the Eastry Hospital land to the north and leads onto the footway on the western side of Lower Street. It is therefore a suitable and available site and its proposed allocation provides for a deliverable policy within the Local Plan.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	SAP32 - Land at Buttsole Pond, Eastry (EAS002)
<p>Rep ID</p>	SDLP1761
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1268179
<p>Consultee Full Name</p>	Mr Gary Ransley
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	SAP32

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	1.No further sighting of Kent Highway report on traffic volume & road conditions through Lower Street which was on the original local plan to be actioned. 2.No mention of drainage system in Buttsole Pond which is a heritage site,breached in 2014 which subsequently led to gas main pipes under Lower Street,pond site collapsed which led to major gas pipes repairs and remedial work to road.Further flooding from here to properties in Lower Street.Buttsole pond also filters water from the underground stream from Tilmanstone through the pond under fields to Brook Street and out to Stour. 3.Unsustainable location because there is no footway and it is too from the village 4.Lack of pedestrian access to bus stops and poor connectivity to the main village 5.Narrow road making it unsuitable and potentially unsafe for the additional traffic expected 6.Very poor visibility because of the sharp blind bend of the road 7.the scale of the allocation is out of proportion to the size of the village and so out of character 8.No connectivity to a railway station. 9.Very few shops & areas of employment to sustain such a large allocation of houses. 10.Better locations within Dover for the allocations of this scale – larger settlements elsewhere 11.Traffic flow in village particularly through Lower Street has already increased 12.Title deeds ref K60861 shows right of way to Halcyon & building restrictions are in place over this piece of land which has been suggested as access to the site at Lower Street.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	This site to be removed from the local plan,178 house already approved at 2 sites in Eastry.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I would like my comments/objections submitted from Regulation 18 taken into account,
Include files	
Local Plan Consultation Point	SAP32 - Land at Buttsole Pond, Eastry (EAS002)
Rep ID	SDLP1654
Rep Status	Processed
Consultee ID	1331511
Consultee Full Name	Kim Hylott

Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP32
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Dear Sir/Madam</p> <p>Having read the amended DDC local plan I would like to raise concerns and objections outlined below with reference to the above plan.</p> <p>I am extremely disappointed at the proposal of 80 houses directly opposite my property and this being totally unsuitable . And am greatly concerned about the road infrastructure directly outside our property and the danger it will cause.</p> <ol style="list-style-type: none"> 1. unsustainable location because there is no footway and no room for footway and as Buttsole is a hamlet it is outside all of the main village constraints . 2. There is lack of pedestrian access to bus stops no shelters and very poor connectivity to the village. 3. A very NARROW and busy road making it unsuitable and potentially unsafe for the additional traffic expected . The requirement for a KCC Report has been removed from the original plan as a highways objection and concerns and s full report was previously required??? This is an area of massive concern. And surely a KCC report is mandatory? 4. Poor visibility sight line because of the narrow and double bend in the road. How can additional road/roads be adjoined to this current road without causing danger. 5. The scale of this allocation is greatly out of proportion to the size of our ancient village and so out of character. There is already a large build underway at the old hospital site, Eastry roads cannot sustain this amount of additional vehicles let alone more! 6. No railway station access to the village or within acceptable distance. 7. employment is a concern, few actual shops, a local company in Felderland have ceased trading, causing unemployment already in the community so employment is a concern to sustain such a large allocation. 8. better locations are within Dover for allocations of this scale – larger settlements elsewhere 9. Access to Gp's is already a concern the nearest surgery is in Sandwich and they are overwhelmed with patients already. 10. Previous flooding is an issue. With a build of this scale would impact this problem further. 11. Buttsole pond is used as drainage system with underwater stream from Tilmsnstone through pond to Brook St and out to Stour. in 2014 with weeks of rain the pond was breached by under water stream rising, eventually causing the road at the pond to sink and bursting main

gas pipes as well as flooding the whole entire area around the pond. No remedial changes to the pond system have been made. This area cannot sustain further water or drainage.

12. Residents of Eastry who use Lower Street already continually moan about the cars that are parked down Lower Street, where will these owners cars get parked to facilitate a road for access to this build?

13. The fields all surrounding this area are full of wildlife, birds of prey, nesting birds, butterflies to name a few and these should not be eradicated.

14. The complete aesthetics of the beautiful views of Eastry as you drive into the village will be ruined.

15. No secondary school in the village or within acceptable distance.

16. I have parked my car on the private land opposite my property (part of the allocated site) for over 17 years as have my neighbours. My direct neighbour for over 50 years. We maintain this area for our parking and have done so to keep our cars off this extremely busy and lethal stretch of the non pathed part of lower street and to enable pedestrians to walk as close within the white lines as possible whilst they are out enjoying walks and to keep the access clear for buses, emergency services and local firms lorries whom would struggle if all our cars were on the road outside our properties. (Possible Adverse possession.)

Finally given the current issues within the village with speeding and the recent car accidents in Lower Street alone it would appear if the plan were to be approved it would make the problem much worse than it is currently and possibly lead to fatalities.

Please lodge my objections to this development
EASA002 (SAP32)

Kind Regards
Kim Hylott
Resident at Buttssole.

2nd December 2022

DDC EDIT: SEE BELOW FOR ADDITIONAL TEXT THAT WAS EMAILED TO DDC ON A REPRESENTATION FORM

- 1.No further sighting of Kent Highway report on traffic volume & road conditions through Lower Street which was on the original local plan to be actioned.
- 2.No mention of drainage system in Buttssole Pond which is a heritage site,breached in 2014 which subsequently led to gas main pipes under Lower Street,pond site collapsed which led to major gas pipes repairs and remedial work to road.Further flooding from here to properties in Lower Street.Buttssole pond also filters water from the underground stream from Tilmanstone through the pond under fields to Brook Street and out to Stour.
- 3.Unsustainable location because there is no footway and it is too from the village
- 4.Lack of pedestrian access to bus stops and poor connectivity to the main village
- 5.Narrow road making it unsuitable and potentially unsafe for the additional traffic expected
- 6.Very poor visibility because of the sharp blind bend of the road
- 7.the scale of the allocation is out of proportion to the size of the village and so out of character
- 8.No connectivity to a railway station.
- 9.Very few shops & areas of employment to sustain such a large allocation of houses.
- 10.Better locations within Dover for the allocations of this scale – larger settlements elsewhere
- 11.Traffic flow in village particularly through Lower Street has already increased

	12.Title deeds ref K60861 shows right of way to Halcyon & building restrictions are in place over this piece of land which has been suggested as access to the site at Lower Street.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	This site to be removed from the local plan,130 house already approved at 2 sites in Eastry.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I would like my comments/objections submitted from Regulation 18 taken into account,
Include files	
Local Plan Consultation Point	SAP32 - Land at Buttsole Pond, Eastry (EAS002)
Rep ID	SDLP1602
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to?Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP32
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified

	Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438. SAP 31 – 33 Eastry (cross referenced SAP 55 Woodnesborough) SAP32: 100 houses at Buttsole pond nature reserve (a small local biodiversity hotspot). The pond acts as a flood sponge as does the arable land all around it. Rudimentary geography suggests that if the arable land is replaced by a housing development there will be a dramatic increase in the run-off to the pond area. And the Landscape Sensitivity Assessment should have ruled this site as being unsound.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP32 - Land at Buttsole Pond, Eastry (EAS002)
Rep ID	SDLP1700
Rep Status	Processed
Consultee ID	1333451
Consultee Full Name	Claire Delahay
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP32

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(1) There is a clear safety issue re. traffic access to this site. Kent Highway report on traffic volume & road conditions through Lower Street (on the original local plan) has not been seen. The road is narrow and not suitable for access to the site. There is very poor visibility because of the blind bend. The few houses opposite (including my own) have only on street parking which would potentially be lost, resulting in parking further up Lower Street in an already crowded location. (2) The traffic issue has already resulted in a campaign "Lower Speed Street" by residents concerned about the speed and volume of traffic at Lower Street. Several accidents in recent months. (3) Concerns re. drainage system at Buttssole Pond which in 2014 led to gas main pipes under Lower Street. At this time, the pond site collapsed, causing major gas repairs and remedial work to road. (4) Environmental and heritage impacts on site supporting natural wildlife. (5) No footway at this location and poor connectivity to the main village for pedestrians. (6) The scale of the allocation is out of proportion to the size of the village. (7) Very little employment within the village to sustain a larger population. (8) Title deeds (ref K60861) shows right of way to "Halcyon" & building restrictions are in place over this piece of land which has been suggested as access to the site at Lower Street
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	With regard to this site in particular, I would suggest that removal from the Local Plan would be the only way to ensure the Plan is sound, given the additional housing proposals for Eastry village.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I would like my comments/objections submitted from Regulation 18 taken into account,
Include files	
Local Plan Consultation Point	SAP32 - Land at Buttssole Pond, Eastry (EAS002)
Rep ID	SDLP1751
Rep Status	Processed
Consultee ID	1333582
Consultee Full Name	Nicholas Smith
Consultee Company / Organisation	
Agent Full Name	

Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP32
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>1.No further sighting of Kent Highway report on traffic volume & road conditions through Lower Street which was on the original local plan to be actioned. 2.No mention of drainage system in Buttsole Pond which is a heritage site, breached in 2014 which subsequently led to gas main pipes under Lower Street, pond site collapsed which led to major gas pipes repairs and remedial work to road. Further flooding from here to Brook Street and out to Stour. 3.Unsustainable location because there is no footway and it is too from the village 4.Lack of pedestrian access to bus stops and poor connectivity to the main village 5.Narrow road making it unsuitable and potentially unsafe for the additional traffic expected 6.Very poor visibility because of the sharp blind bend of the road 7.the scale of the allocation is out of proportion to the size of the village and so out of character 8.No connectivity to a railway station. 9.Very few shops & areas of employment to sustain such a large allocation of houses. 10.Better locations within Dover for the allocations of this scale – larger settlements elsewhere 11.Traffic flow in village particularly through Lower Street has already increased 12.Title deeds ref K60861 shows right of way to Halcyon & building restrictions are in place over this piece of land which has been suggested as access to the site at Lower Street.</p> <p>In addition to the information supplied on the form I would further like to add the following 1) There are already several housing developments taking place around the village which will all add to the traffic congestion locally, this large development will undoubtedly make this much worse. 2) Eastry is a rural village with a very attractive aspect as it is approached from the south, this development on the edge of the village will completely change the nature of this approach which has thankfully remained virtually unchanged for over 150 years. (see attached photos). 3) A development at this site will just increase the future justification for further similar developments and as such will be the start of the slippery slope of mass development around a rural village to create yet another urban sprawl.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	This site to be removed from the local plan, 130 house already approved at 2 sites in Eastry.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I would like my comments/objections submitted from Regulation 18 taken into account.

Include files	Smith 1110 Att2.pdf.jpg Smith 1110 Att3.pdf.jpg SDLP1751 Smith Att1.pdf
Local Plan Consultation Point	SAP32 - Land at Buttsole Pond, Eastry (EAS002)
Rep ID	SDLP1798
Rep Status	Processed
Consultee ID	1333658
Consultee Full Name	Brian and Sue Manton
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP32
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	We consider that the proposed development of 80 dwellings on the land at Buttsole Pond will add significantly to the traffic on Lower Street. There is parking on one side of the road for much of its length and on both sides of the narrow bends in the area of the access road to the planned site. This is already a hazardous section and recently there was an accident involving a double decker bus resulting traffic from the other direction having turn back towards the village. In addition, traffic from the housing under development on the site of the former hospital will add significantly to the traffic along Lower Street. We would ask the Council to re-consider this proposed development on the grounds of safety.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	We would ask the Council to re-consider this proposed development on the grounds of safety.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP32 - Land at Buttssole Pond, Eastry (EAS002)
Rep ID	SDLP1750
Rep Status	Processed
Consultee ID	1273305
Consultee Full Name	Michael Gear
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP32
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>1.No further sighting of Kent Highway report on traffic volume & road conditions through Lower Street which was on the original local plan to be actioned.</p> <p>2.No mention of drainage system in Buttssole Pond which is a heritage site,breached in 2014 which subsequently led to gas main pipes under Lower Street,pond site collapsed which led to major gas pipes repairs and remedial work to road.Further flooding from here to properties in Lower Street.Buttssole pond also filters water from the underground stream from Tilmanstone through the pond under fields to Brook Street and out to Stour.</p> <p>3.Unsustainable location because there is no footway and it is too from the village</p> <p>4.Lack of pedestrian access to bus stops and poor connectivity to the main village</p> <p>5.Narrow road making it unsuitable and potentially unsafe for the additional traffic expected</p> <p>6.Very poor visibility because of the sharp blind bend of the road</p> <p>7.the scale of the allocation is out of proportion to the size of the village and so out of character</p> <p>8.No connectivity to a railway station.</p>

	<p>9.Very few shops & areas of employment to sustain such a large allocation of houses.</p> <p>10.Better locations within Dover for the allocations of this scale – larger settlements elsewhere</p> <p>11.Traffic flow in village particularly through Lower Street has already increased</p> <p>12.Title deeds ref K60861 shows right of way to Halcyon & building restrictions are in place over this piece of land which has been suggested as access to the site at Lower Street.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>This site to be removed from the local plan,130 house already approved at 2 sites in Eastry.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>I would like my comments/objections submitted from Regulation 18 taken into account,</p>
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP32 - Land at Buttsole Pond, Eastry (EAS002)</p>
<p>Rep ID</p>	<p>SDLP1738</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1273333</p>
<p>Consultee Full Name</p>	<p>Lesley Smith</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to?Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP32</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Justified Effective Consistent with National Policy</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>No</p>

<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>No</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>I attach my objection to the local plan SAP32 Land at Buttsole Pond, Eastry (ESA002).</p> <p>In addition to the points raised in my objection form, I would also like to say that the village school would not be large enough to accommodate all the new children that these number of houses would potentially add to the village. As a School Governor and Chair of the PTA in the past, we fought long and hard to raise enough money to build the extension to the village school to replace the portacabins that three year-groups (yrs 4,5 and 6) were educated in for at least 10 years. They were far too hot in summer and far too cold in winter, a situation that is not conducive to a good education and I would hate that situation to be repeated for a further generation.</p> <p>Also we have lost our GP Surgery in Eastry and the surgery in Sandwich seems unable to cope with the current number of residents in Eastry and Sandwich, as it stands. It is extremely difficult to get a doctor's appointment now, without increased pressure from new residents coming into the village, combined with an increased number of new houses in Sandwich.</p> <p>The proposed site (SAP32) is a green field site and should remain so. We have waited well over 30 years for the brown field site at Eastry Hospital/Eastry Workhouse to be developed; if housing was so critical, why wasn't this site developed much sooner?</p> <ol style="list-style-type: none"> 1.No further sighting of Kent Highway report on traffic volume & road conditions through Lower Street which was on the original local plan to be actioned. 2.No mention of drainage system in Buttsole Pond which is a heritage site,breached in 2014 which subsequently led to gas main pipes under Lower Street,pond site collapsed which led to major gas pipes repairs and remedial work to road.Further flooding from here to properties in Lower Street.Buttsole pond also filters water from the underground stream from Tilmanstone through the pond under fields to Brook Street and out to Stour. 3.Unsustainable location because there is no footway and it is too far from the village 4.Lack of pedestrian access to bus stops and poor connectivity to the main village 5.Narrow road making it unsuitable and potentially unsafe for the additional traffic expected 6.Very poor visibility because of the sharp blind bend of the road 7.the scale of the allocation is out of proportion to the size of the village and so out of character 8.No connectivity to a railway station. 9.Very few shops & areas of employment to sustain such a large allocation of houses. 10.Better locations within Dover for the allocations of this scale – larger settlements elsewhere 11.Traffic flow in village particularly through Lower Street has already increased and is dangerous 12.Title deeds ref K60861 shows right of way to Halcyon & building restrictions are in place over this piece of land which has been suggested as access to the site at Lower Street.
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>This site to be removed from the local plan,130 house already approved at 2 sites in Eastry.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note</p>	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	SDLP1738 Smith Att1.pdf SDLP1738 Smith Att2.pdf
Local Plan Consultation Point	SAP32 - Land at Buttsole Pond, Easry (EAS002)
Rep ID	SDLP1754
Rep Status	Processed
Consultee ID	1274628
Consultee Full Name	Amanda Parsonage
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP32
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>1.No further sighting of Kent Highway report on traffic volume & road conditions through Lower Street which was on the original local plan to be actioned. 2.No mention of drainage system in Buttsole Pond which is a heritage site,breached in 2014 which subsequently led to gas main pipes under Lower Street,pond site collapsed which led to major gas pipes repairs and remedial work to road.Further flooding from here to properties in Lower Street.Buttsole pond also filters water from the underground stream from Tilmanstone through the pond under fields to Brook Street and out to Stour. 3.Unsustainable location because there is no footway and it is too from the village 4.Lack of pedestrian access to bus stops and poor connectivity to the main village 5.Narrow road making it unsuitable and potentially unsafe for the additional traffic expected 6.Very poor visibility because of the sharp blind bend of the road 7.the scale of the allocation is out of proportion to the size of the village and so out of character 8.No connectivity to a railway station. 9.Very few shops & areas of employment to sustain such a large allocation of houses. 10.Better locations within Dover for the allocations of this scale – larger settlements elsewhere 11.Traffic flow in village particularly through Lower Street has already increased 12.Title deeds ref K60861 shows right of way to Halcyon & building restrictions are in place over this piece of land which has been suggested as access to the site at Lower Street.</p> <p>I am against the planning development on a personal and general level, my objections are as follows Flooding Pond Cottages, Buttsole Easry have been flooded and we are now on the DEFRA list as prone to flooding, a tarmacked field will exacerbate this along with climate change Pollution to Buttsole Pond The overflow drains to Ham Fens a valued area for nature, neither Ham Fens or Buttsole Pond need any more petrol or diesel impregnated road run off drawing into them. Wildlife disturbance Buttsole pond As I understand there is not another unfenced area of water in Easry which makes Buttsole pond very important for wildlife, a housing estate with families, cats and dogs will make the pond an inhospitable environment for wildlife which will be devastating to the wild bird population in Easry and other wild animals who use the ponds eco system, a housing estate will create a barrier for wildlife who use the wild area at the back of the hospital and also rely on the pond. Other homes in Easry Many homes in Easry are on the main route through the village, they are older style houses and many of them are terraced,</p>

	<p>these are properties with no off road parking facilities to park their vehicles, they rightly so park outside their houses which does help calm traffic moving or cutting through the village, excess traffic caused by more vehicles due to the extra housing will add to the congestion and in turn pollute the families homes on the main road and surrounding area. In my opinion the infrastructure of the village cannot sustain the extra houses. I could not even get change of use for a garden behind my house so how is a housing estate even being considered in the vicinity, I feel this threatens the integrity of Eastry, Many people have worked very hard all of their lives to be able to live in a village and I understand there has to be progression but there are other areas around this part of Dover that will not impact on the lives of people and wildlife to the extent it will do in Eastry where new housing estates have already been built.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>This site to be removed from the local plan, 130 house already approved at 2 sites in Eastry.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>I would like my comments/objections submitted from Regulation 18 taken into account.</p>
<p>Include files</p>	<p>SDLP1754 Parsonage Att1.pdf</p>
<p>Local Plan Consultation Point</p>	<p>SAP32 - Land at Buttsole Pond, Eastry (EAS002)</p>
<p>Rep ID</p>	<p>SDLP1601</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1333368</p>
<p>Consultee Full Name</p>	<p>Miss Frances Taylor</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP32</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Justified Effective</p>

4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>1.No further sighting of Kent Highway report on traffic volume & road conditions through Lower Street which was on the original local plan to be actioned.</p> <p>2.No mention of drainage system in Buttssole Pond which is a heritage site,breached in 2014 which subsequently led to gas main pipes under Lower Street,pond site collapsed which led to major gas pipes repairs and remedial work to road.Further flooding from here to properties in Lower Street.Buttssole pond also filters water from the underground stream from Tilmanstone through the pond under fields to Brook Street and out to Stour.</p> <p>3.Unsustainable location because there is no footway and it is too from the village</p> <p>4.Lack of pedestrian access to bus stops and poor connectivity to the main village</p> <p>5.Narrow road making it unsuitable and potentially unsafe for the additional traffic expected</p> <p>6.Very poor visibility because of the sharp blind bend of the road</p> <p>7.the scale of the allocation is out of proportion to the size of the village and so out of character</p> <p>8.No connectivity to a railway station.</p> <p>9.Very few shops & areas of employment to sustain such a large allocation of houses.</p> <p>10.Better locations within Dover for the allocations of this scale – larger settlements elsewhere</p> <p>11.Traffic flow in village particularly through Lower Street has already increased</p> <p>12.Title deeds ref K60861 shows right of way to Halcyon & building restrictions are in place over this piece of land which has been suggested as access to the site at Lower Street.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	This site to be removed from the local plan,130 house already approved at 2 sites in Eastry.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I would like my comments/objections submitted from Regulation 18 taken into account,
Include files	

SAP33 - Eastry Small Housing Sites

Local Plan Consultation Point	SAP33 - Eastry Small Housing Sites
Rep ID	SDLP75
Rep Status	Processed
Consultee ID	1266501
Consultee Full Name	Mr Alex Child-Villiers
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	TC4S023 SA33 Land adjacent to Cross Farm, Eastry
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note: Document titled 'Facebook: Eastry Community Watch – Lower Street Traffic Complaints' was removed from objective for Data Protection reasons. It contains comments from Facebook and names. The comments relate to traffic on Lower Street (18 pages) and will be made available to the Inspector on request.</p> <p>I object to the inclusion of the land adjacent to Cross Farm (TC4S023), Lower Street, Eastry, in the Dover District Council Local Plan for the following reasons:</p> <p>1. Cross Farm (TC4S023) was not included in the previous Local Plan so there has been no consultation on it, as there was with the previous Local Plan, which has led to significant site allocations being removed from the plan. This is inconsistent with the spirit of this consultation process, is undemocratic and unjust. This shows total disregard for the views of the residents of Dover District Council.</p> <p>2. The location of access to Cross Farm (TC4S023) is dangerous as it's on a busy road, one of the main ones into the village, which is largely single lane due to the parking of cars, making it hard to exit the site, and adjacent to a dangerous blind corner and is likely to lead to serious injury to the public or fatalities. For this reason, this location is unsuitable for additional houses, which is probably why none were built here in the past – see the attached 175 comments on the Eastry Community Watch Facebook page about traffic congestion and the danger to lives on Lower Street.</p> <p>3. Developing Cross Farm (TC4S023) will have a detrimental effect on an area of significant amenity value to the village with listed buildings, including Cross Farm, the adjoining conservation area, and the Saxon burial ground. It will also adversely impact views from the public footpath that runs along the top of The Lynch and overlooks the site.</p> <p>4. Once developed Cross Farm (TC4S023) will add to the already significant traffic congestion on a busy single lane (because of parked cars) bus route into the village and will impact the rest of the village, which only has single lane traffic due to parked cars. If the parking is to be</p>

	<p>banned there is nowhere for residents to park in the village and it will cause huge inconvenience to residents – see the attached 175 comments on the Eastry Community Watch Facebook page about traffic congestion and the danger to lives on Lower Street.</p> <p>5. It will be impossible to develop Cross Farm (TC4S023) without causing huge inconvenience to the village because of the narrowness of Lower Street and the large number of construction vehicles involved – see the attached 175 comments on the Eastry Community Watch Facebook page about traffic congestion and the danger to lives on Lower Street.</p> <p>6. Cross Farm (TC4S023) is not served by utilities, such as gas and sewerage, and given the limited size of it, connecting them is unlikely to be economically viable.</p> <p>7. These additional houses will put huge stress on the village resources, given that it has limited schooling and no medical practices, and all roads in the village are single lane due to parked cars.</p> <p>8. With the 178 houses that have been granted planning permission, Eastry will already be overdeveloped. There is no room for a further 10 houses or the 95 in this Local Plan. Eastry is a village not a town. All of its streets have single file traffic, not two way.</p> <p>9. Given that the government is no long setting targets for numbers of houses built by local authorities, there is no need for this development which will have a detrimental impact on Lower Street and Eastry.</p> <p>10. The whole Local Plan consultation process is unsound and probably illegal. (a) The public exhibition events were poorly promoted and occurred prior to the village receiving an excellent leaflet from the Parish Council, so very few people knew about them as is evidenced by just 300 people attending. (b) Most of the marketing has been web based, excluding many people from participating, such as my parents. (c) The web-based mechanism for providing feedback is over complicated and beyond most people's ability, including mine, to raise objections or comment.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Classify the land adjacent to Cross Farm (TSC4S023) as unsuitable for development.</p> <p>In Section 6, I have commented on why I think the Local Plan is not legally compliant but I'm not a lawyer and am not qualified to comment on changes that would make it legally compliant.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>I have no idea what this means but if it helps classify the land adjacent to Cross Faarm (TSC4S023) as unsuitable for development, I would like to attend.</p>
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP33 - Eastry Small Housing Sites</p>
<p>Rep ID</p>	<p>SDLP434</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1266672</p>
<p>Consultee Full Name</p>	<p>Dr Graham Baker</p>

Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 33
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Whilst I have read the plans for Eastry SP32 (and SP33) and appreciate that various waste water, run off water, ecological and heritage surveys will be done I still have serious reservations with regards the flow of additional traffic through the narrow road from Lower Street past Buttssole Pond and poor observation for vehicle drivers. There are no pavements for pedestrians and too many parked cars outside of the existing building to support 90+10 additional houses proposed. Consideration needs to be made to take parked cars off the road, where possible widen the road and put in proper pavements for pedestrians to make the road safer for pedestrians and slower moving road users like cyclists and horse riders of which there are many. This is a really dangerous road in the village, traffic travels way too fast given the poor line of sight and lack of pavements and the council needs to the impact on public health if non-car users (walkers, runners, cyclists, horse riders) are forced off the roads due to the extra traffic.</p> <p>It should also be noted that Buttsolde Pond lies in the log term flood risk area so additional run off will only add to the problems already experienced where 3 hillside roads converge and this will only get worse if the ony means of drainage (the conduit across to Brook Street) is put under additional strain / when flooding starts to take place.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Widen lower street to junction of Northbourne Road junction, add a pavement and improve sightlines to keep non-vehicle users safe, provision of off road parking for the residents in Lower Street. Develop a roundabout at the junction of Lower Street and Northbourne Road so that traffic to the Buttssole Pond development (and evn hosital site) have an alternative entrance other than driving up Lower Street. Improve the drainage of surface water from Buttssole Pond through to Brook Street and beyond.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP33 - Eastry Small Housing Sites
Rep ID	SDLP210

Rep Status	Processed
Consultee ID	1331233
Consultee Full Name	Mr John Roger
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	sap33 TC4S023
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Vehicular access will be highly dangerous due to the bend in the road and indiscriminate parking on both sides of the road. What are the plans for access to the main drains when the height of the buildings constructed on the bank will present a problem? Or are they all going to be on cesspits or soakaways as are the existing farmhouse and bungalow conversion.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP33 - Eastry Small Housing Sites

Rep ID	SDLP551
Rep Status	Processed
Consultee ID	1261479
Consultee Full Name	Thomas Estates Development Limited c/o Agent
Consultee Company / Organisation	
Agent Full Name	Elizabeth Welch
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP33 - Eastry Small Housing Sites
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Additional information is requested by DDC regarding availability and deliverability of the site - accordingly the following supporting material is detailed below SAP33 Land adjacent to Cross Farm, Eastry (TC4S023) The site remains to be immediately available being owned by a developer -Thomas Estates LLP, and Hollaway Studio remain engaged to work up a scheme of approximately 9 units. The site itself has no ownership or infrastructure constraints or extraordinary development costs, the site is considered by the developer to be a viable proposition. There are no known barriers to development of the site and an application is likely to be submitted in 2023.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	No changes required
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

Local Plan Consultation Point	SAP33 - Eastry Small Housing Sites
Rep ID	SDLP523
Rep Status	Processed
Consultee ID	1330948
Consultee Full Name	Jim Wilson
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Local Planning Site Allocations
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SAP 32 will raise traffic levels in an already troublesome spot. Along with SAP 33 the addition of 90 homes will make Lower Road even more treacherous than it is now , or will be after the hospital development is complete. Older residents of the village have pointed out that the area designated as SAP 32 has flooded historically in bad weather.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Remove SAP 32 from the plan along with the Cross Farm plot.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	

Include files	
Local Plan Consultation Point	SAP33 - Eastry Small Housing Sites
Rep ID	SDLP555
Rep Status	Processed
Consultee ID	1331773
Consultee Full Name	Jane Thomas
Consultee Company / Organisation	
Agent Full Name	Elizabeth Welch
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP33 Eastry Court Farm, Eastry (EAS009)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Comment being made on behalf of Jane Thomas, owner of The Oast House, Brook Street, Eastry, Sandwich CT13 0HR</p> <p>SAP33 Eastry Court Farm, Eastry (EAS009)– The Plan is unsound as the wording within SAP33 (EAS009) is not sufficiently precise. The only form of access should be taken via the existing access to the site on Church Street. This should be mentioned explicitly within the policy narrative. There should be no through access, to the east, onto Brook Street. Brook Street is a narrow rural lane with limited passing places. The wording should also make reference to the need for additional landscaping to the south east of the site to ensure a soft boundary to existing residential properties. Please note that I support the proposed quantum of housing on the site, five units, since the constrained existing access limits any further development on site.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>Add in the additional wording under 'Site-specific issues and requirements'</p> <p>'Access from Church Street only'</p> <p>and additional wording (as inserted in bold)</p> <p>Existing trees and hedgerows should be retained and enhanced where possible and an appropriate landscape buffer provided along the northern 'and south eastern' boundary of the site.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP33 - Eastry Small Housing Sites
Rep ID	SDLP622
Rep Status	Processed
Consultee ID	1331790
Consultee Full Name	Julie Davies
Consultee Company / Organisation	CPRE Kent
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP33 EAS009
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Land adjacent to Cross Farm, Eastry</p> <p>We object to this allocation:</p> <ul style="list-style-type: none"> • The site is not connected to the village. • The Agricultural Land Classification Map indicates that land around Eastry is likely to be in grades 1 and 2 – the best and most versatile agricultural land. • The site is given orange status and the overall landscape summary in HELAA Appendix 3A and the Landscape Consultants Assessment states: • Development conflicts with many landscape characteristics and some significant landscape/visual impacts are likely to occur. Site identified as medium high sensitivity. The overall landscape summary is: • The development of this site would have an impact on the landscape and further assessment is required to demonstrate whether this can be mitigated. • There are no footways from the site to the village and the HELAA Appendix 3B gives the site orange status as 'Highways concerns have been identified in relation to access and/or highway impact and further assessment is required to demonstrate whether this can be mitigated.'

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	CPRE Kent would wish to participate at the examination hearings to explore these issues further.
Include files	
Local Plan Consultation Point	SAP33 - Eastry Small Housing Sites
Rep ID	SDLP760
Rep Status	Processed
Consultee ID	1331848
Consultee Full Name	Mrs Tanya Jaynes
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP33 TC4S023
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	Access and Highways suitability needs to be reviewed the proposed entrance to this development is not safe for this amount of extra vehicles entering and exiting at this location. It is on a blind bend where the road narrows - there are warning signs before the entrance for the road narrowing.

<p>possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>The slow sign to warn traffic to slow down for the bend written on the road just before the entrance to Cross Farm is frequently parked on. Cars are forced from both directions due to parked cars onto the wrong side of the road at this point of Lower Street which is a blind bend.</p> <p>Cars frequently park both sides of the entrance to Cross Farm considerably affecting visibility accessing the road and any flow of traffic.</p> <p>This part of Lower Street has a problem with collision incidents and problems with traffic flow. Eastry Parish Council have recently submitted their latest Highway Improvement plan to KCC Highways and it's number one priority was concerns with speeding and parked cars along Lower Street.</p> <p>There is a huge speeding problem in Lower Street, this is with cars coming in and out of the village. As a result of this problem our car was written off earlier in the year by a speeding car while parked near to the entrance of Cross Farm. Two neighbours cars were also damaged by the collision. Police incident no. 01-1536</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>To remove this development from the local plan on the grounds that the vehicular access point is not suitable.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP33 - Eastry Small Housing Sites</p>
<p>Rep ID</p>	<p>SDLP1396</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1266501</p>
<p>Consultee Full Name</p>	<p>Mr Alex Child-Villiers</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP33</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I'm not happy about the development proposed at Cross Farm, Eastry. I can't find anywhere on your website to make my views known. This page is no help at all https://dover-consult.objective.co.uk/kse/ has nowhere for comments. Please let me know how I do this
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP33 - Eastry Small Housing Sites
Rep ID	SDLP1343
Rep Status	Processed
Consultee ID	1272374
Consultee Full Name	Colin Boughton
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 33 EAS009
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Eatery Court Farm EAS009 is allocated for 5 dwellings in the Local Plan. As I live in the old Farm I, and other local residents, are happy with this number of dwellings. However does this number mean the TOTAL number of dwellings to be built in the Farm or does it exclude any development of the existing pay office and the old barn, which could increase the number to possibly 9 or 10?</p> <p>There is some confusion regarding this which could come under the "soundness" criteria of Reg 19.</p> <p>The accompanying details relating to EAS 009 say that a flood assessment is required! I find this quite strange as the land is adjacent to a church and on very high ground within Eastry. However no mention of a traffic assessment is made in the accompanying details. Why is this?</p> <p>Considering the narrow entrance and exit to the Farm and the width of Church Street, which is a cul-de-sac, together with the sensitivity of the road as a route to the church in a conservation area, this is strange as the traffic issues are the major reason in limiting the dwellings proposed for the Farm.</p> <p>5 dwellings has been the number in the 2015 Local Plan and again in the 2022/3 Local Plan.</p> <p>The omission of a traffic assessment prior to any development being allowed could be considered "unsound".</p> <p>Overall, I am happy with the local plan in relation to EAS009 and I am happy with the consultation process (apart from the fact you can't access the portal to make any comments!), and I trust that DDC will maintain their stance that Eastry Court Farm can only accommodate 5 dwellings (which has been consistent though 2 Local Plans since 2015) , and they will not be swayed by commercial pressure to increase this number.</p> <p>I trust this e mail is sufficient to register these comments for the Reg19 Consultation.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	

Include files	
Local Plan Consultation Point	SAP33 - Eastry Small Housing Sites
Rep ID	SDLP1764
Rep Status	Processed
Consultee ID	1273120
Consultee Full Name	Alan Hughes
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP33 (EAS009)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>With regard to the above, we would like to comment as follows:-</p> <p>In principal and provided no further dwellings are proposed for this site, we agree to the 5 dwellings indicated in the plan, however, these dwellings should be sympathetic to the site, which ajoins the conservation area and should be sympathetic to the buildings that are already there bordering the site, two of which are listed buildings.</p> <p>Of great concern is the current available access to and from the site via church street, any further vehicular activity along this street would not be ideal, currently when vehicles are parked on both sides of the street toward the church end it becomes a very narrow thoroughfare leaving very little space for bigger vehicles to navigate and included amongst these would be fire, ambulance and other emergency services.</p> <p>REDACTED BY DDC of even greater concern REDACTED BY DDC is 1&2Eastry Court Cottages which sit at the entrance to the farm yard. It is a grade 2 listed building being some 320 plus years old, and not built on foundations, we know through experience that heavy vehicles going back and forth will have a detrimental effect on the structure of the building as witnessed through earlier building works accessed from Church street which caused cracks to appear in the building.</p> <p>We are interested to know if curtilage is applicable and to what extent it would apply</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will	

make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP33 - Eastry Small Housing Sites
Rep ID	SDLP1646
Rep Status	Processed
Consultee ID	1267747
Consultee Full Name	Joanna Jones
Consultee Company / Organisation	Eastry Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP33 TC4S023
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Eastry Parish Council believe that the Local Plan is not legally complaint and is unsound as the choice of the land adjacent to Cross Farm Eastry - TC4S023 has not taken into account the following: 1. The location is unsuitable for housing as it is on the busy road into the village which already has problems with speeding and congestion as it is largely single lane due to the parked cars from the terraced housing stock which doesn't have parking provision. Within the last year there have been several accidents/damage to property from buses and speeding cars on Lower Street. 2. This site was not originally in the local plan so no consultation has yet taken place until now. 3. This area is of significant amenity value to the village with listed buildings, adjoining the Conservation area and the saxon burial ground and will adversely effect the views from the footpath that overlooks the site. 4. There are already 178 houses in the process of being built/have permission to be built within the village and these extra 10 houses will put a strain on village resources and lead to over-development
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s)	Take TC4S023 out of the Plan

you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP33 - Eastry Small Housing Sites
Rep ID	SDLP1869
Rep Status	Processed
Consultee ID	1333830
Consultee Full Name	L T James
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP33 (TC4S231)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	My principle objection is that the developer has only limited and prescribed access to the Cross Farm Field. Access to this field is by way of land owned by me. As yet I have not given my permission to either waive or amend the current access restrictions. I have been in previous correspondence with DDC disputing the naming of Meadow Lane and the positioning of the street sign. As yet I have had no response to my request for a site meeting to resolve the positioning of this street sign,

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	TC4S231. Access to this field is by way of land owned by me. As yet I have not given my permission to either waive or amend the current access restrictions.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP33 - Eastry Small Housing Sites
Rep ID	SDLP2031
Rep Status	Processed
Consultee ID	1334471
Consultee Full Name	Matthew Thomas
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	TC4S023
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>I am writing in support of the application below from the new local plan: Reg 19 Site Policy Number: SAP33 Site name: Land adjacent to Cross Farm, Eastry (TC4S023) The application for ten houses in the picturesque setting adjacent to Cross Farm (Meadow Lane) is ideal for development and the plans are sensitive to the surrounding area.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	

Local Plan Consultation Point	Kingsdown
Rep ID	SDLP776
Rep Status	Processed
Consultee ID	1331213
Consultee Full Name	Dr Anne Ballinger
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Page 268 (7.11)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Page 268 states 'to support the delivery of rural local needs homes to enable local people to remain in the village where they live or work and not to be forced to move away because of high house prices and high rents'. The proposed housing in Kingsdown like the rest of the local plan has only 30% affordable. Has the council made any attempt to identify the number of 2nd/3rd/4th homes in Kingsdown or homes bought to run totally as AirBnBs? No there is no mention in the plan. Has the council attempted to find out who has bought the last 10 homes for sale in Kingsdown e.g. the £600,000 2 bedroom home in North Road? If DDC had explored this they would find that many of the homes are not affordable to locals and are bought as 2nd homes. For instance in North Road only 7 of the 34 homes are lived in - the rest are 2nd homes or AirBnBs. This is the same in South Road and many other roads. The new houses will do nothing to increase housing for locals.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	It is unsound because there is no proper assessment of housing need for locals (as you specify in your introduction) in Kingsdown or indeed Deal where there are also many 2nd homes. It is legally not compliant because it encourages car use as the roads in Kingsdown are too narrow for drivers to obey the 2022 Highway Code for cyclists and walkers.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Kingsdown
Rep ID	SDLP879
Rep Status	Processed
Consultee ID	1331918
Consultee Full Name	Mrs Marilyn McDowall
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34(KIN002) and SAP35(TC4S074)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>NE2 11.13 , Allocations for housing development SAP35 (TC4S074) and SAP34(KIN002) fails to address this issue of respecting the landscape and 11.14 states that landscapes provide a livelihood for agricultural and tourism sectors.</p> <p>With SAP35, this site according to Evidence Base Appendix 2c (Housing Sites and Landscapes) cannot be mitigated because of the hilly nature of the terrain allowing the site to be easily viewed. Later assessment gives the qualification that there will be minor negative affects for this site but this is to be disagreed with. There is a PRoW passing through the middle of the field from the western edge of the site and proceeds up to the top of the hill. Any development in this area will be easily discernable and will stand out against the unique and attractive character of the village. The proximity of the aforementioned PRoW is a footpath within easy reach by walking of both residential areas of Deal and Walmer, and is well used by dog walkers, visitors and bird watchers (good for health and well-being and the use of private transport not needed). Its popularity is enhanced by the views over Kingsdown, the adjoining countryside and across the Dover Strait to France. Putting houses in the bottom corner of the field, small though the number is, will unfortunately lead to marring this walk despite questionable attempts to provide buffers.</p> <p>With respect to SAP34 (KIN002), this site for housing is adjacent to the AONB. It is agricultural land , needed for producing food..The development will be on the skyline and mar the landscape.and again will be discernable on the approach to Kingsdown village via the Ringwould Road. This road is narrow and in consequence will be difficult to gain access to and from the site. If the road is widened at this point, the land is part of the AONB and therefore presumably cannot be used for this purpose. The highway network just adjacent to the proposed entrance of this site and</p>

	<p>into and around Kingsdown is much constrained with no pavements for pedestrians. Development of this site for 50 houses will add to the already present congestion of vehicles negotiating this network. This will reduce the attractiveness of the village and deter visitors and tourists. Kingsdown already has a number of 2nd homes and airbnbs. With the infilling that has been done over the past few years, building another 55 houses (SAP35 and SAP34) in this attractive and sensitive area, will allow the potential for this number to increase which might be acceptable for the tourist industry but will not be for people wishing to own and live in this village.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>To maintain and keep the coastal village of Kingsdown as highly attractive and therefore encourage visitors and ensure its sustainability, both sites for development (SAP34 and SAP35) need to be withdrawn from the Local Plan.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>Kingsdown</p>
<p>Rep ID</p>	<p>SDLP888</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331918</p>
<p>Consultee Full Name</p>	<p>Mrs Marilyn McDowall</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>Housing and Employment Site Allocations, 4.236, fig. 4.10, table 4.7, SAP34 and SAP35</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified</p>

	Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Section 4.210 states that the Kingsdown landscape setting is highly attractive and sensitive. Section 4.213 disagree with 1st sentence that these sites are appropriate for development as infilling has already occurred in Kingsdown. Further housing development in this castal village will lead to an increase in 2nd homes and airb&b's.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	To comply with the requirements of the Local Plan , withdraw sites for development SAP34 and SAP35 from the list of housing allocations.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)

Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP71
Rep Status	Processed
Consultee ID	1330704
Consultee Full Name	Mrs Elizabeth ZDZIEBKO
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Infrastructure delivery
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Yet again an attempt to destroy the beauty of Kingsdown.</p> <p>The added traffic of up to 140 potential new cars will be a huge burden on the road down to Kingdown.</p> <p>Visitors will drive past a housing estate on way to the beach.</p> <p>Less and less places to walk with dogs</p> <p>No village infrastructure for all these added families.</p> <p>Far too many houses.</p> <p>Do not need executive houses.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Fewer affordable houses

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Would welcome an opportunity to protect my environment
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP422
Rep Status	Processed
Consultee ID	1268001
Consultee Full Name	Mrs Elizabeth Deschamps
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34-Land at Woodhill Farm
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<ul style="list-style-type: none"> • This development is not needed. Kingsdown has a large proportion of properties that are either second homes or Airbnb. Many of the proposed houses would be used for the same purpose. • Access to the site is very difficult. Ringwould Road is very narrow. Construction of a new access would lead to chaos for existing residents. If the proposed development is built, there are no footways into the village which would mean either driving or walking on a very busy roadway. • The village centre is small with very narrow roads and very limited parking. • There are very few facilities within the village, no doctor or any other health facility. • The primary school is full. The nearest secondary school is in Deal. • Public transport, the bus service, is very limited which means more private car use. • There are no cycle tracks at this end of the village and the roads are too unsafe for cycling. • The proposed development is adjacent to an AONB. It is on the skyline and would be very dominant visually, both from the AONB and also on the approach to the village from Ringwould. Tree planting would not mitigate this. • Prime agricultural land would be lost for ever which is not compatible with food security. • This proposal will not be consistent with the existing village and the limited facilities which it has available. It is out of scale with the appearance and character of the village.

	<ul style="list-style-type: none"> To sum up: the development is not "of a scale that is consistent with the relevant settlement's accessibility, infrastructure provision, level of services available, suitability of sites and environmental sensitivity"SP4
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	Remove this proposal entirely and concentrate on development of brown field sites.
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	No
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP403
Rep Status	Processed
Consultee ID	1272509
Consultee Full Name	Mr Paul Cannons
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	SAP34 - Land at Woodhill Farm Kingsdown (KIN002)
<p>2 - Do you consider this part of the Plan sound?</p>	No
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	Positively prepared Justified Effective Consistent with National Policy
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	No

<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>No</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>Local Development Plan from Dover District Council – Objection to Development of 50 houses SAP34/KIN002</p> <p>The following information is in answer to the question: 'Do you think the local plan is sound?' Was it:</p> <p>Positively prepared – NO Justified – NO Effective – NO Consistent with national policy - NO</p> <p>SAP 34 Ringwould Rd, arable Field behind Glenview Carehome, Kingsdown</p> <p>It is unsound and ineffective to a damaging extent, to list Kingsdown as being a '<i>Local Centre; a village providing services for a local rural area and a secondary focus for development in the rural area</i>' Any development at SAP 34 would do the opposite of 'reinforcing the role of the village'; it would in fact choke off the existing parish economy, reducing its attractiveness to tourists. Any development at SAP34 would endanger life given the unique highways situation of the village, the district-wide need for traffic to flow through village on narrow lanes with single lane passing whenever the A258 is blocked.</p> <p>SAP 34 Kingsdown p. 163: The selection of SAP 34 is totally unsound, on 5 different grounds. Firstly, the Highways Assessment of Ringwould Road is inadequate and unsound as regards this site. The facts are that Ringwould Road is signposted as unsuitable for long vehicles, unsuitable for vehicles over 7.5tonnes and unsuitable for wide vehicles, the road is painted SLOW in 3 places despite the 50mph signs, and there are 4 sections where the road narrows to single lane passing. The Kingsdown village residents (population 2000 + 500? more in summer months due to holiday village + campsite) are all dependent on the Ringwould Road traffic flowing freely. Therefore, selection of SAP 34 for any development is unsound firstly on the grounds of highways assessment unsound/inadequate. This development would cause extreme danger and gridlock, involving the cars of current residents, parents of children of the village primary school, construction vehicles and new residents' cars. KCC for years have refused to listen to requests to reduce the speed limit on this road and refused also to put in pavement on the northern side of Ringwould Road. The economy of the village depends on visitors and residents walking, cycling and horse-riding on the Ringwould Road and any development of SAP 34 would increase the likelihood of accidents which may result in fatalities.</p> <p>The selection of SAP 34 is unsound secondly on the grounds of landscape character, being incompatible with criteria described above in SP 4. the site is on the skyline with sea behind, an iconic view that greets all people arriving in Deal; its selection contradicts the comments in SP4 on individual village identity and character. SAP34 would be the first siting of any visitor turning right off the A258 in Ringwould and heading towards Kingsdown. Regardless of any attempt to hide the development it would still be seen as an 'eyesore'.</p> <p>The selection of SAP 34 is unsound thirdly on the grounds that the Deal/Walmer conurbation of 30,000 depends on the narrow – single lane in places - Ringwould Rd, carrying diverted traffic from the A258 every time A258 is blocked by an RTA or road works. The A258 is the only southern entrance to the 30,000-conurbation starting in Upper Walmer and stretching to North Deal and Sholden. Diverted traffic creates a is a dangerous situation for the village every time it happens, some diverted traffic uses Glen Rd/Liverpool Road selected as site for SAP 15 Ray's Bottom in Walmer. This site too, if developed, is likely to mean diverted traffic cannot get in/out of Deal/Walmer 30,000 conurbation. Surely our emergency services would oppose both developments for this reason as acutely dangerous and life threatening. Unsound due to being incompatible with SP12, because its lanes periodically become part of the district Strategic Transport Infrastructure. Selection of these sites is completely unsound and non-compliant with all laws/planning regulations relating to the prevention of accidents and protection of human life. SAP 34 would result in '<i>Traffic movements from the development resulting in severe impacts to the highway network that it would not be possible to mitigate</i>', and as such contrary to SP4 2 j within the plan, thus unsound and highly ineffective.</p> <p>The selection of SAP 34 is unsound fourthly on the grounds that it borders the AONB and is valuable arable farmland, needed at times for valuable food producing farmland. Moreover 4.238 needs correcting, the parish council-owned, biodiversity-rich site of the Lynch and Freedown woods (that run into Oxney Court Woods) was the subject of a survey by Kent Wildlife Trust in 2017 commissioned by the Ringwould/Kingsdown parish council and paid for by DEFRA, which provides evidence of the natural capital within the boundary of the AONB to be protected on the boundary of this site. Also, because it would be destructive of the Landscape Character. It is also unsound given that it is in a BOA Biodiversity Opportunity Area.</p>

	The selection of SAP 34 is unsound fifthly on the grounds that any development would possibly remove a flood sponge on the top slope of the hill, below which is the Knight's Bottom pumping station and pond which drains towards Rays' Bottom SAP 15, so development here could contribute to flooding (see CC5 p. Flood Risk). This area at the bottom of the dip is already a dangerous blackspot
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP359
Rep Status	Processed
Consultee ID	1266351
Consultee Full Name	Dr Sharon Danby
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No

<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Not Applicable</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>I object strongly to KIN002 being included in the draft LDP for the following reasons:</p> <p>The inclusion of SAP 34 is not legally compliant with NPPF 2021 item 11. (b)ii ‘SPs should provide for objectively assessed needs for housing & other uses, . . . unless(ii) any adverse impacts of doing so would significantly & demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole’. The following arguments show why this development would not be sustainable as is a requirement of the NPPF and would have more adverse impacts than benefits. Also as the government have decided on 5/12/22 to stop putting pressure on local authorities with their unsustainable housing targets; the LDP now needs reviewing with respect to how it is putting pressure on rural communities to accept unreasonable developments of this nature.</p> <p>The continued inclusion of SAP34 / KIN002 land at Woodhill Farm, Kingsdown in the LDP is unsound. Despite many concerns and reasoned arguments from residents the only concession seems to have been to reduce the housing numbers from 90 to 50; and it is doubtful that 50 would be the maximum if the proposal were to go ahead. Developers would likely try to negotiate the number back up to 90. The site has now been given a green allocation in the HELAA report despite its many issues and the fact that an adequate full highways assessment has not yet been carried out and the HELAA highways assessment remains amber. The latest HELAA report states that the many failings can be mitigated for within the LDP. I would argue that this is unsound and not justified or consistent with National Policy NPPF 21. The evidence from DDC has not been used correctly. NE2 Landscape character and the Kent Downs; states in section 11.13 that DDC aims: <i>To ensure that all development coming forward over the plan period respects and reflects the character of the landscape in which it is located.</i> The DDC landscape character assessment of 2020 (LCA) shows that SAP34 / KIN002 falls within Ripple F3, <i>open chalk farmland and woodland.</i> NE2 states <i>The classification identifies 17 LCAs and defines issues of landscape management and development management which should be delivered over the plan period.</i></p> <p>Development Management guidelines for LCA F3 include:</p> <ul style="list-style-type: none"> -<i>Conserve the rural character of the landscape ensuring that it continues to play a role in providing a rural separation between Deal and Kingsdown as well as a rural setting for the Kent Downs AONB.-Seek to reduce lighting and noise impacts on this landscape and in longer views through sensitive highway design/management. Conserve the distinctive narrow winding lanes and grassy verges.</i> - <i>Conserve the open skyline, avoiding the introduction of vertical elements such as pylons, telecommunications masts etc.- Protect and enhance views from more elevated areas and from the coast out to sea and towards landmark features such as Walmer Castle.</i> - <i>Protect the open character of the chalk landscape, preserving elements of tranquillity associated with it.</i> <p>The development of SAP34 would result in the loss of an important buffer between the built environment of Kingsdown along Glen Rd and the AONB. The mitigation measures proposed would also include changes to Ringwould Rd to provide a better access to the site. Guidance for F3 suggests that the narrow winding lanes and grassy verges should be preserved. Ringwould Rd would certainly lose its character and the main entrance to the village would be altered. From within F3 views across to Kingsdown and the sea would be altered by the development of SAP34, the open character of the landscape would be lost and pollution from light and traffic would increase. The HELAA sustainability appraisal incorrectly states; <i>The site has been judged by Council officers to have the potential to moderately affect the District’s landscapes, townscapes or seascapes.</i> I would argue that this is not justified due to inclusion in LCA F3 and proximity to the AONB.</p> <p>NE2 11.19 states <i>The setting of the AONB comprises land adjacent to or within close proximity of its boundary, including but not limited to land which is visible from the AONB and from which the AONB can be seen.....Within the setting of the AONBs, priority will be given over other planning considerations to the conservation or enhancement of natural beauty, including landscape, wildlife habitats, tranquillity, dark skies, and geological features.</i></p> <p>SAP34 is on the boundary of the AONB and within F3 Ripple on land which should provide a clear buffer between Kingsdown built environment and the setting of the AONB. Priority should therefore be given to conservation of the natural beauty of the AONB.</p> <p>SP13 states that <i>the NPPF 2021 requires local plan policies to conserve and enhance the natural environment, to recognise the intrinsic character and beauty of the countryside and the wider benefits from natural capital and ecosystems.</i> It is unsound to include SAP34 in the LDP as it would detract from the beauty of the countryside particularly the adjacent AONB. The Kent Downs AONB management plan 2021-26 says <i>the Kent Downs AONB, perhaps more than any other of Britain’s protected landscapes – AONBs, Heritage Coasts or National Parks, has experienced and is experiencing severe development pressure.</i> DEFRA evidence shows <i>‘The Kent Downs AONB stands out as an area which has experienced major, but expected, change, showing a rate of urban growth of almost 10%.pa, with the urban area spreading by 14 ha over the decade’.</i> The AONB in Dover District has suffered development at a disproportionate rate which indicates that planning pressures on our district are unsustainable. National Planning Practice Guidance (NPPG) confirms that the Duty of Regard is “relevant in considering development proposals</p>

that are situated outside National Park or Area of Outstanding Natural Beauty boundaries, but which might have an impact on the setting of, and implementation of, the statutory purposes of these protected areas." I would argue that because the entrance onto Ringwould Rd requires widening and changing of the road which will encroach into the AONB, to mitigate for it being unsafe, this will be detrimental to the setting and indeed directly upon the AONB.

NPPF 2021 11 – making effective use of land - Planning policies and decisions should: 120 *b recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production.* As food security is such a national issue, including SAP34 for development is unsound and unsustainable as good agricultural land would be better served in producing food.

Local Centres: I would argue that the designation of Kingsdown as a local centre is unsound and not justified. Due to the unique nature of its location with AONB to the South as a border, the Sea to the East, heritage coast and cliffs to the South. The 3 narrow access roads serving Kingsdown do not link up easily to other hamlets and smaller villages to provide services. The main settlement of Ringwould is the other side of the A258 arterial road from Kingsdown and better served by Deal or Dover. There is no doctors, a recently reduced bus service, poor transport links for pedestrians and cyclists, no train station. A small village shop with post office and butchers. It is necessary to run a car to get to Deal or Dover for a food shop. The services within the village are by no means comprehensive and running a car is necessary.

The number of 2nd homes and Air BandB's in the village proves that dwellings outnumber homes required, so there is NOT an 'objectively assessed need for housing within the Parish'. To include SAP34 /KIN002 is therefore unsound and not consistent with NPPF 21.

SAP 34 /KIN002 is outside the village boundary and is part of the green space surrounding the village. In the housing section of the draft LDP strategic policy SP4 which refers to residential windfall developments -ie small scale developments there are strict criteria with regards to development.

a -The scale must be appropriate to the size of the settlement and existing facilities - This development would create problems for Kingsdown as the school is small and oversubscribed, we do not have a doctors surgery and few shops. Inadequate public transport makes travelling to secondary schools difficult as well. Between the Regulation 18 and 19 consultations bus services have been further cut. The HELAA highways assessment indicates it is unlikely that the proposed development will generate enough additional patronage to lead to an increase in bus service provision. This contravenes SP1 as the need to travel by private car would be increased.

Allocated money from the developers would not do any good as there is no space and parking in the village for improving infrastructure. The narrow single track roads through the village which are an inherent part of the character and charm of the village are also a limiting factor for the village in terms of further development. Residents of KIN002 would therefore have to use their cars for everything, creating pollution and congestion.

b - development must be compatible with the layout, density, fabric and appearance of the existing settlement and would not result in merging of separate settlements - . Kingsdown has a sizeable conservation area and is a pretty seaside village with a shingle beach, woodland, chalk grassland and AONB. This would be a blight on the character and heritage of the village and would set the tone for people as they drive into the village. The HELAA assessment indicates that the entrance to the site would require the road to be widened at this point. Land is apparently available on the other side of the road. I would argue that this contravenes NE2 – the AONB would be compromised by taking a section of it to widen the road. This would also be detrimental to the character of the village as it would be the first thing that is seen as you drive into the village and would go against the development guidance for Ripple F3 in the LCA 2020.

C and d- There must not be harm to important green spaces - the site is directly opposite the AONB which is highlighted throughout the draft LDP (NE2) as being an important constraint to development. The AONB must be protected. Green fields around the village are very important to the communities health and happiness and this field is surrounded by busy footpaths and bridleways. This has been shown during the current pandemic to be of vital importance. There is also an area of land on Ringwould Rd in front of the site which is managed for nature by the owner and has a large number of nesting birds in the spring and overwintering birds. To the west of the site is an area of managed rare chalk grassland and woodland which has been the nesting and roosting site for many bird species including buzzards and skylarks.

f and g. It would not result in the loss of best and most versatile agricultural land currently used for agriculture and ...It includes an appropriately sized and designed landscape buffer to the open countryside;

NE2 states that proposals affecting the setting of the AONB will only be supported where the development is sensitively located and designed to avoid or minimise adverse impacts on the AONB and its setting and the development would enhance the special qualities, distinctive character and tranquillity of the AONB.

Having a wide access for good sight lines and widening Ringwould Rd using part of the AONB would be contrary to this. Also due to the contours of the land it would be very difficult to adequately screen the site from the AONB and therefore would have a negative impact on it. The site would also be visible from the Dover Road and would change the character of the landscape which is LCA Ripple F3.

h It would not have a significant adverse impact on the living conditions of existing adjoining residents;-

All residents of Glen Road would have their gardens overlooked and their privacy compromised. This would be contrary to their legal human right to enjoy their homes peacefully. During the building phase there would be a lot of noise, disruption and dust. Their views across the AONB would be blighted. The large number of cars would also create localised pollution and noise once such a development was completed. There would also be an increase in light pollution.

i Where development would result in the loss of active employment, open space, sport or community facilities within the settlement that such development is consistent with the requirements of policies EN2, PM5 and PM6 of this Plan; This development would not be sustainable as it would result in the loss of active employment in the village as the special character of the village would be affected and it would not be as desirable to visitors from outside the area.

j. Traffic movements generated from the development do not result in severe impacts to the highway network that cannot be mitigated - residents of this proposal would all have to use their cars to travel to nearby towns or to join trains or bus routes safely for work. This would create extra pollution contrary to the SP1 climate change strategy. The HELAA highways assessment shows that the site is still designated as orange. However the viability assessment shows it is now green so that the site can be pushed forward to reg 19 stage and concerns can be mitigated within the LDP. I consider this to be unsound. The mitigation is chiefly concerned with using some of the AONB to widen the road. This contravenes the NPPF as it would cause more adverse impacts than benefits to the village and AONB. It is unsound to put any more pressure on the 3 narrow, characterful roads into the village as emergency vehicles will not be able to safely gain access. When the A258 is closed as it was recently due to a fatal accident and traffic diverted into our village the gridlock in Kingsdown is dangerous. The HELAA assessment is also assuming that there is a good bus service; however, this has been cut. The HELAA assessment is underestimating the number of car movements that a development of this size would generate at 60 – 70 at peak times. It is more likely with the large 4 or 5 bed homes that would be built here that this would be in excess of 100.

T11 Development should, in so far as its size, characteristic and location -Give priority to the needs of pedestrians, cyclists, users of public transport, car sharers and users of low and ultra-low emission vehicles. This site is outside the village boundary and not well served by footpaths or cycle paths. The site is crossed by a footpath ER5 which connects to the village along a dirt track with no lighting. The site will exit onto Ringwould Rd which is not safe for children to cycle down and does not have any footpaths. The HELAA Sustainability appraisal is incorrect with its summation of minor negative with regards to climate change mitigation and sustainable transport. This has not taken into account the cutting of bus services to the village and the fact that it is not easy to walk or cycle to Deal or Dover.

T12 New accesses and intensified use of existing accesses onto the road network will not be permitted if it would result in a clear risk of crashes or traffic delays unless the proposals can incorporate measures that provide sufficient mitigation. I consider this site to be unsound as there would be an increase in crashes and traffic delays. Widening the junction at the exit would not do anything for the rest of Ringwould Rd. Land either side (opposite the AONB) is not owned by the same party as KIN002 and so cannot make up part of this development. The access is also very complicated. It is used by visitors to the play area and the landowner to the left as you enter the field from the road. No mention is made in the HELAA highways assessment of the landowner needing access. ER5 also crosses the entrance which would therefore be dangerous to pedestrians crossing from the field back to the village. ER5 is a very busy path used by dog walkers on a daily basis. The sight lines onto Ringwould road from either direction are poor. Ringwould Rd is very narrow in places and in places, 2 vehicles cannot pass each other. Turning left out of the site would be onto a narrow road going into a 20mph zone. Turning right is in a 50mph zone with a bridleway and footpath crossing with poor visibility and slow tractors turning out onto the road. There has already been an RTC resulting in a fatality and serious injury on Ringwould Rd. I would argue that issues with access alone mean that this site is not suitable and unsound for development. A medium pressure gas main crosses KIN002 diagonally and crosses the road at this access point which would require careful consideration when changing the access. This would cause a lot of disruption to the villagers as this is the only classified road in and out of the village and as poor as it is, is the main route to the A258. If traffic had to divert via Deal this would create extra pollution and congestion for a protracted period of time which would be contrary to SP1 and the climate emergency declaration by DDC.

T12 Applicants must demonstrate that traffic movements to and from the development can be accommodated, resolved, or mitigated to avoid severe cumulative residual impacts.

The streets of Kingsdown particularly in the conservation areas are narrow and some unmade and unadopted. There are no footpaths in Upper Street where pedestrians are often to be found walking down the road to the shops. Lorries have repeatedly damaged property in Upper Street and the Rise and this is why there is a weight limit of 7.5 tonnes on Ringwould Rd. During the development phase the construction traffic would

	<p>not safely be able to get in and out of the site. Also how can construction traffic get to the site if there is a 7.5 tonne weight limit on Ringwould Rd? An increase in 50 houses would result in far more car movements than the 60 – 70 car movements in rush hour predicted by the HELAA highways assessment. There would also be all the delivery vans, workmen etc. If these then turn left down the village to avoid the difficult junction at Ringwould onto the A258 they would cause gridlock in the village. The current windfall developments of a few homes per year is enough to cause problems within the village due to vehicle movements.</p> <p>These criteria refer to windfall developments which is how Kingsdown has grown slowly over the last planning period. These criteria are very sensible when applied to a rural settlement with poor infrastructure such as this. Any large scale development other than windfall would have a devastating effect on the community and could be considered as a disproportionate and unsustainable development in terms of this settlement.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Remove SAP34 from the LDP.</p> <p>Housing targets particularly with respect to characterful rural settlements need to be renegotiated in light of new government rulings.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)</p>
<p>Rep ID</p>	<p>SDLP340</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1272938</p>
<p>Consultee Full Name</p>	<p>MR Mauro Feltrin</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified</p>

	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>This plan of 50 new houses clearly does not take in consideration the already much under pressure road infrastructure, of this village, if you are familiar with the local traffic, you will know how congested is especially when you try to go to the post office, butcher or at the school, and no doubt with this extra 50 houses and about 80 to 100 cars will add extra real grief to the existing resident and to the potential new ones.</p> <p>There will be important negative wildlife impact on the local area, also if you take all the necessary preventions.</p> <p>Knowing how the design and the quality building construction of the general developer in UK are the poorest in Europe and the most expensive, will make a real bad impact on the general landscape of the village, by building these match box houses over priced and bad design.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>We should not develop any houses in the area, since we should use first all the brown areas or if we need to build some houses these should be given to an arch practice and to a creative developer that has got a vision.</p> <p>Should not be a plan to make as many houses possible like a mass, dormitory but value the area and cherish it.</p> <p>The house plan should be halved at least, and not to be a high concentration of bricks that will no doubt destroy the local beauty</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	i would like to participate to make sure that what i said is conveyed to the people responsible to take a decision to the interest of the village and not for the Farmer that is money out of this or to the developer.
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP375
Rep Status	Processed
Consultee ID	1261332
Consultee Full Name	Mrs Sally Colligan
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34 Land at Woodhill Farm (KIN002)

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The plan is unsound on five different grounds: a) The Highways Assessment of Ringwoud Road is inadequate; b) landscape character as it is on a skyline with sea behind, and a lovely view and the building of this plan will impact on individual identify and character; c) Ringwoud Road carries diverted traffic from the A258 every time A258 is blocked by an RTA or road works. d) It borders the AONV and is valuable arable farmland, needed in times of national food security is of concern. e) Any development will remove a flood sponge on the top slope of the hill.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	I do not consider that this particular plan is legally compliant or sound. It will have a detrimental impact on Kingsdown and we do not have the infrastructure in place to sustain it.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP431
Rep Status	Processed
Consultee ID	1331127
Consultee Full Name	Mr Laurence Wheeler
Consultee Company / Organisation	
Agent Full Name	

Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Local Centres: Kingsdown, St Margaret's-at-Cliffe,
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The plan is fundamentally unsound for a number of reasons, both practical and cultural.</p> <p>Firstly, the information upon which it is based is inaccurate or specukative. For example, there is no longer a bus service that serves Kingsdown. Stagecoach, the operating comoany have stopped the uneconomivcal service and say they are unlikely to reintroduce it as the cost effectiveness is getting wrose not better and won't imrove to a point of being economucally viable. (The LSE research into subsidied public services support the argument that long term subsidies of public services should not be expected to last indefinitely and would inevitably cease in the economic short term.)</p> <p>Secondly, the sensitive nature of the setting of Kingsdown would be unsettled and disturbed permanently by the introduction of 50 houses on this site because of the impact on its setting within the AONB and proximity to other sensitive areas near by. The village itself would suffer unduly as a result. It is the dark blue bit on the DEal Mnpoly boad for a reason. It is a highly sought after holidiay destination with a large capacity and developed campsite, a holiday park and numerous holiday homes. It is an expensive pace to live as it is so sought after because of its location and composition. Putting a large housing estate on its edges would negatively impact on its ambiance, character and charm that make it the desirable place that it is. Practically it is insane to overload an already overloaded infrastructure with more occupants and development. The drainage system, especially in parts of Upper Street and the lower portion of The Rise are already overloaded and often flood or back up. Southern Water are unable to say why or how this can be improved. Adding more effluent and sewage to the system is madness and likely to make an existing Health and Safety issue worse. The traffic in the village and up to the junction with the A258 at Ringwold is already a problem. There is inadeqaute access and very little parking available in the village itaself and the A258 junction is a congestion and motoring related problem already. The traffic from another 50 houses would have to involve major highways redesign with something like a roundabout or traffic lights, which would impact not only on the village but make the A258 an even more congested and troublesome route than it already is.</p> <p>The evironmental impact is also unacceptable for this location as its not an 'out of the way' / 'out of sight out of mind' situation as there will be light. and noise pollution which would be far reaching beyond the boundries of the development and it will be there permanently, not just for a while!</p> <p>There are also flaws in the propossal in the statement :</p> <p><i>'Development should be set back from the western boundary to mitigate impact on the AONB;'</i></p> <p>This is an acknowledgement that this development will impact on the AONB. The AONB has been researched and refined and registered to determine its boundaries and borders and setting and any impact upon it will reduce its fulfilment of that role. Why is this deemed as acceptable? They are there for a reason and domestic development is no excuse to permananetly remove, impact or destroy them. The boundaries are c exactly where they should be and should not be impinged upon.</p> <p>There is no need for this development in Kingsdown as there are numerous other sites that would accomodate further domestic development without extra impact on the environment. Another 50 residences at Whitfield, which is already under development, would have no extra impact and save the precious areas in our county that are under increasing and unnecessary threat.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s)	

you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP402
Rep Status	Processed
Consultee ID	1272505
Consultee Full Name	Caroline Cannons
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34 Land at Woodhill Farm, Ringwoud Road, Kingsdown (KIN002)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	I believe the selection of SAP34 is unsound in the following areas: 1.Highways Assesment of Ringwoud Road is inadequate and unsound as regards to site SAP34. Ringwoud Road is signposted as unsuitable for: long vehicles (over 7.5 tonnes); wide vehicles; has SLOW painted in 3 places. Residents in Kingsdown are dependent on the Ringwoud

<p>possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>Road traffic flowing freely. Any development will cause further difficulties on an already difficult road to navigate at gridlock times. Traffic diversions through the village - using either Glen Road or Kingsdown Road, when there are issues on the A258, already cause difficulties for and added dangers to residents, (and the children and staff of the village school during term times,) as well as deliveries to village businesses and residents and for emergency services that try to access specific areas within the village. SAP 34 will only increase those dangers and potential loss of life.</p> <p>2.The site of SAP 4 is on the skyline with the backdrop of sea behind, an iconic view that welcomes people to Kingsdown, giving the village its individual identity and character. With the density of 50 houses on this site, that attractive and highly individual identity will be eroded.</p> <p>3. SAP 34 is unsound on the grounds that it borders the AONB, and is valuable arable farmland, needed more than ever now when national food security is of concern. Sites capable of food production and contribution to bio-diversity are SO important these days, the loss of which would impact negatively on this AONB.</p> <p>4.SAP 34 is unsound on the grounds that any development would remove a flood sponge on the top slope of the hill, below which is the Knight's Bottom pumping station and pond, which drains towards Rays' Bottom, so development could lead to flooding in an area that has already seen a near RTA fatality and many near misses on the dip of the Ringwoud Road.</p> <p>Any development should not override existing benefits of current provision. I fear that the above mentioned concerns will erode benefits of village life. The characteristic and charm of Kingsdown will disappear. There will be a loss of amenity to villages for walks and the biodiversity of the area will also be affected.</p> <p>A further concern is the lack of information on the legally binding 0% carbon commitment by 2050 within the plans. What are the quality of the material being used?</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Not Applicable
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
<p>Rep ID</p>	SDLP421
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1329655
<p>Consultee Full Name</p>	Mrs Lamoon Sue Lamoon
<p>Consultee Company / Organisation</p>	

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34 p 163 SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I think this plan is unsound as Kingsdown is already completely overcrowded with what we have. It does not have the roads to accommodate anymore houses and people. Which also won't be affordable for young families. The road needs footpaths, cycle tracks. I also want to state that I think your way of getting us to return our concerns is unacceptable and suggests you have deliberately tried to put us off stating our concern. the language use is incomprehensible.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	New roads. Footpaths cycling tracks. As said before the language in the revised plan is so complicated, designed to bewilder and confuse.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP250
Rep Status	Processed
Consultee ID	1329655
Consultee Full Name	Mrs Lamoon Sue Lamoon

Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I understand houses have to be built but require that all houses built are to the highest quality of sustainability and affordable to our local people. Not to support more second homes and Airbnb's. We do not have the road systems, cycle paths, foot paths to access this site safely. All these should be legally binding to any future building on this site b sewers, c
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP368

Rep Status	Processed
Consultee ID	1331213
Consultee Full Name	Dr Anne Ballinger
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	7.11 page 268, 3.71 page 37, SAP 34 page 163
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Not Legally compliant - The local plan specifically related to Kingsdown (SAP 34 and SAP 35) and the immediate boundary area (SAP 15 and SAP 53) is not legally compliant with the new and legal Highway Code changes which came into place in January 2022 i.e. after the evidence review and call for sites. The Highway Code states that a car must allow a minimum of 1.5 metres to overtake a cyclist (car travelling at under 30 MPH) or pedestrian (2 metres) when there is no pavement. All of the access roads into Kingsdown and the main roads used within Kingsdown (Upper St, The Rise, Undercliffe) do not allow the Highway code to be followed currently but therefore In the Local plan cannot by definition follow the guidance to be legally compliant or to support sustainable infrastructure (encourage walking and cycling) or to works towards climate neutral. The danger to cyclists and walkers will be enhanced when the A258 is blocked after an accident and traffic is diverted via the Ringwold Road.</p> <p>Unsound - the local plan is unsound with reference to SAP34 as the Ringwold Road is already signposted as unsuitable for long vehicles, vehicles over 7.5 tonnes, wide vehicles, narrowing to single lane passing. The proposed SAP34 development would cause dangerous gridlock particularly with the added traffic in summer months.</p> <p>The developments of SAP34, SAP35 and SAP 15 would compromise the 'individual identity of Kingsdown Village' and contradiction to Policy 4 statement.</p> <p>the SAP34 development is unsound on the grounds that it would remove a flood sponge.</p> <p>the Local plan is also unsound in that it has not taken into account reasonable alternatives for Kingsdown or even considered these. There is no mention or even any attempt to assess the number of 2nd (or indeed 3rd, 4th) homes in Kingsdown/Walmer/Deal which are not lived in for most of the year. There is an increasing number of AirBnBs which provide multiple occupants (and multiple cars to travel) for family houses. As there is no attempt to assess these I will provide one road number as an example - Of the 34 houses in North Road, Kingsdown only 7 are lived in as a 1st home. The last house to sell in North/South Road was in the region of £600,000 for a 2nd home. This is in direct contrast to the statement of the local plan (7.11, page 268) 'to support the delivery of rural local needs homes to enable local people to remain in the village where they live or work and not to be forced to move away because of high house prices and high rents'. The plan only allocates 30% of new homes as affordable housing and so there is no demonstration for a local need for more housing. The other 70% of houses being built on greenfield could all be bought as 2nd/3rd/4th homes or run as AirBnBs.</p>

<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>I suggest a review of housing need in specific areas of DDC and build houses in areas of housing need. This need has not be demonstrated in Kingsdown and surrounding areas unless DDC council want an area largely lived in by 2nd home owners. I suggest a 20 MPH limit throughout Kingsdown and the access roads with designated pedestrian and cycling lanes.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)</p>
<p>Rep ID</p>	<p>SDLP318</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331369</p>
<p>Consultee Full Name</p>	<p>Mr Richard Henchley</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP 34</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Effective</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Not Applicable</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Not Applicable</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as</p>	<p>Because it is close to London and the area's natural attractions local economically active people are priced out of the housing market for housing they could otherwise afford. (There would be no effect on existing housing except, maybe, to increase its value). Planning conditions for new developments should impose a "local connection test" so that the housing can only be bought by people who fulfil the test.</p>

<p>possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>The Local and Neighbourhood Plans should contain a proper assessment of the scarcity and cost of housing for locally economically active residents and recommend suitable remedial measures for new developments.</p> <p>The Local and Neighbourhood Plans should contain a proper assessment of the scarcity and cost of housing for locally economically active residents and suitable remedial measures. Accordingly planning law would require applications for planning permission to be determined in line with the development plan reflecting these issues.</p> <p>Any section 106 agreement should require a proportionate contribution to the demands imposed by the development on existing and future local infrastructure.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Because it is close to London and the area's natural attractions local economically active people are priced out of the housing market for housing they could otherwise afford.</p> <p>Planning conditions should impose a "local connection test" so that the housing can only be bought by people who fulfil the test.</p> <p>The Local and Neighbourhood Plans should contain a proper assessment of the scarcity and cost of housing for locally economically active residents and suitable remedial measures. Accordingly planning law would require applications for planning permission to be determined in line with the development plan reflecting these issues. (There would be an effect on existing housing except, maybe to increase its value).</p> <p>Any section 106 agreement should require a proportionate contribution to the demands imposed by the development on existing and future local infrastructure.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)</p>
<p>Rep ID</p>	<p>SDLP264</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331383</p>
<p>Consultee Full Name</p>	<p>Mrs Katie Miller</p>
<p>Consultee Company / Organisation</p>	<p>Kent Downs AONB Unit</p>
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP34</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>Yes</p>

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	This site lies immediately adjacent to the AONB boundary and extensive views of the site are available from the AONB to the south of Ringwold Road due to the rising topography of the AONB to the south and west, including from a well-used network of public right of ways. A large scale development here could impact on the setting of the AONB given its proximity to the AONB and intervisibility, with sensitivity of the site increased by its high topography and the fact it shares similar landscape characteristics to the adjacent AONB. The existing built form of Kingsdown is set back from the edge of the hill and is not readily visible from the AONB in this direction. The safeguards included in criteria a, b, c and e are considered crucial to help manage potential AONB impacts. While we support the provision of a requirement for advanced planting along the western boundary of the site, we consider it unlikely that it will reach maturity prior to the completion of the development and we would recommend that this is amended to also allow planting prior to commencement of development.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	e) Advanced tree planting. This should be undertaken on-site EITHER PRIOR TO THE COMMENCEMENT OF DEVELOPMENT or at the time the development of the site commences, to ensure trees are established and have reached maturity prior to the completion of the development, to mitigate the impact on the AONB;
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP363
Rep Status	Processed
Consultee ID	1331532
Consultee Full Name	Mrs Angela Shrimpton
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	

<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP 34 Kingsdown</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified Effective Consistent with National Policy</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>No</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>No</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>See Green Parth 24 page submission flags up non-legal-compliance with Localism Act 2011, Environment Act 2021. NPPF 2021 version and previous version, the legally binding UK Climate Emergency declaration of 2019 (commitment to net zero 2050) and Climate Change Act 2008.</p> <p>SAP 34 Kingsdown p. 163: The selection of SAP 34 is totally unsound, on 5 different grounds. Firstly the Highways Assessment of Ringwold Road is inadequate and unsound as regards this site. The facts are that Ringwold Road is signposted as unsuitable for long vehicles, unsuitable for vehicles over 7.5tonnes and unsuitable for wide vehicles, the road is painted SLOW in 3 places despite the 50mph signs, and there are 4 sections where the road narrows to single lane passing. The 1400 voters in Kingsdown village (population 2000 + 500? more in summer months due to holiday village + campsite) are all dependent on the Ringwold Road traffic flowing freely. So the selection of SAP 34 for any development is unsound firstly on the grounds of highways assessment unsoundness / inadequacy. Any development would cause dangerous gridlock, involving the cars of current residents, parents of children of the village primary school, construction vehicles and new residents' cars. It is a disgrace that KCC for years have refused to listen to requests to reduce the speed limit on this road and refused also to put in a kerbed pavement on the northern side of Ringwold Road. The economy of the village depends on visitors and residents walking, cycling and horse-riding on the Ringwold Road and any development of SAP 34 would increase the likelihood of fatalities exponentially.</p> <p>The selection of SAP 34 is unsound secondly on the grounds of landscape character, being incompatible with criteria described above in SP 4. the site is on the skyline with sea behind, an iconic view that greets all people arriving in Deal; its selection contradicts the comments in SP4 on individual village identity and character.</p> <p>The selection of SAP 34 is unsound thirdly on the grounds that the Deal / Walmer conurbation of 30,000 depends on the narrow – single lane in places - Ringwold Rd, carrying diverted traffic from the A258 every time A258 is blocked by an RTA or road works. The A258 is the only southern entrance to the 30,000 conurbation starting in Upper Walmer stretching to North Deal and Sholden. Diverted traffic is a dangerous nightmare for the village every time it happens, some diverted traffic uses Glen Rd / Liverpool road selected as site for SAP 15 Ray's Bottom in Walmer. This site too, if developed is likely to mean diverted traffic cannot get in / out of Deal /Walmer 30,000 conurbation. Neighbours working for emergency services say they oppose both developments for this reason. Unsound due to being incompatible with SP12, because its lanes periodically become part of the district Strategic Transport Infrastructure. Selection of these sites is completely unsound and non-compliant with all laws / planning regs relating to the prevention of accidents and protection of human life. SAP 34 would result in <i>'Traffic movements from the development resulting in severe impacts to the highway network that it would not be possible to mitigate'</i>, and as such contrary to SP4 2 j within the plan, thus unsound and highly ineffective.</p> <p>The selection of SAP 34 is unsound fourthly on the grounds that it borders the AONB and is valuable arable farmland, needed in times when national food security is of concern. Moreover 4.238 needs correcting, the parish council-owned, biodiversity-rich site of the Lynch / and Freedown woods (that run into Oxney Court Woods) was the subject of a survey by Kent Wildlife Trust in 2017 commissioned by the Ringwold w/ Kingsdown parish council and paid for by DEFRA, which provides evidence of the natural capital within the boundary of the AONB to be protected on the boundary of this site.</p> <p>The selection of SAP 34 is unsound fifthly on the grounds that any development would remove a flood sponge on the top slope of the hill, below which is the Knight's Bottom pumping station and pond which drains towards Rays' Bottom SAP 15, so development here could contribute to flooding (see CC5 p. Flood Risk). (FYI we have seen an RTA fatality, and many near misses, in this dip on the Ringwold Rd).</p>

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Discard this plan
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	No applicable
Include files	SAP 34 Kingsdown 2.docx
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP449
Rep Status	Processed
Consultee ID	1331663
Consultee Full Name	Mr Ian Williams
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails	Landscape

to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

This site is in the LCAF3 Ripple area defined in the district *Landscape Character Assessment 2020* which defines on page 118 under Development Management that (developments should) **Conserve the rural character of the landscape ensuring that it continues to play a role in providing a rural separation between Deal and Kingsdown as well as a rural setting for the Kent Downs AONB.**

Having defined a conservation strategy for the F3 area, the site proposal then proceeds in a contrary direction with a development allocation of no less than 50 houses in an iconic landscape.

The Kent Downs AONB response to the Regulation 18 consultation is unequivocal: **Sensitivity of the site is increased by its high topography and the fact that it shares similar landscape characteristics to the adjacent AONB. We therefore do not support this allocation.**

The individual site appraisal *HELLA Appendix 2d Landscape Assessments* notes that it is close to and is intervisible with the AONB and shares similar landscape characteristics. The assessment says it is within 400m of the AONB - It is actually across road. It makes clear that the **development of this site would have an impact on the landscape and further assessment is required to demonstrate whether this can be mitigated.**

Environment

HELLA Appendix 3d Environment Assessments reports contaminated land and the risk of surface water flooding. The site is in Groundwater source protection Zone 2.

Use of this land for housing removes productive farmland from the economy. It will remove flood water retention land on the top slope of the site, contributing to seasonal flooding to the proposed site at SAP15

The same report fails to mention (as does the site proposal) the adjacent biologically rich **Local Wildlife Site DO02 The Lynch and Oxney Court Woods**, within the AONB. A 2019 management plan by Kent Wildlife Trust for the parish council provides evidence of environmental capital requiring protection.

In regard to both landscape and environment the proposal appears entirely contrary to paragraph 174a of the NPPF: **'protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan)'**

Regarding landscape and environment, the proposal appears entirely contrary to paragraph 174a of the NPPF: **'protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan)'**

Transport

HELLA Appendix 3b Highways Assessments states that **concerns have been identified in relation to access and/or highway impact and further assessment is required to demonstrate whether this can be mitigated.**

It mentions overreliance on private car for travel owing to an inadequate bus service, which applies incidentally to both SAP15 and SAP35. The service operated by Stagecoach has been declared uneconomic and is likely to remain so, and is entirely funded by KCC. 4 or 5 buses a day run on a circular route at 90 minute interval with a 3-hour break around midday.

Ringwould road is a narrow winding lane unsuitable for wide vehicles and those over 7.5 tons. Elsewhere in Kingsdown in Upper Street and The Rise there are pinch-points where there is single-land traffic owing to parked cars.

The additional traffic likely as a consequence of this development seems not to have been taken into account, and appears contrary to paragraph 104(d) of the NPPF **so that the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.**

Sustainability

The *Sustainability Assessment Appendix F* makes many observations illustrating that the site is unsustainable:

Poor access to the town centre, to secondary school and FE facilities, and to a NHS GP surgery. Where together with SAP15 and SAP34 it is accessible to the local Kingsdown primary school which is currently oversubscribed, resident children will have to travel elsewhere by car, or if given preference will result in other schools overflowing from the ejected population. See comments above with regard to the fragility of the bus service and the impact on roads.

It **incorrectly** states that is not located within Source Protection Zone 1, 2 or 3. **The site is in GWSP Zone 2.**

The site intersects with a SSSI risk zone. See above under environment for Lynch/Freedown Wood which is again neglected.

	NPPF paragraph 11 states Plans and decisions should apply a presumption in favour of sustainable development. 11b (1) in particular points to a strong reason for restricting the overall scale, type or distribution of development in the plan area. It appears that this proposal fails to do so.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP461
Rep Status	Processed
Consultee ID	1331281
Consultee Full Name	Mr MAURICE WEBB
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No

<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Yes</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>I consider the SAP34 proposal is non-compliant with the NPPF requirement to objectively assess the positive and negative impacts of the proposal for the following reasons:</p> <p>1. The SAP34 proposal is non-compliant with the NPPF requirement to objectively assess the positive and negative impacts effect of a proposal.</p> <p>There are no identifiable benefits for local residents, the only benefits would be for house buyers seeking a new property in a suburban type development with a prestigious address.</p> <p>There are many negative impacts on local residents particularly for Glen Road residents. Local shops will not benefit significantly because the site is remote form their location. Pedestrian access to the village proper is via Kingsdown Road which is the main access to Kingsdown for the A258. The route is narrow and unsafe with no pavements at any point. Vehicular access is similarly constrained and exacerbated by lack of parking and there is no Public Transport. The new residents will be house buyers looking for a house in a suburban style new development with a prestigious Postal Address and reasonably close to nearby Deal and Dover shopping centres and Railway stations. Local residents will experience more traffic on Kingsdown Road and other minor local roads and congestion in the village centre as newcomers try to navigate their way through the narrow village streets.</p> <p>I consider the SAP34 Proposal does not comply with the NPPF requirement that the positive and negative impacts of a site should be objectively assessed.</p> <p>2. The SAP34 Proposal is non-compliant with the NPPF requirements for development proposals in, or in the settings of, an AONB.</p> <p>DDC Commissioned a Landscape Character Assessment (LCA)survey . This showed SAP34 was a site in the Ripple Landscape Area which is identified as an Area of Open Chalk Arable Farming. As such the site provided a Buffer between the built Lanscape of Kingsdown village and the surrounding farmland and AONB. This proposal would substantially lessen this buffer with particular impact on the adjacent AONB. DDC also commissioned a Landscape Sensitivity Assessment (LSA) which was a site specific assessment covering a much wider range factors than an LCA and covered the impact on both the the immediate Landscape around a site but also the impact of the wider landscape. DDC selected only 33 sites and for some reason none of the sites in Kingsdown or the neighbouring village Ringwould were selected. The Ringwould site SAP53 was inside the AONB and the Kingsdown site SAP34 was adjacent to the AONB. The selection criteria is unexplained.</p> <p>There has therefoe been no site specific assessment of the Landscape Sensitivity of SAP 34.</p> <p>I consider the SAP34 Proposal is non-compliant with the NPPF requirements for sites in or adjacent to an AONB.</p> <p>3. I consider the SAP 34 Proposal is non-compliant with the Requirements of DDC Site Selection Policies SP3 and/or SP4.</p> <p>DDC have not indicated under which of the above policies SP3 and SP4 they have selected SAP 34. This omission is not limited to this proposal and appears to be genral for all proposals.</p> <p>This omission makes representations against the selection of sites such as SAP34 because both policies could have been used, However SP4 proposal have to comply with SP3 requirements.</p> <p>Any development under either SP policy should be compatible in scale ,design and appearance of the Settlement in or next to which it is situated. A new build housing estate in this particular location is not compatible with any of these.</p> <p>The scale is disproportionate to the existing adjacent properties and the village as whole, the design would be quite unlike any of the neighbouring houses or the general range of mixed styles and ages of property in this village with it's conservation area and appearance would be incopitable with it's location in open arable farmland adjacent to an AONB.</p> <p>I consider that the SAP34 Proposal is non-compliant with DDC Site Selection Policies.</p> <p>For all the above reasons I consider the SAP34 Proposal to be UNSOOUND.</p>

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	I request the removal of the SAP34 proposal from the Local Plan. I consider this will help to make the Local Plan less unsafe .
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP360
Rep Status	Processed
Consultee ID	1331524
Consultee Full Name	Mr Nicholas Fish
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails	The above site allocation is unsound on the following grounds:

<p>to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>Highways Assessment has not fully taken into account the road network in and around Kingsdown. Kingsdown has small narrow roads which often require stopping to allow oncoming vehicles to pass. The recent closure of the A258 in November due to a fatal crash highlighted the unsuitability of Kingsdown's roads for increased traffic numbers. Ringwould Rd has no lighting, cycle lane, footpaths and is narrow in many places. For pedestrians or cyclists to access the village centre and/or school would require traversing a PROW which is unlit and unpaved or using Ringwould Road which as said has no footpath, cycle lane and limited lighting in that area. A proper assessment of the road network would have shown the unsuitability of this site.</p> <p>SAP 34 is inconsistent with NPPF section 104. Buses have been limited in Kingsdown for many years and have been significantly reduced recently. The school bus services have been removed. Developing SAP 34 would not allow new residents access to sustainable transport infrastructure. This would add to the highways impacts detailed above.</p> <p>SAP 34 is inconsistent with the NPPF section 172, paragraph C. As the site straddles a designated coastal zone and doesn't bring wider sustainability it falls foul of this section.</p> <p>SAP 34 is inconsistent with the NPPF section 174, paragraphs A & B. Development of this area would harm the intrinsic natural beauty of Kingsdown and would not protect or enhance the valued landscape.</p> <p>SAP 34 is inconsistent with NPPF section 180. The area is near to a strategic wildlife corridor (Nights Bottom which is fed from the Lynch). The Lynch links to an important chalk grassland area. As Kingsdown is surrounded by important SSSI areas, development is not suitable. As paragraph A states, if no alternative is found the planning should be refused.</p> <p>The updated HELLA report changes SAP34 from Amber to Green, stating concerns can be mitigated through the local plan. I have seen no evidence in the Regulation 19 Submission which reassures me this would be the case. All of the factors above were commented on in the Regulation 18 Submission and still remain from what I can see. I don't therefore think the local plan is sound or has been adequately revised by DDC and their officers.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>A full review of the allocation SAP34, taking into account the above points.</p> <p>The whole plan is lengthy and wordy, which whilst I appreciate this is needed, the format DDC have made it available in is not suitable. There is no search function to easily get to elements of the plan or drill down into areas of interest. If I were to comment via paper, a 100 word limit is mentioned on the paper comment form. This is surely discriminatory to people who are digitally excluded or digitally disadvantaged either through hardware or knowledge.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)</p>
<p>Rep ID</p>	<p>SDLP374</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331525</p>
<p>Consultee Full Name</p>	<p>Mrs Amanda</p>

	Clarke
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34 (KIN002)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Inclusion of SAP34 is not legally compliant with NPPF 2021 item 11 (b) ii.</p> <p>DM Policies NE2 (Natural Environment) p 285. I submit that the area inland from Kingsdown, west to Ringwoud, Ripple, Sutton, Studdal and Little Mongeham should all be included as LTF F Open Arable Chalk Farmland with Woodland, as an extension to F3 Ripple. This would render the designation sound and effective and show why the chalk farmland of SAP34 is unsound/unsuitable for development.</p> <p>SAP34 p 163. The selection of SAP34 is totally unsound on 5 grounds:</p> <ol style="list-style-type: none"> 1) The highways assessment of Ringwoud Road is inadequate and unsound as regards this site. Ringwoud Road (as signposted) is unsuitable for long vehicles, those over 7.5 tonnes and wide vehicles, In several places the road narrows to single lane. Any development on this site is unsound. The village economy relies on pedestrians, cyclists and horse riders who would be severely negatively impacted by the additional traffic development would cause. 2) Landscape character - the selection of SAP34 contradicts the comments in SP4 on individual village identity and character. The site is on the skyline with sea behind - an iconic view which greets all people travelling from Dover to Deal. 3) Unsound and non-compliant with all laws and planning regulations relating to the prevention of accidents and protection of human life. SAP34 would result in traffic movements from the development resulting in severe impacts of the highway network that it would not be possible to mitigate and thus contrary to SP4 2j. 4) Borders an AONB and is valuable arable farmland. A 2017 Kent Wildlife Trust survey provides evidence of the natural capital within the boundary of the AONB to be protected on the boundary of this site. 5) Selection of SAP34 is unsound on the grounds that any development would remove a flood sponge on the top slope of the hill, below which is the pumping station and pond which drains towards Rays Bottom, so development here would contribute to flooding.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Nothing would make SAP34 sound, effective, safe or compliant with Strategic Policy 12.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP378
Rep Status	Processed
Consultee ID	1331547
Consultee Full Name	Mr Don Hough
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34 (KIN002) Land at Woodhill Farm
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The Dover Local plan is unsound on five different grounds. 1. The highways assessment of Ringwoud Road is inadequate and unsound regards the site. 2. Unsound on the grounds of landscape character. 3. Unsound on the grounds of Deal/Walmer conurbation of 30,000 depends on single line traffic/Ringwoud Rd. when there is blockage on the A258. 4. Unsound on the grounds of it borders on AONB and is valuable arable farmland. 5. Unsound on any development would remove a flood sponge on the top slope of the hill, below which is Knight's Bottom pumping station.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance	The area cannot sustain any more building as the roads and infrastructure were not built for the extra housing that is being planned.

with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP392
Rep Status	Processed
Consultee ID	1331558
Consultee Full Name	Mr Robin Mulhern
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I have significant concerns regarding the effects of implementing this part of the plan combined with other plans to build on land adjacent to or near the A258 Dover to Deal Road. The A258 is already a very busy road. From time to time there is a need to divert traffic from this road due to accidents, repairs etc. The only possible diversions take traffic through the villages either side of the road usually causing significant delays and disruption in the villages themselves. For emergency vehicles especially this is of great concern. Further housing development on land between the A258 and the adjacent villages will only exacerbate these problems since there is no tenable way in which these issues can be avoided.

	The present plan is unsound for the above reason together with the detrimental effects that large increases in population and consequential motor vehicles will have on the character of the villages concerned, especially as they lie in an area of outstanding natural beauty.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	There is no obvious practicable or economically viable way in which the above issues can be avoided or ameliorated if significant additional housing development is permitted in the area in question. Windfall development alone will gradually worsen the position in all respects.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP377
Rep Status	Processed
Consultee ID	1331546
Consultee Full Name	Mrs Monica Hough
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34 (KIN002) Land at Woodhill Farm
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<ol style="list-style-type: none"> 1. The highway's assessment of Ringwoud Road is inadequate and unsound regards the site. 2. Unsound on the grounds of landscape character. 3. Unsound on the grounds of Deal/Walmer conurbation of 30,000 depends on single line traffic/Ringwoud Road. When there is a blockage on the A258. 4. Unsound on the grounds it borders on AONB and is valuable arable farmland. 5. Unsound on any development would remove a flood sponge on the top slope, of the hill, below which is Knight's Bottom pumping station.
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The area cannot sustain any more building as the roads and infrastructure were not built for the extra housing that is being planned.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Not Applicable</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)</p>
<p>Rep ID</p>	<p>SDLP476</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331691</p>
<p>Consultee Full Name</p>	<p>Catherine Sayers</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	<p>Julian Sayers</p>
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP34 Land at Woodhill Farm, Kingsdown (KIN002)</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared</p>

4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The plans fail to consider the impact on this unique village with limited road access only. Pedestrians are already compromised with no lighting or pavements. The other access is by car on narrow roads which are already regularly blocked. Schooltimes, deliveries and ordinary travel is necessary by car as there is a very restricted bus service and no nearby station. Alterations to the topography to provide access would, in this area of outstanding scientific interest impact badly on wildlife, particularly bats which need dark corridors. The LCA (2020) from DDC LCA F3 Ripple map shows that KIN002 is within this area of Open Arable Chalk Farmland with Woodland. It should be therefore kept as an important buffer between the village and open countryside to preserve the special character of the area.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP846
Rep Status	Processed
Consultee ID	1260112
Consultee Full Name	Mr Daniel Couzens
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34 - Land at Wood Hill Farm
2 - Do you consider this part of the Plan sound?	No

<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Consistent with National Policy</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>No</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>No</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>Woodhill farm, Ringwould road, Kingsdown 50 houses SAP 34 (KIN002) page 177-79</p> <p>I believe the development of 50 houses in Kingsdown contravenes the guidance set out in: NPPF, Section 2, 11b; Section 9, para 111; Section 15, para 174, 176, 177.</p> <p>Section 2: 11b. Sustainable development: or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole</p> <p>The proposed development is not sound or justified. It does not consider the geography of Kingsdown, how narrow its access and exit roads are, the congestion the village experiences at peak school times, nor the safety of residents because there are no pavements. The development will seriously affect the community and inflict major harm to an area directly next to the AONB. The field itself is enjoyed by residents, and wildlife. The location of the development would seriously affect the local landscape with a housing development on one of the village's highest points, visible from the ANOB and surrounding area.</p> <p>Section 9: 111: The development should "be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impact on the road network would be severe". Kingsdown road from Ringwould is narrow, twisty and hilly. There have been deaths on this road. The cumulative damage caused by an rise in the number of vehicles for building the houses and then by the new homeowners for these 50 houses is not acceptable nor safe. There are high banks on either side of the road and it is restricted to heavy vehicles. The roads though the village are single track (due to parked cars) and do not have pavements.</p> <p>Section 15: 174-177. Planning policies and decisions should contribute to and enhance the natural and local environment by:</p> <p>174a:</p> <ol style="list-style-type: none"> 1 a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan). The site is right next to an AONB. It has long been farmland and has created a buffer to the densely populated Kingsdown village. The village itself is constrained by its hills and descent to cliffs and beach, via a narrow single-track road. 2 b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services. A dense development of 50 houses with minimum of two cars per house and associated utility and household deliveries is beyond what the village infrastructure can accommodate. We already see problems of access for utility and emergency vehicles. 3 c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate. Kingsdown has always welcomed holiday visitors and tourists. But it's popularity in recent years has meant that its infrastructure and services are struggling to cope. The conservation zone status is under threat, with modernisation trumping conservation. The development of 50 homes will only add to the issues that this village already faces. There are no controls of whether these homes will be second or third homes leased out for AirBnB and short holiday lets.

	<p>175: Allocate land with the least environmental amenity and 176: The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas. There will be an environmental and visual impact given that the development is adjacent to an established AONB and that the proposed field is bound by mature hedgerows and trees which I fear would be torn out. Light pollution will affect Kingsdown's resident bat population and other wildlife. New built structures at this high point will impede the flights of bats and other animals.</p> <p>177: Permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest The site is located by AONB. The harm to the village is substantial and is not outweighed by the public or business benefit. The houses will not be for local people, nor will they be affordable. They will be too densely populated and will add to the ongoing traffic issues that the village faces. Not least when the A258 is closed and traffic is redirected through the narrow tiny roads. It will cause substantial harm to wildlife and residential amenity (para c).</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The Woodhill development is in such contravention of national policies that I would want it removed entirely</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)</p>
<p>Rep ID</p>	<p>SDLP584</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1257483</p>
<p>Consultee Full Name</p>	<p>Catherine Stone</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>

<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified Effective Consistent with National Policy</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>No</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>No</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p><i>DDC Note: The attachment to this representation is the Dover Landscape Assessment (Document number NEEB07)</i></p> <p>I consider the inclusion of site SAP34 within the Dover Local Plan is unsound because it:</p> <ul style="list-style-type: none"> • fails to comply with the National Planning Policy Framework (NPPF) • contravenes Dover District Council's strategic policies • contravenes the advice in Dover District Council's Landscape Character Assessment for Dover District. <p>The inclusion of site SAP34 is not consistent with the national policy enabling the delivery of sustainable development in accordance with the policies in the NPPF. In particular it is in contravention of the following paragraphs: 70, 92, 93, 104, 105, 110, 111.</p> <p>Development at this site represents a significant move away from the policy of promoting sustainable transport. The scale, location and density of development proposed is unsound on highways grounds, representing an unacceptable cumulative impact on highway safety, and the residual impacts on the road network would be severe. Ringwould Road is signposted as unsuitable for long vehicles, vehicles over 7.5 tonnes, and wide vehicles, further the road is painted SLOW in three places, despite the 50mph signs, and there are four sections where the road narrows to single lane passing. The road already struggles to cope with the additional traffic use with a) access to the holiday village, campsite and golf course and b) the road is used as an alternative route for traffic diverted from the A258, causing significant safety issues on Ringwould Road, The Rise and Glen Road. Any additional traffic will cause gridlock. A fatal road traffic accident occurred on Ringwould Road in recent years, and the proposal to introduce further traffic to the road represents unacceptable cumulative impact.</p> <p>The inclusion of site SAP34 is unsound because it contravenes Dover District Council's Strategic Policies in particular:</p> <ul style="list-style-type: none"> • SP2. Development at the site will have an adverse effect upon the existing community with a deterioration in existing open spaces, air quality, water maintenance and an increase in traffic. • SP4. The scale of the development is not appropriate to the size of the settlement and existing facilities, would harm green spaces, would result in the loss of agricultural land • SP13 and SP14. Development at the site will have an adverse effect upon the landscape and natural environment. The site borders an AONB and is in close proximity to the Dover to Kingsdown cliffs SAC and site of SSI. Further the site is on the skyline with sea beyond, and any development will have a detrimental effect upon the intrinsic character of the landscape. <p>Development at the site contravenes the advice in Dover District Council's Landscape Character Assessment for Dover District, in particular the advice on landscape management and development as set out on page 118 of the document (file attached).</p> <p>The inclusion of site SAP 34 is unsound on the grounds that any development would remove a flood sponge on the top slope of the hill, below which is the Knight's Bottom pumping station.</p> <p>I consider the inclusion of site SAP34 fails to comply with the duty to co-operate because it does not respect the needs and safety of the local community; it is detrimental to the needs and safety of the local community by increasing the risk of road traffic accidents and flooding, reducing air quality, and deteriorating the natural environment.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful</p>	<p>The inclusion of site SAP34 contravenes the National Policy Planning Framework and I suggest it be removed from the Dover Local Plan.</p>

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	SDLP0584 Stone Att1.pdf
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP465
Rep Status	Processed
Consultee ID	1331679
Consultee Full Name	Mr Charles Walters
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I believe that the plan is neither practical nor consistent with achieving sustainable development. The proposed access to the site via Ringwould Road would place additional strain on a route that is already inadequate. Kingsdown is a holiday village, which attracts significant, additional traffic onto this narrow lane - which does not have dedicated provision for pedestrians or cyclists and is also used by horseriders, visitors to the Golf Club and large farm vehicles. The existing vehicle weight limit of 7.5T already recognises the difficulty in accessing Kingsdown safely via this road and there has been at least one accident leading to a fatality. If, as part of the proposed development, Ringwould Road was upgraded, I would still have significant concerns about an increased volume of traffic joining the A258 at Ringwould. The A258 is an extremely busy, single-carriageway road that has seen a significant number of serious road traffic accidents in recent years including fatalities. At peak times the A258 regularly comes to a stand-still due to the sheer volume of traffic - a situation which will be exacerbated by other residential developments locally for which permission has already been granted. This congestion not only leads to increased pollution but can impede the response times of emergency services.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The Ringwould Road would need to be significantly upgraded to ensure the safety of all users, including pedestrians and cyclists, and to facilitate the free flow of traffic between Kingsdown and Ringwould. The A258 would need to be upgraded to become a dual-carriageway road, without compromising the principles of sustainable development.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Not applicable.
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP878
Rep Status	Processed
Consultee ID	1267463
Consultee Full Name	ms noelle graal
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34 KIN002
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>The selection of SAP 34 is totally unsound, The Highways Assessment of Ringwoud Road is inadequate. The facts are that Ringwoud Road is signposted as unsuitable for long vehicles, unsuitable for vehicles over 7.5tonnes and unsuitable for wide vehicles, the road is painted SLOW in 3 places despite the 50mph signs, and there are Dover and Deal Green Party: submission to Reg 19 consultation on Dover DC new Local Plan, deadline 9 Dec 2022. 14 4 sections where the road narrows to single lane passing. The 1400 voters in Kingsdown village (population 2000 + 500? more in summer months due to holiday village + campsite) are all dependent on the Ringwoud road traffic flowing freely. We have seen an RTA fatality on the road, and many near misses. It is a disgrace that KCC for years have refused to listen to requests to reduce the speed limit on this road and refused also to put in a kerbed pavement on the northern side of Ringwoud Road. The economy of the village depends on visitors walking, cycling and horse-riding on the Ringwoud Road and any development of SAP 34 would increase the likelihood of fatalities exponentially. The inclusion of SAP 34 is not legally compliant with NPPF 2021 item 11. (b)ii 'SPs should provide for objectively assessed needs for housing & other uses, . . . unless(ii) any adverse impacts of doing so would significantly & demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole'. Any development at SAP 34 is unsound firstly on the grounds of highways inadequacy. Any development would cause dangerous gridlock, involving the cars of current residents, parents of children of the village primary school, construction vehicles and new residents' cars. Secondly The selection of SAP 34 is unsound on the grounds that the Deal / Walmer conurbation of 30,000 depends on the narrow – single lane in places - Ringwoud road, carrying diverted traffic from the A258 every time A258 is blocked by an RTA or road works. It is part of the transport infrastructure of the whole district. The A258 is the only southern entrance to the 30,000 conurbation starting in Upper Walmer. Diverted traffic is a dangerous nightmare for the village every time it happens, some diverted traffic uses Glen Rd / Liverpool road selected as site for SAP 15 Ray's Bottom in Walmer, this site too if developed is likely to mean diverted traffic cannot get in / out of Deal / Walmer 30,000 conurbation. Neighbours working for emergency services say they oppose both developments for this reason. Thirdly on the grounds of landscape character, the site is on the skyline with sea behind, an iconic view that greets all people arriving in Deal; its selection contradicts the comments in SP4 on individual village identity and character and falls within LCT F3, Open Arable Chalk farmland with woodland, needed for national food security. The selection of SAP 34 is unsound fourthly on the grounds that it borders the AONB. Moreover 4.238 needs correcting, the parish council-owned, biodiversity-rich site of the Lynch / and Freedown woods (that run into Oxney Court Woods) was the subject of a survey by Kent Wildlife Trust in 2017 commissioned by the Ringwoud w/ Kingsdown parish council and paid for by DEFRA, which provides evidence of the natural capital to be protected on the boundary of this site. The selection of SAP 34 is unsound fifthly on the grounds that any development would remove a flood sponge on the top slope of the hill, below which is the Knight's Bottom pumping station and pond which drains towards Rays' Bottom SAP 15, so development here could contribute to flooding (see CC5). (cross referenced SAP 15 Walmer Rays Bottom).</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	No
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
<p>Rep ID</p>	SDLP658

Rep Status	Processed
Consultee ID	1267585
Consultee Full Name	Ms Karen Brewer
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I believe the development of 50 houses in Kingsdown contravenes the guidance set out in: NPPF, Section 2, 11b; Section 9, para 111; Section 15, para 174, 176, 177.</p> <p>Section 2: 11b. Sustainable development: or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole</p> <p>The proposed development is not sound, justified or effective. It does not consider the geography of Kingsdown, its narrow access and exit roads, the congestion the village faces at peak school times, nor the safety of residents when there are no pavements. The development will adversely impact the community and cause substantial harm to an area sited near an AONB, which is enjoyed by residents, and wildlife.</p> <p>Section 9: 111: The development should "be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impact on the road network would be severe". Kingsdown road is small, narrow and hilly. There have been fatalities on this road. The cumulative damage caused by an increase in the number of vehicles for building the houses and then by the new homeowners for these 50 houses is not acceptable or safe. The current road has high banks on either side. The roads though the village are narrow, single track (due to parked cars) and do not have pavements.</p> <p>Section 15: 174-177. Planning policies and decisions should contribute to and enhance the natural and local environment by:</p> <p>174:</p> <p>a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan). The site is situated near an AONB. It has long been farmland and has created a boundary to the densely populated Kingsdown village. The village itself is constrained by its geography descending to cliffs and beach, via a narrow single-track road.</p> <p>b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services. A dense development of 50 houses with minimum of two cars per house and associated utility and household deliveries is too much for the village infrastructure to accommodate.</p> <p>c) maintaining the character of the undeveloped coast, while improving public</p>

access to it where appropriate. **Kingsdown is a small village at the foot of the White Cliffs. It has always welcomed holiday visitors and tourists. But it's popularity in recent years has meant that its infrastructure and services are struggling to cope. The conservation zone status is under threat, with modernisation trumping. The development of 50 homes will only add to the issues that this village already faces.**

175: Allocate land with the least environmental amenity and 176: The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas. **I am also concerned about the environmental and visual impact given that the development is adjacent to an established AONB and that the proposed field is bound by mature hedgerows and trees which I fear would be torn out.**

177: Permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest **The site is located near to an AONB. The harm to the village is substantial and is not outweighed by the public or business benefit. The houses will not be for local people, nor will they be affordable. They will be too densely populated and will add to the ongoing traffic issues that the village faces. Not least when the A258 is closed and traffic is redirected through the narrow tiny roads. It will cause substantial harm to wildlife and residential amenity (para c).**

There is no public health services in Kingsdown in terms of doctors. Many doctors surgeries and pretty much all dentistry services are closed for NHS patients.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The plan is refused in its entirety.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Not Applicable

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Local Plan Consultation Point

SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)

Rep ID

SDLP579

Rep Status

Processed

Consultee ID

1331287

Consultee Full Name

Mr
Maxwell
McDowall

Consultee Company / Organisation

Agent Full Name

Agent Company / Organisation

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Chapter 4 SAP34, Land at Woodhill Farm, Kingsdown (KIN002)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The inclusion of SAP34bis not legally compliant with NPPF 2021 item 11,(b11 '<i>SP should provide for objectivity assessed needs for housing & other uses...unless(1)any adverse impacts of doing so would significantly & demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole</i>'</p> <p>the following arguments show why this development would not be sustainable as is a requirement of the NPPF and would have more adverse impacts then benefits.</p> <p>NE2 Landscape Character and The kent Downs sections states in section11.13 that DDC aims: 'To ensure that all development coming forward over the plan period respects and reflects the character of the landscape in which it is located. The LCA(2020) from DDC LCA F3 Ripple map shows that KIN002 is within the area of Open Arable Chalk Farmland with Woodland. Proximity of this site to the boundary of the AONB means that it must be kept as an important buffer between the village built enviroment and open countryside in order that the special character of the area is maintained.</p> <p>Kingsdown should not be designated as a local centre. It is unsound and ineffective to a damaging extent. '<i>a village providing services for a local area and a secondary focus for development in the rural area</i>' - it does not serve other settlements and is confined by the sea and AONB, is small and has lots of character and has a rural setting.</p> <p>SP4 Windfall Development. a)- The scale must be appropriate to the size of the settlement and existing facilities. -the village has lots of character, conservation area, narrow roads, small svhoo;, no doctors, much reduced bus service,no access to rail, and is car dependence.</p> <p>b)- development must be compatible with the layout, density, fabric, and appearance of the existing settlement and would not result in merging separate settlements.. this would set the tone as you drive in the village, impacts the AONB, need buffer between village boundary and AONB. Widening the road here to make it suitable for highways would ruin the entrance to the village.</p> <p>c & d)- There must not be harm to important green spaces. - the site is directly opposite the AONB which is highlighted throughout the Draft LDP(NE2) as being an important constraint to development, important to village for health and happiness, dog walking, amenity value,. There is Footpath ER5 round the field.</p> <p>f & g) - It would not result in the loss of best and most vesatile agricultural land currently used for agriculture and - it includes an appropriately sized and designed landscape buffer to the open countryside;</p> <p>NE2 states that proposals affecting the setting of the AONB will only be supported where the development is sensitively located and designed to avoid or minimise adverse impacts on the AONB and its setting and the development would enhance the special qualities, distinctive character and tranquility of the AONB.</p> <p>This development would impact the AONB due to entrance needing to use some of AONB to widen the road, houses seen from the AONB. The site is better put to use in growing food. We need all the agricultural land we have to grow food for future generations. All development must be sustainable NPPF 21 states. To use growing land is not.</p> <p>h) - it would not have a significant adverse impact on the living condition of existing adjoining residents - but Glen Road is affected.</p> <p>i) - Where development would result in the loss of active employment, open space, sport or community facilities within the settlement that such development is consistent with the requirements of policies EN2, PM5, and PM6 of the plan; visitors are less likely to want to come to Kingsdown if the entrance is blighted by this development and roads are gridlocked.</p>

	<p>j) - Traffic movements generated from the development do not result in severe impacts to the highway network that cannot be mitigated. - Ringwould Road is very dangerous - fatality recorded near Pumping Station. Large tractorsturn out into the road, a bridleway and footpaths cross in two points. Ringwould Road has a 7.5 tonne weight limit. There is dangerous gridlock in village during busy periods, namely school run etc.. Ringwould Road would have to be closed for long periods to facilitate work being carried out to make entrance to development safe.</p> <p>T11 - Development should , in so far as its size, characteristic and location , give priority to the needs of pedestrians, cyclists, users of public transport, car sharers, and users of ultra-low emission vehicles. This site is outside the village boundary and not well served by footpaths or cycle paths. The site is crossed by a footpath ER5 which connects to the village along a dirt track with no lighting. Bus services have been reduced and this development is said by HELAA highways assessment to be unlikely to lead to more buses being laid on.</p> <p>T12. - New accesses and intensified use of existing accesses onto the road network will not be permitted if it would result in a clear risk of crashes or traffic delays unless proposals can incorporate measures that provide sufficient mitigation. It is considered this site to be unsound as there would be an increase in crashes and traffic delays. Shared access - poor park users, ER5 footpath, land owner to the left, gas main under the entrance and poor sight lines in both directions.</p> <p>T12 - Applicants must demonstrate that traffic movements to and from the development can be accommodated, resolved, or mitigated to avoid severe cumulative residual impacts. - Kingsdown village has narrow roads few footpaths in main streets. Lorries passing through or delivering/collecting cause long hold-ups beside adding to chaos and doing damage.</p> <p>Kingsdown settlement already has a significant number of 2nd homes and airb&b's, plus the holiday camp. This development of some 50 dwellings could increase this number which would negate the purpose of this development.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Delete site for development KIN002 (50 houses) from the Local Plan. The field needs to be kept as agricultural land as there too many factors against any development</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)</p>
<p>Rep ID</p>	<p>SDLP697</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331548</p>
<p>Consultee Full Name</p>	<p>Mr Roger Highton</p>
<p>Consultee Company / Organisation</p>	

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The development of SAP34 Kingsdown is unsound as it conflicts with National Planning Policy Framework requirements for conserving and enhancing the natural environment. It contradicts NPPF 174 due to the loss of landscape character. DDC's Dover District Landscape Character Assessment 2020 p114-9 identifies LCA F3 Ripple as a valuable landscape where development should conserve the rural character of the landscape ensuring that it continues to play a role in providing a rural separation between Deal and Kingsdown as well as a rural setting for the Kent Downs AONB. The proposed development at Woodhill Farm SAP34 is within LCA F3 area and contradicts the requirement to conserve the characteristic pattern of historic villages maintaining their tight knit enclosed built character.</p> <p>Additionally, the development conflicts with Dover Local Plan SP13 "All proposals within, or affecting the setting of, the AONB and Heritage Coasts must have regard to the purpose of conserving and enhancing their natural beauty in accordance with the requirements of Policy NE2." and NPPF 176 as the development is within the setting of and clearly visible from the Kent Downs AONB, so is not sensitively located. The eastern boundary of the Kent Downs AONB is Ringwould Road, Kingsdown. With the site access on the opposite side of this narrow country lane, the development will not avoid or minimise adverse impacts on the AONB.</p> <p>The development of SAP34 Kingsdown is unsound as it conflicts with NPPF requirements for promoting sustainable transport. The development does not meet the requirements on NPPF 104 and 105 as it is on the edge of the small rural village of Kingsdown with limited opportunities for walking and cycling with particular challenges of walking or cycling along Ringwould Road which is a busy, narrow country lane, with no footpath. Public transport options are limited with an infrequent bus service from Kingsdown to Deal that has recently been significantly reduced. This will result in most journeys to and from this development by car along Ringwould Road which is already very busy as the main access to Kingsdown from A258. However, improvements to Ringwould Road would be challenging without adverse effects on the Kent Downs AONB on the western edge of the road. The location of a site for housing development is the key factor in the use of sustainable transport throughout the lifetime of the housing so it is critical that this accurately assessed before approving development within the local plan. The NPPF requirements for considering development proposals, NPPF 111 in my view should be refused on highways grounds because the additional estimated 75 movement of cars at peak times along the already busy Ringwould Road which would be unsafe to pedestrians, cyclists and motorists. Improvements to the road would conflict with the AONB requirements. Additionally, there is a weight limit of 7.5 tons on this road which would require all deliveries of building materials to the site would be limited to lorries meeting this requirement.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	SAP34 should be removed from the proposed housing allocation in the Dover Local Plan as it would result in the loss of landscape character, would have an adverse impact on the setting of the Kent Downs AONB and would be unsafe for pedestrian, cyclists and motorists.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP850
Rep Status	Processed
Consultee ID	1273295
Consultee Full Name	Mr Martin Garside
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34 - land at Woodhill Farm, Ringwoud Road, Kingsdown
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I object to the proposal to include build housing on land at Woodhill Farm, Ringwoud Road, Kingsdown (SAP34 / site KIN002).</p> <p>I would like to highlight the following concerns:</p> <ol style="list-style-type: none"> road access: This is a notoriously tricky, narrow and hazardous road. A deep dip in the middle is followed on approaching Kingsdown with a dangerous bend and very poor sight lines. It is also frequently used by tractors and other agricultural vehicles. Traffic leaving the new dwellings would have to join this difficult road at right angles - and at a particularly dangerous point with very poor visibility. pedestrian / cycle use: this is essentially a narrow winding rural lane. The speed of traffic on it - and the narrowness - makes it very challenging and hazardous for cyclists. There is no pavement - and as such cannot

	<p>be used safely by pedestrians. This means all traffic to and from the new housing would have to be by motorised vehicles</p> <p>3 emergency vehicle access: emergency access to the new dwellings will be very challenging - given the poor road access</p> <p>4 proximity to AONB: just the other side of this narrow road is the start of the magnificent Kent Downs Area of Outstanding Natural Beauty. Such a large and dense new housing development on a green field site so close to this strongly protected AONB is just wrong.</p> <p>5 scale: the size of the development is simply inappropriate for this location - situated on the edge of this remarkable village. At the moment, these fields form a natural 'break' between two historic settlements - Ringwould and Kingsdown. This large development will hugely extend the current boundary of housing in Kingsdown and change the character and visual amenity of the approach to the village. It will also lose forever an important green space around the village.</p> <p>6 Dover District Landscape Character Assessment: building new housing here is simply not compatible with the findings of DDC's 'Dover District Landscape Character Assessment' of 2020. I refer specifically to LCA F3 (chapter 5 - pages 114-119). As well as highlighting the environmental sensitivities and environmental and habitat values of this part of the district, the document rightly characterised this location as <i>"undulating chalk landscape with an intact agricultural character providing a rural setting for the South Forelands areas of the Kent Downs AONB as well providing rural separation between Deal and Kingsdown"</i>.</p> <p>7 LCA F3 further emphasised the vital importance of conserving:</p> <ul style="list-style-type: none"> • <i>"the rural character of the landscape ensuring that it continues to play a role in providing a rural separation between Deal and Kingsdown as well as a rural setting for the Kent Downs AONB"</i> • <i>"the characteristic pattern of historic villages maintaining their tight knit enclosed built character"</i> <p>In summary, I object to the proposal to build housing on greenfield land at Woodhill Farm, Ringwould Road, Kingsdown.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The proposal to build housing on greenfield land at Woodhill Farm, Ringwould Road, Kingsdown should be removed from the plan.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)</p>
<p>Rep ID</p>	<p>SDLP586</p>
<p>Rep Status</p>	<p>Processed</p>

Consultee ID	1268008
Consultee Full Name	Mr Phillip Deschamps
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 34 KIN002
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The development of this site would have a detrimental landscape impact that cannot be mitigated.</p> <p>The site is adjacent to AONB, which lies immediately to the South.</p> <p>The development would change the approach to the village, which would now be visible from the primary approach and would become the dominant impression, rather than the current rural character. There are also significant viewpoints from Kingsdown Wood, a locally important place of recreation.</p> <p>The site is in an area characterised by rolling countryside and has the same landscape characteristics of the AONB and on the setting of the village.</p> <p>The site provides a vital role in softening the transition from urban form to open countryside. The site boundary is wooded with significant copse to the West. The site is bounded by hedgerows and scrub which is likely to provide important roosting, nesting and resting sites for birds as well as a foraging area for bats.</p> <p>It forms an important ecological link from the Butts to Knight Bottom, which would be severed by this development.</p> <p>The Landscape Assessment says: 'The development of this site would have an impact on the landscape and further assessment is required to demonstrate whether this could be mitigated.'</p> <p>It is of my opinion that given the topography and the some 25m level change from the important viewpoints (on the approach to the village at the junction of the A258; and from approach from Hill Wood), vegetative planting will be inadequate means of mitigation. The proposed site is highly visible and will have a detrimental impact on both the character of the village and the AONB.</p> <p>The Ringwold Road will make a very dangerous unsafe access. It is not suitable for pedestrians or cyclists, unsafe for both modes given the bends in the road on approach to the village and lack of forward visibility. (Indeed the wife of the development sites owner was nearly killed in a car accident a few years ago)</p> <p>With no pavements there is no safe active travel route to the village, and therefore the entire development will be based on car travel, and is therefore unsustainable.</p> <p>I understand the applicant will have proposed the PRoW via the Butts as a suitable alternative, but this is not lit, unsurveyed and of an unsuitable width and surface. It is not suitable for all users.</p>

	I would question the principle of development in Kingsdown to this scale as there is almost no public transport or jobs or services in the village. It will change the character of the village- rural, historic, coastal village particularly when viewed from the special zones identified.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The Ringwould Road would have to be made wider with pavements and cycle ways. this would impact greatly on the character of the valley. It has a weight limitation so would be unsuitable for plant and materials to the site without a massive upgrade. I believe the Government are to scrap house building targets especially on green field sites.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I have lived in St Margarets and Kingsdown for 75 years and have a unique perspective on the changes being proposed.
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP620
Rep Status	Processed
Consultee ID	1331756
Consultee Full Name	Mrs Rhona Kyle
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34 (KIN002) Woodhill Farm Kingsdown
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>No real consideration is given to the impact on the existing community. This proposal will have a devastating effect on our existing inadequate roads. It is an area of outstanding beauty. Also no real support is offered to the existing or proposed community - pharmacies, shops, creative outside spaces, thoughtful well considered landscaping. You are offering the building of what exactly? Define the type of properties. It seems to me you are proposing creeping sprawl. You are offering up a triangular pincer movement of sprawl from Deal, Walmer and Kingsdown. Recently, executive homes in Walmer and Deal have been built that are rammed together, small gardens, lack of privacy, no landscaping (not even trees). Yet these green community ideas were all in the original proposals - so what happened? If recent builds were proven to be a success in providing real support for cohesive, happy communities this might set a positive precedent but that is not the case. Already a negative precedent has been created by recent past mistakes. There is not enough mention of social housing. However, by the time houses do get built the percentage of social housing magically seems to diminish. Faith is built on trust and belief for the good of all - not just erecting too many houses on an area of outstanding beauty and making a profoundly negative impact of the existing community and the extraordinary landscape.</p> <p>On a final note, your online forms are far too complex and impenetrable for people to tackle and therefore without real true consultation this whole proposal is non valid and unsound. The You Tube Video is of poor quality and difficult to understand - this is profoundly unfair.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Infrastructure: Kingsdown is a small village that evolved gradually with additions of small builds over the years. It is organic and the roads mostly are very narrow with few passing spaces. The road from Chalk Hill Road to Ringwould Road through to the A258 is no more than a slightly enlarged single track. It is absolutely treacherous and potentially deadly and already does not support the existing traffic flow. If you propose entrance and exit points on Ringwould Road or The Glenn Road you are creating an absolute death trap (no exaggeration).</p> <p>Potential new residents will use - Kingsdown village & pubs, the beach, Deal town, Dover and Canterbury. All of these roads are already full to capacity and impossible to negotiate. There is no parking facilities and there never can be as there is no space whatsoever for parking. If you are seriously thinking about adding such a massive introduction of new homes you are in fact not addressing the most important issue - the roads. The A258 should be widened or changed completely. Ringwould road to Chalk Hill Road is (given the size of cars and vans) only a single track at times.</p> <p>This will improve your proposal but simultaneously ruin a fine village and an area of outstanding natural beauty. Look at what happened to Brighton and the awful sprawl around the coast - no real thought to the implication on the land or the people.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Not Applicable</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)</p>
<p>Rep ID</p>	<p>SDLP1048</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331758</p>
<p>Consultee Full Name</p>	<p>Sarah Waite-Gleave</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	

<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP 15 & SAP 34</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Justified Effective Consistent with National Policy</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>No</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>No</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>The inclusion of SAP 34 is not legally compliant with NPPF 2021 item 11. (b)ii 'SPs should provide for objectively assessed needs for housing & other uses, . . . unless(ii) any adverse impacts of doing so would significantly & demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole'.</p> <p>DM Policies NE2 (Natural Environment) p.285: It is sound to designate the area inland from Kingsdown, west to Ringwoud, Ripple, Sutton, Studdal and Little Mongeham, south to Guston, as LCT F Open Arable Chalk Farmland with Woodland, F3 Ripple. But it is unsound, ineffective and contradictory to then ignore the designation when selecting the dangerously located chalk farmland of SAP 34 for development.</p> <p>SAP 34 Kingsdown p. 163: The selection of SAP 34 is totally unsound, on 5 different grounds,. Firstly the Highways Assessment of Ringwoud Road is inadequate and unsound as regards this site. The facts are that Ringwoud Road is signposted as unsuitable for long vehicles, unsuitable for vehicles over 7.5tonnes unsuitable for wide vehicles, the road is painted SLOW in 3 places despite the 50mph signs, and there are 4 sections where the road narrows to single lane passing. The 1400 voters in Kingsdown village (population 2000 + 500? more in summer months due to holiday village + campsite) are all dependent on the Ringwoud Road traffic flowing freely. So the selection of SAP 34 for any development is unsound firstly on the grounds of highways assessment unsoundness / inadequacy. Any development would cause dangerous gridlock, involving the cars of current residents, parents of children of the village primary school, construction vehicles and new residents' cars. It is a disgrace that KCC for years have refused to listen to requests to reduce the speed limit on this road and refused also to put in a kerbed pavement on the northern side of Ringwoud Road. The economy of the village depends on visitors and residents walking, cycling and horse-riding on the Ringwoud Road and any development of SAP 34 would increase the likelihood of fatalities exponentially.</p> <p>The selection of SAP 34 is unsound secondly on the grounds of landscape character, being incompatible with criteria described above in SP 4. the site is on the skyline with sea behind, an iconic view that greets all people arriving in Deal; its selection contradicts the comments in SP4 on individual village identity and character.</p> <p>The selection of SAP 34 is unsound thirdly on the grounds that the Deal / Walmer conurbation of 30,000 depends on the narrow – single lane in places - Ringwoud Rd, carrying diverted traffic from the A258 every time A258 is blocked by an RTA or road works. The A258 is the only southern entrance to the 30,000 conurbation starting in Upper Walmer stretching to North Deal and Sholden. Diverted traffic is a dangerous nightmare for the village every time it happens, some diverted traffic uses Glen Rd / Liverpool road selected as site for SAP 15 Ray's Bottom in Walmer. This site too, if developed is likely to mean diverted traffic cannot get in / out of Deal /Walmer 30,000 conurbation. Neighbours working for emergency services say they oppose both developments for this reason. Unsound due to being incompatible with SP12, because its lanes periodically become part of the district's Strategic Transport Infrastructure. Selection of these sites is completely unsound and non-compliant with all laws / planning regs relating to the prevention of accidents and protection of human life. SAP 34 would result in '<i>Traffic movements from the development resulting in severe impacts to the highway network that it would not be possible to mitigate</i>', and as such contrary to SP4 2 j within the plan, thus unsound and highly ineffective.</p> <p>The selection of SAP 34 is unsound fourthly on the grounds that it borders the AONB and is valuable arable farmland, needed in times when national food security is of concern. Moreover 4.238 needs correcting, the parish council-owned, biodiversity-rich site of the Lynch / and Freedown woods (that run into Oxney Court Woods) was the subject of a survey by Kent Wildlife Trust in 2017 commissioned by the Ringwoud w/ Kingsdown parish council and paid for by DEFRA, which provides evidence of the natural capital within the boundary of the AONB to be protected on the boundary of this site. The selection of SAP 34 is unsound fifthly on the grounds that any development would remove a flood sponge on the top slope of the hill, below which is the Knight's Bottom pumping station and pond which drains towards Rays' Bottom SAP 15, so development here could contribute to flooding (see CC5 p. Flood Risk). (FYI we have seen an RTA fatality, and many near misses, in this dip on the Ringwoud Rd).</p>

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Nothing can be done to mitigate putting any development on either site SAP 34 or SAP 15. They should both be excluded as sites for development.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	SAP 34 Kingsdown from Gleave's .docx (1)
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP906
Rep Status	Processed
Consultee ID	1331394
Consultee Full Name	Mr Robert Cummins
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>The proposal to build 50 new houses on land at Woodhill Farm will impact the natural and local environment in a prominent hilltop location not far from the boundary of the Kent Downs Area of Outstanding Natural Beauty and Kent's Heritage Coast. It will entirely consume an open field crossed by footpaths frequented by local residents and visitors. Together with other developments in the vicinity, it will cause shrinkage of the green spaces between Kingsdown and Walmer - a valued landscape of undulating downland and sweeping views. NPPF 2021 chapter 15 para 174 a, b and c refer.</p> <p>The development is likely to lead to a significant increase in car traffic, in an area already constrained by narrow approach roads, very limited clearance in the streets of Kingsdown, and very limited bus services. There would be an unacceptable impact on highway safety, and the residual cumulative impacts on the road network would be severe (per NPPF para 111).</p> <p>The development is also likely to cause strain to Kingsdown's already limited supply of fresh water.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Remove the proposal for Woodhill Farm entirely, for the reasons outlined in 7.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)</p>
<p>Rep ID</p>	<p>SDLP953</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331213</p>
<p>Consultee Full Name</p>	<p>Dr Anne Ballinger</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>7.11 page 268, 3.71 page 37, SAP 34 page 163</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>

<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified Effective</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>No</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>No</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>Not Legally compliant - The local plan specifically related to Kingsdown (SAP 34 and SAP 35) and the immediate boundary area (SAP 15 and SAP 53) is not legally compliant with the new and legal Highway Code changes which came into place in January 2022 i.e. after the evidence review and call for sites. The Highway Code states that a car must allow a minimum of 1.5 metres to overtake a cyclist (car travelling at under 30 MPH) or pedestrian (2 metres) when there is no pavement. All of the access roads into Kingsdown and the main roads used within Kingsdown (Upper St, The Rise, Undercliffe) do not allow the Highway code to be followed currently but therefore In the Local plan cannot by definition follow the guidance to be legally compliant or to support sustainable infrastructure (encourage walking and cycling) or to works towards climate neutral. The danger to cyclists and walkers will be enhanced when the A258 is blocked after an accident and traffic is diverted via the Ringwoud Road.</p> <p>Unsound - the local plan is unsound with reference to SAP34 as the Ringwoud Road is already signposted as unsuitable for long vehicles, vehicles over 7.5 tonnes, wide vehicles, narrowing to single lane passing. The proposed SAP34 development would cause dangerous gridlock particularly with the added traffic in summer months.</p> <p>The developments of SAP34, SAP35 and SAP 15 would compromise the 'individual identity of Kingsdown Village' and contradiction to Policy 4 statement.</p> <p>the SAP34 development is unsound on the grounds that it would remove a flood sponge.</p> <p>the Local plan is also unsound in that it has not taken into account reasonable alternatives for Kingsdown or even considered these. There is no mention or even any attempt to assess the number of 2nd (or indeed 3rd, 4th) homes in Kingsdown/Walmer/Deal which are not lived in for most of the year. There is an increasing number of AirBnBs which provide multiple occupants (and multiple cars to travel) for family houses. As there is no attempt to assess these I will provide one road number as an example - Of the 34 houses in North Road, Kingsdown only 7 are lived in as a 1st home. The last house to sell in North/South Road was in the region of £600,000 for a 2nd home. This is in direct contrast to the statement of the local plan (7.11, page 268) 'to support the delivery of rural local needs homes to enable local people to remain in the village where they live or work and not to be forced to move away because of high house prices and high rents'. The plan only allocates 30% of new homes as affordable housing and so there is no demonstration for a local need for more housing. The other 70% of houses being built on greenfield could all be bought as 2nd/3rd/4th homes or run as AirBnBs.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>I suggest a review of housing need in specific areas of DDC and build houses in areas of housing need. This need has not been demonstrated in Kingsdown and surrounding areas unless DDC council want an area largely lived in by 2nd home owners.</p> <p>I suggest a 20 MPH limit throughout Kingsdown and the access roads with designated pedestrian and cycling lanes.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	

Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP632
Rep Status	Processed
Consultee ID	1331786
Consultee Full Name	Mr Philip Sparks
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34 - Land at Woodhill Farm, Ringwould Road, Kingsdown (KIN002) Point M
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I believe the plan is unsound in the respect that I cannot see that any consideration has been made for the fact that the adjacent highways are not suitable for such a development.</p> <p>In particular There are only three roads which access the site, Ringwould Rd has a 7.5 ton weight limit on it so should not be used by construction traffic. The other two roads are Glen Rd and The Rise. Both these roads are single track roads with passing places and all three roads form the only access to Kingsdown Primary School. All three roads suffer with regular blockages and vehicles having to reverse in order to pass each other which can cause considerable congestion. The local bus service comes up The Rise and proceeds past the School and down The Glen. The bus often gets blocked by vehicles passing in the opposite direction. For example I saw the bus stuck for around 20 minutes on the Glen recently as the person driving in the opposite direction was incapable of reversing to a suitable passing place and by then had traffic backed up all the way to Walmer further preventing their movement. Any additional traffic on these two roads in particular would be dangerous and prove impossible for local residents.</p> <p>Furthermore, I don't believe any consideration has been made for the fact that this lively and active village has a narrow and often impassable road through its centre called Upper St. This is the main access road through the village from Ringwould to Walmer/Deal. This road regularly cannot cope with the existing amount of traffic and gets blocked on a daily basis. Any additional traffic to this road from this development would render it impossible to use for residents and visitors to the Kingsdown Holiday Park at the bottom of this road. I cannot see that any consideration has been made for this knock on effect just a few hundred yards from the development.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance	I don't believe I am qualified to answer this particular part of the development of the plan.

with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP582
Rep Status	Processed
Consultee ID	1331779
Consultee Full Name	Mrs Catherine Taylor
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The Dover Local Plan (SAP 34) is totally unsound on the grounds that it is not effective. In comparison with other areas, most of which have been classified as unsuitable, this field is by no means suitable. This area is agricultural farmland, situated behind a Primary school and beside a playpark.</p> <p>This is also a dangerous stretch of road - a recognised black spot. As a resident of Glen Road on the junction to Balmoral Road, I have witnessed first hand the chaos which often ensues, particularly at school drop off and pick up times. There are no pavements on Glen Road and the narrow nature of the road allows for only one car to pass at a time. Currently, traffic pulls onto my driveway to allow other vehicles to pass.</p> <p>The following points have been overlooked:</p>

- Poor bus service. The current bus service is due to be further reduced
- Distance from GP surgeries
- The site is a groundwater source protection zone
- Development of the site has the potential to result in the loss of less than 25% of an open space, sport, recreation facility, open country or registered common land.
- The Primary School is oversubscribed so additional children will need to travel to attend other schools.
- The site is within 200m of a Public Right of Way/Cycle Path.
- The site is not within 2,000m of a secondary school.
- The site is not within 2,000m of further/higher education facilities.
- The site is not within 2,000m of Strategic Employment Sites/Enterprise Zones
- The site is not within 1,200m of a town centre.

Firstly:

Ringwold Rd is signposted as unsuitable for long vehicles, unsuitable for vehicles over 7.5 tonnes and unsuitable for wide vehicles. The road is painted "SLOW" in 3 places and there are four sections where the road narrows to single lane passing.

The population of Kingsdown, in excess of 2,500 (more in summer months due to the campsite and holiday park), depends on the traffic flowing freely. Therefore, SAP 34 is totally unsound for any development on the grounds of highways inadequacy. Any development would cause dangerous gridlock involving cars of current residents, parents/guardians of children attending Kingsdown Primary School, construction vehicles and new residents' vehicles.

Secondly:

On the grounds of landscape character. I moved to Kingsdown just over a year ago. Having previously lived (for around 30 years) in Walmer, this has always been an iconic sea view that greets people visiting Deal. Any development would COMPLETELY destroy the unique village identity and character. This is a beautiful rural location with a lot of local wildlife including bats, firecrests, goldfinches, greenfinches, great-tits, blue-tits, long-tailed tits, wrens, blackbirds, woodpeckers, robins, dunnocks, sparrows, herons and skylarks, which are now becoming quite rare in the UK. Also, many species of butterflies visit, including humming bird hawk moths and many others. Rural locations need to be protected from development, or all these species will disappear. There is also reported a Saxon burial ground on the propose site.

Thirdly:

On the grounds that the Deal/Walmer conurbation of 30,000 depends on the narrow, single lane in places - Ringwold Road, carrying diverted traffic. Much of the diverted traffic uses Glean Road/Liverpool Road. This would also be a major concern for emergency vehicles.

Fourthly:

On the grounds that it borders the AONB and is valuable arable farmland. This is particularly pertinent when national food security is of concern.

Fifthly:

On the grounds that any development would remove the flood sponge

	<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	No
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP721
Rep Status	Processed
Consultee ID	1331832
Consultee Full Name	Mrs Suzanne De Ruyter
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	SAP34
<p>2 - Do you consider this part of the Plan sound?</p>	No
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	Positively prepared Justified Consistent with National Policy
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	No

<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>No</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>No adequate traffic assessment with regard to the impact upon the village or indeed sufficient equalities assessments relating to the junior and aging population of its residents and their safety as they engage within their community. When the Dover Road is at rush hour, exiting the Ringwould road can be difficult. There are two other routes out of Kingsdown - one being Liverpool Road - a single lane Road, which would also provide for the land identified as suitable SAP75; and The Rise, to Upper Street - which already struggles to manage its existing traffic flow at peak times such as school pick up and drop off. These are all narrow or single lane roads with no footpaths in the village - There will be an increased danger to pedestrians with more traffic. There are no footpaths, so pedestrians have to stop to allow cars to pass frequently. With more traffic it would be very difficult to walk anywhere within the village. Particularly on the lower part of The Rise and on Upper street (where the shops are). People do walk in the village not only for exercise but to the shops as there are very few parking spaces. There is already a problem with traffic flow, with cars having to reverse to allow other cars to pass. This creates frequent traffic jams particularly involving the bus - which is an important mode of transport for the elderly and school children. Has there been a discussion with the bus drivers? To ask them how difficult it is already for them to provide the much needed service. The development would have a poor relationship with the existing settlement and would be detrimental in terms of additional vehicles. The proposed access to the Site "Ringwould road" Also is single lane with no footpath with blind bends. The duty of care to the local villagers safety is lacking within this plan.</p> <p>No consultation with BT open-reach to see if there would be adequate broadband available. This is currently a problem in the Village of Kingsdown with intermittent Wifi and particularly difficulty in connecting new customers.</p> <p>Whilst the plan claims to have consulted with Southern water, the proposal that the development link to existing sewers is unsound. There have been examples of the failure of the existing sewer lines in the village, having significant detrimental impact, in addition the storm water drains do not cope with existing run off and additional development will exacerbate this. There appears to be no consideration of these environmental impacts.</p> <p>The determination of the suitability of SAP34 for development is incongruous with the plans own determination of the unsuitability of other considered sites within Kingsdown. KIN06, KIN07. It would seem that the site selection has been based upon a topographical view of the village and fails to consider adequately the impact on the amenity of the village upon entry from the Ringwould road, which is Arable land (currently used year on year for agriculture and pastoral grazing which of itself adds to the amenity of the area bordering an AONB, but also contributing positively to the wellbeing of the Residents who graze their horses and walk to OXNEY Woods or the National Trust Woodland. Whilst the plan refers to the need to provide for trees, given the number of units to this site the likelihood will be dense development with postage stamp gardens deterring the planting of maturing native trees and any planting would require strict application of enforcement for their protection which does not feature.</p> <p>Following the Pandemic, greater appreciation of the need for open green spaces should have been provided for within the plan when considering the Health and Wellbeing of Residents. The Plan presumes the existing green space to be sufficient to accommodate the additional residents that would result from this development without provision for additional provision. The Plan fails to account for the increased demand for parking to access shops in the village or the increased traffic which will result either from the new residents driving through the village (to access Deal) or the noise impact of heavier traffic along the Ringwould and Dover Road.</p> <p>The plan is supposed to have complied with National Policy. The Government has announced its intention to rescind the Requirement of Local Governments to provide for a minimum number of houses.</p> <p>There has been insufficient analysis as to the actual need or demand for the proposed housing development in the area. There are new build properties showing as for sale which were added to Rightmove as long ago as 25.08.2021 (as at 08.12.2022) - some 16 months on the market. And that is based upon a quick search of one website.</p> <p>There has been inadequate consideration of the implications on the infrastructure or the economy of the area</p> <p>The identification of this area as suitable is incongruous with the decision to determine other areas such as KIN06 and KIN07 as unsuitable - the same grounds applying to those areas applying to this.</p> <p>* The development would have a poor relationship to the settlement and not in keeping with the character of the village. It is certainly not a logical extension to the settlement area (nor is SAP35).</p> <p>Where mistakes have been made previously with regard to permitted planning should not and must not be a basis for continued errors. This is one of the very few remaining Historic Villages, with a committed community seeking to preserve its heritage and beauty.</p> <p>The Council undertook a Conservation Area Appraisal of Kingsdown, the very first observation under 1.1 of part 1 of that document noting that Kingsdown is a "small, compact village... that has at its roots a history of both farming and fishing."</p>

	<p>That assessment noted "Section 72 of the 1990 Act specifies that in determining any application for development within the conservation area, special attention shall be had to the desirability of preserving or enhancing the character or appearance of the conservation area."</p> <p>Increased numbers of residents, thus increasing the size of the village and the traffic through the conservation area will contravene this ethos; and it is noted that the Council in recent years EXTENDED the Conservation area, highlighting the importance of Kingsdown's particular character.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>regenerate Dover town centre particularly the wharf to attract an influx of spending from visitors and from the ferry passengers thus providing more jobs. Compulsory purchase the rundown housing stock and regenerate to provide affordable housing and flats to families, which are close to jobs, shops, places to eat and transport hubs. Make Dover a destination and a place to be proud of</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>The Portal and is too difficult to use and the language hard to understand</p>
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)</p>
<p>Rep ID</p>	<p>SDLP673</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331800</p>
<p>Consultee Full Name</p>	<p>Mr Hugh Kyle</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP34</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified Effective</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Not Applicable</p>

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Kingsdown is a small village with terrible traffic problems both within the village and with access to the village, especially the road from the Ringwold/A258 junction. This proposed development will increase the amount of traffic in the village and on this road in particular. The Ringwold Road is terribly narrow and hilly — as are all the roads in Kingsdown — and is exceptionally dangerous with very bad visibility on the corners. The proposed access to this site is in a very difficult part of the road and will make an already busy and dangerous road even more so. I most strongly object to this proposal.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	I would not have an access road to this development at this place on the Ringwold Road. It will be lethal. Kingsdown gets very busy especially in the summer with huge camper vans trying to access the camp site. We also have a holiday village here which also increases the amount of traffic. Kingsdown just cannot cope with the traffic it already has.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP840
Rep Status	Processed
Consultee ID	1331916
Consultee Full Name	Dr Phil Peach
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 34, Kin 002
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective

	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Firstly the Highways Assessment of Ringwould Road is inadequate and unsound as regards this site. The facts are that Ringwould Road is signposted as unsuitable for long vehicles, unsuitable for vehicles over 7.5tonnes unsuitable for wide vehicles, the road is painted SLOW in 3 places despite the 50mph signs, and there are 4 sections where the road narrows to single lane passing. This road is a known accident blackspot that has suffered a recent fatal accident. The access to the site of SAP 34 is just behind the brow of a hill and behind a sharp bend, just as the road narrows to one lane. Having traffic join here seems obviously dangerous. For this reason I believe SAP 34 is non-compliant with all laws / planning regs relating to the prevention of accidents and protection of human life.</p> <p>The selection of SAP 34 is unsound secondly on the grounds of landscape character, being incompatible with criteria described above in SP 4. the site is on the skyline with sea behind, an iconic view that greets all people arriving in Deal; its selection contradicts the comments in SP4 on individual village identity and character. DM Policies NE2 (Natural Environment) p.285: It is 'sound' to designate the area inland from Kingsdown, west to Ringwould, Ripple, Sutton, Studdal and Little Mongeham, south to Guston, as LCT F Open Arable Chalk Farmland with Woodland, F3 Ripple. But it is unsound, ineffective and contradictory to then ignore the designation when selecting the dangerously located chalk farmland of SAP 34 for development.</p> <p>The selection of SAP 34 is unsound on the grounds that any development would remove a flood sponge on the top slope of the hill, below which is the Knight's Bottom pumping station and pond which drains towards Rays' Bottom SAP 15, so development here could contribute to flooding (see CC5 p. Flood Risk).</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP665
Rep Status	Processed
Consultee ID	1331808
Consultee Full Name	Mr Robert

	Hogben
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I object to KIN002 (SAP 34) being included in the draft LDP for the following reasons:</p> <p>The inclusion of SAP 34 is not legally compliant with NPPF 2021 item 11. (b)ii 'SPs should provide for objectively assessed needs for housing & other uses, . . . unless (ii) any adverse impacts of doing so would significantly & demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole'.</p> <p>The following arguments show why this development would have more adverse impacts than benefits and would not be sustainable.</p> <p>Kingsdown is a quiet village which has not developed into a larger settlement because it is isolated by its geography (see my later comments on local centres). Allocated money from developers would not 'improve' the infrastructure of the village as there is no space to provide parking or for widening roads or for improving any other physical infrastructure. The narrow single track roads through the village which are an inherent part of the character and charm of the village are also a limiting factor for the village in terms of further development. The roads in the village are already adorned with parked cars wherever possible, and there are very limited pavements in the village, this means pedestrians are often forced to walk in the middle of the roads and duck in-between cars when traffic approaches. Some parts of the roads have high walls and no pavements which, with current traffic levels, make walking perilous. Any increase in cars trying to park to use services or passing through the village, would be very dangerous. Residents of KIN002 would have to use their cars for almost all of their journeys, creating pollution and congestion.</p> <p>Furthermore, as the UK government have decided on 5/12/22 to stop putting pressure on local authorities to authorise unsustainable housing targets the LDP now needs reviewing in light of the new directives. The Dover District Area has, in recent years, been subject to considerable housing development, higher than that allowed for by the current local plan, and this development has been unsustainably concentrated into certain specific areas, because much of our district is either already overdeveloped, or not suitable for large scale development as it is either designated as an area of outstanding natural beauty (AONB), or it is heritage coast, or it is very low lying and liable to flooding or needed as floodplain.</p> <p>The continued inclusion of SAP34/ KIN002 land at Woodhill Farm, Kingsdown in the LDP is unsound, because, despite many concerns and reasoned arguments from residents the only concession seems to have been to reduce the housing numbers from 90 to 50; Due to the weak wording of the local plan that only suggests what would be 'preferred' by the district council, it is highly likely that the final number of houses would be in excess of 50 and possibly in excess of 90, if the proposal were to go ahead.</p> <p>The site has now been given a green allocation in the HELAA report despite its many issues and the fact that an adequate highways assessment has not yet been carried out and the HELAA highways assessment remains amber. The latest HELAA report states that the many failings can</p>

be mitigated for within the LDP. I argue that this is unsound and not justified nor consistent with National Policy NPPF 21. The evidence from DDC has not been used correctly. NE2 Landscape character and the Kent Downs; states in section 11.13 that DDC aims: *To ensure that all development coming forward over the plan period respects and reflects the character of the landscape in which it is located.* The DDC landscape character assessment of 2020 (LCA) shows that SAP34 / KIN002 falls within Ripple F3, *open chalk farmland and woodland.* **NE2** states; *the classification identifies 17 LCAs and defines issues of landscape management and development management which should be delivered over the plan period.*

Development Management guidelines include:

- Conserve the rural character of the landscape ensuring that it continues to play a role in providing a rural separation between Deal and Kingsdown as well as a rural setting for the Kent Downs AONB.-Seek to reduce lighting and noise impacts on this landscape and in longer views through sensitive highway design/management. Conserve the distinctive narrow winding lanes and grassy verges.

SAP 34 would not *'conserve the rural character of the landscape'*

SAP 34 would be right next to the AONB so would clearly not *'provide a rural setting for the Kent Downs AONB'*.

SAP 34 would, in direct contravention of the guidelines, increase *'lighting and noise impacts on this landscape'*.

SAP 34 would, in direct contravention of the guidelines, due to the raised setting of the site, negatively affect the rural setting of the AONB on *'longer views'* of this landscape, both looking into and out from the AONB.

SAP 34 would also, according to the HELLA Highways assessment, require the alteration of and therefore not *'conserve the narrow winding lane and grassy verges'* which form the main entrance to and help to define the character of, the quiet village of Kingsdown.

The Development Management guidelines also include:

- Conserve the open skyline, avoiding the introduction of vertical elements such as pylons, telecommunications masts etc.- Protect and enhance views from more elevated areas and from the coast out to sea and towards landmark features such as Walmer Castle.

SAP 34 is in an elevated position so it would not *'Conserve the open skyline'* of this landscape area of open chalk fields with woodland.

SAP 34 is in an elevated position so it would not *'Protect and enhance views from more elevated areas'* of this special landscape area of Ripple F3.

SAP 34 is clearly visible from many viewpoints within both the AONB and the Ripple F3 special landscape area, from along the A258 and the network of footpaths, and from the locally renowned 'Nelsons seat viewpoint'. I contend that it would therefore not *'protect and enhance the views of this landscape'*.

SAP 34 can, as I have mentioned be seen from within the Ripple F3 landscape area, and from certain directions it would be in the foreground of views out to sea, it would therefore not *'Protect and enhance views out to sea'*

SAP 34 has views out to the picturesque Ripple windmill, which I contend is a *'landmark feature'*, therefore this development would contravene the development guidelines, by not protecting nor enhancing views towards *'landmark features'*, which would be lost.

The development of SAP34 would result in the loss of an important buffer between the built environment of Kingsdown and the AONB. Ringwould Rd would lose part of its character and the main entrance to the village would be deprived of its character. Part of the AONB would be lost as would part of the character of the AONB. From within The Ripple F3, views across to Kingsdown and the sea would be negatively impacted and the open character of the landscape would be lost and pollution from light and traffic would increase. The HELAA sustainability appraisal states; *The site has been judged by Council officers to have the potential to moderately affect the District's landscapes, townscapes or seascapes.* I argue that this is not supported by the facts, and is not a fair appraisal of the probable impact of this development, especially when considered in the light of the site forming part of the LCA F3, the proximity to the nationally important AONB and the suggested necessary alterations to the *'distinctive narrow winding lane and verges'* which lead into what is at present a quiet rural village.

NE2 11.19 states *'The setting of the AONB comprises land adjacent to or within close proximity of its boundary, including but not limited to land which is visible from the AONB and from which the AONB can be seen.....Within the setting of the AONBs, priority will be given over other planning considerations to the conservation or enhancement of natural beauty, including landscape, wildlife habitats, tranquillity, dark skies, and geological features'*.

NE2 11.19 clearly and accurately describes the proposed site for SAP34. It is adjacent to and within close proximity of the AONB, it is visible from the AONB and the AONB can be seen from it. By allowing this development to go ahead, *'conservation of natural beauty, including landscape, wildlife habitats, tranquillity and dark skies'* would not have been given *'priority over other planning considerations'* I therefore contend that the development is not sound.

SP13 states that *the NPPF 2021 requires local plan policies to conserve and enhance the natural environment, to recognise the intrinsic character and beauty of the countryside and the wider benefits from natural capital and ecosystems.* Including SAP34 in the LDP is therefore in direct contravention of the NPPF, which means it is unsound as it would detract from the beauty of the countryside particularly the adjacent AONB. The Kent Downs AONB management plan 2021-26 says *the Kent Downs AONB, perhaps more than any other of Britain's protected landscapes – AONBs, Heritage Coasts or National Parks, has experienced and is experiencing severe development pressure.* DEFRA evidence shows *'The Kent Downs AONB stands out as an area which has experienced major change, showing a rate of urban growth of almost 10%.pa, with the urban area spreading by 14 ha over the decade'*. The AONB in Dover District has suffered development at a disproportionate rate which indicates that planning pressures on our district are unsustainable as they are overflowing into this nationally important landscape area. National Planning Practice Guidance (NPPG) confirms that the Duty of Regard is *'relevant in considering development proposals that are situated outside National Park or Area of Outstanding Natural Beauty boundaries, but which might have an impact on the setting of, and implementation of, the statutory purposes of these protected areas'*. I would argue that because the entrance onto Ringwoud Rd requires widening and changing of the road which will encroach into the AONB, to mitigate for it being unsafe, this will be detrimental to the setting and directly upon the AONB.

NPPF 2021 11 – making effective use of land - Planning policies and decisions should: 120 b *recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production.* As food security is such a national issue, including SAP34 for development is unsound and unsustainable as good agricultural land would be better served in producing food. I would add that the local plan talks about sustainability for future generations, but as the UK only produces around half of the food we need domestically, and the world population is growing and with global warming crops around the world are beginning to fail, it is highly likely that in the future we will need all the agricultural land we have to feed ourselves. Developing agricultural land is not sustainable.

Allocated money from the developers would not improve things as there is no space to provide parking in the village or for widening roads or for improving infrastructure. The narrow single track roads through the village which are an inherent part of the character and charm of the village are also a limiting factor for the village in terms of further development. The roads in the village are already adorned with parked cars wherever possible, and there are very limited pavements in the village, this means pedestrians are often forced to walk in the middle of the roads and duck in-between cars when traffic approaches. Any increase in cars trying to park to use services or passing through the village would be very dangerous. Residents of KIN002 would therefore have to use their cars for everything, creating pollution and congestion

Local Centres:

I would argue that the designation of Kingsdown as a local centre is unsound. Due to the nature of its location, with the undeveloped AONB, heritage coast and cliffs to the south, with no roads for access from this direction, the Sea to the east, with no villages, inhabitants nor roads, only Walmer to the north, which is closer to the town of Deal than to Kingsdown, but in any case, itself has better facilities than Kingsdown. To the west there are several small villages, such as East and West Langdon, but they are closer to and have better links to Dover, to the north west are Studdle, Ripple and Mongeham, but they are closer to and have better links to Deal. This leaves the small settlement of Ringwoud, which is close to Kingsdown, but is cut off by the Arterial A258. Ringwoud Road, which joins the two settlements, is steep and narrow in parts and not suitable for occasional cyclists or walkers, so most people would tend to drive between the two villages, however, there is very limited parking and limited facilities in Kingsdown, so even people from Ringwoud are much more likely to frequent Dover, Walmer or Deal for everyday needs or services. All of this probably goes a long way to explain why Kingsdown has never developed wide roads and modern infrastructure.

The high proportion of second homes and Air b and bs in the village demonstrates that dwellings outnumber homes required, so there is not an *'objectively assessed need for housing within the Parish'*. If largescale development were to take place in Kingsdown, it is highly likely that, many of them would become second homes or Air b and bs. Unless houses used for these purposes are owned by local people who already live in the village, which is unlikely, such houses would bring very little to the village. To include SAP34 /KIN002 is therefore unsound and not consistent with NPPF 21.

NPPF 2021, Paragraph 73. b) states that suitable land for development should; *'ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access'*; However SAP34 is unsound because there are extremely limited opportunities for employment within Kingsdown and there is not *'good access'* to larger towns. There is no rail link, the bus service is very limited and reduced since Reg 18, and the roads are narrow and already at certain times, dangerously busy.

NPPF 2021 Paragraph 79, states; *To promote sustainable development in rural areas, 'housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby'*. Because as I have outlined, Kingsdown is not at the heart of other rural settlement, the development of SAP34 will not *'enhance or maintain the vitality of rural communities'*.

The HELLA highways assessment commented that the scale of KIN002 was too small to create enough new footfall to improve the bus service, I suggest it would also be insufficient to warrant any other new services either.

I have mentioned that Kingsdown is isolated by distance and due to poor public transport, due to the position of the A258 and due to the narrow roads leading to and from the village. For these reasons, it cannot be said to be part of a '*group of smaller settlements*', where '*development in one village may support services in a village nearby*'. New residents at KIN002 would mostly have to use their cars to visit Dover, Deal or Walmer for services, contributing to Carbon emissions and making the roads more congested and dangerous. For these reasons I believe the KIN002 is unsound and unsustainable.

For all of the above reasons I contend that classifying Kingsdown as a 'village centre' is not justified by the facts. It should be reclassified as a 'larger village', which would mean the only development permitted would be windfall development within the village boundary.

If Kingsdown were to be classified as a larger village, which I have shown is demonstrably appropriate, then there would be strict criteria limiting developments such as KIN002, which would not be allowed to proceed as it is outside the village boundary.

When using the criteria of the draft local plan SAP34 is not sustainable and unsound for the following reasons:

TI1 Development should, in so far as its size, characteristic and location -Give priority to the needs of pedestrians, cyclists, users of public transport, car sharers and users of low and ultra-low emission vehicles.

The location and size of SAP34 means it will give priority to car drivers only so it will not be in line with TI1. The HELLA appraisal said it will not be large enough to warrant improvement of public transport. It is not on a train route. There are poor footpath routes to the village and only narrow and winding lanes to the village and to local towns. There is a cycle route to Deal along the seafront, but this joins Kingsdown at the other side of the village and the route would probably be too far for most casual cyclists. It is probably too far for people to walk to Deal or Dover in order to use the facilities at these towns. Any attempt to improve the cycling and walking routes to the village would result in loss of the distinctive character of the winding lanes which the 2020 LCA F3 Ripple seeks to preserve.

TI2 New accesses and intensified use of existing accesses onto the road network will not be permitted if it would result in a clear risk of crashes or traffic delays unless the proposals can incorporate measures that provide sufficient mitigation. I consider this site to be unsound as there would be an increase in crashes and traffic delays. Widening the junction at the exit would not do anything to improve the narrow dangerous access through Kingsdown village. It would also not improve the access from Ringwould Road onto the very busy A258 at Ringwould. Widening the road at the access point on Ringwould Road, would mean losing part of the Kent Downs AONB and would also effect the character of the winding lane entering the village, which as I have mentioned the 2020 LCA F3 Ripple seeks to preserve. Land either side of Ringwould Road is not owned by the same party as KIN002 and so cannot make up part of this development. Furthermore, any attempt to alter Ringwould Road at any point would also result in the loss of the charming character of the road. The access is also complicated. It is used by visitors to the play area and the landowner to the left as you enter the field from the road. No mention is made in the HELAA highways assessment of the landowner needing access. ER5 also crosses the entrance which would therefore be dangerous to pedestrians crossing from the field back to the village. ER5 is a very busy path used by dog walkers on a daily basis. The sight lines onto Ringwould Road in both direction are poor. Ringwould Rd is very narrow in places and in places, 2 vehicles cannot pass each other. Turning left out of the site would be onto a narrow road going into a 20mph zone. Turning right is in a 50mph zone with a bridleway and footpath crossing with poor visibility and slow tractors turning out onto the road. There has already been an RTC resulting in a fatality and serious injury on Ringwould Rd. I would argue that issues with access alone mean that this site is not suitable and unsound for development. A medium pressure gas main crosses KIN002 diagonally and crosses the road at this access point which would require careful consideration when changing the access. This would cause a lot of disruption to the villagers as this is the only classified road in and out of the village and as poor as it is, is the main route to the A258. If traffic had to divert via Deal this would create extra pollution and congestion for a protracted period of time which would be contrary to SP1 and the climate emergency declaration by DDC.

TI3 Applicants must demonstrate that traffic movements to and from the development can be accommodated, resolved, or mitigated to avoid severe cumulative residual impacts.

As I have already pointed out, traffic movements to and from the site would be on to Ringwould Road. This road is narrow, in places steep, in places it has high banks and hedgerows which preclude views along it, it sometimes floods in the dip before the hill towards Ringwould and I have known many winters when it has been impassable because of snow. If cars from the proposed development SAP34 were to turn left onto Ringwould Road they would soon enter the narrow streets of Kingsdown where there are many parked cars and very little pavement for pedestrians. If they were to turn right they would find themselves on the narrow, twisting, steep, liable to flooding and with poor sight lines, high banks and hedges, Ringwould Road. After this they would have to try to get onto the busy, at times extremely busy A258 at Ringwould. Ringwould Road is crossed by an official footpaths, and an official footpath/bridalway, both are on bends where it is difficult for pedestrians and

	<p>horse riders to see what traffic is coming or to be seen by drivers. Pedestrians also use Ringwould Road to access the special needs school and Ringwould Village Hall which are both situated on the road close to the junction with the A258.</p> <p>Any increase in traffic on this Road would be impossible to mitigate for without damaging the character of the 'distinctive winding narrow lane' which the 2020 LCA F3 Ripple seeks to preserve.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>SAP34 should not be included in the LDP.</p> <p>DDC should now reconsider the housing allocation targets in light of the government announcement of 5/12/22, particularly with respect to rural settlements.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)</p>
<p>Rep ID</p>	<p>SDLP816</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331834</p>
<p>Consultee Full Name</p>	<p>Kitewood</p>
<p>Consultee Company / Organisation</p>	<p>Kitewood</p>
<p>Agent Full Name</p>	<p>Lucy Wilford</p>
<p>Agent Company / Organisation</p>	<p>DHA Planning</p>
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>Local Plan Allocations SAP21</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified Effective Consistent with National Policy</p>

4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	See attached supporting statement DDC note: Cannot find reference to SAP21 in attached file. Assumed to be error and consultation point changed to SAP34
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	See attached supporting statement
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	In order to ensure that our case is properly put forward and understood, and to provide the opportunity to respond to any questions/points raised by the Council and Local Plan Inspector which might result outside the written representations made and following discussion at the EIP.
Include files	Kitewood Estates Limited Reg19 Dover Local Plan Reps.pdf (5)
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP891
Rep Status	Processed
Consultee ID	1331943
Consultee Full Name	Ms Alexa Childs
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No

<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Justified Effective Consistent with National Policy</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>No</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>No</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>SAP 34 Kingsdown The selection of SAP 34 is totally unsound, on 5 different grounds. Firstly the Highways Assessment of Ringwoud Road is inadequate and unsound as regards this site. The facts are that Ringwoud Road is signposted as unsuitable for long vehicles, unsuitable for vehicles over 7.5tonnes and unsuitable for wide vehicles, the road is painted SLOW in 3 places despite the 50mph signs, and there are 4 sections where the road narrows to single lane passing. The 1400 voters in Kingsdown village (population 2000 + 500? more in summer months due to holiday village + campsite) are all dependent on the Ringwoud Road traffic flowing freely. So the selection of SAP 34 for any development is unsound firstly on the grounds of highways assessment unsoundness / inadequacy. Any development would cause dangerous gridlock, involving the cars of current residents, parents of children of the village primary school, construction vehicles and new residents' cars. It is a disgrace that KCC for years have refused to listen to requests to reduce the speed limit on this road and refused also to put in a kerbed pavement on the northern side of Ringwoud Road. The economy of the village depends on visitors and residents walking, cycling and horse-riding on the Ringwoud Road and any development of SAP 34 would increase the likelihood of fatalities exponentially.</p> <p>The selection of SAP 34 is unsound secondly on the grounds of landscape character, being incompatible with criteria described above in SP 4. the site is on the skyline with sea behind, an iconic view that greets all people arriving in Deal; its selection contradicts the comments in SP4 on individual village identity and character.</p> <p>The selection of SAP 34 is unsound thirdly on the grounds that the Deal / Walmer conurbation of 30,000 depends on the narrow – single lane in places - Ringwoud Rd, carrying diverted traffic from the A258 every time A258 is blocked by an RTA or road works. The A258 is the only southern entrance to the 30,000 conurbation starting in Upper Walmer stretching to North Deal and Sholden. Diverted traffic is a dangerous nightmare for the village every time it happens, some diverted traffic uses Glen Rd / Liverpool road selected as site for SAP 15 Ray's Bottom in Walmer. This site too, if developed is likely to mean diverted traffic cannot get in / out of Deal /Walmer 30,000 conurbation. Neighbours working for emergency services say they oppose both developments for this reason. Unsound due to being incompatible with SP12, because its lanes periodically become part of the district Strategic Transport Infrastructure. Selection of these sites is completely unsound and non-compliant with all laws / planning regs relating to the prevention of accidents and protection of human life. SAP 34 would result in <i>'Traffic movements from the development resulting in severe impacts to the highway network that it would not be possible to mitigate'</i>, and as such contrary to SP4 2 j within the plan, thus unsound and highly ineffective.</p> <p>The selection of SAP 34 is unsound fourthly on the grounds that it borders the AONB and is valuable arable farmland, needed in times when national food security is of concern. Moreover 4.238 needs correcting, the parish council-owned, biodiversity-rich site of the Lynch / and Freedown woods (that run into Oxney Court Woods) was the subject of a survey by Kent Wildlife Trust in 2017 commissioned by the Ringwoud w/ Kingsdown parish council and paid for by DEFRA, which provides evidence of the natural capital within the boundary of the AONB to be protected on the boundary of this site.</p> <p>The selection of SAP 34 is unsound fifthly on the grounds that any development would remove a flood sponge on the top slope of the hill, below which is the Knight's Bottom pumping station and pond which drains towards Rays' Bottom SAP 15, so development here could contribute to flooding . (FYI we have seen an RTA fatality, and many near misses, in this dip on the Ringwoud Rd).</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The current plan is not compliant or sound. The scale of the development is unacceptably and impossible to implement without infringement of current agreed parameters. A development of this scale will literally destroy the identity of our village and make the roads a misery for all those who have to use them. We will become part of a sprawl of housing. I object to development on green sites completely. Why not build new housing on existing brown field sites in the area of which there are many.</p>

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP766
Rep Status	Processed
Consultee ID	1331834
Consultee Full Name	Kitewood
Consultee Company / Organisation	Kitewood
Agent Full Name	Lucy Wilford
Agent Company / Organisation	DHA Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Housing and Employment Site Allocations - SAP34 Land at Wood Hill Farm, Ringwoud Road, Kingsdown
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	See attached supporting statement
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will	See attached supporting statement

make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	In order to ensure that our case is properly put forward and understood, and to provide the opportunity to respond to any questions/points raised by the Council and Local Plan Inspector which might result outside the written representations made and following discussion at the EIP.
Include files	Kitewood Estates Limited Reg19 Dover Local Plan Reprs.pdf (1)
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP748
Rep Status	Processed
Consultee ID	1331858
Consultee Full Name	Mr Jonathan Stone
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Goes against National Planning Policy Framework. See paragraphs paragraphs: 70, 92, 93, 104, 105, 110, 111.</p> <p>Clearly goes against Dover District Council's Landscape Character Assessment for Dover District. See advice on landscape management and development on page 118. Removal of a flood sponge.</p> <p>Fails to comply with the Duty to Cooperate - Already high traffic accident rate will be made worse +Village already too congested. Cant handle more.</p> <p>Does not align with Dover District Council's Strategic Policies:</p> <ul style="list-style-type: none"> · SP2. Development will lead to deterioration in existing open spaces, air quality, water maintenance and an increase in traffic. · SP4. Size the development is not appropriate to of the settlement area and existing facilities, · SP13 and SP14. Site borders an AONB and is in close proximity to the Dover to Kingsdown cliffs SAC and site of SSI.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP773
Rep Status	Processed
Consultee ID	1331869
Consultee Full Name	Mr Timothy Stone
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>I consider the inclusion of site SAP34 within the Dover Local Plan is unsound because it:</p> <ul style="list-style-type: none"> · fails to comply with the National Planning Policy Framework (NPPF) · contravenes Dover District Council's strategic policies · contravenes the advice in Dover District Council's Landscape Character Assessment for Dover District. <p>The inclusion of site SAP34 is not consistent with the national policy enabling the delivery of sustainable development in accordance with the policies in the NPPF. In particular it is in contravention of the following paragraphs: 70, 92, 93, 104, 105, 110, 111.</p> <p>Development at this site represents a significant move away from the policy of promoting sustainable transport. The scale, location and density of development proposed is unsound on highways grounds, representing an unacceptable cumulative impact on highway safety, and the residual impacts on the road network would be severe. Ringwould Road is signposted as unsuitable for long vehicles, vehicles over 7.5 tonnes, and wide vehicles, further the road is painted SLOW in three places, despite the 50mph signs, and there are four sections where the road narrows to single lane passing. The road already struggles to cope with the additional traffic use with a) access to the holiday village, campsite and golf course and b) the road is used as an alternative route for traffic diverted from the A258, causing significant safety issues on Ringwould Road, The Rise and Glen Road. Any additional traffic will cause gridlock. A fatal road traffic accident occurred on Ringwould Road in recent years, and the proposal to introduce further traffic to the road represents unacceptable cumulative impact.</p> <p>The inclusion of site SAP34 is unsound because it contravenes Dover District Council's Strategic Policies in particular:</p> <ul style="list-style-type: none"> · SP2. Development at the site will have an adverse effect upon the existing community with a deterioration in existing open spaces, air quality, water maintenance and an increase in traffic. · SP4. The scale of the development is not appropriate to the size of the settlement and existing facilities, would harm green spaces, would result in the loss of agricultural land · SP13 and SP14. Development at the site will have an adverse effect upon the landscape and natural environment. The site borders an AONB and is in close proximity to the Dover to Kingsdown cliffs SAC and site of SSI. Further the site is on the skyline with sea beyond, and any development will have a detrimental effect upon the intrinsic character of the landscape. <p>Development at the site contravenes the advice in Dover District Council's Landscape Character Assessment for Dover District, in particular the advice on landscape management and development as set out on page 118 of the document.</p> <p>The inclusion of site SAP 34 is unsound on the grounds that any development would remove a flood sponge on the top slope of the hill, below which is the Knight's Bottom pumping station.</p> <p>I consider the inclusion of site SAP34 fails to comply with the duty to co-operate because it does not respect the needs and safety of the local community; it is detrimental to the needs and safety of the local community by increasing the risk of road traffic accidents and of flooding, reducing air quality, and deteriorating the natural environment.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Removal of SAP34 from the Local Plan.</p>

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP817
Rep Status	Processed
Consultee ID	1331897
Consultee Full Name	Mr Martin Stone
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34 (KIN002)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I consider the inclusion of site SAP34 within the Dover Local Plan is unsound because it:</p> <ul style="list-style-type: none"> - fails to comply with the National Planning Policy Framework (NPPF) - contravenes Dover District Council's strategic policies - contravenes the advice in Dover District Council's Landscape Character Assessment for Dover District. <p>The inclusion of site SAP34 is not consistent with the national policy enabling the delivery of sustainable development in accordance with the policies in the NPPF. In particular it is in contravention of the following paragraphs: 70, 92, 93, 104, 105, 110, 111.</p> <p>Development at this site represents a significant move away from the policy of promoting sustainable transport. The scale, location and density of development proposed is unsound on highways grounds, representing an unacceptable cumulative impact on highway safety, and the residual</p>

impacts on the road network would be severe. Ringwould Road is signposted as unsuitable for long vehicles, vehicles over 7.5 tonnes, and wide vehicles, further the road is painted SLOW in three places, despite the 50mph signs, and there are four sections where the road narrows to single lane passing. The road already struggles to cope with the additional traffic use with a) access to the holiday village, campsite and golf course and b) the road is used as an alternative route for traffic diverted from the A258, causing significant safety issues on Ringwould Road, The Rise and Glen Road. Any additional traffic will cause gridlock. A fatal road traffic accident occurred on Ringwould Road in recent years, and the proposal to introduce further traffic to the road represents unacceptable cumulative impact.

The inclusion of site SAP34 is unsound because it contravenes Dover District Council's Strategic Policies in particular:

- SP2. Development at the site will have an adverse effect upon the existing community with a deterioration in existing open spaces, air quality, water maintenance and an increase in traffic.
- SP4. The scale of the development is not appropriate to the size of the settlement and existing facilities, would harm green spaces, would result in the loss of agricultural land
- SP13 and SP14. Development at the site will have an adverse effect upon the landscape and natural environment. The site borders an AONB and is in close proximity to the Dover to Kingsdown cliffs SAC and site of SSI. Further the site is on the skyline with sea beyond, and any development will have a detrimental effect upon the intrinsic character of the landscape.

Development at the site contravenes the advice in Dover District Council's Landscape Character Assessment for Dover District, in particular the advice on landscape management and development as set out on page 118 of the document.

The inclusion of site SAP 34 is unsound on the grounds that any development would remove a flood sponge on the top slope of the hill, below which is the Knight's Bottom pumping station.

I consider the inclusion of site SAP34 fails to comply with the duty to co-operate because it does not respect the needs and safety of the local community; it is detrimental to the needs and safety of the local community by increasing the risk of road traffic accidents and of flooding, reducing air quality, and deteriorating the natural environment.

NPPF 2021 item 11 states in (b)ii 'SPs should provide for objectively assessed needs for housing & other uses, . . . unless(ii) any adverse impacts of doing so would significantly & demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole'. The inclusion of SAP34 within the plan is unsound because it does not objectively address the need for housing. The adverse impact on the already overloaded local infrastructure and would be detrimental to the small village of Kingsdown and adjacent areas of natural beauty.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Removal of SAP34 from the plan

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP880
Rep Status	Processed
Consultee ID	1331932
Consultee Full Name	Ms CHRIS GRAHAM
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>This area is within Open Arable Chalk Farmland with Woodland. Proximity of this site to the boundary of the AONB requires it to be kept as a buffer between the existing built environment and open countryside in order that the special character of the area is maintained.</p> <p>The village has lots of character, includes a conservation area, has narrow roads, a small school, limited amenities such as no medical services, limited bus service, recently reduced, no immediate access to rail services and therefore very dependent on car use. This results in frequent congestion in the village. There are limited footpaths in the village, unlit so access becomes increasingly dependent on motor transport.</p> <p>The site is opposite the AONB where there is normally pedestrian access for health and wellbeing.</p> <p>The proposal would result in the loss of agricultural land, recently becoming a topic of concern as continuity of food supply is threatened. Access is compromised and becomes dangerous on an already difficult road.</p> <p>This village has narrow roads which are already congested and at times blocked, as heavy vehicles try to gain access.</p> <p>My question is why there is a proposal for development here when it is within the zone of influence of both an SSI and AONB.</p> <p>The elevated views from routes to and from Wood Hill cannot be mitigated against with planting alone. Sensitive view points are 25m above the site from both the lynch and the woods. A screen of planting cannot satisfactorily mitigate the impact on these sensitive views from a nationally important designated sites.</p> <p>I think the access is also a major issue. The Ringwould road is not suitable for pedestrians and cyclists - unsafe for both modes given the bend in the road on the approach to the village and lack of forward visibility. With no pavement there is no safe active travel route to the village, and therefore the entire development will be based on car travel, and is therefore unsustainable.</p>

	<p>It is not suitable to redesign/ provide offsite 'improvements' - lights/tarmac etc to pedestrian path through the trees as it is an important bat corridor (must remain dark) and important ecological corridor (that makes a strategic green link to the green corridor at Knights bottom and along the Glen)</p> <p>Moreover, the access to the site will require tree/hedge/scrub removal and impede movement of wildlife from the Butts ecological zone and the woodland to the west of the site.</p> <p>With regards to site access, given the high banks and bend in the road, the junction is poorly located, particularly given the speed of peoples approach from the A 258 and the width of the carriageway.</p> <p>I would also question the principle of development in Kingsdown to this scale as there is no public transport or jobs/services in the village. It will change the character of the village- rural, historic, coastal village etc, particularly when viewed from the special zones that they have identified.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP1752
Rep Status	Processed
Consultee ID	1252448
Consultee Full Name	Mr Mike Hawker
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I am writing to you reference the new Local Plan and two large proposed developments in Kingsdown. I believe these to be totally inappropriate. Our village infrastructure is woefully inadequate to support such developments. Kingsdown already has traffic problems and the local primary school is full to the brim. The cancelling of local buses for school and public will add to the problem. The disruption caused by these developments, particularly building materials and heavy plant deliveries, will be intolerable. The muck away will cause major problems on the narrow county lanes. From what I have seen this plan has not been thought through. No infrastructure conditions been given on planning. Like new schools, doctor surgery, and access roads.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP889
Rep Status	Processed
Consultee ID	1331940
Consultee Full Name	Dr Sophie Peach
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The inclusion of SAP 34 is not legally compliant with NPPF 2021 item 11. (b)ii 'SPs should provide for objectively assessed needs for housing & other uses, . . . unless (ii) any adverse impacts of doing so would significantly & demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole'. SAP 34 Kingsdown p. 163: The selection of SAP 34 is totally unsound, on 5 different grounds.. Firstly the Highways Assessment of Ringwoud Road is inadequate and unsound as regards this site. The facts are that Ringwoud Road is signposted as unsuitable for long vehicles, unsuitable for vehicles over 7.5tonnes unsuitable for wide vehicles, the road is painted SLOW in 3 places despite the 50mph signs, and there are 4 sections where the road narrows to single lane passing. The 1400 voters in Kingsdown village (population 2000 + 500? more in summer months due to holiday village + campsite) are all dependent on the Ringwoud Road traffic flowing freely. So the selection of SAP 34 for any development is unsound firstly on the grounds of highways assessment unsoundness / inadequacy. Any development would cause dangerous gridlock, involving the cars of current residents, parents of children of the village primary school, construction vehicles and new residents' cars. It is a disgrace that KCC for years have refused to listen to requests to reduce the speed limit on this road and refused also to put in a kerbed pavement on the northern side of Ringwoud Road. The economy of the village depends on visitors and residents walking, cycling and horse-riding on the Ringwoud Road and any development of SAP 34 would increase the likelihood of fatalities exponentially.</p> <p>The selection of SAP 34 is unsound secondly on the grounds of landscape character, being incompatible with criteria described above in SP 4. the site is on the skyline with sea behind, an iconic view that greets all people arriving in Deal; its selection contradicts the comments in SP4 on individual village identity and character. DM Policies NE2 (Natural Environment) p.285: It is 'sound' to designate the area inland from Kingsdown, west to Ringwoud, Ripple, Sutton, Studdal and Little Mongeham, south to Guston, as LCT F Open Arable Chalk Farmland with Woodland, F3 Ripple. But it is unsound, ineffective and contradictory to then ignore the designation when selecting the dangerously located chalk farmland of SAP 34 for development.</p> <p>The selection of SAP 34 is unsound thirdly on the grounds that the Deal / Walmer conurbation of 30,000 depends on the narrow – single lane in places - Ringwoud Rd, carrying diverted traffic from the A258 every time A258 is blocked by an RTA or road works. The A258 is the only southern entrance to the 30,000 conurbation starting in Upper Walmer stretching to North Deal and Sholden. Diverted traffic is a dangerous nightmare for the village every time it happens, some diverted traffic uses Glen Rd / Liverpool road selected as site for SAP 15 Ray's Bottom in Walmer. This site too, if developed is likely to mean diverted traffic cannot get in / out of Deal /Walmer 30,000 conurbation. Neighbours working for emergency services say they oppose both developments for this reason. Unsound due to being incompatible with SP12, because its lanes periodically become part of the district Strategic Transport Infrastructure. Selection of these sites is completely unsound and non-compliant with all laws / planning regs relating to the prevention of accidents and protection of human life. SAP 34 would result in 'Traffic movements from the development resulting in severe impacts to the highway network that it would not be possible to mitigate', and as such contrary to SP4 2 j within the plan, thus unsound and highly ineffective.</p> <p>The selection of SAP 34 is unsound fourthly on the grounds that it borders the AONB and is valuable arable farmland, needed in times when national food security is of concern. Moreover 4.238 needs correcting, the parish council-owned, biodiversity-rich site of the Lynch / and Freedown woods (that run into Oxney Court Woods) was the subject of a survey by Kent Wildlife Trust in 2017 commissioned by the Ringwoud w/ Kingsdown parish council and paid for by DEFRA, which provides evidence of the natural capital within the boundary of the AONB to be protected on the boundary of this site. The selection of SAP 34 is unsound fifthly on the grounds that any development would remove a flood sponge on the top slope of the hill, below which is the Knight's Bottom pumping station and pond which drains towards Rays' Bottom SAP 15, so development here could contribute to flooding (see CC5 p. Flood Risk).</p>

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP901
Rep Status	Processed
Consultee ID	1331949
Consultee Full Name	Mr Shaun Roper
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	I object to this proposal on the grounds of traffic congestion, the ringwold road is narrow with pinch points (very bad on the rise and chalk hill road) and increased traffic will just worsen congestion that already causes queues and delays. This is a major problem if emergency and essential services need reasonable access. there is nat an option to widen the road as it would mean using land allocated to AONB. There is also no footpath and increased traffic will endanger pedestrians. This is also a protection zone for the aquifer. The public transport is not adequate at

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	present and the service will not cope with the increase in demand and there will be no increase in services. Other services such as schools will be under increased pressure and can barely cope at present. There is also a lack of shops in kingsdown which will increase traffic in and out of thr village. I see there is no plan for cycle paths so increased traffic will endanger cyclists.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP995
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The County Council requests that the Transport Assessment must include consideration of Bridleways ER21, ER20 and PROW network offsite,
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The County Council requests that the Transport Assessment must include consideration of Bridleways ER21, ER20 and PROW network offsite,
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP1323
Rep Status	Processed
Consultee ID	1267660
Consultee Full Name	Mrs J Mallion
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Planning policies and decisions should contribute to and enhance the natural and local environment.</p> <p>The proposed site is next to an Area of Outstanding Natural Beauty and any development would have a detrimental effect on the surrounding area. Mature hedgerows would be torn down destroying habitats for wildlife which makes the area such a special place. In the case of the policy SAP35 Skylarks currently nest at the site of the proposed development and in a species who's habitat is already at risk any further loss would be a disaster.</p> <p>The development of 50 new homes is unlikely to improve local environmental conditions. It is likely to bring an extra 100 plus cars into the village. Ringwold Road is completely unsuitable to cope with this extra traffic. It is extremely narrow and has no footpaths for pedestrians or cyclists nor is there any space for these to be added. Added to the existing village, school, campsite and holiday park traffic, the already struggling village roads would cease to cope. The situation would be made even worse if the proposed development of 75 houses SAP15 were to go ahead.</p> <p>Kingsdown is a small village and does not have the infrastructure to support such developments.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP1550
Rep Status	Processed
Consultee ID	1272952
Consultee Full Name	Susan Watson
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I consider the SAP34/KIN002 site to be an unsound choice for a development of 50 houses because:</p> <p><u>Traffic</u> Traffic dangers make site SAP34 unsuitable for a development of 50 houses. There is only one access point onto this field from the Ringwold road, which is a dangerous stretch of road and an accident black-spot. However, there should be more to a highways assessment than simply just the entrance/exit to the proposed development site and the nearby junction onto the Dover Road (which has weight and size limits). Kingsdown is a small country village set at the top of a hill. The 3 main roads leading up into the village are all narrow country lanes which wind uphill. Not just the Ringwold road, but ALL of these country lanes would be affected by the increased amount of traffic that a development of 50 more houses would bring to the top of Kingsdown. These roads are mostly only wide enough for one car to pass at a time, and not suitable for large volumes of traffic. Even now there are often hold-ups on the hills.</p> <p>When the Dover road is closed between Ringwold and Deal the traffic from that road is diverted through Kingsdown using the country lanes which causes havoc when it happens leading to concerns from the Emergency Services about access. And of course Building work itself would generate noise and increased traffic volume with large vehicles and dust, putting extra strain on the country lanes.</p> <p>I do not feel that enough consideration has been given to the existing road structure in Kingsdown and so I consider that the Highways Assessment for SAP34 is unsound and inadequate.</p> <p>No footpaths for pedestrians.</p> <p><u>Greenfield site used for agriculture</u> Real sustainability - This field is currently farmland used for agriculture. In the wake of Brexit this country should be producing as much of its own food as possible, so all local farmland should be kept as such to provide food for our local population in a sustainable fashion. We are constantly hearing on the TV News that farmland is much needed for agriculture, in particular there is a shortage of wheat that used to come from Ukraine – this field was used to grow wheat in 2021 and can be again – it would be very short-sighted to allow any change of use to building development on this land.</p> <p><u>Infrastructure</u> Kingsdown is a small rural village, with only one small general village shop/post office and a butcher, but no doctors or dentists or any of the other infrastructure needed for a large population. The village school is already oversubscribed. Local bus services are being cut back. It is a historic village with no room for expansion for large volumes of traffic or people beyond the current inhabitants and holiday visitors. Water supply may also be stressed if serving more people.</p> <p><u>AONB</u> I looked up the Kent Downs Area of Outstanding Natural Beauty (AONB) online (a satellite image) and from what I could see it looks as if this AONB runs right up to the Ringwold road – literally across the lane from SAP34 Kingsdown site. It is also near to a SSSI, thus local flora & fauna, hedgerows and habitats need to be protected – bats, birds, trees, flowers so that the character of the surrounding countryside and biodiversity is protected. I noticed a comment that “the developer” is already working with the Highways Agency and may be able to obtain land over the other side of the road to improve access – is he jumping the gun? If the land talked about on the opposite side of the Ringwold road from the proposed entrance/exit is in the AONB would he be allowed to use it? I believe there are rules about building on land that is this close to an AONB. Also governing how the local views would impact the AONB. This proposed development would be clearly visible and impossible to hide from nearby roads and fields.</p> <p><u>Biodiversity</u> SAP34 in Kingsdown is a beautiful rural location with a lot of local wildlife. I have often heard skylarks overhead which are now becoming quite rare in the UK, and also seen a firecrest and often buzzards. I also have many birds, nearly all of which are declining in numbers in the UK, regularly visiting my garden, including woodpeckers, goldfinches, greenfinch, blue tit, long-tailed tit, great tit, wren, robin and a heron as well as</p>

the more common pigeons, collared doves, seagulls, sparrows, dunnocks and blackbirds. Also many species of butterflies visit, including humming bird hawk moths and many others. Rural locations need to be protected from development, or all these species will disappear. This field is a much-valued local green space where many village people walk their dogs and take exercise.

Historical site

Possible Saxon Burial Ground in this field which should be investigated.

Housing need

There is not a need for housing in Kingsdown Village as evidenced by the number of 2nd homes and Airbnb properties in the village. You have only to drive round Walmer, Sholden and areas all over Deal to see how much housing development has already taken place in this district and how much is STILL being built. More is simply not needed in Kingsdown and SAP34 is the wrong place for it.

Not justified - I consider that the best approach when considered against reasonable alternatives is to remove site SAP34/KIN002 from this Local Plan. It would certainly be the best thing for Kingsdown Village. This is a beautiful rural location which should be protected from development and in my view should be made part of the nearby Area of Outstanding Natural Beauty.

Kingsdown is happy as a village and does not want to be a sprawling metropolis with motorways coming into it. There is the potential for a development of this size (50 houses in SAP34) and the traffic associated with it to cause great harm to our village and its identity. If more houses are needed they should be placed near a larger main road which can cope more easily with the traffic generated, or, better still, in a larger town where there would be better public transport links and infrastructure. Kingsdown Village can then be preserved and retain its identity, charm, beauty and character. Therefore I consider the selection of SAP34 Kingsdown as a site for development is unsound.

Legal Compliance

The section on Legal Compliance talks about the involvement of the local community in the preparation and revision of the Plan. The one comment from everyone is how difficult this has been made. The online Consultation Portal caused problems for quite a few people during the first round of consultation a couple of years ago, but at that stage it was possible for people to send written comments in their own words by email or post which was helpful. This second round of consultation (Reg 19) has caused even more problems with its restrictive format of having to answer certain questions on a specific form and needing definitions which has caused even more upset and confusion, particularly among elderly residents and has meant that some have been unable to comment on the revision of the plan which has made them feel that their views are not being listened to. Future consultations should be simpler and more flexible and genuinely take everyone's comments into account. Re the KIN002/SAP34 site I have heard said many times "no-one in Kingsdown wants this development" – this view should be taken into account and not just dismissed out of hand by the powers that be.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Local Plan Consultation Point

SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)

Rep ID

SDLP1344

Rep Status	Processed
Consultee ID	1331106
Consultee Full Name	Linda Brennan
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I'm against 50 house because;</p> <p>Access to site unsuitable. There is no turning for site lorries and heavy plant machinery Ringwould road in whole length is narrow with banks either side. Banks and verges would be mashed. Site traffic on this road would be hazardous</p> <p>Challenging junction exit into the constantly busy Dover Road with volume of users as it is.</p> <p>Site access would present extreme danger for village car drivers when using key village exits (narrow junction at the top of The Rise/Chalkhill road. The Site entrance is on a blind bend.</p> <p>There are no pavements in Ringwould road. No pavements for footfall from site to village centre</p> <p>Pollution and village traffic congestion from additional cars from this choice of site is a huge concern . Kingsdown to Deal bus cannot be relied upon to run to timetable</p> <p>Visual impact of 50 houses in proposed location unacceptable. Local Vista ruined No amount of screening would mitigate. Trees take a long time to establish</p> <p>This location is not suitable for development. Site access point has no turning space for site lorries or heavy plant traffic.</p> <p>Site access is located on a blind bend.</p> <p>There are no pavements in Ringwould Road. There are no pavements from site to village.</p> <p>Ringwould Road for its whole length is very narrow. Site traffic would make this road hazardous for users. The road has high banks and verges which would become completely mashed.</p> <p>The narrow junction of Ringwould Road into the busy Dover Road would not be safe for site traffic and normal users to share.</p> <p>Pollution and village traffic congestion from this proposed development vehicles would be abominable. The village centre has few pavements walkers and cyclists are challenged as it is.</p> <p>Visually development would be totally out of keeping with the village.</p> <p>Village vista of green space would be ruined. No amount of screening would make this area look better. Trees take a long time to grow and mature. Whatever colour the houses were painted, or materials used, the green space is still gone forever .</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s)	This site should be removed.

you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP1345
Rep Status	Processed
Consultee ID	1331498
Consultee Full Name	Mr. Peter Cartwright
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34/KIN002
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>Having lived in Kingsdown for 17 or more years I am totally against any major housing development here. Although I realise there is a need for more homes nationally, I feel that Kingsdown is totally unsuitable for this purpose for a number of reasons.</p> <p>This pretty village has limited access by road, which can be illustrated at the present time by the congestion caused by cars arriving to drop off and pick up of children too and from the local primary school.</p> <p>The village itself has mainly narrow winding approach roads, with the main high street (Upper Street) having limited parking places, which would be made worse by the addition of a large housing development.</p> <p>A development of this nature would potentially destroy Kingsdown as we now know it.</p> <p>The logistics of houses being built here would involve better public transport, improved roads especially the A258 and many other considerations. On the assumption that most of the properties would be purchased by people of working age, and in all probabilities would need to travel to London. As Kingsdown is some way from the railway station, which has limited parking, and also poor access roads to the A2/ A20 this would also make for an unsuitable choice for this development.</p> <p>Since I have lived here, past developments in the surrounding area do not seem to have been given sufficient thought before being agreed, Burlington House next to County Hotel, and The White Cliffs Experience are two examples which come to mind.</p> <p>The beauty of this area of Kent is its coast line and coastal villages such as Kingsdown, St Margarets, and Capel-le Ferne, with Deal, Dover and Folkestone adding additional character.</p> <p>Please look again and not include Kingsdown in the DDC Development Plan and help preserve the character of this village for the future.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)</p>
<p>Rep ID</p>	<p>SDLP1093</p>

Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The selection of SAP 34 is totally unsound, The Highways Assessment of Ringwould Road is inadequate. The facts are that Ringwould Road is signposted as unsuitable for long vehicles, unsuitable for vehicles over 7.5tonnes and unsuitable for wide vehicles, the road is painted SLOW in 3 places despite the 50mph signs, and there are 4 sections where the road narrows to single lane passing. The 1400 voters in Kingsdown village (population 2000 + 500? more in summer months due to holiday village + campsite) are all dependent on the Ringwould road traffic flowing freely. We have seen an RTA fatality on the road, and many near misses. It is a disgrace that KCC for years have refused to listen to requests to reduce the speed limit on this road and refused also to put in a kerbed pavement on the northern side of Ringwould Road. The economy of the village depends on visitors walking, cycling and horse-riding on the Ringwould Road and any development of SAP 34 would increase the likelihood of fatalities exponentially.</p> <p>The inclusion of SAP 34 is not legally compliant with NPPF 2021 item 11. (b)ii 'SPs should provide for objectively assessed needs for housing & other uses, . . . unless(ii) any adverse impacts of doing so would significantly & demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole'.</p> <p>Any development at SAP 34 is unsound firstly on the grounds of highways inadequacy. Any development would cause dangerous gridlock, involving the cars of current residents, parents of children of the village primary school, construction vehicles and new residents' cars. Secondly The selection of SAP 34 is unsound on the grounds that the Deal / Walmer conurbation of 30,000 depends on the narrow – single lane in places - Ringwould road, carrying diverted traffic from the A258 every time A258 is blocked by an RTA or road works. It is part of the transport infrastructure of the whole district. The A258 is the only southern entrance to the 30,000 conurbation starting in Upper Walmer. Diverted traffic is a dangerous nightmare for the village every time it happens, some diverted traffic uses Glen Rd / Liverpool road selected as site for SAP 15 Ray's Bottom in Walmer, this site too if developed is likely to mean diverted traffic cannot get in / out of Deal / Walmer 30,000 conurbation. Neighbours working for emergency services say they oppose both developments for this reason. Thirdly on the grounds of landscape character, the site is on the skyline with sea behind, an iconic view that greets all people arriving in Deal; its selection contradicts the comments in SP4 on individual village identity and character and falls within LCT F3, Open Arable Chalk farmland with woodland, needed for national food security. The selection of SAP 34 is unsound fourthly on the grounds that it borders the AONB. Moreover 4.238 needs correcting, the parish council-owned, biodiversity-rich site of the Lynch / and Freedown woods (that run into Oxney Court Woods) was the subject of a survey by Kent Wildlife Trust in 2017 commissioned by the Ringwould w/ Kingsdown parish council and paid for by DEFRA, which provides evidence of the natural capital to be protected on the boundary of this site. The selection of SAP 34 is unsound fifthly on the grounds that any development would remove a</p>

	flood sponge on the top slope of the hill, below which is the Knight's Bottom pumping station and pond which drains towards Rays' Bottom SAP 15, so development here could contribute to flooding (see CC5). (cross referenced SAP 15 Walmer Rays Bottom).
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP1603
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No

<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>No</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438.</p> <p>SAP 34 & 35 Kingsdown</p> <p>The selection of SAP 34 is totally unsound, The Highways Assessment of Ringwould Road is inadequate. The facts are that Ringwould Road is signposted as unsuitable for long vehicles, unsuitable for vehicles over 7.5tonnes and unsuitable for wide vehicles, the road is painted SLOW in 3 places despite the 50mph signs, and there are 4 sections where the road narrows to single lane passing. The 1400 voters in Kingsdown village (population 2000 + 500? more in summer months due to holiday village + campsite) are all dependent on the Ringwould road traffic flowing freely. We have seen an RTA fatality on the road, and many near misses. It is a disgrace that KCC for years have refused to listen to requests to reduce the speed limit on this road and refused also to put in a kerbed pavement on the northern side of Ringwould Road. The economy of the village depends on visitors walking, cycling and horse-riding on the Ringwould Road and any development of SAP 34 would increase the likelihood of fatalities exponentially.</p> <p>The inclusion of SAP 34 is not legally compliant with NPPF 2021 item 11. (b)ii 'SPs should provide for objectively assessed needs for housing & other uses, . . . unless(ii) any adverse impacts of doing so would significantly & demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole'.</p> <p>Any development at SAP 34 is unsound firstly on the grounds of highways inadequacy. Any development would cause dangerous gridlock, involving the cars of current residents, parents of children of the village primary school, construction vehicles and new residents' cars. Secondly The selection of SAP 34 is unsound on the grounds that the Deal / Walmer conurbation of 30,000 depends on the narrow – single lane in places - Ringwould road, carrying diverted traffic from the A258 every time A258 is blocked by an RTA or road works. It is part of the transport infrastructure of the whole district. The A258 is the only southern entrance to the 30,000-conurbation starting in Upper Walmer. Diverted traffic is a dangerous nightmare for the village every time it happens, some diverted traffic uses Glen Rd / Liverpool Road selected as site for SAP 15 Ray's Bottom in Walmer, this site too if developed is likely to mean diverted traffic cannot get in / out of Deal / Walmer 30,000 conurbation. Neighbours working for emergency services say they oppose both developments for this reason. Thirdly on the grounds of landscape character, the site is on the skyline with sea behind, an iconic view that greets all people arriving in Deal; its selection contradicts the comments in SP4 on individual village identity and character and falls within LCT F3, Open Arable Chalk farmland with woodland, needed for national food security. The selection of SAP 34 is unsound fourthly on the grounds that it borders the AONB. Moreover 4.238 needs correcting, the parish council-owned, biodiversity-rich site of the Lynch / and Freedown woods (that run into Oxney Court Woods) was the subject of a survey by Kent Wildlife Trust in 2017 commissioned by the Ringwould w/ Kingsdown parish council and paid for by DEFRA, which provides evidence of the natural capital to be protected on the boundary of this site. The selection of SAP 34 is unsound fifthly on the grounds that any development would remove a flood sponge on the top slope of the hill, below which is the Knight's Bottom pumping station and pond which drains towards Rays' Bottom SAP 15, so development here could contribute to flooding (see CC5). (cross referenced SAP 15 Walmer Rays Bottom).</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note</p>	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP1615
Rep Status	Processed
Consultee ID	1333374
Consultee Full Name	Linda Hedley (Clerk)
Consultee Company / Organisation	Ringwould with Kingsdown Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>SAP34 & SAP35</p> <p>After careful consideration of the Local Plan (LP) and on hearing comments from the residents in both Ringwould and Kingsdown it is considered by the PC that the LP is unsafe.</p> <p>The village of Kingsdown is a small village of mainly small properties, it has an Article 4 on some areas of the village, some areas are in a conservation zone, and some of the village is also in an AONB.</p> <p>Yes, there is a small shop and a butcher, along with a small school, however there are no medical facilities and all health care requirements will only be accessed by private transport; this is not sustainable.</p> <p>The roads are narrow and there is no space for any mitigation to take place to alleviate this, therefore this will be contrary to any Traffic management within the Plan and the HELAA highways assessment has stated that it does not see an increase in any public transport; in fact, in recent weeks the PC have been notified of a reduction/removal of public transport. Again unsustainable, and the road from Kingsdown to the A258 is narrow, with local agricultural use of large tractors and trailers.</p> <p>The public realm would be severely affected, by unsafe roads, unsafe bridleways & PROWs and loss of open space. There appears to have been no assessments of the fauna or flora loss that would occur if the development was in the plan.</p> <p>Both sites are outside the village settlement and should be removed from the plan.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant	That both sites are removed from the Local Plan

and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	To emphasise the position of the PC
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP1825
Rep Status	Processed
Consultee ID	1330872
Consultee Full Name	Mrs Sandra Upton
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	I object to development of 50 new houses on the field between Glen Rd and Ringwould Rd Kin002/SAP34. Before one more house in Kingsdown is even considered the infrastructure must be improved by KCC and Southern Water, The highway from the A258 Deal to Dover including the junction must be improved. Currently the Ringwould Rd has 50 mPH speed limit. No grass verge. The narrow road only just wide enough for two small cars to pass is flanked by high overgrown hedges and high banks. To add construction traffic and materials delivery lorries to the

<p>possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>existing traffic without widening and straightening the Ringwould Rd would cause the Rd to be even more dangerous than it is now. The Road should be widened right through to the junction with Upper Street which should be improved as it is almost blind. The increased use by towed caravans and campervans of the junction en route too and from the Kingsdown International Camp and Caravan Centre makes this junction very dangerous.</p> <p>It is a traffic offence to drive across a registered footpath. The Footpath ER 23 is currently flanked by posts to prevent cars being parked on it. The footpath requires to be re routed. An adopted highway running through the 50 houses to the lane beside Glendale Lodge requires to be built before the 50 houses. The junction with Glen Rd must be improved and Glen Rd and Liverpool road all requires to be widened by KCC and sewers laid prior to one house being built. the new road from behind Glendale Lodge to the Ringwould Rd should be the new access route for all school traffic. There should be a large car park for dropping off and collection of children for school and parking for the play park and the developer should have to provide a new village hall and landscape the Butts leading from Glen Rd because the Parish Council refuse to do it. The village hall with up to date refreshment facilities should be built before the houses, enabling the toilets to be used by the builders.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Not Applicable
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
<p>Rep ID</p>	SDLP1793
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1331774
<p>Consultee Full Name</p>	Mr Simon Pollard
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	SAP34
<p>2 - Do you consider this part of the Plan sound?</p>	No

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I am a resident of Kingsdown. My concern is with the consequences of the housing developments at Woodhill Farm (SAP 34 - 50 dwellings) and Courtlands (SAP 35 - 5 dwellings), also adjacent developments at Ringwoud Alpines (SAP 53 - 10 dwellings) and at Rays Bottom, Walmer (SAP 15 - 75 dwellings). These are connected by Ringwoud Road between Kingsdown and Ringwoud, by Glen Road between Kingsdown and Walmer (inland) and by Kingsdown Road between Kingsdown and Walmer (along the seafront). The first two, in particular, are narrow roads with inadequate width at many/most locations for passing traffic. Kingsdown Road is less restrictive. The number of dwellings will inevitably lead to increased car usage for Kingsdown village access, for school access, for work/employment access, for shopping and for general leisure access. There is no meaningful bus service to accommodate all these needs. Kingsdown Primary School will likely be the primary school of choice for the developments I have noted, putting particular strain on these roads. Children at secondary school (and those attending primary schools elsewhere) will all need to use these roads to move out of the referenced development areas. The whole village road network is generally narrow and unsuited for heavy traffic volumes. When discussing these aspects with DDC Planning representatives at the Deal open-day for the Plan, I was advised that the plan does not address these transport needs (and I have not found any text to contradict them.)</p> <p>My main comment therefore is that a full traffic analysis must be made to ensure adequate provision for the daily needs of the developments. Access for construction traffic will be an immediate concern. While not directly related to the quoted paragraphs of the Infrastructure Plan, the village primary school is probably too small to accommodate the likely increase in demand. Road access around it does fall within the reference and is similarly restrictive already. Additionally, for Ringwoud Road between Kingsdown and Ringwoud there should be pavement(s) (or alternative footpaths) to provide a safe pedestrian route to access the main bus route along the A258 (the Dover-Deal road). The current road is unsafe for pedestrians and cyclists. The junction of Ringwoud Road with the A258 will need to be enhanced to accommodate the increased traffic. Similar safe access will be required for Glen Road.</p> <p>It is not clear to me how the narrow road network in Kingsdown can be modified to suit an increased volume of traffic. This might in itself be good reason to object to the developments, but a more positive attitude by the planners and developers is surely required?</p>

	<i>(DDC note: This representation was originally made against the Infrastructure Delivery Plan consultation document but has been duplicated in relevant places against the Local Plan due to the specific site allocation references made)</i>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP1763
Rep Status	Processed
Consultee ID	1267050
Consultee Full Name	Victoria Hughes
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No

<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Not Applicable</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>To whom it may concern, (Without prejudice)</p> <p>I would like to object to SAP 34 for the reasons as specified below. These reasons also apply to SAP 35, 53 and 15 .</p> <p>The inclusion of SAP 34 is not legally compliant with NPPF 2021 item 11. (b)ii ‘SPs should provide for objectively assessed needs for housing & other uses, . . unless(ii) any adverse impacts of doing so would significantly & demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole’. SAP 34 Kingsdown p. 163: The selection of SAP 34 is totally unsound, on 5 different grounds,.</p> <p>Firstly the Highways Assessment of Ringwould Road is inadequate and unsound as regards this site. The facts are that Ringwould Road is signposted as unsuitable for long vehicles, unsuitable for vehicles over 7.5tonnes unsuitable for wide vehicles, the road is painted SLOW in 3 places despite the 50mph signs, and there are 4 sections where the road narrows to single lane passing. The 1400 voters in Kingsdown village (population 2000 + 500? more in summer months due to holiday village + campsite) are all dependent on the Ringwould Road traffic flowing freely. So the selection of SAP 34 for any development is unsound firstly on the grounds of highways assessment unsoundness / inadequacy. Any development would cause dangerous gridlock, involving the cars of current residents, parents of children of the village primary school, construction vehicles and new residents’ cars. It is a disgrace that KCC for years have refused to listen to requests to reduce the speed limit on this road and refused also to put in a kerbed pavement on the northern side of Ringwould Road. The economy of the village depends on visitors and residents walking, cycling and horse-riding on the Ringwould Road and any development of SAP 34 would increase the likelihood of fatalities exponentially.</p> <p>The selection of SAP 34 is unsound secondly on the grounds of landscape character, being incompatible with criteria described above in SP 4. the site is on the skyline with sea behind, an iconic view that greets all people arriving in Deal; its selection contradicts the comments in SP4 on individual village identity and character. DM Policies NE2 (Natural Environment) p.285: It is ‘sound’ to designate the area inland from Kingsdown, west to Ringwould, Ripple, Sutton, Studdal and Little Mongeham, south to Guston, as LCT F Open Arable Chalk Farmland with Woodland, F3 Ripple. But it is unsound, ineffective and contradictory to then ignore the designation when selecting the dangerously located chalk farmland of SAP 34 for development.</p> <p>The selection of SAP 34 is unsound thirdly on the grounds that the Deal / Walmer conurbation of 30,000 depends on the narrow – single lane in places - Ringwould Rd, carrying diverted traffic from the A258 every time A258 is blocked by an RTA or road works. The A258 is the only southern entrance to the 30,000 conurbation starting in Upper Walmer stretching to North Deal and Sholden. Diverted traffic is a dangerous nightmare for the village every time it happens, some diverted traffic uses Glen Rd / Liverpool road selected as site for SAP 15 Ray’s Bottom in Walmer. This site too, if developed is likely to mean diverted traffic cannot get in / out of Deal /Walmer 30,000 conurbation. Neighbours working for emergency services say they oppose both developments for this reason. Unsound due to being incompatible with SP12, because its lanes periodically become part of the district Strategic Transport Infrastructure. Selection of these sites is completely unsound and non-compliant with all laws / planning regs relating to the prevention of accidents and protection of human life. SAP 34 would result in ‘Traffic movements from the development resulting in severe impacts to the highway network that it would not be possible to mitigate’, and as such contrary to SP4 2 j within the plan, thus unsound and highly ineffective.</p> <p>The selection of SAP 34 is unsound fourthly on the grounds that it borders the AONB and is valuable arable farmland, needed in times when national food security is of concern. Moreover 4.238 needs correcting, the parish council-owned, biodiversity-rich site of the Lynch / and Freedown woods (that run into Oxney Court Woods) was the subject of a survey by Kent Wildlife Trust in 2017 commissioned by the Ringwould w/ Kingsdown parish council and paid for by DEFRA, which provides evidence of the natural capital within the boundary of the AONB to be protected on the boundary of this site.</p> <p>The selection of SAP 34 is unsound fifthly on the grounds that any development would remove a flood sponge on the top slope of the hill, below which is the Knight’s Bottom pumping station and pond which drains towards Rays’ Bottom SAP 15, so development here could contribute to flooding (see CC5 p. Flood Risk).</p> <p>Any development of SAP 34 is not legally compliant with emerging government policy, see Mr Sunak statement 5 Dec 2022 announcing dropping of compulsory housing targets for LPAs (Local Planning Authorities such as DDC)’. I would also like to object to SAP 35, 53 and 15 for the same reasons as above.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant</p>	

and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP1755
Rep Status	Processed
Consultee ID	1267645
Consultee Full Name	Alan & Sarah Gleave
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC Note: The text below was extracted from the attached representation The inclusion of SAP 34 and SAP 15 especially, (but also SAP 53 and SAP 35) is not legally compliant with NPPF 2021 item 11. (b)ii 'SPs should provide for objectively assessed needs for housing & other uses, . . . unless(ii) any adverse impacts of doing so would significantly & demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole'. Also it is not compliant with the

emerging govt policy announced 5 Dec 2022 by Mr Sunak on stopping compulsory housing targets on LPAs, and empowering LPAs to decide on local needs.

DM Policies NE2 (Natural Environment) p.285: It is sound to designate the area inland from Kingsdown, west to Ringwould, Ripple, Sutton, Studdal and Little Mongeham, south to Guston, as **LCT F Open Arable Chalk Farmland with Woodland, F3 Ripple**. But it is unsound, ineffective and contradictory to then ignore the designation when selecting the dangerously located, chalk farmland of SAP 34 for development.

It is unsound and ineffective to a damaging extent, to list Kingsdown as being a '*Local Centre ; a village providing services for a local rural area and a secondary focus for development in the rural area*'. Any development at SAP 34 would do the opposite of 'reinforcing the role of the village'; it would in fact choke off the existing parish economy, reducing its attractiveness to tourists, a key location on the Deal Welcomes Walkers initiative. The number of 2nd homes and airB&B in the village proves that dwellings outnumber homes required, so there is NOT an 'objectively assessed need for housing a la NPPF 11' within the Parish'. (Gladman did a landgrab in 2017 in the parish 17/00487 An application rejected by DDC that Gladman took to Planning Inspectorate and won. Currently being built by Taylor Wimpey on A258 as 85 executive homes on land opposition 423-459 Dover Road to the endangerment of all road users of arterial A258 with refusal to put in pavements).

SAP 34 Kingsdown p. 163: The selection of SAP 34 is totally unsound and not legally compliant on 5 different grounds.

- 1 The selection of SAP 34 is unsound on the grounds that the Deal / Walmer conurbation of 30,000 depends on the narrow, single lane in places, Ringwould Rd, carrying diverted traffic from the A258 every time A258 is blocked by an RTA or road works. The A258 is the only southern entrance to the 30,000 conurbation starting in Upper Walmer stretching to North Deal and Sholden. Diverted traffic is a dangerous nightmare for the village every time it happens, some diverted traffic uses Glen Rd / Liverpool road (selected as site for SAP 15 Ray's Bottom in Walmer). This site too, if developed is likely to mean diverted traffic cannot get in / out of Deal /Walmer 30,000 conurbation. Neighbours working for emergency services say they oppose both developments for this reason. So Unsound due to being incompatible with SP12, because its lanes periodically become part of the district Strategic Transport Infrastructure. Selection of these sites is completely unsound and non-compliant with all laws / planning regs relating to the prevention of accidents and protection of human life. SAP 34 would result in '*Traffic movements from the development resulting in severe impacts to the highway network that it would not be possible to mitigate*', and as such contrary to **SP4 2 j** within the plan, thus unsound and highly ineffective.
- 2 Local village traffic; the Highways Assessment of Ringwould Road is inadequate and unsound as regards this site. The facts are that Ringwould Road is signposted as unsuitable for long vehicles, unsuitable for vehicles over 7.5tonnes, unsuitable for wide vehicles, the road is painted SLOW in 3 places despite the 50mph signs, and there are 4 sections where the road narrows and bends to single lane passing. The 1400 voters in Kingsdown village (population 2000 + 500? more in summer months due to holiday village + campsite) are all dependent on the Ringwould Road traffic flowing freely. So the selection of SAP 34 for any development is unsound on the grounds of highways assessment unsoundness / inadequacy. Any development would cause dangerous gridlock, involving the cars of current residents, parents of children of the village primary school, construction vehicles and new residents' cars. It is a disgrace that KCC for years have refused to listen to requests to reduce the speed limit on this road and refused also to put in a kerbed pavement on the northern side of Ringwould Road. The economy of the village depends on visitors and residents walking, cycling and horse-riding on the Ringwould Road and any development of SAP 34 would increase the likelihood of fatalities exponentially.
- 3 Landscape character, being incompatible with criteria described above in SP 4. the site is on the skyline with sea behind, an iconic view that greets all people arriving in Deal; its selection contradicts the comments in SP4 on individual village identity and character.
- 4 Borders the AONB and is valuable arable farmland, needed in times when national food security is of concern. Moreover 4.238 needs correcting, the parish council-owned, biodiversity-rich site of the Lynch / and Freedown woods (that run into Oxney Court Woods) was the subject of a survey by Kent Wildlife Trust in 2017 commissioned by the Ringwould w/ Kingsdown parish council and paid for by DEFRA, which provides evidence of the natural capital within the boundary of the AONB to be protected on the boundary of this site.
- 5 Flood Risk DM-CC5 . Any development would remove a flood sponge on the top slope of the hill, below which is the Knight's Bottom pumping station and pond which drains towards Rays' Bottom SAP 15, so development here could contribute to flooding along the biodiverse, valley bottom from Ringwould Road to junction of Gram's Road/ Liverpool Rd (FYI we have seen an RTA fatality, and many near misses, in the sometimes flooded dip on the Ringwould Rd).

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will

make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	SDLP1755 Gleave Redacted.pdf
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP1845
Rep Status	Processed
Consultee ID	1333706
Consultee Full Name	Cindy Crancher
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SAP34 not legally compliant with NPPF 20-21 item 11 DM policies NE2 (natural environment) P285 The chalk farmland of SAP34 is unsound/unsuitable for development. SAP34 is unsound on the grounds of landscape character being incompatible with criteria in SP4. SAP34 is unsound on the grounds that it borders the AONB and is valuable arable farmland. SAP34 – any development would remove a flood sponge on the top slop of the hill which drains toward Ray Bottom SAP15, so development here would contribute to flooding. SAP35 is unsound in that it involves loss of food producing farmland; destructive of the landscape character and it is in a BOA. SAP15 is unsound as incompatible with SP4; 3.71 separation of settlements. Also, it is incompatible with statements in SP14 relating to biodiversity connectivity. The highways assessment of this site is unsound and inadequate. SAP15 A.160 fails to note that Liverpool Road is a single lane road which becomes gridlocked with traffic from Kingsdown primary school twice a day.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	no comment
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP1881
Rep Status	Processed
Consultee ID	1333838
Consultee Full Name	mrs rosemary anne Holmes
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	Total number of new houses is inflated to suit property developers and not residents of Kingsdown. The development will impact on surface water management and flood risk. 3.71 separation of settlements and need to prevent villages coalescing to protect AONB valley bottom valuable as a flood sponge (Rays Bottom) and protection of wildlife and protected grasslands.

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Southern water admits to depleting water in our chalk aquifers
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Do not use the field KIN002 to build 5 dwellings. This site is not suitable on any level and is unsound: - Highways assessment of Ringwold Road is inadequate and unsound due to highways development. If possible would result in dangerous gridlock A258 is narrow – single lane in places. Emergency services would be unable to travel to emergencies in village.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP1880
Rep Status	Processed
Consultee ID	1272184
Consultee Full Name	Tony and Valerie Armitage
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails	The Deal/Walmer road system will not cope if permission is given for anymore developments; SAP14, SAP15, SAP34 are unsound

to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Congestion caused by over-development along the Dover Road from Ringwoud into Deal will result in traffic queues more frequently than at present making walking and cycling irresistible. June 2020 Deal Town Council report requires pavements, cycle lanes, wide roads and detailed junction plans. Traffic in Kingsdown would be gridlocked winter and summer
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	In an ideal world- Ringwoud Road in and out of Kingsdown to have cycle lanes and walking paths. Park and pedal scheme I Borrowpit Carpark to be activated Glen Road / Liverpool Road to have cycle lanes and walking paths St James Road / Upper Street junction to be redesigned and made safe to take all the construction traffic. Alexander Road / Upper Street junction to be redesigned and made safe to take construction / extra traffic
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP1932
Rep Status	Processed
Consultee ID	1273883
Consultee Full Name	Deborah Moggach
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SP34 – totally unsound due to inadequate roads leading to appalling congestions. It borders AONB with rare chalk meadow and precious biodiversity. It would destroy a much loved and sensitive landscape.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Rule out the sites SP34 and SP15 due to access issues, biodiversity issues and congestion issues. Build new houses in brownfield sites near to local services. Don't concrete over our lovely local fields
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP1948
Rep Status	Processed
Consultee ID	1275951
Consultee Full Name	Mr David Dobby
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective

4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I consider that 50 dwellings on this site is too many. The site only has one access from Ringwoud Road, which is not enough for 50 dwellings. If the access is blocked, no emergency services can gain access other than by helicopter. Ringwoud Road is narrow and very busy, further traffic accessing onto this road will make it even more of a danger than at present Final it will be a further loss to our food agricultural land.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Reduce the number proposed significantly or reduce altogether
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP1662
Rep Status	Processed
Consultee ID	1331541
Consultee Full Name	Mr Simon Jefferson
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The selection of SAP34 is not sound because the Highways Assessment of Ringwold Road is inadequate in that:</p> <ul style="list-style-type: none"> • It is unsuitable for long vehicles • Unsuitable for vehicles over 7.5 tonnes • The road is signed SLOW in three places despite 50mph signage • There are four sections where the road narrows to single lane traffic • The road is unsuitable for wide vehicles <p>At this time when there is a traffic problem on the Dover road traffic has to pass through Kingsdown any increase in traffic caused by development would increase the risk of even greater traffic gridlock inhibiting the emergency services vehicles from getting to emergencies with the possible result in loss of life. An increase in traffic would also affect cycle riders that frequent the village as well as horse riders and walkers/hikers. I submit that SAP is therefore unsound.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP1874
Rep Status	Processed
Consultee ID	1272184
Consultee Full Name	Tony and Valerie Armitage
Consultee Company / Organisation	

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Total number of new houses is inflated to suit property developers and not residents of Kingsdown. The development will impact on surface water management and flood risk and 3.71 separation of settlements and need to prevent villages coalescing to protect AONB. Valley bottom valuable as a flood sponge (rays bottom) and protection of wildlife and protected grasslands. Southern Water admits to depleting water in our chalk aquifers.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Do not use the field KIN002 to build 50 dwellings. This site is not suitable on any level and is unsound: - Highways assessment of Ringwold Road is inadequate and unsound due to highways development. If possible it would result in dangerous gridlock. A258 is narrow – single lane in places. Emergency services would be unable to travel to emergencies in village.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP1866
Rep Status	Processed
Consultee ID	1272675
Consultee Full Name	Vanessa Clift
Consultee Company / Organisation	

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<ol style="list-style-type: none"> 1 Very obtuse and confusing for people to understand 2 Appears to be a fait accompli rather than seeking local opinion. Also new government guidelines show cutting back on unsuitable developments 3 Unsound due to a very already congested village with poor road structure. Primary school in the middle 4 Very disappointing due to lack of safety issue especially with an elderly local population 5 The Dover-Deal A258 is constantly challenged blocked with traffic diversions through Kingsdown. It can't cope with more traffic. 6 There is no potential for a pavement/cycle path for the local residents, both elderly and young.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	As a move elderly resident I feel the local plan and how it is structured make it very difficult for my age group to properly represent our opinions. It is designed to be battling to make the development plans SAP35 and 15 more sound I strongly suggest it is an over intense treatment of an already congested area. Inadequate narrow lanes, a busy primary school and elderly population and young families and overwhelmed by an ever-growing holiday population. The various limited approaches to the village are unable to cope with the traffic burden.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP1806
Rep Status	Processed

Consultee ID	1331598
Consultee Full Name	Alan Nash
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Kingsdown has one primary school which is over subscribed. There is no Doctors surgery or Dentist. JUSTIFIED. These sites are unsuitable for development. Your website is not clear as to what research or solid facts you have, or from whom it has been compiled by. EFFECTIVE. These sites will be detrimental to the existing residents by causing light pollution, noise pollution, congestion and pollution. CONSISTENT. I am not certain what the national policy is, if it is to make existing residents unhappy in there existing environment, then these proposed sites would achieve that. LEGALLY compliant. I consider that most people within the village were not aware of these sites being considered, my neighbours and I were only aware when the details were noted in the November 2022 issue of Rural Roundup. Your website is over complicated and not fit for purpose. Within the village there are many elderly residents who do not have access to computers. TC4S074 was not in the Regulation 18 Consultation-there has not been adequate time for public engagement. DUTY to co-operate. Unable to find out if this was carried out.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Scheme should be scrapped.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	As a resident I have found this a very confusing and difficult process to complete and would look forward to attending an oral examination to put my questions to whoever allowed these proposals to get this far.

Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP1816
Rep Status	Processed
Consultee ID	1333682
Consultee Full Name	Ms Carolyn Barber
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SAP34 not legally complaint with NPPF 20-21 Hem11 DM policies NE2 (natural environment) P/285 The chalk farmland of SAP3A is unsound/unsuitable for development. SAP34 is unsound on the grounds of highways assessment unsoundness/inadequacy SAP34 us unsound on the grounds of landscape character being incompatible with criteria in SP4. SAP34 is unsound on the grounds that is borders the AONB and is valuable arable farmland. SAP34 – any development would remove a flood sponge on the top slope of the hill which drains towards Ray Bottom. SAP1550 development here could contribute to flooding.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP1840
Rep Status	Processed
Consultee ID	1333703
Consultee Full Name	Marion Osborne
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>SAP34 not legally compliant with NPPF 20-21 items 11 DM policies NE2 (natural environment) P285 The chalk farmland of SAP34 is unsound/unsuitable for development. SAP34 is unsound on the grounds of landscape character being incompatible with criteria in SP4. SAP34 is unsound on the grounds that it borders the AONB and is valuable arable farmland. SAP34 – any development would remove a flood sponge on the top slop of the hill which drains toward Ray Bottom SAP15, so development here would contribute to flooding. SAP35 is unsound in that it involves loss of food producing farmland; destructive of the landscape character and it is in a BOA. SAP53 is unsounds as being incompatible with LSA falling within the AOB. SAP15 is unsounds as incompatible with SP4; 3.71 separation of settlements. Also, it is incompatible with statements in SP14 relating to biodiversity connectivity.</p> <p>The highways assessment of this site is unsound and inadequate. SAP15 4.160 fails to note that Liverpool Road, is a single lane road which becomes gridlocked with traffic from Kingsdown primary school twice a day</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant	no comment

and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP1844
Rep Status	Processed
Consultee ID	1333704
Consultee Full Name	Mr Peter Alan Davis
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SAP34 (KIN002) PP177-179 Woodhill Farm Access/Exit from site: B2057 Ringwould/Kingsdown Road. The proposed access is on the North side of the B2057 on a bend where there is also access to and parking for the village playing field with play apparatus for children. The road itself is very narrow with no footpath. There is already a restriction (frequently ignored) on 'heavy vehicles' using the road.

Will use of the playing field facilities including parking be affected or denied during and/or after the proposed development?

The increased traffic of construction vehicles during the proposed development and then that of future residents from it will cause added congestion and safety hazards on this winding country lane which forms the main service road from Dover have to be diverted via Walmer and Glen Road or via the coast road to Upper Street.

Without a detailed site plan of the proposed development and its internal access roads to be certain, but it is possible that SAP34 (KIN002) is accessible from the Glen at the site's northern extremity. Added construction traffic to this narrow-wooded lane, single track with passing places would cause major hold-ups, a real concern for care-staff, visitors and residents at Glendale Lodge and for the many who use this main access to the north end of Kingsdown, and the school.

SAP34 (KIN002)

Selection of the site for development and its effect on the environment and community.

The proposed site is clearly productive, arable land; a scarce and vital commodity, yet the DDC proposes to build over it, or rather, allow developers to make use of it.

This completely contrasts with the findings and landscape management guidelines of the Dover District Landscape Character Assessment (chap 5) of October 2020 (LUC1199) F3 Ripple, which clearly includes SAP34 (KIN002) on the F3 Ripple Map.

The 'Landscape Evaluation' identifies key sensitivities and values including 'the open character of the landscape allowing uninterrupted view across the arable landscape and over the surrounding lower landscapes. The uncluttered skylines are vulnerable to large scale of intrusive development'. Precisely what SAP34 proposes. The 'Landscape Strategy' presumably DDC policy, states the overall aim is to conserve the rural character of the landscape and sense of place created by the combination of an open rolling arable landscape with small historic villages linked by winding rural lanes and panoramic views.

Widening and straightening the B2057 in order to turn open rolling arable land into a building site hardly fits this strategy to conserve the distinctive narrow winding lanes and grassy verges. Neither does it fit with the Landscape Management Guidelines (LUC1118) to manage and enhance arable land to enhance its biodiversity value and connectivity by encouraging the creation of uncultivated field margins and headlands perhaps not by building on it. LUC1119

SAP34 (KIN002)

Development Management Guidelines from Dover District Landscape Character Assessment, F3 Ripple LUC1118 (chap 5) to conserve the rural character of the landscape, ensuring that it continues to play a role in providing a rural separation between Deal and Kingsdown as well as a rural setting for the Kent Downs Area of Outstanding Natural Beauty.

This laudable policy would lead us to believe that DDC takes a serious role as custodians of our countryside, but the SAP34 proposal represents a complete reverse of this policy.

What has led DDC to propose a development on this particular area of precious landscape? It cannot be directly connected to water, sewage or power supplies without major disruption to access to Kingsdown and road building over arable land, with environmental damage.

What is special about SAP34 (KIN002)?

In developers terms it has 'added value' location location.

A panoramic North westerly view, unique in the area; from Oxney Woods, St Nicholas Tower, Ripple Mill, a distant road and rolling fields. Idyllic. Nobody would have been given OK to build on it before, witness DDC planning problems for the long-standing small—holding at Kingsdown, yet somehow the whole upper field is to be placed in the hands of a developer for fifty luxury homes. Despite DDC policies outlines above, the landowner, developer, DDC members and officers will have engineered a highly profitable scheme that results in lasting damage to the landscape, environment and quality of life of a small Kent village and its visitors. SAP34 must be removed from the Dover District Local Plan

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The proposal for building development on SAP34 (KIN002) Woodhill Farm, Kingsdown should be removed from the Dover Local Plan. Addition sheets are attached to support this
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I do not have the internet technology or expertise apparently necessary to make a proper response, or the legal advice to make a decision on Q4 and Q5
Include files	SDLP1844 Davis - Att 1.pdf
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP1848
Rep Status	Processed
Consultee ID	1333706
Consultee Full Name	Cindy Crancher
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails	SAP34 not legally compliant with NPPF 20-21 item 11 DM policies NE2 (natural environment) P285 The chalk farmland of SAP34 is unsound/unsuitable for development. SAP34 is unsound on the grounds of landscape character being incompatible with criteria in

to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SP4. SAP34 is unsound on the grounds that it borders the AONB and is valuable arable farmland. SAP34 – any development would remove a flood sponge on the top slop of the hill which drains toward Ray Bottom SAP15, so development here would contribute to flooding. SAP35 is unsound in that it involves loss of food producing farmland; destructive of the landscape character and it is in a BOA. SAP15 is unsound as incompatible with SP4; 3.71 separation of settlements. Also, it is incompatible with statements in SP14 relating to biodiversity connectivity. The highways assessment of this site is unsound and inadequate. SAP15 A.160 fails to note that Liverpool Road is a single lane road which becomes gridlocked with traffic from Kingsdown primary school twice a day.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	no comment
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP1899
Rep Status	Processed
Consultee ID	1272960
Consultee Full Name	Jenifer Wakelyn
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy

4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I consider the plan not legally compliant, is unsound and fails to comply with the duty to co-operate because there has been little or inadequate consultation with local Council's and community groups.</p> <p>I believe the plan is not complaint with the Climate Change Act 2009 regulations to protect the climate and with National Planning Policy Framework 2021 item 11 in relation to designation of the area in land for Kingsdown to Ringwoud, Ripple, Sutton, Studdal and Little Mongeham chalk farmland.</p> <p>SAP34 is also unsound because Ringwoud Road is unsuitable for long and heavy vehicles on grounds of landscape criteria and individual village character and is non-compliant with laws and regulations relating to the prevention of accidents and protection of human life. SAP34 borders AONB and is valuable arable farmland. Development in SAP15 contravenes the need to promote biodiversity connectivity, misrepresents the SSSI at Hawkshill Freedown, and disregards the vital importance of the valley bottoms as a flood sponge protections against flooding</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	I believe it is vital that the plan should take into account and proactively protect against unplanned erosion of countryside between confines of settlements and should proactively protect the individual identity of these villages and important elements of their setting – i.e. farmland and coastal landscape of unequalled beauty in the UK. The plans in SAP34 and 15 are unsound and would significantly damage and negatively impact the village
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP1871
Rep Status	Processed
Consultee ID	1273892
Consultee Full Name	Suzanne Mulvaney
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<ul style="list-style-type: none"> • Very obtuse and legalese which confuse most people • It appears to be fait accompli rather than seeking local opinions • Unsound because there is an existing traffic problem which these proposals will exacerbate • Very disappointing in the lack of safety considerations and lots of old people who will face difficulties
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The above question 7 appears to be designed to minimize or prevent any contributions For example how do you expect the average person to answer complex legal questions??? I cant access form with my iPad
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	It is necessary to hear and pay attention to the opinions of those who will be directly affected by plans and proposals drawn up in isolation by someone sitting at a desk and looking at paper plans.
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP1858
Rep Status	Processed
Consultee ID	1333808
Consultee Full Name	Patricia Barrington
Consultee Company / Organisation	
Agent Full Name	Kingsdown Conservation Group
Agent Company / Organisation	Kingsdown Conservation Group

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Extracts from the 24-page submission on DDC Reg 19 Local Plan Consultation, Dover and Deal Green Party. Focused on sites affecting Ringwould with Kingsdown Parish :</p> <p>the inclusion of SAP34 is not legally compliant with NPPF 2021 item 11. (b)ii 'SPs should provide for objectively assessed needs for housing and other uses, . . unless (ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole'.</p> <p>DM policies NE2 (Natural Environment) p..285: we submit that the area inland from Kingsdown, west to Ringwould, Ripple, Sutton, Studdal and Little Mongeham should all be included as LFT F Open Arable Chalk Farmland with woodland and as extension to F3 Ripple. This would render the designation sound and effective and show why the chalk farmland of SAP34 is unsound / unsuitable for development.</p> <p>SP4 Residential Windfall Development p.37: 3.71 separation oof settlements: unplanned erosion of countryside between confines oof settlements . . . therefore has the potential to have a serious adverse impact on the overall landscape character and on the individual identity of villages through loss of important elements of their setting or more seriously through coalescence. Around Deal particularly at risk. There is a contradiction between this strategic Policy 4 statement which is very sound and the inclusion of SAP35/35 and 15 in the Local Plan. Any development of any of those sites would compromise the 'individual identity' of Kingsdown Village and lead to coalescence of loss of identity. It is unsound and ineffective to a damaging extent, to list Kingsdown as being a 'Local Centre; a village providing services for a local rural area and a secondary focus for development in the rural area'. Any development at SAP34 would do the opposite of 'reinforcing the role of the village'; it would in fact choke off the existing parish economy, reducing its attractiveness to tourists, a key location on the Deal Welcomers Walkers initiative. Any development at SAP34 would endanger life given the unique highways situation of the village, the district-wide need for traffic to flow through the village on narrow lanes with single lane passing whenever the A258 is blocked. The number of 2nd homes and AirB&B in the village proves that dwellings outnumber homes required, so there is NOT and 'objectively assessed need for housing'. NPPF 11 'withing the parish'. (Gladman did landgrab in 2017 in the parish 17/00487 and application rejected by DDC that Gladman took to planning inspectorate and won. Currently being built on A258 land opposition 423-429 Dover Road to the endangerment of all road users of arterial A258).</p> <p>SAP34 Kingsdown p.163: The selection of SAP34 is totally unsound on 5 different grounds. Firstly, the Highways Assessment of Ringwould Road is inadequate and unsound as regards this site. The facts are that Ringwould Road is signposted as unsuitable for long vehicles, unsuitable for vehicles over 7.5 tonnes, unsuitable for wide vehicles, the road is painted SLOW in 3 places despite the 50mph signs, and there are 4 sections where the road narrows to single lane passing. The 1400 voters in Kingsdown village (population 200 + 500? more in summer months due to holiday village + campsite) are all dependent on the Ringwould Road traffic flowing freely. So, the selection of SAP34 for any development is unsound firstly on the grounds of highway assessment unsoundness/inadequacy. Any development would cause dangerous gridlock, involving the cars of current residents, parents of children of the village primary school, construction vehicles and new residents' cars. It is a disgrace that KCC for years have refused to listen to the requests to reduce the speed limit on this road and refused also to put in a kerbed pavement on the northern side of Ringwould Road. The economy of the village depends on visitors and residents walking, cycling and horse-riding on the Ringwould Road and any development of SAP34 would increase the likelihood of fatalities exponentially.</p> <p>The selection of SAP34 is unsound secondly on the grounds of landscape character, being incompatible with criteria described above in SP4. The site is on the skyline with the sea behind, an iconic view that greets all people arriving in Deal; its selection contradicts the comments in SP4 on individual village identity and character.</p>

The selection of SAP34 is unsound thirdly on the grounds that the Deal/Walmer conurbation of 30,000 depends on the narrow – single lane in places – Ringwoud Road, carrying diverted traffic from the A258 every time A258 is blocked by an RTA or road works. The A258 is the only southern entrance to the 30,000 conurbation starting in Upper Walmer stretching to North Deal and Sholden. Diverted traffic is a dangerous nightmare for the village every time it happens, some diverted traffic uses Glen Road/Liverpool Road selected as site for SAP15 Ray's Bottom in Walmer. This site too, if developed is likely to mean diverted traffic cannot get in/out of Deal/Walmer 30,000 conurbation. Neighbours working for emergency services say they oppose both developments for this reason. Unsound due to being incompatible with SP12, because its lanes periodically become part of the district Strategic Transport Infrastructure. Selection of these sites is completely unsound and non-compliant with all laws/planning regs relating to the prevention of accidents and protection of human life. SP34 would result in 'traffic movements from the development resulting in severe impacts to the highway network that it would not be possible to mitigate' and as such contrary to SP4 2 j within the plan, thus unsound and highly ineffective.

The selection of SAP34 is unsound fourthly on the grounds that it borders the AONB and is valuable arable farmland, needed in times when national food security is of concern. Moreover 4.238 needs correcting, the parish council-owned, biodiversity-rich site of the Lynch/and Freedown Woods (that run into Oxney Court Woods) was the subject of a survey by Kent Wildlife Trust in 2017 commissioned by the Ringwoud with Kingsdown parish council and paid for by DEFRA, which provides evidence of the natural capital within the boundary of the AONB to be protected on the boundary of this site. The selection of SAP34 is unsound fifthly on the grounds that any development would remove a flood sponge on the top slop of the hill, below which is the Knight's Bottom pumping station and pond which drains towards Rays' Bottom SAP15, so development here could contribute to flooding (see CC5 p. Flood Risk). (FY1 we have seen an RTA fatality, and many near misses, in this dip on the Ringwoud Road).

Page 2 of 2 Extracts from the 24-page submission on DDC Reg 19 Local Plan consultation, Dover and Deal Green Party. Comments focused on sites affecting Ringwoud with Kingsdown Parish.

Reasons why including KIN002 (SAP34) land at Woodhill Farm, Ringwoud Road is unsound:

The inclusion of SAP34 is not legal compliant with NPPF 2021 item 11. (b)ii 'SPs should provide for objectively assessed needs for housing and other uses, .. unless(ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits assessed against the policies in this Framework taken as a whole'. The following arguments show why this development would not be sustainable as is a requirement of the NPPF and would have more adverse impacts than benefits.

NE2 Landscape character and the Kent Downs section states in section 11.13 that DDC aims: to ensure that all development coming forward over the plan period respects and reflects the character of the landscape in which it is located. The LCA (2020) from DDC LCA F3 Ripple map clearly shows that KIN002 is within this area of Open Arable Chalk Farmland with Woodland. Proximity of this site to the boundary of the AONB means that it must be kept as an important buffer between the village-built environment and open countryside in order that the special character of the area is maintained.

Kingsdown should not be designated as a local centre – it is unsound and ineffective to a damaging extent, a village providing services for a local rural area and a secondary focus for development in the rural area it does not serve other settlements as is confined by the sea and AONB, is small and has lots of character and has rural setting. Therefore, is instead ideally suited to windfall development.

SP4 – windfall development

A – the scale must be appropriate to the size of the settlement and existing facilities

The village has lots of character, conservation area, narrow roads, small school, no doctors, much reduced bus service, no access to rail, car dependance.

B – development must be compatible with the layout, density, fabric and appearance of the existing settlement and would not result in merging of separate settlements

Would set the tone as you drive in the village, impacts AONB (area of outstanding natural beauty), need buffer between village boundary and AONB. Widening road here to make ok for highways would ruin the entrance to the village

C and D – there must not be harm to important green spaces

The site is directly opposite the AONB which is highlighted throughout the draft LDP (NE2) as being an important constraint to development. Important to village for health and happiness, dog walking, amenity value. Footpath ER5 around the field.

F and G – it would not result in the loss of best and most versatile agricultural land currently used for agriculture and... it includes an appropriately sized and designed landscape buffer to the open countryside;

NE2 states that proposals affecting the setting of the AONB will only be supported where the development is sensitively located and designed to avoid or minimize adverse impacts on the AONB and its setting and the development would enhance the special qualities, distinctive character and tranquility of the AONB.

This development would impact AONB due to entrance needing to use some of AONB to widen road, houses seen from AONB. Land better out to use of growing food. Need all the agricultural land we have to grow food for future generations. All development must be sustainable NPPF 21 states using good growing land is not.

H – it would not have a significant adverse impact on the living conditions of existing adjoining residents.

Glen Road affected

I – where development would result in the loss of active employments, open space, sport or community facilities within the settlement that such development is consistent with the requirements of policies EN2, PM5 and PM6 of this plan

Visitors less likely to want to come to Kingsdown if the entrance is blighted by this development and roads are gridlocked.

J – traffic movements generated from the development do not result in severe impacts to the highway network that cannot be mitigated.

Ringwood Road very dangerous – fatality recorded. Tractors turning out onto road, bridleway and footpaths crosses at 2 points. Ringwood Road has a 7.5 tonne weight limit. Dangerous gridlock in village during busy periods – school run etc. Ringwood Road would have to be shut for long periods while work done to make entrance safe.

T11 Development should, in so far as its size, characteristic and location – give priority to the needs of pedestrians, cyclists, users of public transport, car sharers and users of low and ultra-low emissions vehicles.

This site is outside the village boundary and not well served by footpaths or cycle paths. The site is crossed by a footpath, ER5, which connects to the village along a dirt track with no lighting. Buses have been cut and this development is said by HELAA highways assessment to be unlikely to lead to more buses being laid on.

	<p>T12 New accesses and intensified use of existing accesses onto the road network will not be permitted if it would result in a clear risk of crashes or traffic delays unless the proposals can incorporate measures that provide sufficient mitigation. I consider this site to be unsound as there would be an increase in crashes and traffic delays. Shared access – park users, ER5 footpath, land owner to left. The gas main under the entrance. Poor sight lines both ways.</p> <p>T12 Applicants must demonstrate that traffic movements to and from the development can be accommodated, resolved, or mitigated to avoid sever cumulative residual impact. Village has narrow roads, few footpaths in main streets. Cannot have lorries in village as damage property and cause chaos.</p> <p>These criteria refer to windfall developments, which is how Kingsdown has grown slowly over the last planning period. These criteria are very sensible when applied to a rural settlement with poor infrastructure such as this. Any large scale development other than windfall would have a devastating effect on the community and could be considered as a disproportionate development in terms of this settlement.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>I consider the changes to the plan the responsibility of DDC</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>to ensure a resident's voice is heard.</p>
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)</p>
<p>Rep ID</p>	<p>SDLP1922</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1333885</p>
<p>Consultee Full Name</p>	<p>lesley Dobby</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Ringwould Road from Kingsdown to Ringwould is already a very busy road with constant traffic. O build 50 houses and consequently each house may have more than one car would only add to more congestions. This land has always been agriculture and should remain so. The safety for the residents of Kingsdown using this road should be paramount
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	This site I feel is not appropriate for residential development
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP1962
Rep Status	Processed
Consultee ID	1334290
Consultee Full Name	Mr Ian Miller
Consultee Company / Organisation	
Agent Full Name	

Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<ol style="list-style-type: none"> 1 Ref: Landscape assessment – the proposed site would clearly have a visual impact on the vicinity, and it would appear doubtful that this could be mitigated or softened 2 Ref: Highway assessment – given the nature of the access from the proposed development onto the narrow Ringwould Road there would appear to be issues of safety for all road users. It would appear to be impossible to increase traffic movements on this lane and not endanger life or infringe the law of the new highway code
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP1831
Rep Status	Processed
Consultee ID	1333692
Consultee Full Name	Claudia Carr
Consultee Company / Organisation	
Agent Full Name	

Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<ul style="list-style-type: none"> • I believe the plans to be unsound for reasons of safety. The increased pressure on the roads (esp at Glen Road) will cause inevitable traffic jams so emergency services will not be able to get through • The plans do not fully take account of the 'landscape assessment'. Bird and animal habitats will be destroyed, and alternative sites will not be joined up. • The sloping nature of both sites means it would be a flood risk for the lower lying properties and agriculture. • The infrastructure (bus services, schools, doctors) could not sustain the proposed swelling • The narrowness of the roads (esp the Ringwould Kingsdown Road) is already too dangerous to walk or cycle along and with extra traffic there's a high risk of pedestrian or cyclist's lives being lost • Risk of surface water contamination. The aquafer is inside the development zone
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP1963
Rep Status	Processed
Consultee ID	1334285
Consultee Full Name	Mr

	Henry Paice
Consultee Company / Organisation	
Agent Full Name	Kingsdown Conservation Group
Agent Company / Organisation	Kingsdown Conservation Group
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Extracts from the 24-page submission on DDC Reg 19 Local Plan Consultation, Dover and Deal Green Party. Focused on sites affecting Ringwould with Kingsdown Parish :</p> <p>the inclusion of SAP34 is not legally compliant with NPPF 2021 item 11. (b)ii 'SPs should provide for objectively assessed needs for housing and other uses, . . unless (ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole'.</p> <p>DM policies NE2 (Natural Environment) p..285: we submit that the area inland from Kingsdown, west to Ringwould, Ripple, Sutton, Studdal and Little Mongeham should all be included as LFT F Open Arable Chalk Farmland with woodland and as extension to F3 Ripple. This would render the designation sound and effective and show why the chalk farmland of SAP34 is unsound / unsuitable for development.</p> <p>SP4 Residential Windfall Development p.37: 3.71 separation oof settlements: unplanned erosion of countryside between confines oof settlements . . . therefore has the potential to have a serious adverse impact on the overall landscape character and on the individual identity of villages through loss of important elements of their setting or more seriously through coalescence. Around Deal particularly at risk. There is a contradiction between this strategic Policy 4 statement which is very sound and the inclusion of SAP35/35 and 15 in the Local Plan. Any development of any of those sites would compromise the 'individual identity' of Kingsdown Village and lead to coalescence of loss of identity. It is unsound and ineffective to a damaging extent, to list Kingsdown as being a 'Local Centre; a village providing services for a local rural area and a secondary focus for development in the rural area'. Any development at SAP34 would do the opposite of 'reinforcing the role of the village'; it would in fact choke off the existing parish economy, reducing its attractiveness to tourists, a key location on the Deal Welcomers Walkers initiative. Any development at SAP34 would endanger life given the unique highways situation of the village, the district-wide need for traffic to flow through the village on narrow lanes with single lane passing whenever the A258 is blocked. The number of 2nd homes and AirB&B in the village proves that dwellings outnumber homes required, so there is NOT and 'objectively assessed need for housing'. NPPF 11 withing the parish'. (Gladman did landgrab in 2017 in the parish 17/00487 and application rejected by DDC that Gladman took to planning inspectorate and won. Currently being built on A258 land opposition 423-429 Dover Road to the endangerment of all road users of arterial A258).</p> <p>SAP34 Kingsdown p.163: The selection of SAP34 is totally unsound on 5 different grounds. Firstly, the Highways Assessment of Ringwould Road is inadequate and unsound as regards this site. The facts are that Ringwould Road is signposted as unsuitable for long vehicles, unsuitable for vehicles over 7.5 tonnes, unsuitable for wide vehicles, the road is painted SLOW in 3 places despite the 50mph signs, and there are 4 sections where the road narrows to single lane passing. The 1400 voters in Kingsdown village (population 200 + 500? more in summer months</p>

due to holiday village + campsite) are all dependent on the Ringwoud Road traffic flowing freely. So, the selection of SAP34 for any development is unsound firstly on the grounds of highway assessment unsoundness/inadequacy. Any development would cause dangerous gridlock, involving the cars of current residents, parents of children of the village primary school, construction vehicles and new residents' cars. It is a disgrace that KCC for years have refused to listen to the requests to reduce the speed limit on this road and refused also to put in a kerbed pavement on the northern side of Ringwoud Road. The economy of the village depends on visitors and residents walking, cycling and horse-riding on the Ringwoud Road and any development of SAP34 would increase the likelihood of fatalities exponentially.

The selection of SAP34 is unsound secondly on the grounds of landscape character, being incompatible with criteria described above in SP4. The site is on the skyline with the sea behind, an iconic view that greets all people arriving in Deal; its selection contradicts the comments in SP4 on individual village identity and character.

The selection of SAP34 is unsound thirdly on the grounds that the Deal/Walmer conurbation of 30,000 depends on the narrow – single lane in places – Ringwoud Road, carrying diverted traffic from the A258 every time A258 is blocked by an RTA or road works. The A258 is the only southern entrance to the 30,000 conurbation starting in Upper Walmer stretching to North Deal and Sholden. Diverted traffic is a dangerous nightmare for the village every time it happens, some diverted traffic uses Glen Road/Liverpool Road selected as site for SAP15 Ray's Bottom in Walmer. This site too, if developed is likely to mean diverted traffic cannot get in/out of Deal/Walmer 30,000 conurbation. Neighbours working for emergency services say they oppose both developments for this reason. Unsound due to being incompatible with SP12, because its lanes periodically become part of the district Strategic Transport Infrastructure. Selection of these sites is completely unsound and non-compliant with all laws/planning regs relating to the prevention of accidents and protection of human life. SP34 would result in 'traffic movements from the development resulting in severe impacts to the highway network that it would not be possible to mitigate' and as such contrary to SP4 2 j within the plan, thus unsound and highly ineffective.

The selection of SAP34 is unsound fourthly on the grounds that it borders the AONB and is valuable arable farmland, needed in times when national food security is of concern. Moreover 4.238 needs correcting, the parish council-owned, biodiversity-rich site of the Lynch/and Freedown Woods (that run into Oxney Court Woods) was the subject of a survey by Kent Wildlife Trust in 2017 commissioned by the Ringwoud with Kingsdown parish council and paid for by DEFRA, which provides evidence of the natural capital within the boundary of the AONB to be protected on the boundary of this site. The selection of SAP34 is unsound fifthly on the grounds that any development would remove a flood sponge on the top slop of the hill, below which is the Knight's Bottom pumping station and pond which drains towards Rays' Bottom SAP15, so development here could contribute to flooding (see CC5 p. Flood Risk). (FYI we have seen an RTA fatality, and many near misses, in this dip on the Ringwoud Road).

Page 2 of 2 Extracts from the 24-page submission on DDC Reg 19 Local Plan consultation, Dover and Deal Green Party. Comments focused on sites affecting Ringwoud with Kingsdown Parish.

Reasons why including KIN002 (SAP34) land at Woodhill Farm, Ringwoud Road is unsound:

The inclusion of SAP34 is not legal compliant with NPPF 2021 item 11. (b)ii 'SPs should provide for objectively assessed needs for housing and other uses, .. unless(ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits assessed against the policies in this Framework taken as a whole'. The following arguments show why this development would not be sustainable as is a requirement of the NPPF and would have more adverse impacts than benefits.

NE2 Landscape character and the Kent Downs section states in section 11.13 that DDC aims: to ensure that all development coming forward over the plan period respects and reflects the character of the landscape in which it is located. The LCA (2020) from DDC LCA F3 Ripple map clearly shows that KIN002 is within this area of Open Arable Chalk Farmland with Woodland. Proximity of this site to the boundary of the AONB means that it must be kept as an important buffer between the village-built environment and open countryside in order that the special character of the area is maintained.

Kingsdown should not be designated as a local centre – it is unsound and ineffective to a damaging extent, a village providing services for a local rural area and a secondary focus for development in the rural area it does not serve other settlements as is confined by the sea and AONB, is small and has lots of character and has rural setting. Therefore, is instead ideally suited to windfall development.

SP4 – windfall development

A – the scale must be appropriate to the size of the settlement and existing facilities

The village has lots of character, conservation area, narrow roads, small school, no doctors, much reduced bus service, no access to rail, car dependance.

B – development must be compatible with the layout, density, fabric and appearance of the existing settlement and would not result in merging of separate settlements

Would set the tone as you drive in the village, impacts AONB (area of outstanding natural beauty), need buffer between village boundary and AONB. Widening road here to make ok for highways would ruin the entrance to the village

C and D – there must not be harm to important green spaces

The site is directly opposite the AONB which is highlighted throughout the draft LDP (NE2) as being an important constraint to development. Important to village for health and happiness, dog walking, amenity value. Footpath ER5 around the field.

F and G – it would not result in the loss of best and most versatile agricultural land currently used for agriculture and... it includes an appropriately sized and designed landscape buffer to the open countryside;

NE2 states that proposals affected the setting of the AONB will only be supported where the development is sensitively located and designed to avoid or minimize adverse impacts on the AONB and its setting and the development would enhance the special qualities, distinctive character and tranquility of the AONB.

This development would impact AONB due to entrance needing to use some of AONB to widen road, houses seen from AONB. Land better out to use of growing food. Need all the agricultural land we have to grow food for future generations. All development must be sustainable NPPF 21 states using good growing land is not.

H – it would not have a significant adverse impact on the living conditions of existing adjoining residents.

Glen Road affected

I – where development would result in the loss of active employments, open space, sport or community facilities within the settlement that such development is consistent with the requirements of policies EN2, PM5 and PM6 of this plan

Visitors less likely to want to come to Kingsdown if the entrance is blighted by this development and roads are gridlocked.

	<p>J – traffic movements generated from the development do not result in severe impacts to the highway network that cannot be mitigated.</p> <p>Ringwould Road very dangerous – fatality recorded. Tractors turning out onto road, bridleway and footpaths crosses at 2 points. Ringwould Road has a 7.5 tonne weight limit. Dangerous gridlock in village during busy periods – school run etc. Ringwould Road would have to be shut for long periods while work done to make entrance safe.</p> <p>TI1 Development should, in so far as its size, characteristic and location – give priority to the needs of pedestrians, cyclists, users of public transport, car sharers and users of low and ultra-low emissions vehicles.</p> <p>This site is outside the village boundary and not well served by footpaths or cycle paths. The site is crossed by a footpath, ER5, which connects to the village along a dirt track with no lighting. Buses have been cut and this development is said by HELAA highways assessment to be unlikely to lead to more buses being laid on.</p> <p>TI2 New accesses and intensified use of existing accesses onto the road network will not be permitted if it would result in a clear risk of crashes or traffic delays unless the proposals can incorporate measures that provide sufficient mitigation. I consider this site to be unsound as there would be an increase in crashes and traffic delays. Shared access – park users, ER5 footpath, land owner to left. The gas main under the entrance. Poor sight lines both ways.</p> <p>TI2 Applicants must demonstrate that traffic movements to and from the development can be accommodated, resolved, or mitigated to avoid sever cumulative residual impact. Village has narrow roads, few footpaths in main streets. Cannot have lorries in village as damage property and cause chaos.</p> <p>These criteria refer to windfall developments, which is how Kingsdown has grown slowly over the last planning period. These criteria are very sensible when applied to a rural settlement with poor infrastructure such as this. Any large scale development other than windfall would have a devastating effect on the community and could be considered as a disproportionate development in terms of this settlement.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>I consider the changes to the plan the responsibility of DDC</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>To ensure a resident's voice is heard</p>
<p>Include files</p>	

Local Plan Consultation Point	SAP34 - Land at Woodhill Farm, Kingsdown (KIN002)
Rep ID	SDLP1927
Rep Status	Processed
Consultee ID	1334333
Consultee Full Name	Mr Nigel Blundell
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SAP34 is unsound because: <ul style="list-style-type: none"> • An iconic vista has been ignored. Destruction of it is unjustified • No preparedness has been given to the impact on overstretched school, medical centres, and traffic flows. • SAP34 is undeliverable without causing traffic hazards and village gridlock since the site is accessed only via a single-lane road leading to a hazardous junction.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	A completely different site needs to be chosen – one that will not cause gridlock by feeding traffic either into Kingsdown Village (single lane) driving custom away from local shops and pubs; or sending extra traffic (single lane) towards the hazardous junction at Ringwould – a route that has already caused deaths.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	

Include files

SAP35 - Land adjacent Courtlands (TC4S074)

Local Plan Consultation Point	SAP35 - Land adjacent Courtlands (TC4S074)
Rep ID	SDLP70
Rep Status	Processed
Consultee ID	1330704
Consultee Full Name	Mrs Elizabeth ZDZIEBKO
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Regulation 19 habitats regulation
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Kingstown is becoming a very busy place, people move here from London come for weekends, bring money into the economy enjoy walking. completely ruin this beautiful place and will encroach on the Hawksdown walk
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Not appropriate to build more executive homes. Do. It need added traffic
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	As someone who has lived in Kingsdown and Ringwould my whole life would like to have my say

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP35 - Land adjacent Courtlands (TC4S074)
Rep ID	SDLP84
Rep Status	Processed
Consultee ID	1330792
Consultee Full Name	Mr Costa
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP35 - Site TC4S074 - Land Adjacent to Courtlands
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I do not feel that development on this land is justified - even for a small number of dwellings. The land comprises an area of biodiversity, with rare birds fledging in the hedge, and the land itself supports a population of hedgehogs, and other field dwellers. Furthermore, the land itself is one of the few natural chalk soils and grasses that still exist in the UK. It also happens to be subject to flooding at different times during the year, which would make it unsuitable for development.</p> <p>Kingsdown is a small village with only single lane roads. Further development in this section of Kingsdown will lead to environmental damage due to increased motor traffic which brings with it idling of vehicles, and further congestion. Access to this area will increase traffic through a settled neighbourhood.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The council should consider other areas of Kingsdown abutting the Dover Road as a possible alternative. The Dover Road is a major thoroughfare that can support additional traffic and residential development.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP35 - Land adjacent Courtlands (TC4S074)
Rep ID	SDLP454
Rep Status	Processed
Consultee ID	1260112
Consultee Full Name	Mr Daniel Couzens
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP35- land adjacent to Cortlands TC4S074
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The proposal for Courtlands was not included in the Reg 18 consultation and was slipped into the Reg 19 consultation without any notice thus not giving the fullest opportunity for the local community or directly affected residents to review it properly or seek its removal at the earlier consultation stage. The proposal does not take account of how the building of these five houses and the loss of this part of the field contravenes Section 15 of the National Planning Policy Framework in terms of the following paragraphs</p> <p>174. Planning policies and decisions should contribute to and enhance the natural and local environment by:</p> <p>a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan) - the assessment makes a light mention of biodiversity when locals know the field is visited by nesting skylarks in the summer and the field edge contains the burrows of bumble bees. Bats also feed and fly across the field and hedge line. The field is also regarded as a valued landscape with open views across the Channel that is widely enjoyed by locals and tourists who walk between Walmer and Kingsdown over the free down</p> <p>b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services –including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland - building over a quarter or more of the field will make it less sustainable for agriculture. The field is regularly used for arable crops. There is little confidence that there will not be pressure of build over the rest of the field despite the plan</p> <p>c) maintaining the character of the undeveloped coast, while improving public</p>

	access to it where appropriate - the building of these five homes further develops the coast. Given how other parts of the south coast have been ruined by dense coastal developments this development doesn't comply at all. The homes will be viewable from Kingsdown beach and the sea.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	I can see no better modification than for the removal of this proposal from the plan for its un-soundness and non-compliance with the NPPF Section 15
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	courtlands field crop.jpg courtlands field sea view.jpg
Local Plan Consultation Point	SAP35 - Land adjacent Courtlands (TC4S074)
Rep ID	SDLP341
Rep Status	Processed
Consultee ID	1272938
Consultee Full Name	MR Mauro Feltrin
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP35 - Land adjacent Courtlands (TC4S074)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>This spot of area is one of the most beautiful sight in kingsdown and is a real shame that has being considered to become am area of development, I thnk is a real short sight to allow this delopment to take place. it gives a signal to the future generation, that there is not limit where greed can reach..</p> <p>Does kingsdown need these 10 houses at the cost to loose this beautifl sight / NO really. All the residents that are aware in the village and outside the village are shocked, that this site has been proposed to be devlepped. with further destruction and a real damage to the environment. Plus more road to connect and trees and natural landscape gone, without mentioning the potential archeological loss.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	YES just leave this site alone, and instead to plan 10 houses plan how to incentivte with some funds the farmer to plant tress and encourage the wildlife.I know the council needs moeny but we also need a vision and a healthy future for our children.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Making sure that my thought have been heard
Include files	
Local Plan Consultation Point	SAP35 - Land adjacent Courtlands (TC4S074)
Rep ID	SDLP385
Rep Status	Processed
Consultee ID	1273886
Consultee Full Name	Mrs Elaine Mordaunt
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to?Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Land Adjacent Courtlands(TC4S074) SAP35
2 - Do you consider this part of the Plan sound?	No

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I do not consider that the introduction of SAP35 into the proposed Dover Local Plan Reg19 is legally compliant. This parcel of land did not feature in Reg18, but without warning it appears in Reg 19. Why has it appeared? The council found they had a shortfall of five houses? Can we believe that? No one was warned or consulted. The Council has failed in their Duty to Cooperate. It has been slipped in without any consultation or notification to the people who live closeby.</p> <p>This version of the Dover Local Plan Reg19 is unsound because</p> <p>SAP35 Courtlands seems to contradict Dover Councils own Policies SP4, regarding protecting the naturalness of coastal landscaping and habitat. HELLA Appendix 2c.</p> <ol style="list-style-type: none"> 1 It is incorrect to say the proposed triangle is untended meadow. That only applies for a small section. 2 That small section is kept like that to provide a sponge to help hold back all the rain that falls on this huge arable field, that SAP35 is part of. At present there is a very noticeable flow of water down Courtlands after heavy rain. Without this sponge ie if there is a tarmaced road and houses, the flow of water would be unbearable. I live at No 5 Courtlands, and would take the full brunt of the water flow. What would be done to protect my property? 3 I understand a Policy called Ripple 3 protects much of the countryside in this area. Please could it be extended to include the land of SAP35 Courtlands which fits the description of open arable chalk farmland with woodland. 4 Why does this Local Plan encourage land being taken out of food production. If the farmer doesn't want to grow things, it should be returned to chalk grassland. 5 Each time a chunk of field is taken away it makes the land less sustainable for agriculture. In this case, SAP35 it is a quarter of the field, not just a little plot in the corner. I know the land is in different ownership but it is maintained agriculturally as a whole. 6 The footpath to the West of SAP35 is much frequented by locals and tourists. At the highest point there is a most fantastic view of the English Channel. Do not ruin this precious resource by allowing the land to be given over to housing. 7 The current hedgerow along the Eastern boundary of SAP35 is much frequented by rare birds and bees. Do not destroy by building houses too close. 8 Any planning Application would have to include full proposals about how the above problems would be mitigated. I don't think it can be done satisfactorily to maintain the bio-diversity and to stop the stop the loss of the current habitat. <p>The proposed Local Plan Reg 19 -The Highways infrastructure for SAP35 - has not been fully assessed or is incorrect.</p> <ol style="list-style-type: none"> 1 Courtlands comes off Kingsdown Road. Turning out of Courtlands is very difficult at present as you cannot safely see to either side without pulling out into Kingsdown Road. This is dangerous. There are often cars parked adjacent to Beech Mews causing vehicles from Deal to move over to the right hand side of the road, and thus be out of view. 2 Encouraging more lorries onto Kingsdown road is a bad thing. They cannot negotiate Upper Street, Chalk Hill Road nor The Rise and turning round by the Rising Sun is very difficult. 3 Courtlands road is quite unsuitable as an access road to SAP35. There are no pavements, it is only just wide enough for two cars to pass and there are blind spots. 4 Courtlands as an access road would need to be widened but properties 1-5 all own land on both sides of the road. 5 Courtlands serves 14 properties plus the five houses in a little lane whose addresses are Kingsdown Road. That is 19 properties. Not what is stated in the Highways Assessment. HELLA Appendix 2c

<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>I think it is quite wrong of the Dover Council to propose SAP35 for Housing. They know full well that once a road access is made into a small section of a field that it is only a short time before housing is built on the rest whether or not there are Planning restrictions in place. When an Application goes to Appeal all the careful work of the local council goes out of the window and the Appeal is granted because our country needs more houses, with little regard to the nature of the area.</p> <p>Final questions</p> <ol style="list-style-type: none"> 1 How will the planners ensure that access to the field will not encourage a route through to the potential development of more houses? 2 How will the planners mitigate the intrusion of five houses in this rural and natural setting? 3 How will the Environmental Agency protect my house from rivers of water flowing past, or into my property, in times of heavy rain. 4 If SAP35 stays in the Local Plan there should be very strict rules in place and expectations that a developer would provide considerable benefits to the local community and village infrastructure. A binding Community Infrastructure Levy eg a pavement along the whole of Kingsdown Road from Deal, at the very least.
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP35 - Land adjacent Courtlands (TC4S074)</p>
<p>Rep ID</p>	<p>SDLP380</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1261332</p>
<p>Consultee Full Name</p>	<p>Mrs Sally Colligan</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>5 Courtlands, Kingsdown, SAP 35</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Not Applicable</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Not Applicable</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Not Applicable</p>

6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	It is not in the best interests of the Village of Kingsdown and will have an adversely negative impact on the infrastructure.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	As above.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP35 - Land adjacent Courtlands (TC4S074)
Rep ID	SDLP425
Rep Status	Processed
Consultee ID	1268001
Consultee Full Name	Mrs Elizabeth Deschamps
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP35 Land adjacent to Courtlands
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<ul style="list-style-type: none"> • This site is good agricultural land although it has been neglected recently. Allowing this to be developed on, will encourage more land to be left so that it too will be built on until development stretches all the way to Walmer. • A large proportion of existing properties in this part of Kingsdown are second homes or let out as Airbnb. New houses on this site would most likely go the same way. • This area is used very extensively by walkers, both on the adjacent footpath and around the field of which this proposed site is part. Development would cause a serious loss of amenity to the village. • The surrounding trees and hedges are very important to wildlife, including as a roosting spot for migrating birds. Even if the hedges are retained having housing so close will deter wildlife. • There is practically no employment in Kingsdown, any new residents would need to drive to work, increasing the pressure on already overcrowded roads.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Remove this site from the Local Plan as increasing the housing stock by 5 is not worth the damage that would be caused to the environment.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP35 - Land adjacent Courtlands (TC4S074)
Rep ID	SDLP319
Rep Status	Processed
Consultee ID	1331369
Consultee Full Name	Mr Richard Henchley
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 35

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>This particular development of only five houses would have very little impact on housing demand whilst having a disproportionate impact on local visual amenity.</p> <p>Because it is close to London and the area's natural attractions local economically active people are priced out of the housing market for housing they could otherwise afford.</p> <p>Planning conditions on new developments should impose a "local connection test" so that the housing can only be bought by people who fulfil the test.</p> <p>The Local and Neighbourhood Plans should contain a proper assessment of the scarcity and cost of housing for locally economically active residents and suitable remedial measures. Accordingly planning law would require applications for planning permission to be determined in line with the development plan reflecting these issues. (There should be no effect on existing housing except, maybe to increase its value).</p> <p>Any section 106 agreement should require a proportionate contribution to the demands imposed by the development on existing and future local infrastructure.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>See above</p> <p>This particular development of only five houses would have very little impact on housing demand whilst having a disproportionate impact on local visual amenity.</p> <p>Because it is close to London and the area's natural attractions local economically active people are priced out of the housing market for housing they could otherwise afford.</p> <p>Planning conditions should impose a "local connection test" so that the housing can only be bought by people who fulfil the test.</p> <p>The Local and Neighbourhood Plans should contain a proper assessment of the scarcity and cost of housing for locally economically active residents and suitable remedial measures. Accordingly planning law would require applications for planning permission to be determined in line with the development plan reflecting these issues. (There would be no effect on existing housing except, maybe to increase its value).</p> <p>Any section 106 agreement should require a proportionate contribution to the demands imposed by the development on existing and future local infrastructure.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP35 - Land adjacent Courtlands (TC4S074)
Rep ID	SDLP382
Rep Status	Processed
Consultee ID	1331546

Consultee Full Name	Mrs Monica Hough
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 35
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Any more building in this area would seriously affect the road safety aspect of Kingsdown. There are no pavements and the traffic would seriously impact on the area which could not sustain.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP35 - Land adjacent Courtlands (TC4S074)
Rep ID	SDLP383
Rep Status	Processed

Consultee ID	1331525
Consultee Full Name	Mrs Amanda Clarke
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 35
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>SP4 Residential Windfall Development - p37, 3.71 - Separation of settlements: Unplanned erosion of countryside between confines of settlements...therefore has the potential to have a serious adverse impact on the overall landscape character and on the individual identity of villages. There is a contradiction between this Strategic Policy 4 statement and the inclusion of SAP 35 in the Local Plan.</p> <p>Any development of this site would inevitably lead to the remainder of this and neighbouring fields - which separate Kingsdown from Walmer - being developed.</p> <p>Any development of this site would compromise the individual identity of Kingsdown village and lead to coalescence and loss of identity. It is unsound and ineffective to list Kingsdown as a "Local Centre". Any development of SAP35 would do the opposite of "reinforcing the role of the village". It would reduce its attractiveness to tourists - in particular walkers using the footpath adjacent to SAP35 - which has iconic views of France across the sea - to travel between Kingsdown and Walmer Castle,</p> <p>The number of second homes and air b&bs in Kingsdown (in addition to the number of properties available for sale) prove that dwellings outnumber homes required, so there is not an "objectively assessed need for housing" NPPF 11 within the parish.</p> <p>SAP35 is also unsound as it would involve the loss of food-producing farmland and additionally it would be destructive of the Landscape Character.</p> <p>SAP35 is also unsound given that it is in a Biodiversity Opportunity Area.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Nothing would make SAP35 sound, effective, safe or compliant with Strategic Policy 12.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP35 - Land adjacent Courtlands (TC4S074)
Rep ID	SDLP229
Rep Status	Processed
Consultee ID	1331287
Consultee Full Name	Mr Maxwell McDowall
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Chapter 4, 4.240, SAP35 (TC4S074)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<ul style="list-style-type: none"> SAP35 (TC4S074) A windfall (non-strategic) site of 5 dwellings (10 dwellings in Habitats Assessment Appendix C Screening Matrix page LUC i C-30) is unsound for the following reasons. Chapter 2 2.1 Vision and Objectives, , Overarching Vision, site fails to comply with 2nd paragraph in respect Landscapes, SP1 ,3.8, again biodiversity and landscapes and section on Adaptation, site is contrary to paragraph h, Chapter 3 ,3.47, site not protecting the character of the settlement and surrounding countryside of Kingsdown; SP4, 3.71 and 3.72, site fails again to respect the landscape and the importance of protecting the distinctive character of individual settlements i.e Kingsdown; section g mentions buffers adjoining open countryside i.e. west and north sides of the plot would take years to mature and be at risk of being removed for the views.; section implementation ,3.74 , paragraph 1 mentions distinctive character and identity plus highway network (Kingsdown has in the main narrow streets with no pavements presenting a danger to pedestrians especially the vulnerable such children and the elderly; site does not comply.

	<ul style="list-style-type: none"> • chapter 4 , 4.210 mentions Kingsdown being highly attractive and sensitive, it has already had infill throughout the years in parts of the village and a further site will only add to its urbanisation. • section 4.240 mentions the site is within a Biodiversity Opportunity Area ; there is a thick hedgerow with mature trees not on the eastern boundary as stated but adjacent in the access track for the properties opposite; this hedgerow takes up half the 41feet width of the track and is home to foxes badgers, numerous species of rodents and birds, reptiles such as adders and slow-worms; however, the access track is actually included in the site and therefore this hedgerow is not on the boundary and could be taken out; • Habitat Regs Assessment, Appendix C, page LUC I C-30 gives an adverse report for this development. • NE2, Landscape Character, 11.13 and 11.14, the developmentwhat is contrary to the contained text of these paragraphs; • Appendix 2c Housing Sites Landscape Assessment has mention that the countryside beyond the western and northern boundary is hills that provide views into the site and any development of the site would have to mitigate the impact on the open countryside and due to the countryside beyond hilly nature is difficult to see how the impact can be mitigated; if mitigation of the north and west boundaries of the development is entertained with natural "soft" buffers, this will take time to mature and would be subject to being eradicated for maintaining views; • SP4 Residential Windfall Development p.37; 3.72 Separation of settlements. <i>Unplanned erosionof countryside between confines of settlements... has the potential to have a serious adverse impact on the overall landscape character and on the individual identity of villages through the important elements of their setting or more seriously through coalescence.</i> Around Deal is particularly at risk. There is contradiction between Strategic Policy 4 statement which is sound and the inclusion of SAP 35 (TC4S074). • Kingsdown has a conservation area with narrow roads with no pavements, hence even with 20 mph speed limit, it is still particularly dangerous for pedestrians with children or the elderly. • Courtlands for which this site must use for access has no pavements. From experience, vehicles have the tendency to accelerate up the slope despite the fact there is a blind bend in the road. • The field which contains this site, has a PRoW passing by the western side of the site and then goes up to the top of the hill . Throughout its length, superb views over the surrounding countryside can be had including the sea and the French coast. In order to preserve this amenity, certain local residents have acquired small sections of the field soecifically to maintain the agricultural aspect with its views. In addition, it is an amenity which is within walking distance for the local community of Deal and Walmer (use of private transport not necessary (hence pollution reduced, plus there is exercise and well being). This PRoW and the Hawshill Freedown is therefore very popular and well used by not only the local community but also visitors/tourists and even Twitchers for watching migratory birds. • Kingsdown has not only a large holiday camp about its conservation area but also a significant number of second homes and airb&b's throughout the entire village, Because of its attractiveness, building more houses could increase that number still further, particularly if such houses are near the beach.
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Delete SAP35 (TC4S074) site for development from the local plan in order to maintain the agricultural aspect and keep the amenity of the spectacular views for the benefit of the whole community</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	

Local Plan Consultation Point	SAP35 - Land adjacent Courtlands (TC4S074)
Rep ID	SDLP473
Rep Status	Processed
Consultee ID	1331290
Consultee Full Name	Mrs Helen Williams
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP35
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>SAP 35- Courtlands</p> <p>The Courtlands site was only introduced to the local plan after reg 18, and was poorly advertised , so few people knew about it.</p> <p><u>Highways considerations.</u></p> <p>These need mitigation.</p> <p>The road into Courtlands is now adopted by KCC, but there is no footpath at the side.</p> <p>The likely residents of these proposed houses are likely to have cars, and would join the stream of traffic going through the single lane narrow roads of Kingsdown , onto the Ringwould road, and join the overcrowded Deal to Dover road, which has problems at the Duke of York's Roundabout. There is also a problem returning to Kingsdown from the main Dover Deal road, as at the turn off at Ringwould, the road is only 2 lanes wide , so when a car turns right to go to Kingsdown, all the traffic behind has to wait. This part of the road needs to be made 3 lanes wide.</p> <p><u>Sustainability considerations.</u></p> <p>Sustainability is poor because:</p> <p>Kingsdown is not well served by public buses. There is no direct bus to Dover, and the Ringwould road up to the A258 does not have a path, and is only just 2 lanes wide, so it is a dangerous road for pedestrians, or bikes. There is a service into and from Deal. The service is limited, infrequent, does not operate throughout the day, and Kent County council recently threatened to cut the funding for Stagecoach, who run the service. as it is not profitable, Th end result has reduced the service, and may reduce it further. From Deal there is a bus connection to Dover, but the times of arrival and departure from the bus station do not coincide.</p> <p>There is a poor bus service for children going to secondary schools, and many parents from the village drive their children at least part way, adding to the road congestion in the narrow country lanes. E.g. to get to Walmer station, to catch a train to Sandwich schools , they drive along the single lane Glen road.</p> <ul style="list-style-type: none"> • The site is not within 1,200m of an NHS GP Surgery.

- The site is within 200m of a Public Right of Way/Cycle Path, but the cycle path is not lit at night. .
- The site is not within 2,000m of a secondary school.
- The site is not within 2,000m of further/higher education facilities.
- The site is not within 2,000m of Strategic Employment Sites/Enterprise Zones.
- The site is not within 1,200m of a town centre.

Landscape

The proposal does not take account of how the building of these five houses and the loss of this part of the field contravenes Section 15 of the National Planning Policy Framework in terms of the following paragraphs

Para 174. Planning policies and decisions should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan) - the assessment makes a light mention of biodiversity when locals know the field is visited by nesting skylarks in the summer and the field edge across the Channel that is widely enjoyed by locals and tourists who walk between Walmer and Kingsdown over the free down contains the burrows of bumble bees. There are many bats which flit about and can be seen at dusk here (low levels of lighting here favours this). The field is also regarded as a valued landscape with open views

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services –including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland – building over a quarter or more of the field will make it less sustainable for agriculture. The field is regularly used for arable crops. There is very little confidence that there will not be pressure of build over the rest of the field despite the plan. It is likely that the old hedge, (at edge of the old estate), at one side of the property would be removed. It needs to be protected, as it is full of wildlife. .

c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate - the building of these five homes further develops the coast, as it is up a bit higher. Given how other parts of the south coast have been ruined by dense coastal developments this development doesn't comply at all. The homes will be viewable from Kingsdown beach and the sea.

In addition, This site is in the LCA F3 Ripple area defined in the district *Landscape Character Assessment 2020* which defines on page 118 under Development Management that (developments should) **Conserve the rural character of the landscape ensuring that it continues to play a role in providing a rural separation between Deal and Kingsdown as well as a rural setting for the Kent Downs AONB.**

In the HELLA Appendix 2c Landscape Assessments it says "**Any development of the site would have to mitigate the impact on the hilly countryside and due to this hilly nature it is difficult to see how the impact can be mitigated.**

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

SAP 35- Courtlands

The Courtlands site was only introduced to the local plan after reg 18, and was poorly advertised , so few people knew about it.

Highways considerations

The road into Courtlands is now adopted by KCC, but there is no footpath at the side.

The likely residents of these proposed houses are likely to have cars, and would join the stream of traffic going through the single lane narrow roads of Kingsdown, onto the Ringwould Road, and join the overcrowded Deal to Dover road, which has problems at the Duke of York's Roundabout. There is also a problem returning back to Kingsdown from the main Dover Deal road, as at the turn off at Ringwould, the road is only 2 lanes wide , so when a car turns right to go to Kingsdown, all the traffic behind has to wait. This part of the road needs to be made 3 lanes wide.

Sustainability

Kingsdown is not well served by public transport into and from Deal. The service is limited, infrequent, does not operate throughout the day, and Kent County council recently threatened to cut the service completely, as it is not profitable, but then has ended up reducing the service, and may reduce it further. From Deal there is a bus connection to Dover, but the times of arrival and departure from the bus station do not coincide.

There is a poor bus service for children going to secondary schools, and many parents from the village drive their children there, adding to the road congestion in the narrow country lanes. E.g. to get to Walmer station, to catch a train to Sandwich schools , drive along the single lane Glen road.

- The site is not within 1,200m of an NHS GP Surgery.
- The site is within 200m of a Public Right of Way/Cycle Path, but the cycle path is not lit at night. .

- The site is not within 2,000m of a secondary school.
- The site is not within 2,000m of further/higher education facilities.
- The site is not within 2,000m of Strategic Employment Sites/Enterprise Zones.
- The site is not within 1,200m of a town centre.

Landscape

The proposal does not take account of how the building of these five houses and the loss of this part of the field contravenes Section 15 of the National Planning Policy Framework in terms of the following paragraphs

Para 174. Planning policies and decisions should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan) - the assessment makes a light mention of biodiversity when locals know the field is visited by nesting skylarks in the summer and the field edge across the Channel that is widely enjoyed by locals and tourists who walk between Walmer and Kingsdown over the free down contains the burrows of bumble bees. There are many bats which flit about and can be seen at dusk here. The field is also regarded as a valued landscape with open views

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services –including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland- building over a quarter or more of the field will make it less sustainable for agriculture. The field is regularly used for arable crops.

c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate - the building of these five homes further develops the coast. Given how other parts of the south coast have been ruined by dense coastal developments this development doesn't comply at all. The homes will be viewable from Kingsdown beach and the sea.

In addition, This site is in the LCA F3 Ripple area defined in the district *Landscape Character Assessment 2020* which defines on page 118 under Development Management that (developments should) **Conserve the rural character of the landscape ensuring that it continues to play a role in providing a rural separation between Deal and Kingsdown as well as a rural setting for the Kent Downs AONB.**

In the HELLA Appendix 2c Landscape Assessments it says **The development of this site would have an impact on the landscape and further assessment is required to demonstrate whether this can be mitigated.**

A general point about this site being suitable for 5 houses. This site is 0.71 hectares. There is a site opposite, over the Kingsdown Road called Beach Mews, which has been built on fairly recently. It is 0.265 hectares and has 7 luxury 3 & 4 bed houses built on it. My suspicion is, that the owner of site SAP 35 will not be content with just 5 houses in a large area, but will apply for more houses in due course, badly affecting the landscape. Any houses built on SAP 35 will be luxury houses to fit into the area. Finally, this area does not need more luxury houses, but it badly needs houses for young families at an affordable price. This will not happen here

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Local Plan Consultation Point

SAP35 - Land adjacent Courtlands (TC4S074)

Rep ID

SDLP524

Rep Status

Processed

Consultee ID

1266351

Consultee Full Name

Dr
Sharon
Danby

Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP35 Land adjacent to Courtlands
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The selection of SAP35 is unsound as it involves the loss of food-producing farmland. This is unsustainable and contrary to NPPF 21. Future generations will not be able to grow sufficient food if we continue to lose our agricultural land. The CPRE have found that almost 14,500 hectares of the country's best agricultural land, which could grow at least 250,000 tonnes of vegetables a year, has been permanently lost to development in just 12 years.</p> <p>This is also unsound as it would be destructive of the Landscape Character. It appears from the mapping that it is within Ripple F3 from the DDC LCA (2020). Any development would require tree and hedge planting to shield the site from the open character of the landscape and would need to be done early to allow it to mature.</p> <p>It is also unsound given that it is in a BOA Biodiversity Opportunity Area. NE1 requires that the net gain be at least 10%. Existing hedges on site are important for birds nesting and roosting.</p> <p>I also consider that the consultation process is flawed with respect to this site. SAP35 was not included in Regulation 18 and this has come as a surprise to residents who now find it in Regulation 19 with a much more complicated and daunting process to try and come to terms with before making a submission.</p> <p>There is grave concern from residents that this would result in coalescence with Walmer by way of ribbon development along the cliffs. This would be contrary to SP3 and SP4.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>Agricultural land should not be built on if development is to be truly sustainable.</p> <p>Retention of all hedges and trees.</p> <p>Thorough mapping and protection of the BOA</p> <p>A hard boundary to the village to prevent ribbon development and coalescence with Walmer.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP35 - Land adjacent Courtlands (TC4S074)
Rep ID	SDLP650
Rep Status	Processed
Consultee ID	1267585
Consultee Full Name	Ms Karen Brewer
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP35 - Land adjacent to Courtlands, (TC4S074)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I do not believe that the proposal for five houses for Courtlands is justified or effective. I believe it also contravenes the guidance set out in: NPPF, Section 2, 11b; Section 9, para 111; Section 15, para 174-175.</p> <p>In relation to the soundness of the proposal: Courtlands was not included in the Reg 18 consultation and was only first seen in the Reg 19 consultation without any notice. This has not allowed the local community or residents directly affected to comment at an earlier stage. The proposal negatively impacts on visual and residential amenity and there is no proportionate evidence to show how five houses are justified. Section 2: 11b. Any adverse impacts of [development] would significantly and demonstrably outweigh the benefits.</p> <p>The development will adversely impact access to green space, to neighbouring properties, to visual amenity and cause substantial harm to a site which is enjoyed by both residents and wildlife (including nesting skylarks, solitary bees and bats).</p> <p>Section 9: para 111. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.</p> <p>Access to this farmland will be along the narrow, busy, heavily parked up Cliffe Road, through a small residential road on entering Kingsdown. There is a fixed 7.5 tonne limit for the narrow roads of Kingsdown which will inevitably lead to issues for builders and therefore anyone visiting or living in the area. The cumulative impact on development within Kingsdown is already felt by residents, utilities, emergency vehicles and those servicing the three public houses. When the A258 Dover Road is closed due to accidents, it is this one entry and exit road in Kingsdown which takes all the traffic. This leads to gridlocking and is not sustainable for homeowners or businesses.</p>

	<p>The proposal does not take account of how the building of these five houses and the loss of this part of the field contravenes Section 15 of the National Planning Policy Framework in terms of the following paragraphs:</p> <p>1 Planning policies and decisions should contribute to and enhance the natural and local environment by:- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan) - the assessment mentions biodiversity when locals know the field is visited by nesting skylarks in the summer, is populated by bats and the field edge contains thousands of burrowing solitary bees. The field is also regarded as a valued landscape with open views across the Channel that is widely enjoyed by locals and tourists who walk between Walmer and Kingsdown over the free down.</p> <p>b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services –including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland - building over a quarter or more of the field will make it less sustainable for agriculture. The field is regularly used for arable crops. There is little confidence that there will not be pressure to build over the rest of the field despite the plan.</p> <p>c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate - the building of these five homes further develops the coast. Given how other parts of the south coast have been ruined by dense coastal developments this development doesn't comply at all. The homes will be viewable from Kingsdown beach and the sea, so will therefore impact visual amenity.</p> <p>Para 175: Allocate land with the least environmental or amenity value for the reason of nesting skylarks, bats and colonies of solitary bees and enjoyed by villagers for decades. For over 20 years that I have lived here the land has been successfully farmed and any loss of this agricultural land can only lead to further proposal for more houses and the land becoming less valuable for farming.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Removal of the development in its entirety.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Not Applicable</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP35 - Land adjacent Courtlands (TC4S074)</p>
<p>Rep ID</p>	<p>SDLP720</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1268008</p>
<p>Consultee Full Name</p>	<p>Mr Phillip</p>

	Deschamps
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP35
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	This proposal TC4SO74 was added to the plan without sufficient notice. Not included in Regulation 18. I bounds an area very important to hundred of dog walkers and in my opinion one of the most beautiful areas of our coastline. The house proposed would, no doubt be sold for six figure prices and do nothing to solve the housing shortage. It would lead to pressure to continue development outside the village boundaries on this green field site.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Please concentrate on brown field sites and windfall, before taking valuable agricultural land, reducing food security
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP35 - Land adjacent Courtlands (TC4S074)
Rep ID	SDLP855
Rep Status	Processed

Consultee ID	1273295
Consultee Full Name	Mr Martin Garside
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP35 - Land adjacent Courtlands (TC4S074)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<ol style="list-style-type: none"> 1 Location: this is not an appropriate location for new housing. This would build on an historic piece of greenfield agricultural land. This field forms a natural 'break' between the village of Kingsdown and Walmer. Development here will extend the current boundary of housing in Kingsdown and change the character and visual amenity of this historic approach to the village over Hawksdown. 2 Dover District Landscape Character Assessment: building new housing here is not compatible with DDC's 'Dover District Landscape Character Assessment' of 2020. I refer specifically to LCA F3 (chapter 5 - pages 114-119). As well as highlighting the environmental sensitivities and environmental and habitat values of this part of the district, the document rightly characterised this location as "<i>undulating chalk landscape with an intact agricultural character providing a rural setting for the South Forelands areas of the Kent Downs AONB as well providing rural separation between Deal and Kingsdown</i>". 3 LCA F3 further emphasised the vital importance of conserving: <ul style="list-style-type: none"> • <i>"the rural character of the landscape ensuring that it continues to play a role in providing a rural separation between Deal and Kingsdown as well as a rural setting for the Kent Downs AONB</i> • <i>"the characteristic pattern of historic villages maintaining their tight knit enclosed built character"</i> <p>In summary, I object to the proposal to build housing on greenfield land adjacent to Courtlands, Kingsdown (SAP35 -TC4S074)</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The proposal to build new housing on greenfield land adjacent to Courtlands, Kingsdown (SAP35 -TC4S074) should be removed from the plan.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP35 - Land adjacent Courtlands (TC4S074)
Rep ID	SDLP955
Rep Status	Processed
Consultee ID	1331213
Consultee Full Name	Dr Anne Ballinger
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	7.11 page 268, 3.71 page 37, SAP 34 page 163
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Not Legally compliant - The local plan specifically related to Kingsdown (SAP 34 and SAP 35) and the immediate boundary area (SAP 15 and SAP 53) is not legally compliant with the new and legal Highway Code changes which came into place in January 2022 i.e. after the evidence review and call for sites. The Highway Code states that a car must allow a minimum of 1.5 metres to overtake a cyclist (car travelling at under 30 MPH) or pedestrian (2 metres) when there is no pavement. All of the access roads into Kingsdown and the main roads used within Kingsdown (Upper St, The Rise, Undercliffe) do not allow the Highway code to be followed currently but therefore In the Local plan cannot by definition follow the guidance to be legally compliant or to support sustainable infrastructure (encourage walking and cycling) or to works towards climate neutral. The danger to cyclists and walkers will be enhanced when the A258 is blocked after an accident and traffic is diverted via the Ringwould Road.</p> <p>Unsound - the local plan is unsound with reference to SAP34 as the Ringwould Road is already signposted as unsuitable for long vehicles, vehicles over 7.5 tonnes, wide vehicles, narrowing to single lane passing. The proposed SAP34 development would cause dangerous gridlock particularly with the added traffic in summer months.</p> <p>The developments of SAP34, SAP35 and SAP 15 would compromise the 'individual identity of Kingsdown Village' and contradiction to Policy 4 statement.</p>

	<p>the SAP34 development is unsound on the grounds that it would remove a flood sponge.</p> <p>the Local plan is also unsound in that it has not taken into account reasonable alternatives for Kingsdown or even considered these. There is no mention or even any attempt to assess the number of 2nd (or indeed 3rd, 4th) homes in Kingsdown/Walmer/Deal which are not lived in for most of the year. There is an increasing number of AirBnBs which provide multiple occupants (and multiple cars to travel) for family houses. As there is no attempt to assess these I will provide one road number as an example - Of the 34 houses in North Road, Kingsdown only 7 are lived in as a 1st home. The last house to sell in North/South Road was in the region of £600,000 for a 2nd home. This is in direct contrast to the statement of the local plan (7.11, page 268) 'to support the delivery of rural local needs homes to enable local people to remain in the village where they live or work and not to be forced to move away because of high house prices and high rents'. The plan only allocates 30% of new homes as affordable housing and so there is no demonstration for a local need for more housing. The other 70% of houses being built on greenfield could all be bought as 2nd/3rd/4th homes or run as AirBnBs.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>I suggest a review of housing need in specific areas of DDC and build houses in areas of housing need. This need has not be demonstrated in Kingsdown and surrounding areas unless DDC council want an area largely lived in by 2nd home owners.</p> <p>I suggest a 20 MPH limit throughout Kingsdown and the access roads with designated pedestrian and cycling lanes.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	No
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
Include files	
Local Plan Consultation Point	SAP35 - Land adjacent Courtlands (TC4S074)
Rep ID	SDLP885
Rep Status	Processed
Consultee ID	1331394
Consultee Full Name	Mr Robert Cummins
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	SAP35 - Land adjacent to Courtlands (TC4S074)
<p>2 - Do you consider this part of the Plan sound?</p>	No

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The proposal for Courtlands was not included in the Reg 18 consultation. It has been included in the Reg 19 consultation without any notice, effectively denying affected residents and the wider community the opportunity to review it properly and/or to seek its removal at an earlier stage.</p> <p>The presumption in favour of sustainable development (as required in NPPF 2021 chapter 2 et seq) has not been upheld.</p> <p>Contrary to NPPF 2021 chapter 15, the proposal for Courtlands will not contribute to or enhance the natural and local environment.</p> <p>The development will take up a substantial part of an arable field crossed by public footpaths and highly valued by residents of Kingsdown and Walmer, and visitors from further afield, for its very broad and uninterrupted views of the sea as well as the woods and downland around Kingsdown. As such, it will severely harm a valued landscape (per NPPF para 174a), it fails to recognise the intrinsic character and beauty of the countryside (per NPPF para 174b), it constrains the viability of versatile agricultural land (per NPPF para 174b), and it fails to maintain the character of the undeveloped coast (per NPPF para 174c).</p> <p>It will also impact an area of biodiversity (per NPPF para 174a and 174d): the field is visited by nesting skylarks in the summer and the field edge contains the burrows of bumble bees. For the natural and local environment to be so harmed, so close to the Kingsdown Conservation Area and the Kent Downs Area of Outstanding Natural Beauty, for the sake of building 5 additional houses, is clearly not sustainable, sound or legally compliant. There is no exceptional circumstance or public benefit that would justify it.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The proposal for Courtlands should be entirely removed from the Dover Local Plan. For the reasons outlined in 6 above, any housing development on the land in question is unlikely to be legally compliant and/or sound.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I consider it necessary because the importance of the natural and local environment is best appreciated and explained by those who have known and treasured it for several decades.
Include files	
Local Plan Consultation Point	SAP35 - Land adjacent Courtlands (TC4S074)
Rep ID	SDLP775
Rep Status	Processed

Consultee ID	1331213
Consultee Full Name	Dr Anne Ballinger
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP35 - Land adjacent to Courtlands
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The Local Plan states this on page 268 (7.11): 'to support the delivery of rural local needs homes to enable local people to remain in the village where they live or work and not to be forced to move away because of high house prices and high rents'. This happens in Kingsdown but there is no mention in the local plan. Houses in Kingsdown are rapidly bought by 2nd/3rd/4th home owners as 2nd homes or to run as AirBnB. There is absolutely no assessment of these numbers in the plan but for instance North Rd in Kingsdown has only 7 of 34 home owners who live there. This is a representation of many other roads. Building homes near Courtlands will not solve this problem as they are not ALL allocated as affordable. Given the space allocation near Courtlands which is almost 3 times the size of Beach Mews (9 houses) it seems likely these will be large executive homes with big gardens which will subsequently have houses built in them potentially increasing numbers to 15 houses. The local plan with reference to transport is inconsistent with the Highway Code (Jan 2022) which specifies 1.5. metre minimum passing a cyclist and 2 metre for pedestrian for cars under 30 MPH. Therefore it will be illegal to overtake a cyclist or pedestrian going up the hill in all the roads leading out of Kingsdown. No car will wait going to work or to take their child to the school at the top and so DDC have encouraged illegal activity by increasing the number of homes and drivers.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	To make a proper assessment of housing needs in Kingsdown for local people as you outline in your plan
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP35 - Land adjacent Courtlands (TC4S074)
Rep ID	SDLP834
Rep Status	Processed
Consultee ID	1331507
Consultee Full Name	Ms HOPE MACDONALD
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP35 - Land adjacent Courtlands (TC4S074)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The inclusion of site SAP35 (land at Courtlands in Kingsdown TC4S074) is unsound because it is not consistent with the NPPF 2021 policy (174) that planning decisions should : "contribute to and enhance the natural and local environment by (a) protecting and enhancing valued landscapes..." and "(b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital...".</p> <p>The site, which was not included in the Regulation 18 consultation, was added in response to the Council's call for windfall sites. The site is on the south-east corner of arable-chalk farming fields which slope up from Kingsdown village to the hills above the English Channel. These open fields are bisected by a popular Public Right of Way (PROW) which eventually joins the England Coastal Path. Iconic photos from the top of these fields looking down over the countryside surrounding Kingsdown and out to the sea emphasise Kingsdown's special rural ambience. One such photo features in Kent County Council's pamphlet on the Kingsdown to Walmer section of the National Trail.</p> <p>In the proposal put forward by the planning agent, five plots of detached houses will directly abut, in a row, this PROW which connects Kingsdown to the hills above. The council's Landscape Assessment Evidence for the site (TC4S074 HELAA Appendix 2c) states:</p> <p>"There is residential development to the south and east of the site, with open countryside to the west and north. There is strong tree screening along the southern and eastern boundary, the western and northern boundaries are exposed. Further the countryside beyond the western and northern boundary are hills the provide views into the site. Any development of the site would have to mitigate the impact on the open countryside and due to the countryside beyond's hilly nature it is difficult to see how the impact can be mitigated."</p>

	<p>Presumably, the officer's judgement of "difficult" was considered in the context of the local plan's SP4 (Residential Windfall Development) criteria, specifically:</p> <p>"d) It would conserve and enhance landscape character and biodiversity and not result in an unacceptable intrusion into the open countryside or the loss of important green spaces within the confines that contribute positively to the existing character of that settlement" and;</p> <p>"g) Where the site adjoins open countryside, an appropriately designed landscape buffer is included."</p> <p>Also, in the implementation criteria of SP4 the local plan specifies that (3.73): "This buffer should enable limited views into and out from the development to ensure the development blends in with its setting."</p> <p>In the agent's proposal, the western and northern boundaries of the site, the latter sitting right on the PROW, are landscaped to screen the development. The agent suggests that with some landscape screening the Kingsdown settlement boundaries could thus be moved forward/extended without harm to the visual amenities of the countryside.</p> <p>The agent's proposals fail to consider that the iconic views of Kingsdown when approached from the north of these open fields are from a vantage point some 35 feet higher than the site. This fact did not elude the officer providing the evidence for the Landscape Assessment (HELAA Appendix 2c), who used the word "difficult". The agent's assurances do not alter the topographical facts.</p> <p>This site is located in a landscape of particular local value; a landscape which accentuates Kingsdown's special characteristics as a seaside village, a hillside village, and a rural village. The benefits of this development do not outweigh the adverse impact on this much-loved landscape of breaking through the boundaries of the Kingsdown settlement.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The Local Plan would be more sound if site SAP35 was ruled out for housing development.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Not Applicable</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP35 - Land adjacent Courtlands (TC4S074)</p>
<p>Rep ID</p>	<p>SDLP839</p>

Rep Status	Processed
Consultee ID	1331536
Consultee Full Name	Mr PETER CROSS
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP35
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I object to the Selection of SAP35 - TC4S074 Land adjacent to Courtlands as it is Unsound, not legally Compliant and has not illustrated a Duty to Co-operate.</p> <p>1 SAP35 was <u>not</u> in the consultation document regulation 18 and therefore there has not been sufficient time for public consultation. This is contrary to the statement in the "Introduction" within regulation 19, page 12, "Consultation and engagement" item 1.7 which states "significant consultation has been undertaken with the local community and key stakeholders". The proposal is Unsound and not legally Compliant and should be rejected.</p> <p>1 SAP35 has no information relating to the site. whereas SAP34 – Woodhill Farm which was in regulation 18, has copious notes relating to its location and a further 14 statements (a-n) relating to development proposals such as - Access - design and height of properties - location of the properties relative to the borders of the site - impact on pathways, etc, etc There is nothing attached to SAP35 which further illustrates that Proposal SAP35 has not undergone Consultation and engagement or sufficient Scrutiny.</p> <p>1 The location of SAP35 is outside of the Kingsdown residential boundary and is on agricultural land which is actively farmed to produce food. This particular incursion into agricultural land has significant and far-reaching consequences (see items 4 and 8 below). Strategic Policy 3 (SP3) Item 3.47 advises "a balance must be achieved to protect the character and heritage of the settlements as well as the surrounding countryside". This declared objective is repeated again in SP4 item 3.70. In this instance Regulation 19 is not consistent with its own guidelines or those of the National Policy.</p> <p>1 SP4, Separation of Settlements - item 3.72 clearly states "Small settlements in close proximity to the three urban settlements of Dover, Deal and Sandwich are particularly at risk of coalescence". If coalescence is to be prevented, eventually a stand has to be taken over the erosion of boundaries between residential areas and food producing farmland. There is no justification to allow the breaching of the village boundary to allow a development such as SAP35 to be approved.</p>

	<p>1 Allowing this development to proceed will reduce the size of the contained area currently being actively farmed, to a level which would render it uneconomical to farm. it would then become a prime target for “Land banking”. The land immediately adjacent to and North of SAP35 is owned by the same entity as SAP35. By default this will become a “land banked” area. The Central Government is against Land banking, a strategy most recently emphasised by the Prime Minister in Parliament on 7th January 2022. To approve SAP35 is therefore a major contributor to Coalescence (SP4 item 3.72) as well as being against Government Policy</p> <p>1 SAP35 is unsound as it is designated a Biodiversity Opportunity area. The details in the application on Page 179 and relating to trees and hedgerows is misleading as the major hedgerow worthy of protection and supporting significant wildlife, is within the site and not on the boundary. The SAP35 application even acknowledges it has an issue with Biodiversity but presumes it can be ignored. As there is no information available relating to access and the fate of the hedge and the Biodiversity Opportunity, conclusions cannot be drawn. The Biodiversity Opportunity area guidance has not been addressed rendering the application unsound.</p> <p>1 SAP35 is a huge site of .710 hectares with a declared capacity for 5 houses. 100 meters from SAP35 is a development of 7 luxury houses with garages on a site of .265 hectares, approximately a third of the size of SAP35. SAP35 is therefore going to be a development of luxurious and hugely expensive properties. The overarching objective from Central government for the House building programme is “to provide affordable accommodation, particularly for young people to get on the housing ladder and remain in the community where they work and where their families live.” This sound objective is repeated throughout all documents such as regulation 18/19 and the National Planning Policy Framework. SAP35 fails to address this fundament objective by any criteria and should be denied.</p> <p>1 The stretch of elevated agricultural land between Kingsdown and Walmer Castle provides outstanding vistas and coastal views and is considered a treasure. Visitors and the community, both Local and further afield walk this route on a daily basis. As the path is largely on level ground it is enjoyed by young and old alike. It affords people with mobility issues the opportunity to enjoy a stimulating outdoor environment and is essential to the health and wellbeing of the community. This route gives access to the World War One Airfield and down to Walmer Castle. Granting approval for SAP35 will be the crucial key to unlocking the inevitable speculative development of these fields which are the Holy Grail for property developers. Approval of this site is contrary to the guidelines in SP3 and SP4 and is therefore unsound.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>1 By acknowledging SAP35 was introduced under uncertain circumstances with no scrutiny, the plan would be preventing the accusation of being unsound.</p> <p>2 The act of rejecting SAP35 would indicate that the plan is paying some attention to its own guidelines such as biodiversity, respect for the protection of agriculture land, the value of protecting open spaces and the need to support the health and wellbeing of the community.</p> <p>3 that the wishes of the community can be respected over the greed and pressure from powerful speculators. this is seen as a major criticism of the planning process</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>The objections are based a broad range of circumstances and circumstances at local level cannot, quite understandably, cannot be adequately conveyed or evaluated by people quite removed from the working of a small community such as Courtlands.</p>
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP35 - Land adjacent Courtlands (TC4S074)</p>
<p>Rep ID</p>	<p>SDLP870</p>

Rep Status	Processed
Consultee ID	1331808
Consultee Full Name	Mr Robert Hogben
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP35
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The selection of SAP35 is unsound as it involves the loss of food-producing farmland. This is unsustainable and contrary to NPPF 21. Future generations will not be able to grow sufficient food if we continue to lose our agricultural land. The CPRE have found that almost 14,500 hectares of the country's best agricultural land, which could grow at least 250,000 tonnes of vegetables a year, has been permanently lost to development in just 12 years.</p> <p>This is also unsound as it would be destructive of the Landscape Character. It appears from the mapping that it is within Ripple F3 from the DDC LCA (2020). Any development would require tree and hedge planting to shield the site from the open character of the landscape and would need to be done early to allow it to mature.</p> <p>It is also unsound given that it is in a BOA Biodiversity Opportunity Area. NE1 requires that the net gain be at least 10%. Existing hedges on site are important for birds nesting and roosting.</p> <p>I also consider that the consultation process is flawed with respect to this site. SAP35 was not included in Regulation 18 and this has come as a surprise to residents who now find it in Regulation 19 with a much more complicated and daunting process to try and come to terms with before making a submission.</p> <p>There is grave concern from residents that this would result in coalescence with Walmer by way of ribbon development along the cliffs. This would be contrary to SP3 and SP4.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	<p>Agricultural land should not be built on if development is to be truly sustainable. Retention of all hedges and trees.</p> <p>Thorough mapping and protection of the BOA.</p> <p>A hard boundary to the village to prevent ribbon development and coalescence with Walmer.</p>

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP35 - Land adjacent Courtlands (TC4S074)
Rep ID	SDLP724
Rep Status	Processed
Consultee ID	1331832
Consultee Full Name	Mrs Suzanne De Ruyter
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP35
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Failure to consult: No consultation with BT open-reach is listed to see if there would be adequate broadband available. This is currently a significant and persistent problem in the Village of Kingsdown with intermittent Wifi and particular difficulty in connecting new customers. Whilst the plan claims to have consulted with Southern water, the proposal that the development link to existing sewers is unsound. There have been examples of the failure of the existing sewer lines in the village, having significant detrimental impact, in addition the storm water drains do not cope with existing run off and additional development will exacerbate this. There appears to be no consideration of these environmental impacts. The determination of the suitability of SAP35 for development is incongruous with the plans own determination of the unsuitability of other considered sites within Kingsdown. KIN06, KIN07. It would seem that the site selection has been based upon a topographical view of the village

	<p>and fails to consider adequately the impact such development will have on the amenity of the edge of the village. Whilst the plan refers to the need to maintain existing hedging, and provide for trees, any planting would require strict application of enforcement for their protection which is not noted (and the Council's enforcement has been seriously lacking in the Village in recent years setting a concerning precedent).</p> <p>Whilst the list of consultees is significant, I can see no actual analysis of the recreational use and therefore the impact upon Villagers of this area. It is significant in that it is an easily accessed high point of open land with a walking path to Hawksdown and Walmer Castle, frequently used by locals as a place to take exercise and to contemplate. Such areas were VITAL to the mental wellbeing during the recent pandemic; and yet there has been inadequate consideration to the mental health and wellbeing of the Residents deprivation of this area would have.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Not Applicable
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	SAP35 - Land adjacent Courtlands (TC4S074)
<p>Rep ID</p>	SDLP1393
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1331002
<p>Consultee Full Name</p>	Dr David Casey
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	SAP35
<p>2 - Do you consider this part of the Plan sound?</p>	No
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	Justified

4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>6) Details of why I consider part of the Dover Local Plan is unsound with regard to Local Plan Site Allocation SAP35</p> <p>The inclusion of SAP35 (TC4S074) in the plan at a later stage (2021) after the Regulation 18 Draft Local Plan consultation has meant that there has been inadequate time for public engagement and consultation on its inclusion. This is a very sensitive greenfield site within the LCT/F3 of the Dover Landscape Character Assessment 2020 and development here would therefore be inappropriate. The proposed 5 home development also will immediately lead to developer pressure for further windfall or larger scale, development of the adjacent agricultural land to the north of Kingsdown which slopes down to the coast to the east with fine maritime views over the Downs and Channel. As custodians of meadowlands close to this site we are fully aware of recent developer pressure to access more land here for development. Development of SAP35 will be counter to the Landscape Character Assessment guidelines as it will threaten conservation of the rural character of the landscape ensuring that it continues to play a role in providing a rural separation between Deal and Kingsdown as well as a rural setting for the Kent Downs AONB. Development will also threaten the wildlife potential of this area which hosts declining farmland bird species including skylark, yellowhammer, and house sparrow, and is an important arrival and departure point for seasonally migrating birds including numerous warblers, goldcrests and firecrests, and winter snipe and woodcock.</p> <p>In addition I feel the inclusion of SAP35 is unsound as little account has yet been taken of the fact that Courtlands is a popular pavement free access route to the large network of PROWs which radiate from the locale of the SAP35 site - increased residential development here will necessarily increase risk of harm to all walking up and down Courtlands.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>7) Recommended Change to make Dover Local Plan More Sound</p> <p>Remove SAP35 from the Local Plan to make it consistent with Dover Landscape Character Assessment 2020 and to remove risk of follow on development of the seaward facing agricultural land to the north of Kingsdown village</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP35 - Land adjacent Courtlands (TC4S074)
Rep ID	SDLP1305
Rep Status	Processed
Consultee ID	1331561
Consultee Full Name	Mrs Barbara Ridout

Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 35 Land adjacent to Courtlands (TC4S074)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I consider it to be unsound because there are many controversial issues arising from it eg-lack of Infrastructure Development Planning, (open spaces, for example) Also this site has just been added on to the Regulation 18 plan ;therefore the local community and neighbouring residents did not have the opportunity to comment on it .</p> <p>It is also unsound because it involves loss of food-producing farmland.A;so it would be destructive of the Landscape Character. The site is within a Biodiversity Opportunity Area. (SAP 35)-Landscape Assessment. There is also a Protected Right of Way across the field to the north , up a long slope , which is used continually by hikers and dog walkers , for the benefits of fresh air and open landscapes across the Channel (so vital for mental health), The development of this site would have an uncalled for impact on the landscape and further assessment is required to demonstrate whether this can be mitigated.HELLA Appendix 2c Landscape assessments.</p> <p>SP 13 is non - compliant with the Environmental Act .Well established hedges and trees on the east boundary are important stops for migrating birds.(they are protecting and enhancing)valued landscapes.</p> <p>SAP35 Highways assessment (TC4SO74) The bus stops do not promise a reasonably frequent service any longer. There are no footpaths on the Courtlands site (which is not a wide road ,like most roads in the village) There are 12 properties in Courtlands and a further 5 along the 'lane ' which leads along the east side of the site .There are also 2 dwellings at the top of the PROW which runs along the west side of the site. These already generate a surprising amount of vehicle movements not just from the residents but also from commercial traffic.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	In my opinion , to make it sound, there needs to be a reduction to the number of dwellings proposed and even more important, an in depth look at the present situation with regard to traffic movement in the narrow village roads.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP35 - Land adjacent Courtlands (TC4S074)
Rep ID	SDLP1094
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SAP 35 is also unsound in that it involves loss of food-producing farmland. It is also unsound given that it is in a BOA Biodiversity Opportunity Area. The selection of this site is unsound in that it contradicts the promises in SP4 3.71 about respecting the individual identity of villages and need to prevent settlements coalescing.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	SAP35 - Land adjacent Courtlands (TC4S074)
Rep ID	SDLP1756
Rep Status	Processed
Consultee ID	1267645
Consultee Full Name	Alan & Sarah Gleave
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP35
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC Note: The text below was extracted from the attached representation The inclusion of SAP 34 and SAP 15 especially, (but also SAP 53 and SAP 35) is not legally compliant with NPPF 2021 item 11. (b)ii 'SPs should provide for objectively assessed needs for housing & other uses, . . . unless(ii) any adverse impacts of doing so would significantly & demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole'. Also it is not compliant with the emerging govt policy announced 5 Dec 2022 by Mr Sunak on stopping compulsory housing targets on LPAs, and empowering LPAs to decide on local needs. DM Policies NE2 (Natural Environment) p.285: It is sound to designate the area inland from Kingsdown, west to Ringwould, Ripple, Sutton, Studdal and Little Mongeham, south to Guston, as LCT F Open Arable Chalk Farmland with Woodland, F3 Ripple. But it is unsound, ineffective and contradictory to then ignore the designation when selecting the dangerously located, chalk farmland of SAP 34 for development. It is unsound and ineffective to a damaging extent, to list Kingsdown as being a 'Local Centre ; a village providing services for a local rural area and a secondary focus for development in the rural area' Any development at SAP 34 would do the opposite of 'reinforcing the role of the village'; it would in fact choke off the existing parish economy, reducing its attractiveness to tourists, a key location on the Deal Welcomes Walkers initiative. The number of 2nd homes and airB&B in the village proves that dwellings outnumber homes required, so there is NOT an 'objectively assessed need for housing a la NPPF 11' within the Parish'. (Gladman did a landgrab in 2017 in the parish 17/00487 An

	<p>application rejected by DDC that Gladman took to Planning Inspectorate and won. Currently being built by Taylor Wimpey on A258 as 85 executive homes on land opposition 423-459 Dover Road to the endangerment of all road users of arterial A258 with refusal to put in pavements).</p> <p>SAP 35 is unsound SP4 Residential Windfall Development p.37: 3.71 Separation of Settlements : Unplanned erosion of Countryside between confines of settlements . . . therefore has the potential to have a serious adverse impact on the overall landscape character and on the individual identity of villages through the loss of important elements of their setting or more seriously through coalescence. Around Deal particularly at risk. There is a contradiction between this Strategic Policy 4 statement which is very sound and the inclusion of SAP 35 in the Local plan. Also it involves loss of food-producing farmland. Selection of this site is destructive of the Landscape Character. It is also unsound given that it is in a BOA Biodiversity Opportunity Area.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	SDLP1755 Gleave Redacted.pdf
<p>Local Plan Consultation Point</p>	SAP35 - Land adjacent Courtlands (TC4S074)
<p>Rep ID</p>	SDLP1355
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1333128
<p>Consultee Full Name</p>	David Powell
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	Klaire Lander
<p>Agent Company / Organisation</p>	Lander Planning
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	SAP35
<p>2 - Do you consider this part of the Plan sound?</p>	Yes
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	

4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Lander Planning sent a PDF document which has been split across the relevant sections of the Plan. See Original Attachment on SDLP1346)</p> <p>The identification of the land adjacent to Courtlands, Kingsdown as a housing allocation is supported. The site is available and deliverable and is sustainably located. Housing in this local centre is important to creating sustainable development in these areas. The policy is therefore 'effective' and 'justified' and therefore supported.</p> <p>In terms of the likely phasing of delivery of the site, ecology and other surveys are underway, with the hope that a planning application will be submitted in 2023. A pre-application has taken place with the Council, with it identifying the key issues that any planning application would need to address.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP35 - Land adjacent Courtlands (TC4S074)
Rep ID	SDLP1849
Rep Status	Processed
Consultee ID	1272833
Consultee Full Name	Sylvia Main
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP35

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<ul style="list-style-type: none"> • The DDC landscape assessment for Ripple F3 says 'it is difficult to see how the impact can be mitigated' • On the sustainability assessment it says 'that there is no GP within 1200m, no secondary school within 2000m, not within 2000m a railway station and has a very poor and inadequate bus service into and from Deal. In fact this service has recently been reduced by KCC
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP35 - Land adjacent Courtlands (TC4S074)
Rep ID	SDLP1801
Rep Status	Processed
Consultee ID	1331598
Consultee Full Name	Alan Nash
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP35

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Kingsdown has one primary school which is over subscribed. There is no Doctors surgery or Dentist. JUSTIFIED. These sites are unsuitable for development. Your website is not clear as to what research or solid facts you have, or from whom it has been compiled by. EFFECTIVE. These sites will be detrimental to the existing residents by causing light pollution, noise pollution, congestion and pollution. CONSISTENT. I am not certain what the national policy is, if it is to make existing residents unhappy in there existing environment, then these proposed sites would achieve that. LEGALLY compliant. I consider that most people within the village were not aware of these sites being considered, my neighbours and I were only aware when the details were noted in the November 2022 issue of Rural Roundup. Your website is over complicated and not fit for purpose. Within the village there are many elderly residents who do not have access to computers.TC4S074 was not in the Regulation 18 Consultation-there has not been adequate time for public engagement. DUTY to co-operate.Unable to find out if this was carried out.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Scheme should be scrapped.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	As a resident I have found this a very confusing and difficult process to complete and would look forward to attending an oral examination to put my questions to whoever allowed these proposals to get this far.
Include files	
Local Plan Consultation Point	SAP35 - Land adjacent Courtlands (TC4S074)
Rep ID	SDLP1604
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP35
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<i>DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438.</i> SAP 35 is also unsound in that it involves loss of food-producing farmland. It is also unsound given that it is in a BOA Biodiversity Opportunity Area. The selection of this site is unsound in that it contradicts the promises in SP4 3.71 about respecting the individual identity of villages and the need to prevent settlements coalescing.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP35 - Land adjacent Courtlands (TC4S074)
Rep ID	SDLP1841
Rep Status	Processed
Consultee ID	1333703

Consultee Full Name	Marion Osborne
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP35
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>SAP34 not legally compliant with NPPF 20-21 items 11 DM policies NE2 (natural environment) P285 The chalk farmland of SAP34 is unsound/unsuitable for development. SAP34 is unsound on the grounds of landscape character being incompatible with criteria in SP4. SAP34 is unsound on the grounds that it borders the AONB and is valuable arable farmland. SAP34 – any development would remove a flood sponge on the top slop of the hill which drains toward Ray Bottom SAP15, so development here would contribute to flooding. SAP35 is unsound in that it involves loss of food producing farmland; destructive of the landscape character and it is in a BOA. SAP53 is unsounds as being incompatible with LSA falling within the AOB. SAP15 is unsounds as incompatible with SP4; 3.71 separation of settlements. Also, it is incompatible with statements in SP14 relating to biodiversity connectivity.</p> <p>The highways assessment of this site is unsound and inadequate. SAP15 4.160 fails to note that Liverpool Road, is a single lane road which becomes gridlocked with traffic from Kingsdown primary school twice a day</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	no comment
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	

Include files	
Local Plan Consultation Point	SAP35 - Land adjacent Courtlands (TC4S074)
Rep ID	SDLP1616
Rep Status	Processed
Consultee ID	1333374
Consultee Full Name	Linda Hedley (Clerk)
Consultee Company / Organisation	Ringwould with Kingsdown Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP35
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>AP34 & SAP35</p> <p>After careful consideration of the Local Plan (LP) and on hearing comments from the residents in both Ringwould and Kingsdown it is considered by the PC that the LP is unsafe.</p> <p>The village of Kingsdown is a small village of mainly small properties, it has an Article 4 on some areas of the village, some areas are in a conservation zone, and some of the village is also in an AONB.</p> <p>Yes, there is a small shop and a butcher, along with a small school, however there are no medical facilities and all health care requirements will only be accessed by private transport; this is not sustainable.</p> <p>The roads are narrow and there is no space for any mitigation to take place to alleviate this, therefore this will be contrary to any Traffic management within the Plan and the HELAA highways assessment has stated that it does not see an increase in any public transport; in fact, in recent weeks the PC have been notified of a reduction/removal of public transport. Again unsustainable, and the road from Kingsdown to the A258 is narrow, with local agricultural use of large tractors and trailers.</p> <p>The public realm would be severely affected, by unsafe roads, unsafe bridleways & PROWs and loss of open space. There appears to have been no assessments of the fauna or flora loss that would occur if the development was in the plan.</p> <p>Both sites are outside the village settlement and should be removed from the plan.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	That both sites are removed from the Local Plan

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	To emphasise the position of the PC
Include files	
Local Plan Consultation Point	SAP35 - Land adjacent Courtlands (TC4S074)
Rep ID	SDLP1753
Rep Status	Processed
Consultee ID	1252448
Consultee Full Name	Mr Mike Hawker
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP35
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I am writing to you reference the new Local Plan and two large proposed developments in Kingsdown. I believe these to be totally inappropriate. Our village infrastructure is woefully inadequate to support such developments. Kingsdown already has traffic problems and the local primary school is full to the brim. The cancelling of local buses for school and public will add to the problem. The disruption caused by these developments, particularly building materials and heavy plant deliveries, will be intolerable. The muck away will cause major problems on the narrow county lanes. From what I have seen this plan has not been thought through. No infrastructure conditions been given on planning. Like new schools, doctor surgery, and access roads.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP35 - Land adjacent Courtlands (TC4S074)
Rep ID	SDLP1765
Rep Status	Processed
Consultee ID	1267050
Consultee Full Name	Victoria Hughes
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP35
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails	To whom it may concern, (Without prejudice) I would like to object to SAP 34 for the reasons as specified below. These reasons also apply to SAP 35, 53 and 15 .

to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

The inclusion of SAP 34 is not legally compliant with NPPF 2021 item 11. (b)ii 'SPs should provide for objectively assessed needs for housing & other uses, . . . unless(ii) any adverse impacts of doing so would significantly & demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole'. SAP 34 Kingsdown p. 163: The selection of SAP 34 is totally unsound, on 5 different grounds..

Firstly the Highways Assessment of Ringwoud Road is inadequate and unsound as regards this site. The facts are that Ringwoud Road is signposted as unsuitable for long vehicles, unsuitable for vehicles over 7.5tonnes unsuitable for wide vehicles, the road is painted SLOW in 3 places despite the 50mph signs, and there are 4 sections where the road narrows to single lane passing. The 1400 voters in Kingsdown village (population 2000 + 500? more in summer months due to holiday village + campsite) are all dependent on the Ringwoud Road traffic flowing freely. So the selection of SAP 34 for any development is unsound firstly on the grounds of highways assessment unsoundness / inadequacy. Any development would cause dangerous gridlock, involving the cars of current residents, parents of children of the village primary school, construction vehicles and new residents' cars. It is a disgrace that KCC for years have refused to listen to requests to reduce the speed limit on this road and refused also to put in a kerbed pavement on the northern side of Ringwoud Road. The economy of the village depends on visitors and residents walking, cycling and horse-riding on the Ringwoud Road and any development of SAP 34 would increase the likelihood of fatalities exponentially.

The selection of SAP 34 is unsound secondly on the grounds of landscape character, being incompatible with criteria described above in SP 4. the site is on the skyline with sea behind, an iconic view that greets all people arriving in Deal; its selection contradicts the comments in SP4 on individual village identity and character. DM Policies NE2 (Natural Environment) p.285: It is 'sound' to designate the area inland from Kingsdown, west to Ringwoud, Ripple, Sutton, Studdal and Little Mongeham, south to Guston, as LCT F Open Arable Chalk Farmland with Woodland, F3 Ripple. But it is unsound, ineffective and contradictory to then ignore the designation when selecting the dangerously located chalk farmland of SAP 34 for development.

The selection of SAP 34 is unsound thirdly on the grounds that the Deal / Walmer conurbation of 30,000 depends on the narrow – single lane in places - Ringwoud Rd, carrying diverted traffic from the A258 every time A258 is blocked by an RTA or road works. The A258 is the only southern entrance to the 30,000 conurbation starting in Upper Walmer stretching to North Deal and Sholden. Diverted traffic is a dangerous nightmare for the village every time it happens, some diverted traffic uses Glen Rd / Liverpool road selected as site for SAP 15 Ray's Bottom in Walmer. This site too, if developed is likely to mean diverted traffic cannot get in / out of Deal /Walmer 30,000 conurbation. Neighbours working for emergency services say they oppose both developments for this reason. Unsound due to being incompatible with SP12, because its lanes periodically become part of the district Strategic Transport Infrastructure. Selection of these sites is completely unsound and non-compliant with all laws / planning regs relating to the prevention of accidents and protection of human life. SAP 34 would result in 'Traffic movements from the development resulting in severe impacts to the highway network that it would not be possible to mitigate', and as such contrary to SP4 2 j within the plan, thus unsound and highly ineffective.

The selection of SAP 34 is unsound fourthly on the grounds that it borders the AONB and is valuable arable farmland, needed in times when national food security is of concern. Moreover 4.238 needs correcting, the parish council-owned, biodiversity-rich site of the Lynch / and Freedown woods (that run into Oxney Court Woods) was the subject of a survey by Kent Wildlife Trust in 2017 commissioned by the Ringwoud w/ Kingsdown parish council and paid for by DEFRA, which provides evidence of the natural capital within the boundary of the AONB to be protected on the boundary of this site.

The selection of SAP 34 is unsound fifthly on the grounds that any development would remove a flood sponge on the top slope of the hill, below which is the Knight's Bottom pumping station and pond which drains towards Rays' Bottom SAP 15, so development here could contribute to flooding (see CC5 p. Flood Risk).

Any development of SAP 34 is not legally compliant with emerging government policy, see Mr Sunak statement 5 Dec 2022 announcing dropping of compulsory housing targets for LPAs (Local Planning Authorities such as DDC)'.

I would also like to object to SAP 35, 53 and 15 for the same reasons as above.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP35 - Land adjacent Courtlands (TC4S074)
Rep ID	SDLP1929
Rep Status	Processed
Consultee ID	1334333
Consultee Full Name	Mr Nigel Blundell
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP35
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SAP35 is unsound because: - <ul style="list-style-type: none"> The site was not in the Regulation 18 consultation, so denying time for public consultation This site is an iconic vista that appears on Kent tourism site to draw business to the area. To build on an AONB would be an act of philistine vandalism
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness	To avert the despoiling of an extraordinarily iconic seaside vista, allocate the five units (which would be in the £1 million bracket) to an already urbanized area, such as Whitfield.

matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP35 - Land adjacent Courtlands (TC4S074)
Rep ID	SDLP1794
Rep Status	Processed
Consultee ID	1331774
Consultee Full Name	Mr Simon Pollard
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP35
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I am a resident of Kingsdown. My concern is with the consequences of the housing developments at Woodhill Farm (SAP 34 - 50 dwellings) and Courtlands (SAP 35 - 5 dwellings), also adjacent developments at Ringwoud Alpines (SAP 53 - 10 dwellings) and at Rays Bottom, Walmer (SAP 15 - 75 dwellings). These are connected by Ringwoud Road between Kingsdown and Ringwoud,

by Glen Road between Kingsdown and Walmer (inland) and by Kingsdown Road between Kingsdown and Walmer (along the seafront). The first two, in particular, are narrow roads with inadequate width at many/most locations for passing traffic. Kingsdown Road is less restrictive. The number of dwellings will inevitably lead to increased car usage for Kingsdown village access, for school access, for work/employment access, for shopping and for general leisure access. There is no meaningful bus service to accommodate all these needs. Kingsdown Primary School will likely be the primary school of choice for the developments I have noted, putting particular strain on these roads. Children at secondary school (and those attending primary schools elsewhere) will all need to use these roads to move out of the referenced development areas. The whole village road network is generally narrow and unsuited for heavy traffic volumes. When discussing these aspects with DDC Planning representatives at the Deal open-day for the Plan, I was advised that the plan does not address these transport needs (and I have not found any text to contradict them.)

My main comment therefore is that a full traffic analysis must be made to ensure adequate provision for the daily needs of the developments. Access for construction traffic will be an immediate concern. While not directly related to the quoted paragraphs of the Infrastructure Plan, the village primary school is probably too small to accommodate the likely increase in demand. Road access around it does fall within the reference and is similarly restrictive already. Additionally, for Ringwould Road between Kingsdown and Ringwould there should be pavement(s) (or alternative footpaths) to provide a safe pedestrian route to access the main bus route along the A258 (the Dover-Deal road). The current road is unsafe for pedestrians and cyclists. The junction of Ringwould Road with the A258 will need to be enhanced to accommodate the increased traffic. Similar safe access will be required for Glen Road.

It is not clear to me how the narrow road network in Kingsdown can be modified to suit an increased volume of traffic. This might in itself be good reason to object to the developments, but a more positive attitude by the planners and developers is surely required?

(DDC note: This representation was originally made against the Infrastructure Delivery Plan consultation document but has been duplicated in relevant places against the Local Plan due to the specific site allocation references made)

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP35 - Land adjacent Courtlands (TC4S074)
Rep ID	SDLP1846
Rep Status	Processed
Consultee ID	1333706
Consultee Full Name	Cindy Crancher
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP35
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SAP34 not legally compliant with NPPF 20-21 item 11 DM policies NE2 (natural environment) P285 The chalk farmland of SAP34 is unsound/unsuitable for development. SAP34 is unsound on the grounds of landscape character being incompatible with criteria in SP4. SAP34 is unsound on the grounds that it borders the AONB and is valuable arable farmland. SAP34 – any development would remove a flood sponge on the top slop of the hill which drains toward Ray Bottom SAP15, so development here would contribute to flooding. SAP35 is unsound in that it involves loss of food producing farmland; destructive of the landscape character and it is in a BOA. SAP15 is unsound as incompatible with SP4; 3.71 separation of settlements. Also, it is incompatible with statements in SP14 relating to biodiversity connectivity. The highways assessment of this site is unsound and inadequate. SAP15 A.160 fails to note that Liverpool Road is a single lane road which becomes gridlocked with traffic from Kingsdown primary school twice a day.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness	no comment

matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP35 - Land adjacent Courtlands (TC4S074)
Rep ID	SDLP1966
Rep Status	Processed
Consultee ID	1333808
Consultee Full Name	Patricia Barrington
Consultee Company / Organisation	
Agent Full Name	Kingsdown Conservation Group
Agent Company / Organisation	Kingsdown Conservation Group
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP35
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SAP 35 I object to the selection of SAP35 – TC4S074 Land adjacent to Courtland as it is unsound, not legally compliant and has not illustrated a duty to co-operate

	<p>1 SAP35 was not in the consultation document regulation 18 and therefore has not been sufficient time for public consultation. 'Significant consultation has not been undertaken with the local community and key stakeholders'</p> <p>2.SAP35 has no information relating to the site or development proposals further illustrates that proposal SAP35 has not undergone consultation and engagement or sufficient scrutiny</p> <p>3.The location of SAP35 is outside of the Kingsdown residential boundary and is on agricultural 'a balance must be achieved to protect the character and heritage of the settlements as well as the surrounding countryside. Regulation 10 is not consistent with its own guidelines or those of the National Policy</p> <p>4.SP4 page 39 – separation of settlements – item 3.72 clearly states 'small settlements in close proximity to the three urban settlements of Dover Deal and Sandwich are particularly at risk of coalescence'. There is no justification to allow the breaching of the village boundary to allow SP35 to be developed on agricultural land.</p> <p>5.Needs words to support coalescence like creep along the fields to Walmer. To approve SAP35 is therefore a major contributor to coalescence.</p> <p>6.SAP35 is unsound as it is designated a Biodiversity Opportunity area. The SAP35 application even acknowledges it has an issue with Biodiversity but presumes it can dismiss it. As there is no information available relating to access has not undergone consultation and engagement or sufficient scrutiny.</p> <p>7.SAP35 is a huge site of for a declared capacity of 5 houses. It hugely luxuriously and expensive properties.to overarching objective from Central Government is to 'provide affordable accommodation, particularly for young people to get on the housing ladder and remain in the community where they work and where their families live.</p> <p>Extracts from the 24-page submission on DDC Reg 19 Local Plan Consultation, Dover and Deal Green Party. Focused on sites affecting Ringwould with Kingsdown Parish :</p> <p>SP4 Residential Windfall Development p.37: 3.71 separation oof settlements: unplanned erosion of countryside between confines oof settlements . . . therefore has the potential to have a serious adverse impact on the overall landscape character and on the individual identity of villages through loss of important elements of their setting or more seriously through coalescence. Around Deal particularly at risk. There is a contradiction between this strategic Policy 4 statement which is very sound and the inclusion of SAP35/35 and 15 in the Local Plan. Any development of any of those sites would compromise the 'individual identity' of Kingsdown Village and lead to coalescence of loss of identity. It is unsound and ineffective to a damaging extent, to list Kingsdown as being a 'Local Centre; a village providing services for a local rural area and a secondary focus for development in the rural area'.</p> <p>SAP35 is also unsound in that it involves loss of food producing farmland. Also, because it would be destructive of the Landscape Character. It is also unsound given that it is in a BOA Biodiversity Opportunity Area</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>I consider changes to the Plan to be the responsibility of DDC</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>to ensure a resident's voice is heard</p>

Include files	
Local Plan Consultation Point	SAP35 - Land adjacent Courtlands (TC4S074)
Rep ID	SDLP1819
Rep Status	Processed
Consultee ID	1333682
Consultee Full Name	Ms Carolyn Barber
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP35
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SAP35 is unsounds in that it involves loss of food producing farmland, destructive of the landscape character and it is in a BOA.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP35 - Land adjacent Courtlands (TC4S074)
Rep ID	SDLP1967
Rep Status	Processed
Consultee ID	1334285
Consultee Full Name	Mr Henry Paice
Consultee Company / Organisation	
Agent Full Name	Kingsdown Conservation Group
Agent Company / Organisation	Kingsdown Conservation Group
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP35
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>SAP 35</p> <p>I object to the selection of SAP35 – TC4S074 Land adjacent to Courtland as it is unsound, not legally compliant and has not illustrated a duty to co-operate</p> <ol style="list-style-type: none"> 1 SAP35 was not in the consultation document regulation 18 and therefore has not been sufficient time for public consultation. 'Significant consultation has not been undertaken with the local community and key stakeholders' 2.SAP35 has no information relating to the site or development proposals further illustrates that proposal SAP35 has not undergone consultation and engagement or sufficient scrutiny 3.The location of SAP35 is outside of the Kingsdown residential boundary and is on agricultural 'a balance must be achieved to protect the character and heritage of the settlements as well as the surrounding countryside. Regulation 10 is not consistent with its own guidelines or those of the National Policy 4.SP4 page 39 – separation of settlements – item 3.72 clearly states 'small settlements in close proximity to the three urban settlements of Dover Deal and Sandwich are particularly at risk of coalescence'. There is no justification to allow the breaching of the village boundary to allow SP35 to be developed on agricultural land. 5.Needs words to support coalescence like creep along the fields to Walmer. To approve SAP35 is therefore a major contributor to coalescence.

	<p>6.SAP35 is unsound as it is designated a Biodiversity Opportunity area. The SAP35 application even acknowledges it has an issue with Biodiversity but presumes it can dismiss it. As there is no information available relating to access has not undergone consultation and engagement or sufficient scrutiny.</p> <p>7.SAP35 is a huge site of for a declared capacity of 5 houses. It hugely luxuriously and expensive properties.to overarching objective from Central Government is to 'provide affordable accommodation, particularly for young people to get on the housing ladder and remain in the community where they work and where their families live.</p> <p>Extracts from the 24-page submission on DDC Reg 19 Local Plan Consultation, Dover and Deal Green Party. Focused on sites affecting Ringwould with Kingsdown Parish :</p> <p>SP4 Residential Windfall Development p.37: 3.71 separation oof settlements: unplanned erosion of countryside between confines oof settlements . . . therefore has the potential to have a serious adverse impact on the overall landscape character and on the individual identity of villages through loss of important elements of their setting or more seriously through coalescence. Around Deal particularly at risk. There is a contradiction between this strategic Policy 4 statement which is very sound and the inclusion of SAP35/35 and 15 in the Local Plan. Any development of any of those sites would compromise the 'individual identity' of Kingsdown Village and lead to coalescence of loss of identity. It is unsound and ineffective to a damaging extent, to list Kingsdown as being a 'Local Centre; a village providing services for a local rural area and a secondary focus for development in the rural area'.</p> <p>SAP35 is also unsound in that it involves loss of food producing farmland. Also, because it would be destructive of the Landscape Character. It is also unsound given that it is in a BOA Biodiversity Opportunity Area</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>I consider changes to the Plan to be the responsibility of DDC</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>to ensure a resident's voice is heard</p>
<p>Include files</p>	

Local Plan Consultation Point	Shepherdswell
Rep ID	SDLP366
Rep Status	Processed
Consultee ID	1263106
Consultee Full Name	Mr Mark Norcliffe
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	1) Local Centres : Paragraph 4.209 and following, with specific reference to Shepherdswell and 2) Housing Site Allocations : paragraph 4.242 and following, with reference to site SAP36
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>1) LOCAL CENTRES</p> <p>Shepherdswell is designated as a local centre [para 4.209], alongside Eythorne & Elvington, Eastry, Ash, Wingham, St Margaret's and Kingsdown. This paragraph contains a particularly egregious error in stating that <i>"Shepherdswell is located to the north of Dover just to the west of the A2."</i> Shepherdswell, in fact, lies to the east of the A2, and it is distressing that a Local Plan could be so geographically inaccurate.</p> <p>Unfortunately, this is not the only inaccuracy in assessing Shepherdswell as a "local Centre." When this exercise was first presented under the Regulation 18 consultation, various mistakes in the scoring of Shepherdswell were identified and reported by consultees. It appears that only some have these have been corrected in the latest draft. The following errors and inconsistencies remain :</p> <ul style="list-style-type: none"> • The local bus service is described as "infrequent" in para 5.1 of the Rural Settlement Hierarchy Supporting Document, but has been strangely up-graded to "regular daily" in the scores table presented in para 5.2. There is also no acknowledgement that two services have subsequently been withdrawn • The "pop-up" Post Office which visits the village briefly on two days per week is accorded the same score as permanent Post Offices in other villages • Two points are "awarded" for unspecified services, without further explanation • There is no recognition that neither the local pub nor café serve food in the evening <p>In para 4.4 of the document, it is acknowledged that the village survey data is taken from the Council's Authority Monitoring Report of 2018/2019, which was not up-dated due to Covid restrictions, and they have relied on Parish Council input for any up-dates and corrections. Such an ad-hoc approach to data collection and verification is neither reliable nor sound.</p> <p>The Settlement Hierarchy scoring system only records the "advantages" of the different communities ; there is no consideration of the negatives. In that context, the road infrastructure for Shepherdswell and Eythorne/Elvington is markedly inferior that of the other "local centres." The other</p>

centres are either directly crossed by main “A” roads, or have such roads in close proximity and running parallel to the main axis of the community – thereby providing easy access.

All access to Shepherdswell and Eythorne/Elvington is by small rural lanes, particularly the narrow, tortuous and congested road known variously along its course as Coxhill, Eythorne Road, Shepherdswell Road, Wigmore Lane and Barville Road. The problems with this route are well known, but are almost wholly ignored in the draft Local Plan. Indeed, the silence of the Plan on the critical subject of the area’s rural road network is another example of why it is “unsound.”

2) HOUSING SITE ALLOCATIONS

In the previous version of the draft Local Plan, submitted for Regulation 18 consultation, two large sites (then designated SHE003 and SHE004) were ear-marked for housing development. Whilst it is pleasing to see that SHE003 has now been dropped, it is illogical and unsound to that the other site (now renamed SAP36) has been retained, and, indeed, quietly enlarged, even though it was opposed on the same grounds as SHE003.

SAP36 has, in fact, been considered – and rejected – for housing development in the past, with previous DoE inspectors highlighting the potential damage to the landscape and environment, and the problems with the transport infrastructure. Over the years, the environmental issues have not changed, but the transport problems have got worse.

The proposed access to SAP36 would be via St Andrew’s Gardens. St Andrew’s Gardens can only be accessed from Mill Lane. Mill Lane itself, at its north-eastern end, is a narrow single track lane, whilst, at its south-western extremity, it connects, at the village green, with the narrow and congested Church Hill and the small back road from Coldred. It is, therefore, impossible to access St Andrew’s Gardens other than by single-lane, constricted roads that are inadequate for existing levels of traffic. St Andrew’s Gardens currently contains approximately 50 dwellings, meaning that the planned development would double the volume of traffic needing to use this route. An on-site traffic survey conducted on 11 November 2022 suggested that, based on current volumes, an extra 250 vehicles would enter/leave St Andrew’s Garden’s during peak times. In rejecting a previous planning application, a DoE inspector wrote that “the layout of St Andrew’s Gardens is too constricted and too tortuous to provide free and safe access to any considerable number of dwellings.” Nothing has changed since that comment was made.

It has also become clear that the actual carriageway within St Andrew’s Gardens itself was constructed to a very basic standard, and, as a result, the tarmac surface is noticeable pitted and pot-holed, and in need of regular repair. It is inadequate for current levels of usage, and would not be capable of supporting a doubling of traffic volumes, nor, indeed, the passage of the heavy machinery that would inevitably be part of any construction project.

The draft Local Plan, in its existing form, makes no attempt to address these issues, although they have been extensively explained in the past.

The traffic problems are not confined to the immediate vicinity of the proposed development site. Vehicular access to Shepherdswell is, with the exception of a couple of small country lanes, confined to the road running from the A2, just west of the Lydden junction, through the villages of Shepherdswell and Eythorne to the A256, south of Tilmanstone, and known variously along its course as Coxhill / Eythorne Road / Shepherdswell Road / Wigmore Lane / Barville Road. This road is itself a minor route – narrow, frequently tortuous, beset by poor sight lines, and, in many places, unable to accommodate two lines of traffic at the same time. It is deemed unsuitable for heavy goods vehicles. The road is already over-used and heavily congested, with daily instances of traffic queuing at the various bottlenecks, and the occasional “confrontation.” The local topography and the proximity of existing dwellings to the road’s edge excludes any possibility of a significant up-grade.

This is the same route that would have to serve the 300 new houses proposed for Eythorne and Elvington (SAP28 and SAP29).

The draft plan blandly suggests that “a review of the impact on the surrounding rural road network” should be undertaken as part of any planning application. Surely, any review should be conducted **before** the sites are accepted for possible development.

Similarly, alongside the transport infrastructure problems, any substantial housing development in Shepherdswell would put extra strain on a sewerage and waste water system that is already unable to cope, a local primary school that is currently over-subscribed, and a doctor’s surgery that is having to send patients to Dover for treatment. Again, the draft local plan is silent on how such problems can be handled.

It is again necessary to draw attention to inaccuracies and misinformation contained on the Plan’s evidence base. For example, the Sustainability Appraisal Appendix contains – in more than one place – the assertion that site SAP36 is within 500 metres of the local railway station. It is not. GPS data clearly shows that it is almost one kilometre from the site to the station utilising the most direct road and footpaths.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness

- Correction of persisting errors in the Local Centre scoring system, and correction of errors in the evidence base
- Recognition of not only the advantages, but also the negatives, in assessing whether a community qualifies as a Local Centre (e.g. deficiencies in the local infrastructure)

matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	- The removal from the Plan of site SAP36 as a suitable location for future housing development.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	In the responses to the Regulation 18 consultation of the draft Local Plan, numerous inaccuracies and mistakes were reported to DDC. These were not matters of opinion, but matters of fact. It has become apparent that not all of these have been corrected in the document now under consultation. I am not, therefore, confident that the Council can be relied upon to present to the Inspector a document that is 100% accurate, and that members of the local community must have the opportunity to challenge such failings in a public forum.
Include files	
Local Plan Consultation Point	Shepherdswell
Rep ID	SDLP660
Rep Status	Processed
Consultee ID	1331648
Consultee Full Name	Robert Stevenson
Consultee Company / Organisation	Canterbury Diocesan Enterprises Limited
Agent Full Name	Robert Stevenson
Agent Company / Organisation	Canterbury Diocesan Enterprises Limited
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Paragraph 4.241, Figure 4.11 and Table 4.8 Housing Site Allocations in Shepherdswell.
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Omission of land at Shepherdswell Glebe as a housing allocation. The site is identified in the associated Maps, Plans and Images Document. The Local Plan makes the case for additional housing development at Shepherdswell, which is designated as a Local Centre. The Glebe site could deliver a further 30 dwellings bringing the total to be allocated to 100.

	<p>The 2.5 hectare site would be a logical extension to the village. It has clear development potential for 30 houses.</p> <p>It is a gently sloping, arable field with peripheral structural vegetation. It has a very long frontage onto Coldred Road and a separate pedestrian access to the centre of the settlement.</p> <p>The proposed development is achievable, suitable and deliverable.</p> <p>Development would complement its setting and deliver excellent connectivity with the established community.</p> <p>There is a unique opportunity to reinstate the historical field boundary and create a wildlife corridor.</p> <p>There is an acute problem of lack of off-street parking in Shepherdsweil which causes inconvenience, congestion and pedestrian-vehicle conflict when traffic is only slightly above average. The proposed development could make provision for overspill parking.</p> <p>The northern section is scrubby grazing with strong boundary vegetation and the southern section forms part of a featureless arable field. There is scope to create a strong southern boundary by recreating hedgerow as part of strong structural landscaping around the site.</p> <p>There is scope to create a new principal vehicular access point away from the village green with its awkward junctions.</p> <p>There is a strong case for new village housing at Shepherdsweil in terms of benefits to the village and neighbouring communities and to the District as a whole in achieving a more balanced spread of deliverable sites for new homes.</p> <p>The site now put forward to the south of the village is the 'natural' location for new village housing. It would round-off development and create the opportunity to reinstate hedgerows as many were grubbed out sometime after WW2. The development would meet all of the principles of sustainable development and deliver a good degree of connectivity with the existing community and the surrounding footpath network. An allocation of 30 houses would assist in sustaining and supporting local services as well as contributing towards meeting housing needs with an array of appropriate sites across the District. There is also the opportunity to resolve the long running car parking problem in the village. It should therefore be included as a housing site in the District Local Plan.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Allocate land at Shepherdsweil Glebe for housing with an indicative capacity of 30 units and requirements for strong structural landscaping and the delivery of off street parking to serve the wider community.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>Shepherdsweil Glebe Maps Plans Images Reg 19 Dover DLP Dec 2022.pdf</p>
<p>Local Plan Consultation Point</p>	<p>Shepherdsweil</p>
<p>Rep ID</p>	<p>SDLP713</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331817</p>
<p>Consultee Full Name</p>	<p>Mr Shaun</p>

	Williams
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Traffic and the local road networks through and around Shepherdswell
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Traffic and the local road network</p> <p>Comments regarding poor access via single track roads with passing places to and through Shepherdswell have been made by numerous individuals and various points of the consultation process and in response to the current planning application at St Andrews Gardens. Such concerns do not only relate to the proposed development within Shepherdswell but also include the <u>scale of proposed local development</u> in the surrounding villages that will increase the burden on the local road network.</p> <p>There are obviously concerns not just locally but also within DDC and KCC highways in relation to the burden on the local road network, as the local plan Regulation 19 quotes that for sites SHE006 (Botolph street Farm 10 dwellings) and SHE008 (Land off Mill Lane 10 dwellings) under Site Specific issues and Requirements states a "Transport Statement. This must take into account the cumulative impact of this, and other sites allocated in this Plan on common road links."</p> <p>This criterion is not mentioned for the proposed 50 dwellings at SHE004 and the revised extension to this TC4S082. In fact in the current planning application 22/0127 for SHE006 the applicants Highways Statement quotes "2.1.2 The proposed development of the site does not warrant a full Transport Assessment in accordance with the National Planning Policy Framework (NPPF) as the site will not generate significant traffic flows. The site falls below the Department for Transport 'Guidance on Transport Assessments' that suggests a threshold of 80 units of C3 Land use requiring a full assessment."</p> <p>Why has the site at Saint Andrews Gardens not been identified as requiring analysis of the "cumulative impact of this and other sites allocated in this Plan on common road links." Especially as we see potential developers already trying to avoid this.</p> <p>The logic of placing the onus of individual sites to ascertain "the cumulative impact of their development and other sites allocated in this Plan on common road links" seems unsound. Will this not result in a first come first serve rush as the burden on local roads increases. Or possible a stale mate where each site reaches the conclusion that the local road network cannot support the level of development proposed. Surely this will also result significant duplication with each site completing the same piece of work. Is it not the purpose of the Plan to allocate proposed sites on the bases that they are suitably located and dispersed to ensure that the impact on local services and road networks can sustainable the impact and that where discrepancies are noted that mitigation is taken in advance of an issue manifesting?</p> <p>The regulation 19 Transport modelling forecast Report (70089926 dated October 2022) 9. External Local Plan Sites 9.1 Introduction (incorrectly labelled in footer as page 239 of 239) acknowledges that for sites outside the DDTM study area modelling has been completed in significantly less detail. 9.1.2 goes on to explain that excel modelling has been used. 9.2.3 states that automatic and manual counts were completed during November and December 2019 and 9.2.4 states the detail of these surveys are shown in table 9-1 and figure 9-1. Table 9.1 is titled 2019 Data Collection (although some of this data was collected in October 2021) There are errors dates on lines 22 to 25 5/10/21 -7/19/21 (paragraph 9.2.6 explains that further manual counts were undertaken in Eythorne between 5/10/21 and 7/10/21).</p> <p>I note the bulk of the traffic data is now three years old. Government guidelines in respect of the preparation of local plans states "Is the evidence base sufficiently up-to-date? 1.12. Evidence base documents, especially those relating to development needs and land availability, that date from two or more years before the submission date may be at risk of having been overtaken by events, particularly as they may rely on data</p>

that is even older. As a minimum, any such documents should be updated as necessary to incorporate the most recent available information. But this may not be necessary for evidence documents on topics that are less subject to change over time, such as landscape character assessments.” (extract from Procedure Guide for Local Plan Examinations - GOV.UK (www.gov.uk) as updated February 2022)

From Figure 9.1 it appears that no traffic surveys were undertaken in Shepherdswell. 9.2.33 identifies only one key junction within Eythorne and 9.2.34 states that KCC raised concerns regarding additional anticipated flow on Shepherdswell road due to the narrow rural nature of the road. Traffic traveling from the A2 to Eythorne converges at the junction of Coxhill, Churchill, Eythorne Road and Westcourt Lane which due to the parking at the COOP lack of footways and narrowing bend at the rail crossing. Traffic at this point is combined with that of Shepherdswell and is equally in not more important than the junction in Eythorne.

9.2.34 also details speed, distance and time from the Church Hill / Shooters Hill junction in Eythorne **it incorrectly quotes the speed as 64 Kph much of this route is through 30mph and 40mph limits? Distance 2.13Km its 4.5Km or 2.8 miles? And time 2 minutes Goole maps suggests 6 minutes?**

Due to the errors, age of the data and omission of specific physical survey data relating to the Coxhill, Churchill, Eythorne Road and Westcourt Lane junction in the regulation 19 Transport modelling forecast Report (70089926 dated October 2022). It cannot be considered as sound source of in respect of the cumulative impact on the local roads from development both within Shepherdswell and the surrounding villages.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Transport modeling for the local roads through and around Shepherdswell should be current (less than two years old) and consider all proposed housing land allocations that will impact on the local road network. The information in the modeling should be accurate and consider appropriate pinch points (for example the junction of Coxhill Road, Church Hill, Eythorne Road and West Court Lane).

If the modeling shows that the current road network cannot support the increased traffic flows mitigation should be identified and modeled to ensure it alleviates any issues or land allocations in the area should be reduced to a level where the local road network can cope.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Local Plan Consultation Point

Shepherdswell

Rep ID

SDLP1698

Rep Status

Processed

Consultee ID

1252327

Consultee Full Name

Mr
Guy
Osborne

Consultee Company / Organisation

Agent Full Name

Agent Company / Organisation

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Omission Site Shepherdswell (SHE003)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Full Representation attached to SDLP1698. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1698.)</p> <p>Introduction</p> <p>1.1 Country House Homes Limited thanks Dover District Council for setting a 7-week period for its Local Plan Review Regulation 19 Public Consultation from 21st October 2022 to 9th December 2022.</p> <p>1.2 Country House Homes Limited is a Kent based property developer with a good understanding of the Borough and its spatial arrangement. The directors of the company live in and come from Kent, therefore we have a good knowledge of the district and are well placed to express valid opinions on the housing, employment and social strategies promoted within the Local Plan Review.</p> <p>1.3 Country House Homes Limited are the promoter of site SHE003, Land to the north of Westcourt Lane. This site was allocated as part of the Regulation 18 stages of the Local Plan Review for 100 homes. This site has since been removed following the findings of the Dover District Housing and Employment Land Availability Assessment of September 202, which found that the site was not suitable 'due to highway safety concerns raised by KCC'. We are of the opinion that this assessment of the site is flawed and that the removal of this site is unsound.</p> <p>2.0 - Country House Homes Regulation 19 Representations Summary of Findings</p> <p>2.1 Country House Homes Limited submit the following in regard to the District Council Local Plan Regulation 19 Public Consultation December 2022.</p> <p>2.2 Our representations upon the Local Plan find that the Local Plan is not Legally Compliant and is Unsound.</p> <p>2.3 We are of the view that the plan is not legally compliant given that the Plan fails to adopt a robust spatial strategy.</p> <p>2.4 We are of the view that the plan is unsound given that it is not positively prepared, it is not justified, it is not effective and it is not consistent with national policy.</p> <p>2.5 The plan is unsound because it has failed to employ a spatial strategy that is sufficiently robust and fails to deliver the required housing growth in the right locations.</p> <p>2.6 Our proposed Modifications to the Local Plan Review are outlined within our responses below where we fully address how Modifications are required to the Local Plan to render the Local Plan Legally Compliant and Sound, however, to summarise please see the points below;</p> <p>2.6.1 The Whitfield Garden Village/Urban Expansion is an inappropriate location for housing growth given that it would cause irreparable landscape harm, leave future residents isolated from established sustainable centres and</p>

result in affordable housing residents being isolated from their locations of origin. The proposed housing delivery here should be reduced by at least 800 homes. 2.6.2 The Council is demonstrating an over reliance on the Whitfield expansion, which will harm the A2 highway network and result in neglect to its established Rural Service Centres and Local Centres. The reduction of units by 800 homes will allow the Council to properly mitigate the perceived harm.

2.6.3 The Council is under-providing homes at Shepherdswell and has ignored an opportunity to significantly improve highway safety and capacity to the Coxhill Road and Westcourt Road routes from the A2 to Shepherdswell, Eythorne and Elvington.

2.6.4 A highly sustainable site (HELLA Site SHE003) with direct pedestrian and cycle connectivity to Shepherdswell Train Station has been ignored, even though the proposal brings forward much needed Affordable Housing, a 6Ha Public Access Local Nature Reserve and Highway Enhancements.

2.6.5 The Council should Allocate HELLA Site SHE003 for 130 new homes and attain the associated benefits of Housing Delivery, Affordable Housing Provision, Public Transport Access and Highway Enhancements

3.0 Policy SP3 – Housing Growth

(DDC Note - Section DUPLICATED onto SP3)

3.1 In our view the Spatial Strategy adopted by Dover District Council is flawed by virtue of;

3.1.1 The new housing provision to the Secondary Regional Centres of Dover and Whitfield, makes up some 60.5% of Housing Allocations across the borough, providing a minimum of 3,381 homes. Policy SP3 states that the majority of housing will be in Dover Town and at Whitfield. While this is the case, 60.5% of the District's growth located either in Dover or adjacent to Dover at Whitfield, is not a sustainable strategy for the District's Growth going forward.

3.1.2 This level of Growth in a single location over an 18 year period from 2022 to 2040 would not only result in an oversupply of housing within Dover, most likely resulting in the sales of these homes to struggle. Additionally, from these Regulation 19 alterations housing delivery in Rural Service Centres and Local Centres has fallen by 7% of the total allocations within the Borough. This will lead to an undersupply of housing in these areas, negatively affect residents who wish to remain within the villages in which they are brought up within and a subsequent further increase in housing prices to these locations.

3.1.3 The changes from the Regulation 18 version of the Local Plan Review to Regulation 19, have resulted in 530 fewer homes in Rural Service Centres, 195 fewer homes in Local Centres and 95 fewer homes in Larger Villages.

3.1.4 These revisions will result in 820 less homes within the Rural Locations of the District. This will sufficiently harm the growth of the Borough going forward in the Plan Period and does not meet with the outlined Spatial Strategy at SP3. We would argue that 60% of housing located in the Secondary Regional Centre,

while representing a 'majority' of new housing development, is an excessive amount of housing growth in one location, that will prove to be undeliverable at the annual rate advocated by the Council.

3.1.6 It is commonly accepted that urban expansions that are akin to Garden Village scale proposals will not deliver at the rate the Council expects due to the quantum of new homes being located in one location, where developments will compete against each other for housing sales.

3.1.7 Additionally locating the relevant proportion of affordable homes within the Whitfield expansion area will lead to future residents being isolated from Dover centre and again prevent residents from being able to remain within the villages

from which they are from.

3.1.8 Given that Rural Services Centres are noted as being 'the secondary focus for housing development' we are unable to countenance as to why such low numbers of new homes have been identified within the Allocated Sites for these highly sustainable locations.

3.1.9 Para's 68 & 69 of the NPPF states;

Para 68. Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

- a) specific, deliverable sites for years one to five of the plan period³⁴; and
- b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.

Para 69. Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:

- a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;
- b) use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward;
- c) support the development of windfall sites through their policies and decisions –

giving great weight to the benefits of using suitable sites within existing settlements for homes; and d) work with developers to encourage the sub-division of large sites where this

could help to speed up the delivery of homes.

3.1.10 It is our opinion that the Council is not able to identify sites in accordance with Para 69 of the NPPF given that the sites identified have not been proven to be deliverable or viable, as required under Para 68 of the NPPF.

3.1.11 It is important to refer to analyse the build-out rate to Garden Villages of the 2000+, noting that this scale of delivery is accepted as being 130 per annum when there are more than 3 outlets operating at one time. This is evidenced by the Lichfields Feb 2020 'Start to Finish' document at Page 14, a copy of which is attached at Appendix 1 below.

3.1.12 Given our understanding of delivery, evidence provided by Lichfields and the historic slow rate at which homes are delivered within the urban area of Dover, we are of the view that the proposed strategy is unsound, that the Council has too great a reliance on the Whitfield urban expansion and that greater focus to Rural Services Centres, Local Centres and Larger Villages is required to meet the Housing Land Supply for the Plan Period.

Shepherdswell – Local Centre

3.1.13 Country House Homes Limited are the promoters of HELAA Site SHE003, as identified by the location plan shown below.

3.1.14 The above land lies within the parish of Shepherdswell, on the north-west side of the village centre, approximately 450m from the centre of

Shepherdswell village. 3.1.15 Shepherdswell is a designated Local Centre within the Dover District and being a Sustainable Settlement and should be identified for greater growth than the 70 homes that have been identified within the Reg19 version of the plan.

3.1.16 The majority of the site is currently arable land directly abutting the existing settlement boundary of the village to the south of the site and abutting the Dover-Canterbury Railway Line to the east of the site. Within the north-east portion of the existing site there is a natural woodland separating the site from wider arable land to the north.

3.1.17 The proposed development would take vehicular access from Westcourt Lane via a proposed road widening and new junction. A new 3m wide pedestrian/cycleway access directly to Shepherdswell Railway Station is provided to the north-east of the site.

3.1.18 The existing site has a sloping topography, rising from its abutment to Westcourt Lane in the south to a higher elevation in the north where the north portion of the existing site has a natural woodland which is retained by the proposed development.

3.1.19 The total site area is 12.1Ha of which 6Ha is dedicated to a new Local Nature Reserve populating the west and north sides of the proposed residential development. The proposed Local Nature Reserve is to be planted in a parkland style with significant new tree and understory planting as well as ecology enhancements and new pedestrian pathways.

3.1.20 The remaining developable area of the site equates to 6.1Ha, which can provide 100 new homes to the lower elevations of the site at a housing density of 16 dwellings per hectare, a low housing density as is appropriate for this edge of settlement location.

3.1.21 The proposed Master Plan shown below includes a widening to Westcourt Lane in order to facilitate the proposed new junction, to accommodate the location of the local bus stop within the existing single lane carriageway and to improve highway safety within the street.

3.1.22 Westcourt Lane, at its frontage to the subject site is currently a single lane roadway which opens out to a two lane roadway at 50m to the east of the subject site. The roadway has a 30mph speed limit and the approach to the subject site from the west has a 'gateway' into the village showing the change in speed limit from 60mph to 30mph.

3.1.23 The locational sustainability of the site is very good. It is located some 450m from the village centre and has a bus stop directly outside of the subject site in Westcourt Lane and has direct pedestrian and cycle access to Shepherdswell Train Station. Access to essential services is very good with nearly all daily/weekly required services being located in Shepherdswell.

3.1.24 The site itself is not protected by any landscape designations and the site already has residential development abutments to its south, and west boundaries. The introduction of a new natural woodland to the east and north boundaries will largely screen and protect the landscape to the east and north from the impact of development. Given the site location, surrounding uses and the proposed landscape enhancements the site is very well positioned from a landscape sustainability viewpoint.

3.1.25 The development site has been subject to professional surveys including topographical, ecology, arboriculture, geology and protected species.

3.1.26 The key issue that has led to Dover District Council removing this site from the process is Highways, however we have already demonstrated to the

	<p>Council and to KCC Highways how the main routes of Westcourt Road and Coxhill Road can be improved, widened and controlled to safely manage the highway capacity, highway traffic flow and highway safety matters that caused concern, as shown in our Shepherdswell Highway Analysis & Enhancement Proposals attached at Appendix 2.</p> <p>3.1.27 This document was first shared with the Council & KCC Highways during in December 2020 and was further promoted during 2021.</p> <p>3.1.28 The proposals provide the Council with the opportunity to significantly improve the highway routes from the A2 to Shepherdswell which would not only aid the transport movements for Shepherdswell but would also significantly improve access to Eythorne and Elvington where additional housing growth has been identified. These other villages, identified for some 355 new homes rely heavily on the Coxhill and Westcourt Road routes to the A2.</p> <p>3.1.29 We are of the view that the Council has missed a significant opportunity here, that would make the site allocations of Shepherdswell, Eythorne and Elvington robust in highway terms and well as providing an appropriate level of housing growth in Shepherdswell.</p> <p>3.1.30 Consequently we find the Local Plan to be unsound in regard to the site allocations and highway transportation matters. We recommend that; HELLA Site SHE003 be reinstated to the Local Plan and that our Highway Enhancement Proposals are adopted by the Council in order to provide Soundness to the Local Plan.</p> <p>Appendix 1 – LICHFIELDS FEBRUARY 2020 START TO FINISHGUIDE ON BUILD OUT RATES FOR LARGE SCALE SITES</p> <p>Appendix 2 – COUNTRY HOUSE HOMES LTD SHEPHERDSWELL HIGHWAY ANALYSIS AND ENHANCEMNT PROPOSALS</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>Osbourne Email 1149 Att1_Redacted.pdf</p>

SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House, Shepherdswell (SHE004/ TC4S082)

Local Plan Consultation Point	SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House, Shepherdswell (SHE004/ TC4S082)
Rep ID	SDLP30
Rep Status	Processed
Consultee ID	1259309
Consultee Full Name	Mr Peter Jull
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP36
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Offsite open space is only nearby if direct access is provided otherwise it is a long walk round the road.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	At l. policy wording needs to be extended ...subject to a direct access footpath being provided.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House, Shepherdswell (SHE004/ TC4S082)
Rep ID	SDLP219
Rep Status	Processed
Consultee ID	1331262
Consultee Full Name	Mrs Gill Vaughan
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP36
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SAP 36, SHE004, TC4S082, SAP37 A full species and habitat survey has not taken place, which should take place over a full 12 month period, 24 hours day and night. A wintering bird survey must also be undertaken, again 24 hours every day. The ancient pilgrim trail between Canterbury and Rome must be fully acknowledged and totally protected.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	SAP 36, SHE004, TC4S082, SAP37 to make this proposal legally compliant in Shepherdswell, there needs to be access to the Village by roads which are NOT single track with passing places the provision of pedestrian pathways must be made. All roads leading into the Village and the proposed development are not safe or adequate for the additional traffic which will result in additional houses. All roads into the village are Single Track. The water pressure issues in that area must be addressed - a water supply is a basic human need. And the sewage/waste water problems which have existed in the lower part of the village for over 40 years must also be addressed. Extra waste water cannot be accommodated by the present system. There are no local jobs, therefore the new residents would need cars to get to their jobs and the roads into and out of the village do not have that capacity. There is no regular reliable bus service and what is already in place is under threat of removal. The train station provides one train per hour each way. If the track between Dover and Folkestone suffers another rockfall, this will not be repaired and Dover will become just a branch line. The fast track bus system from Whitfield would not be used for the purpose of getting a fast train from Dover to London.

	No fast link to London, equals more cars on the roads which is against government policy of reducing vehicle traffic and carbon emissions CC1.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House, Shepherdswell (SHE004/ TC4S082)
Rep ID	SDLP386
Rep Status	Processed
Consultee ID	1331556
Consultee Full Name	Mr Mark Webb
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP36 and TC4S082 land to north and East of St Andrews gardens
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The consultation does not conform to the statement of community involvement. No attempt has been made to discuss the impact of TC4S082 recently added to the plan with the most involved or the known local interest group (SAD). It does not meet the sustainability assessment SA10 or landscapes impact assessment SA11. The sustainability report admits a substantial wildlife impact(7.205) with loss or damage to habitats. This area is a 'Red-high' site for migrating birds. What can possibly mitigate against this during a bird flu epidemic, a sign telling them to fly to another location!</p> <p>The DDC has failed to keep in contact with local residents, some receive letters others nothing. The website is sometimes unavailable, login greyed out, documents including others comments unavailable to view. I requested a paper copy of the plan, I was quizzed as to how many would be using it and when told it would be shared with neighbours accepted. No such document has been received and I do not expect it will by the due date. Proving a reluctance to consult and involve the local community.</p>

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House, Shepherdswell (SHE004/ TC4S082)
Rep ID	SDLP491
Rep Status	Processed
Consultee ID	1331713
Consultee Full Name	Woodchurch Property (BK) Ltd
Consultee Company / Organisation	Woodchurch Property (BK) Ltd
Agent Full Name	Rosie Dennis
Agent Company / Organisation	DHA Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House, Shepherdswell (SHE004 & TC4S082)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The allocation is for the development of approximately 50 new dwellings across the entire site. Woodchurch Property (BK) Ltd support the proposed allocation of the site for residential development but object to components of the draft policy. Woodchurch raise an overarching objection to the combination of this site (ref. TC4S082) with the land to the north and east of St Andrews Gardens (ref. SHE004). The principle reasons as to why Woodchurch would suggest that the sites should not be combined for the purposes of the allocation have been summarised below:

- Promotion – as far as we are aware, neither party has promoted the sites on the basis of a combined allocation or delivery. The amalgamation of the sites has been proposed unilaterally by the Council, contrary to the Call for Sites submissions.
- Land ownership - the northern section of the site allocation (ref. SHE004) is under separate land ownership to the land to the south (ref. TC4S082). This would have implications on any future development in terms of deliverability and certainty of development coming forward.
- Delivery – Woodchurch are the chosen developer for site ref. TC4S082 and have prepared a development proposal, as summarised in Section 2, above. The proposal is being prepared as part of a planning application that is anticipated to be submitted in the near future and which has benefitted from pre-application discussions with the LPA. Whilst the land to the north is being promoted, we have not been made aware of the preparation of a separate application for that parcel and therefore cannot guarantee that development will come forward on this site. There has been no discussion between the parties to date. This has implications for the Council with regards to housing land supply and target delivery.

Whilst the draft wording of the policy seeks to avoid a ransom situation with regards to access, that alone is not considered to be sufficiently robust as rights of access over land are not solely governed by Town and Country Planning. The allocation as drafted therefore does not guarantee delivery of the Mill House land. Notwithstanding this, delivery of the Mill House land is wholly dependant upon prior delivery of the remainder of the site, which is outside the control of the Mill House land owners. The drafting therefore fails to guarantee delivery of the Mill House site, a position which is avoidable and unnecessary given that it benefits from its own deliverable and suitable access.

The southern site (TC4S082), in isolation, is immediately available for development and allocating as two separate sites would therefore increase certainty for the Council in relation to the delivery of the number of dwellings required through the allocation.

- Access & Highways – the draft combined allocation would require all c. 50 dwellings to be accessed via St Andrews Gardens. If these were split as proposed, this would lessen the impact upon existing residents at St Andrews Gardens. As confirmed above, the Mill House land is capable of being accessed via Mill Lane and would not be reliant upon achieving access via St Andrews gardens.
- Quality of Development – Woodchurch have prepared a development proposal on the basis of the area of land available to the south. The development proposal offers 10no. new dwellings that would be of a density and design approach that is consistent with the location of the site on the settlement edge. Woodchurch would not have control over the form of development proposed to the north and should the sites have to come forward together, it would be considered detrimental to the scheme proposed thus far. Furthermore, the allocation as drafted would necessitate access through the existing and established landscaped northern boundary of the Mill House site, which would give rise to negative landscape and biodiversity impacts. As above with regard to access, these impacts are unnecessary and unavoidable given the site can be developed in isolation, preserving that boundary. Quality of future development of the sites can still be secured through two separate allocations. If both are allocated, it would be reasonable to include wording in each policy that requires any scheme to demonstrate regard to the future delivery of development on the adjacent site and ensure that development in no way precludes future effective development of that site.

In view of the above, it is requested that the two sites are separated as shown in the attached representation.

The draft policy also includes a number of criteria which we are able to respond to directly, as below.

- 1 The existing trees along the southern border of the site are to be maintained and enhanced with new screening to be provided to northwest and western boundaries to mitigate the impact of development on the countryside and provide opportunities for biodiversity habitat creation and enhancement.
No objections are raised to this criterion. The development proposal shown in Section 2 seeks to retain the existing trees along the boundaries of the site, with the exception of two trees at the site entrance which need to be removed to allow for acceptable visibility splays. A Tree Survey has been conducted which demonstrates that the trees are Category C and in view of the other vegetation retained at the entrance, the loss of the trees would pose a minimal impact on the site, its ecological circumstances, or surrounding area.
In contrast, as currently drafted as a single allocation, the policy would necessitate the avoidable removal of vegetation between the two land parcels.
- 2 Trees which need to be removed to enable an access to be provided to the site, shall be kept to the minimum needed to provide necessary visibility, and will be required to be replaced on-site.
No objections are raised to this criterion. The trees on this boundary would not be lost in the creation of an access to the southern parcel. A landscape masterplan is being prepared to support the application that can take the above into consideration. Separating the two sites as individual allocations would also avoid the need to breach the existing landscaped boundary between the two land parcels.
- 3 Primary vehicular, pedestrian and cycle access to the whole site shall be provided from St. Andrews Gardens, and therefore development of site SHE004 must provide vehicle access and servicing up to the boundary with TC4S082 to enable a main access road to be created through the whole development. An additional, secondary emergency access onto Mill Lane may be achievable from TC4S082 and should be explored, along with a speed survey to clarify and address visibility restrictions.

- Objections raised.** Woodchurch object to this criterion based on the above request for the two plots of land to be separated into individual allocations. This drafting does not overcome potential concerns relating to rights of access and agreement between the parties and does not guarantee delivery of the Mill House parcel. This requirement is unnecessary given that access to the Mill House parcel can be suitably achieved via Mill Lane.
- Should the parcels of land be separated, a secondary access to the northern parcel should not be provided through this site. Inclusion of the access to the northern parcel would require a loss in the number of units proposed and would also detrimentally affect the development with regards to the quality of the development through the avoidable loss of existing boundary vegetation which currently provides screening and habitat. Accesses should be provided independently to both development parcels.
- 4 Provide off-site pedestrian improvements (pram crossings) at road junctions within the St. Andrews Garden Estate.
Should the plots be separated, this requirement should be included in the allocation of the land to the north. It would not be considered reasonable or necessary for off-site improvements to be delivered through the development of the southern plot of land alone as access would not be via St Andrews Gardens.
- 5 Provide pedestrian crossing improvements on Mill Lane.
No objections are raised to this criterion.
- 6 In accordance with Policy SP13, a wintering bird survey must be undertaken in advance of a planning application on the site. If the bird survey identifies that the development will exceed the threshold of significance, mitigation will be required. A suitable scheme of mitigation will need to be submitted with the planning application for the site.
Objections raised. Woodchurch object to this criterion. Following the preparation of a Preliminary Ecology Appraisal for the proposed development in the Mill House plot, wintering bird surveys are required where site allocations have a high or moderate suitability for qualifying bird species.
The site is not in close proximity to the specified designated sites (the Thanet Coast and Sandwich Bay SPA and Ramsar, Stodmarsh SPA and Ramsar and Dungeness, Romney Marsh and Rye Bay SPA). The site has also not been identified to have a high or moderate suitability to support the qualifying bird species. As such, these should not be required for the Mill House parcel. Impacts on nesting birds generally would in any event be significantly reduced if the allocations are separated and the existing boundary between the land parcels preserved. A letter from PJC Ecology is enclosed that provides context to the above.
- 7 Ensure appropriate species and habitat surveys are carried out prior to determination. Survey results will inform layout and design to avoid ecological impacts in accordance with the mitigation hierarchy and to inform on site ecological mitigation, compensation and enhancement measures and proposals for effective implementation, management and monitoring of all such measures.
No objections. A Preliminary Ecological Appraisal has been conducted to support the application for the Mill House site. The PEA identified that no further surveys would be required. As such, they should not be required as part of any future planning application.
- 8 A site-specific Flood Risk Assessment is required to address the issue of surface water flooding and consider the impacts of climate change over the lifetime of the development.
No objections. The southern site is within Flood Zone 1 and measures less than 1 hectare. Therefore, an FRA should not be required. However, a Flood Risk Assessment is being prepared for the southern plot (land adjacent to Mill House) and will be submitted with the application in any event.
- 9 An Archaeological Assessment for the site must be carried out in accordance with Policy HE3 Archaeology, the results of which should inform the layout and design of the development which is necessary to avoid harm to any archaeological assets identified through the assessment.
No objections. An Archaeological Assessment is being prepared for the southern plot (land adjacent to Mill House) and will be submitted with the application.
- 0 An assessment of land contamination for the site shall be carried out and submitted as part of the planning application and appropriate mitigation measures must be implemented prior to development commencing.
No objections. A Phase 1 Desk Study is being prepared for the southern plot (land adjacent to Mill House) and will be submitted with the application.
- 1 Layout is planned to ensure future access to existing wastewater infrastructure for maintenance and upsizing purposes.
Objection raised. The layout of the development on the Mill House land parcel (which Woodchurch request is severed from the northern parcel) has been planned to ensure future access to existing wastewater infrastructure if necessary. Woodchurch would, however, object to future access being provided and maintained through the southern plot to facilitate access for the northern site in view of the impact this would have on the quality and quantum of development proposed on the plot. This would in any event be unnecessary if both sites have their own independent access.
- 2 Open space requirements in accordance with Policy PM3 shall be provided. However, due to the location nearby to existing open space infrastructure, off-site contributions to upgrade or enhance nearby facilities may be sought rather than on-site provision.

Open space will be provided on-site through this development. Woodchurch would be pleased to discuss if off-site contributions are necessary with the Council.

Summary and Conclusions

The draft policy includes both the land adjacent to Mill House and the site to the north and east of St Andrews Gardens Estate. Woodchurch have shown, through the preparation of a development scheme and associated technical assessment work, that the southern site should be separated from the northern parcel in the allocations.

The southern parcel (TC4S082) is in separate ownership to the northern parcel (SHE004). This representation demonstrates that the southern parcel is readily available and that development is deliverable without any reliance on third party land, including land to the north. We are not aware of the ownership of the land to the north and have not been made aware of any development proposal coming forward as part of this. In view of this, there is no certainty that the northern parcel is coming forward. Separating the two sites will afford the Council a greater level of certainty that at least one of the sites will be developed to a high standard.

As currently drafted, the proposed allocation policy unnecessarily introduces risk to delivery and would deliver unnecessary landscape and ecology impacts that separate allocations would avoid. The two sites are not related or linked physically, in separate ownership and have been promoted separately. Whilst both sites are considered sound allocations in their own right, there is not considered to be any reasonable justification for them to be combined as a single allocation with a single point of access.

Woodchurch therefore object to various prescriptive parts of the draft policy as set out and in the event the combined draft allocation remains, would wish to make representations to the Inspector at the Examination Hearings accordingly.

Given the above, we request that Policy SAP36 is revised to separate sites SHE004 & TC4S082 and the wording of the draft allocation amended accordingly.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

This representation has been prepared and submitted behalf of Woodchurch Property (BK) Limited in respect of the Dover District Council Regulation 19 draft Local Plan Review. These representations highlight support for the draft allocation of the Land Adjacent to Mill House for residential development in principle, but highlight specific concerns with regard to the detail of the draft allocation under Policy SAP36.

A summary of suggested amendments:

- Land Adjacent to Mill House (TC4S082) should be severed from the land to the north at Land to the North and East of St Andrews Gardens (SHE004) and the allocation split into two.
- Access to be amended to allow for separate primary accesses to the northern and southern parcels of land.
- Requirement for a wintering bird survey should be deleted for the Mill House land parcel, based on the response provided by the ecologist for the development proposal being prepared on the southern half of the site.
- Provision for off-site highways improvements for St Andrews Estate be restricted to the allocation for the northern parcel of land (SHE004).
- Open space requirement to be a proportionate level, based on the total number of units and layout of the southern section of the site.
- Future access to wastewater infrastructure to be retained but amended so that the access and provision on the southern half of the site is proportionate to the scale of the development.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

To be able to respond to any matters raised in relation to amendments to Draft Policy SAP36. Any changes to the allocation directly impact the ability for the site at Land Adjacent to Mill Lane to be able to be delivered by our client, thus impacting the Council's housing delivery targets.

Include files

[Land Adjacent to Mill Lane_Regulation 19 Written Rep_December 2022.pdf](#)

Local Plan Consultation Point

SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House, Shepherdswell (SHE004/ TC4S082)

Rep ID

SDLP534

Rep Status

Processed

Consultee ID

1331750

Consultee Full Name	Mr Chris dalziel
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP36
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Loss of chalk farmland and surrounding woodlands with dramatic impact to natural habitats.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House, Shepherdswell (SHE004/ TC4S082)
Rep ID	SDLP726
Rep Status	Processed

Consultee ID	1331817
Consultee Full Name	Mr Shaun Williams
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP36 (SHE004/TC4S082)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Traffic and the local road network</p> <p>There are obviously concerns not just locally but also within DDC and KCC highways in relation to the burden on the local road network, as the local plan Regulation 19 quotes that for sites SHE006 (Botolph street Farm 10 dwellings) and SHE008 (Land off Mill Lane 10 dwellings) under Site Specific issues and Requirements states a "Transport Statement. This must take into account the cumulative impact of this, and other sites allocated in this Plan on common road links."</p> <p>This criterion is not mentioned for the proposed 50 dwellings at SHE004 and the revised extension to this TC4S082. In fact in the current planning application 22/0127 for SHE006 the applicants Highways Statement quotes "2.1.2 The proposed development of the site does not warrant a full Transport Assessment in accordance with the National Planning Policy Framework (NPPF) as the site will not generate significant traffic flows. The site falls below the Department for Transport 'Guidance on Transport Assessments' that suggests a threshold of 80 units of C3 Land use requiring a full assessment."</p> <p>Why has the site at Saint Andrews Gardens not been identified as requiring analysis of the "cumulative impact of this and other sites allocated in this Plan on common road links." Especially as we see potential developers already trying to avoid this.</p> <p>Emergency Access to Sanit Andrews Gardens</p> <p>HELAA document appendix 4 used a traffic light system Red (unsuitable) amber (potentially suitable) and green (suitable). Site SHE004 was shown in amber and stated under the heading of suitability assessment "secondary emergency access required which does not appear achievable". This comment is was not included in the key considerations in the regulation 18 draft Local Plan. The current regulation 19 draft states "C -Primary vehicular, pedestrian and cycle access to the whole site shall be provided from St. Andrews Gardens, and therefore development of site SHE004 must provide vehicle access and servicing up the boundary with TC4S082 to enable a main access road to be created through the whole development. An additional, secondary emergency access onto Mill Lane may be achievable from TC4S082 and should be explored, along with a speed survey to clarify and address visibility restrictions;</p> <p>This is inconsistent and fails to align with Kent County Councils "Kent Design Guide- Step 3 Designing for movement" (https://www.kent.gov.uk/__data/assets/pdf_file/0018/12096/design-guide-movement.pdf). The terminology used in regulation 19 "main access road" does not align with that used in the Kent Design Guide, which refers to:</p> <ul style="list-style-type: none"> Major Access Roads described as "3 generally serves between 50 and 300 dwellings (or equivalent mixed uses) including those located on other access roads feeding onto it. In some cases, it could serve as a bus route. 4 preferably has two points of access or is a loop with a short connection to a single point of access and a secondary emergency access link" pages 124 & 125

- Minor Access Road “2 generally serves up to 100 dwellings, including those in other residential areas which feed onto it. **The road should either be a through-road or, if a cul-de-sac, serve no more than 50 dwellings unless an alternative emergency access route, to serve also as a pedestrian and cycle route, can be provided**”pages 126 & 127

In both instances secondary emergency access is required where there is either not a short interconnecting link or in excess of 50 dwellings in a Cul-de-Sac configuration. Saint Andrews Gardens currently comprises 56 dwellings and the proposals in the local plan will increase this to 107

Adoptable Highways

Regulation 19 of the Draft Local Plan under SAP36 (Saint Andrews Gardens) states “4.245 The site is made of of two parcels of land but should be designed and implemented as one contiguous scheme, where possible. Each phase of development, regardless of ownership, **shall provide adoptable highways and services up its boundaries** to enable subsequent phases to be delivered. No ‘ransom strip’ or other gap should be left between the highway and the site boundary”

However, I note that under the current planning application on this parcel 22/01207 the Rebus planning statement (RS/0731) page 28 section 9.6 “The highway statement addresses access geometry, **confirming that it is the developers intention not to offer the highways for adoption all be in that they will be constructed to adoptable standards**”

Under the current application 22/01207, Jackson Turner + Day “Existing Lower Site Sections” project 1789 drawing 004, shows spot heights across the lower site. Looking at section A, the end of the existing road at the edge number 54 St Andrews Gardens is shown at 115.99 meters and immediately the other side of the existing substation on the same section A is 113.02 meters. This indicates a fall of virtually 3 meters in a linear distance of 20 meters. This equates to an incline of 1 in 6.6 or 15% or 8.53 degrees. It may be possible to lengthen this access into the site to reduce the gradient however the site continues to fall.

Kent County Councils “Kent Design Guide- Step 3 Designing for movement states “ Minor Access Way which generally serve a maximum of about 50 dwelling (or 25 if a cul-de-sac). These are for access by low pantechnicon, refuse vehicle, fire tender and cars. They should have a **maximum longitudinal gradient of 6% to 7% it does state that gradients may only be increase if unavoidable due to local topography and alternatives can be provided for the mobility impaired**”.

Regulation 19 draft of the Local Plan does mention that the land at SHE006 rises from north to south but does not go as far as to acknowledge that this gradient exceeds the guidance for adoptable standards and stipulate that alternatives must be provided for the mobility impaired.

Construction Traffic

Aside from increased traffic post development access and the impact developing sites on local roads is an important consideration. The current proposed access under planning application 22/01207 as borne out by KCC’s responses to this application dated 25 October 2022” While routing of vehicles via A256 and Barville Road is **preferred**”. It is acknowledged in the same letter that “Wigmore Lane and Shepherdswell Road are subject reduced highway widths, pinch points and localised on street parking. Mill Lane on this approach is narrow in width. Therefore, the size of vehicles and timings of deliveries is paramount.”

Aside from KCC’s comments it is noted at the north end of Wigmore Lane Road adjacent to multi panel UK and Bakkavor Salads the proposed route is designated and signposted as “Unsuitable for Heavy Goods vehicles”. The route beyond these signs to St Andrews Gardens stretches for 2.2miles. It initially narrows down under some tree cover which frequently has poor visibility due to sunlight, this section isn’t truly two way and care is needed to squeeze past other vehicles. Once through the narrow tree lined section the road opens up passing through Eythorne. There are however parked cars on one side and speed humps. There is a school crossing at the junction of Church Hill and after this the road narrows again before becoming Shepherdswell Road and winding through to the end of Mill Lane. At this point the route is single track with passing places on soft verges. At the end of Mill Lane approaching Shepherdswell there are some blind bends and a livery where horses are common site on the road and the route finally passes through a narrow section again under low tree cover. The school busses and a large proportion of the school traffic for Shepherdswell use this route. These factors combined result in frequent stopping, reversing (sometimes for considerable distances) and jostling at numerous times of the day.

Although the designation of “Unsuitable for Heavy Goods vehicles” is not enforceable and delivery vehicles may use these routes if they have a legitimate drop off in the area. The construction of 50 dwellings will not result in intermittent access and will presumably persist for more than a year, hence the risk and potential for disruption increases as will the subsequent damage of the highway and soft verges. KCC recognise this in they response to planning application 22/01207 dated 25 October 2022” Due to the location of the site, it is considered that deliveries should be restricted to avoid the AM and PM peak periods. Moreover, the size of vehicle proposed to be utilised during construction **will need to be outlined to ensure no or limited use of HGVs and trailers**”

	This restriction is not stated in Regulation 19 of the Draft Local Plan and the statement itself raises questions as to the viability of this route for such a significant development that will take place over a prolonged period require large plant to construct roads and complete landscaping, a significant quantity of aggregate and large roof trusses to name but a few that can only be transported on large vehicles.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>The site criteria for SHE004 & TC4S082 should be ammended to mirror the other sites in shepherdswell and include a "Transport Statement. This must take into account the cumulative impact of this, and other sites allocated in this Plan on common road links".</p> <p>If the sites at St Andrews Gardens (SHE05 &TC4S082) cannot provide adoptable highways and services up to (typo in reg 19 document) its boundaries as per paragraph 4.245. Due to excess gradients with no alternative route for the mobility impaired, width of access and bondaries to the lower site or lack of secondary emergency access. The sites should be removed or the scale reduced.</p> <p>In terms of construction traffic should the site still be deemed suitable the developer should be require to provide proper hard standing suitable passing points along the route and part time traffic signals should be included on the narrowest section at the end of Mill Lane adjacent the livery operating when there are construction traffic movements.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House, Shepherdswell (SHE004/ TC4S082)
Rep ID	SDLP757
Rep Status	Processed
Consultee ID	1331862
Consultee Full Name	Sindy Denyer
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Section 1.Category Infrastructure Delivery Plan Reference: Infrastructure Delivery Plan – Draft for Consultation October 2022 PART 1: Physical Infrastructure Theme 1: Transport SP12 - Strategic Transport Infrastructure- Local Road Network 3.39 As part of the Local Plan modelling work, the impacts of Local Plan growth on the Local Highway Network were assessed however site specific mitigation and policies need to be considered . The plan must address the adequacy of the Coxhill, Eythorne Road, Shepherdswell Roads, local road network and public transport services supporting the proposed SAP 36,37, 28, 29 and 30 developments.
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

The draft local plan regulation 19 states under TI2 - Transport Statements, Assessments and Travel Plans section 10.7 the objective to ensure that traffic generated from new development can be accommodated on the highway network to promote the delivery of sustainable development. Section 10.8 states that traffic generated by development should normally be targeted towards the primary and secondary route network in the District. However other routes should not be subject to inappropriate levels of traffic generation or unsuitable traffic movements.

In the event SAP 36,37, 28, 29 and 30 developments are implemented the Coxhill, Eythorne Road, Shepherdswell Roads will be the main route by car from Shepherdswell, Eythorne and Elvington to the A2 road network, we believe this will place significant pressure on local road traffic which needs to be addressed however there is no material consideration to implementing road improvements and assign funding in either the Dover Local Plan or SP12.

Access to Shepherdswell, Eythorne and Elvington from the A2 involves narrow single track road with passing place. Access at the top end of Shepherdswell village via Mill Lane connects to the lower end of the Shepherdswell Road restricted by road width, parked vehicles, speed humps and traffic. All access roads currently suffer from significant traffic congestion during peak commuter periods.

Shepherdswell has limited parking facilities around the village hall and local shop and heavy reliance on road parking further limits the width of Coxhill to single file traffic. Traffic bound for the Eythorne industrial estates includes a significant flow of large articulated lorries that regularly lead to partial/ temporary road blockages and significant road congestion.

The Local Plan SP12 - Strategic Transport Infrastructure focusses on improvements to the A2 highway network and key junctions only and decisions around improvements to the local road network are deferred. Regulation 19 Transport Modelling Forecasting Report, forecasts that traffic leading from the A2 through Coxhill, Shepherdswell and Eythorne, is projected to grow at 15-19% as a minimum scenario, our independent assessment based independent analysis of development proposals is this will be nearer 60%.

Analysis of Coxhill peak traffic flow conducted by Shepherdswell Speedwatch (in collaboration with the Metropolitan Police) in June and July 2022 recorded traffic flow of circa 550 vehicles per hour.

The Draft Local Plan Regulation 19 states that approved development must account for the cumulative impact of all developments allocated in the Plan on common road links. SAP 36,37, 28, 29 and 30 proposed developments will add 425 houses to the local area served by the A256 with residents needing to commute regularly to work, schools etc. during peak commuting periods. Shepherdswell has circa 700 houses so combined with the proposed plan increase of 425 houses in Shepherdswell, Eythorne and Elvington, this represents a 60% increase in property numbers which we project will be mirrored by an equivalent increase in road traffic. An increase of 60% on current commuter peak traffic flow translates to circa 590 vehicles per hour or 10 vehicles per minute along largely single-track road with road speed impacted by slow moving heavy goods traffic.

Compounding significant road congestion there is a lack of pedestrian footways in Shepherdswell leading to key routes i.e. school, local shop, health centre and village hall, peak footfall along pavement less roads occurs when traffic flow is at its highest presenting a significant road safety concern.

There are specific road access concerns relating to St Andrews Gardens (SAP 36 SHE004) a development of 57 houses served by one road access and exit point. The Local Plan Reg 19 proposes to increase the number of properties by 50 on this estate effectively doubling its size without addressing & mitigating emergency access and road safety design.

KCC's Kent Design, Creating the design, Step 3- Design recommends that minor access roads generally serving up to 100 dwellings, including those in other residential areas which feed on to it should either be a through road or, if a cul-de-sac, serve no more than 50 dwellings unless an alternative access route, to serve motorists, pedestrian and cyclists, can be provided. Previous development surveys of SHE004 access points used the Housing and Economic Land Availability Assessment traffic light system which rated this site as Amber with an assessment proviso that "secondary emergency access is required however this does not appear achievable".

St Andrews Gardens access road links into Mill Lane which is restricted at points to single track road with passing places. Mill Lane is heavily used constituting one of the main access routes to the Shepherdswell Health Centre, School and Church.

	The Draft Local Plan Regulation 19 states under section E1 that for designated industrial settlements new employment development will be supported within existing employment sites as identified on the Policies Map or on land within or immediately adjoining the settlement confines of designated settlements. While employment for villagers is essential it should be considered without a viable public transportation network such development will further challenge the stressed A256 local road network.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The Draft Local Plan Regulation 19 must propose improvements that address the adequacy of the A256 and local road network and public transport services supporting the proposed SAP 36,37, 28, 29 and 30 developments and ensure funding for these needs is addressed in the final plan.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House, Shepherdswell (SHE004/ TC4S082)
Rep ID	SDLP996
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP36
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The County Council requests that the policy includes reference to Footpath ER78 improvements for connection to North Downs Way.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The County Council requests that the policy includes reference to Footpath ER78 improvements for connection to North Downs Way.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House, Shepherdswell (SHE004/ TC4S082)
Rep ID	SDLP1559
Rep Status	Processed
Consultee ID	1252218
Consultee Full Name	Cllr Linda Keen
Consultee Company / Organisation	DDC WARD - Aylesham, Eythorne and Shepherdswell
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP36
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy

4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I write in support of the comments made by Shepherdswell Parish Council.</p> <ol style="list-style-type: none"> 1. Evidence errors – the Parish Council points out several inaccuracies in the Local plan statements, un relation to various local amenities (which do not actually exist), and the village’s location, which are rather worrying. The Council is also concerned about the validity of the traffic survey results in relation to these surveys being taken just pandemic when traffic flows were significantly lower – and this is very significant because a main objection to the house building is the inadequate road structure. The Council quotes current Speedwatch reports which show traffic flows much higher than those recorded with a peak of 224 vehicles per hour – and which was measured one way only. 2. Highways infrastructure and transport - the existing local highway network is already inadequate for the number of houses in the village and surrounding areas. More houses will mean be significant adverse effects on the already heavily congested and dangerous Cox hill crossroads by the Co-op, and Coxhill road running through Shepherdswell, This road is already over stretched, and extensively used as a rat run between the Sandwich/Dover main road and the A2. There will also be a knock-on effect from the 350 houses planned for Eythorne, which will make this problem even worse – these should not be built – plus the expansion of the industrial estate planned there. SAP 37 transport statement specifies that the development must account for the cumulative impact of all developments in this plan on common road links, but the proposed plans for Elvington and Eythorne, which will obviously significantly increase traffic numbers, utterly invalidate this statement. Nothing can be done about all this, unless you build a by-pass, for which funding will simply never be available, and which would be undesirable anyway, given the rural and beautiful nature of the area. Kent Highways has no cash to undertake mitigation works – such as improving junctions and dealing with congestion caused by on-street parking – and the number of houses will not generate enough Developer funding to pay for such attempts to resolve these problems. . There is also a problem with sustainable transport – there are no cycle tracks, and the bus service has recently been cut – and there are no footways or cycleways along dangerously narrow and bendy roads. The Coldred SHE013 proposals suffer, too, from such drawbacks. Again, there are no funds to improve these problems, despite the (unachievable) aspirations in the Local Plan. While there is a railway station at Shepherdswell, disabled access urgently requires improvement. 3. Sewage and drainage – the Parish Council statement explains fully the serious problems already existing here, and , as a DDC ward Cllr, I am currently trying to get something done about the regular flooding problems affecting the houses next to St Andrew’s development which will worsen the situation. Kent County Council say the Developers should pay for this but there are insufficient funds – and Kent Council has no plans for new drainage systems, as far as I am aware. The Local Plan does not deal adequately with these problems. 4. Village amenities – the Parish Council outlines the problems with the limitations on these – especially with regards to local school places, and inadequate transport arrangements for pupils to get to the secondary schools in Dover, Deal or Sandwich. Access to the shops, school, village hall etc are difficult and dangerous because of some roads without proper footways, such as Church Hill. The capacity of the local surgery is also clearly insufficient to cope with existing demand.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>The Highways, draining and public transport problems are understated in the Local Plan, where there appears to be no coherent strategy for achieving improvements in the rural road network or rural transport or local drainage – or for achieving sustainable travelling through cycling, walking and public transport use. We need a specific strategy on these important matters, which should clearly set out the problems and solutions - and, most importantly, identify clearly where funding is to be obtained, as there appears to be no future funding available in the foreseeable future for any of these areas from Dover or Kent Councils, or the Government. Aspirations are meaningless without a realistic chance of implementation – which means CASH. Without such strategies, there should be little or no further housing development in this rural area of Shepherdswell and Eythorne, and attention should be focused on other larger villages - with better facilities than Shepherdswell, and better road and transport links - and on brownfield sites.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House, Shepherdswell (SHE004/ TC4S082)
Rep ID	SDLP1288
Rep Status	Processed
Consultee ID	1263106
Consultee Full Name	Mr Mark Norcliffe
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	1) Local Centres : Paragraph 4.209 and following, with specific reference to Shepherdswell and 2) Housing Site Allocations : paragraph 4.242 and following, with reference to site SAP36
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>1) LOCAL CENTRES</p> <p>Shepherdswell is designated as a local centre [para 4.209], alongside Eythorne & Elvington, Eastry, Ash, Wingham, St Margaret's and Kingsdown. This paragraph contains a particularly egregious error in stating that <i>"Shepherdswell is located to the north of Dover just to the west of the A2."</i> Shepherdswell, in fact, lies to the east of the A2, and it is distressing that a Local Plan could be so geographically inaccurate.</p> <p>Unfortunately, this is not the only inaccuracy in assessing Shepherdswell as a "local Centre." When this exercise was first presented under the Regulation 18 consultation, various mistakes in the scoring of Shepherdswell were identified and reported by consultees. It appears that only some have these have been corrected in the latest draft. The following errors and inconsistencies remain :</p> <ul style="list-style-type: none"> • The local bus service is described as "infrequent" in para 5.1 of the Rural Settlement Hierarchy Supporting Document, but has been strangely up-graded to "regular daily" in the scores table presented in para 5.2. There is also no acknowledgement that two services have subsequently been withdrawn • The "pop-up" Post Office which visits the village briefly on two days per week is accorded the same score as permanent Post Offices in other villages • Two points are "awarded" for unspecified services, without further explanation • There is no recognition that neither the local pub nor café serve food in the evening <p>In para 4.4 of the document, it is acknowledged that the village survey data is taken from the Council's Authority Monitoring Report of 2018/2019, which was not up-dated due to Covid restrictions, and they have relied on Parish Council input for any up-dates and corrections. Such an ad-hoc approach to data collection and verification is neither reliable nor sound.</p>

The Settlement Hierarchy scoring system only records the “advantages” of the different communities ; there is no consideration of the negatives. In that context, the road infrastructure for Shepherdswell and Eythorne/Elvington is markedly inferior that of the other “local centres.” The other centres are either directly crossed by main “A” roads, or have such roads in close proximity and running parallel to the main axis of the community – thereby providing easy access.

All access to Shepherdswell and Eythorne/Elvington is by small rural lanes, particularly the narrow, tortuous and congested road known variously along its course as Coxhill, Eythorne Road, Shepherdswell Road, Wigmore Lane and Barville Road. The problems with this route are well known, but are almost wholly ignored in the draft Local Plan. Indeed, the silence of the Plan on the critical subject of the area’s rural road network is another example of why it is “unsound.”

2) HOUSING SITE ALLOCATIONS

In the previous version of the draft Local Plan, submitted for Regulation 18 consultation, two large sites (then designated SHE003 and SHE004) were ear-marked for housing development. Whilst it is pleasing to see that SHE003 has now been dropped, it is illogical and unsound to that the other site (now renamed SAP36) has been retained, and, indeed, quietly enlarged, even though it was opposed on the same grounds as SHE003.

SAP36 has, in fact, been considered – and rejected – for housing development in the past, with previous DoE inspectors highlighting the potential damage to the landscape and environment, and the problems with the transport infrastructure. Over the years, the environmental issues have not changed, but the transport problems have got worse.

The proposed access to SAP36 would be via St Andrew’s Gardens. St Andrew’s Gardens can only be accessed from Mill Lane. Mill Lane itself, at its north-eastern end, is a narrow single track lane, whilst, at its south-western extremity, it connects, at the village green, with the narrow and congested Church Hill and the small back road from Coldred. It is, therefore, impossible to access St Andrew’s Gardens other than by single-lane, constricted roads that are inadequate for existing levels of traffic. St Andrew’s Gardens currently contains approximately 50 dwellings, meaning that the planned development would double the volume of traffic needing to use this route. An on-site traffic survey conducted on 11 November 2022 suggested that, based on current volumes, an extra 250 vehicles would enter/leave St Andrew’s Garden’s during peak times. In rejecting a previous planning application, a DoE inspector wrote that “the layout of St Andrew’s Gardens is too constricted and too tortuous to provide free and safe access to any considerable number of dwellings.” Nothing has changed since that comment was made.

It has also become clear that the actual carriageway within St Andrew’s Gardens itself was constructed to a very basic standard, and, as a result, the tarmac surface is noticeable pitted and pot-holed, and in need of regular repair. It is inadequate for current levels of usage, and would not be capable of supporting a doubling of traffic volumes, nor, indeed, the passage of the heavy machinery that would inevitably be part of any construction project.

The draft Local Plan, in its existing form, makes no attempt to address these issues, although they have been extensively explained in the past.

The traffic problems are not confined to the immediate vicinity of the proposed development site. Vehicular access to Shepherdswell is, with the exception of a couple of small country lanes, confined to the road running from the A2, just west of the Lydden junction, through the villages of Shepherdswell and Eythorne to the A256, south of Tilmanstone, and known variously along its course as Coxhill / Eythorne Road / Shepherdswell Road / Wigmore Lane / Barville Road. This road is itself a minor route – narrow, frequently tortuous, beset by poor sight lines, and, in many places, unable to accommodate two lines of traffic at the same time. It is deemed unsuitable for heavy goods vehicles. The road is already over-used and heavily congested, with daily instances of traffic queuing at the various bottlenecks, and the occasional “confrontation.” The local topography and the proximity of existing dwellings to the road’s edge excludes any possibility of a significant up-grade.

This is the same route that would have to serve the 300 new houses proposed for Eythorne and Elvington (SAP28 and SAP29).

The draft plan blandly suggests that “a review of the impact on the surrounding rural road network” should be undertaken as part of any planning application. Surely, any review should be conducted **before** the sites are accepted for possible development.

Similarly, alongside the transport infrastructure problems, any substantial housing development in Shepherdswell would put extra strain on a sewerage and waste water system that is already unable to cope, a local primary school that is currently over-subscribed, and a doctor’s surgery that is having to send patients to Dover for treatment. Again, the draft local plan is silent on how such problems can be handled.

It is again necessary to draw attention to inaccuracies and misinformation contained on the Plan’s evidence base. For example, the Sustainability Appraisal Appendix contains – in more than one place – the assertion that site SAP36 is within 500 metres of the local railway station. It is not. GPS data clearly shows that it is almost one kilometre from the site to the station utilising the most direct road and footpaths.

<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>- Correction of persisting errors in the Local Centre scoring system, and correction of errors in the evidence base</p> <p>- Recognition of not only the advantages, but also the negatives, in assessing whether a community qualifies as a Local Centre (e.g. deficiencies in the local infrastructure)</p> <p>- The removal from the Plan of site SAP36 as a suitable location for future housing development.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>In the responses to the Regulation 18 consultation of the draft Local Plan, numerous inaccuracies and mistakes were reported to DDC. These were not matters of opinion, but matters of fact. It has become apparent that not all of these have been corrected in the document now under consultation. I am not, therefore, confident that the Council can be relied upon to present to the Inspector a document that is 100% accurate, and that members of the local community must have the opportunity to challenge such failings in a public forum.</p>
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House, Shepherdsweil (SHE004/ TC4S082)</p>
<p>Rep ID</p>	<p>SDLP1402</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1267704</p>
<p>Consultee Full Name</p>	<p>Christine Dobson</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP36</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified Effective Consistent with National Policy</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Not Applicable</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Not Applicable</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails</p>	<p>We have sent 3 letters giving specific reasons why developing the above land is a bad idea. We hope you have received them. We are depressed and helpless at what you propose, so this email is an emotional reaction to the plan, which, as you are human beings, we hope you may accept.</p>

to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>This land is the only green space in the village and it is right at the centre. It is ancient meadow land and its beauty and what it means to the community is beyond words. If you allow development on this land you will destroy something real and tangible and you will be destroying the village itself. Previous generations knew this: that is why it has never been built on before.</p> <p>Wars will end; diseases will be cured; poverty can be abolished - but once you build on this land it is dead - finished. What has contributed immeasurably to the character of the village and the wellbeing of its inhabitants over hundreds of years - and continues every day to do so - will be gone forever. PLEASE PLEASE PLEASE remove it from your Plan. In hope</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	PLEASE PLEASE PLEASE remove it from your Plan
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House, Shepherdsweil (SHE004/ TC4S082)
Rep ID	SDLP1244
Rep Status	Processed
Consultee ID	1274099
Consultee Full Name	Rebekah Bates
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 36
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The recent policy change on mandatory numbers for new housing means that individual developments for houses should be reviewed and that current plans are not sound, they do not comply with policy.</p> <p>The South east is under pressure and does not have the infrastructure to cope with the demands that new housing developments bring. It is one of the driest counties and so water stress will become a more serious issue.</p> <p>In Shepherdswell access from the A2 is by two narrow lanes. Both are unsafe for pedestrians, cyclists and horses. There is nowhere local for people to ride. I often struggle to walk the 50 m from the village hall to the shop with my two dogs. There is no traffic calming and cars do not slow down.</p> <p>The many extra houses expected at Elvington will increase this traffic as will the houses planned for the village itself. This is a major concern. I support the Green Party proposal for safe, well lit cycle lanes to link villages with stations but this does not help dog walkers.</p> <p>People move to the countryside to be able to access and enjoy green spaces but this is difficult with so many cars. We don't see children playing out as they used to.</p> <p>I am concerned about the destruction of hedges for new build projects. Tho the plan proposes to maintain as many as possible we have recently seen the ripping out of a perimeter hedge for the community trust housing next to the village hall. I do not trust that hedges and trees will be maintained and emphasise that mature hedging and trees offer so much more habitat than new planting which would need to be on a much greater scale if it is to offer the same benefits in terms of carbon capture as well as habitat.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Policy on housing has changed and so plans should change to comply with this. The housing which our village needs is sheltered housing for the elderly, many of whom are single, living alone, wanting to stay in the village. Providing purpose built accommodation for them would free up many houses for families. Have the needs of the often ageing population of villages been considered? A limited number of affordable housing is included in larger developments but this does not meet the needs of our ageing villagers.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House, Shepherdswell (SHE004/ TC4S082)
Rep ID	SDLP1246
Rep Status	Processed
Consultee ID	1274097
Consultee Full Name	Marita Bates
Consultee Company / Organisation	
Agent Full Name	

Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 36
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Roads busy, little or no traffic calming, lack of lit cycle routes, safe routes for families, dogs walkers, horse riders Pressure on local school places Limited bus service and trains do not link with on-going services Threat to wildlife with loss of trees and hedgerows
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Suggest bat boxes, bird boxes for all new builds and retention of hedging, trees Suggest provision of local sheltered housing for elderly which would free up family housing in village.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House, Shepherdswell (SHE004/ TC4S082)
Rep ID	SDLP1677
Rep Status	Processed
Consultee ID	1331262
Consultee Full Name	Mrs Gill

	Vaughan
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP36
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Shepherdswell is a village with a local community spirit. additional housing will not enhance that community spirit. it would be best to build at the Whitfield site where the village profile has already considerably changed.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House, Shepherdswell (SHE004/ TC4S082)
Rep ID	SDLP1672
Rep Status	Processed

Consultee ID	1331530
Consultee Full Name	Mrs Carol Johnson
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP36
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Houses to land off Mill Lane and St Andrew's Gardens.</p> <p>The western portion of this site is close to the North Downs Way and the Via Francigena. A pilgrim route from Canterbury to Rome. Pilgrims' appreciation of this view can be read in the Visitors' book kept in St Andrew's church.</p> <p>The proposed development would obliterate historic views and be an intrusion into the Downs landscape.</p> <p>The additional housing proposed in Regulation 19, would create massive pressure on Mill Lane in each direction. It is mostly a single track lane.</p> <p>only recently a bus caught fire and caused considerable damage to boundary hedges and trees. It could so easily have affected nearby properties.</p> <p>Additional traffic generated by additional housing and the constant heavy vehicles carrying building materials, would be an impossible intrusion to villages living in this area.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House, Shepherdswell (SHE004/ TC4S082)
Rep ID	SDLP1674
Rep Status	Processed
Consultee ID	1331750
Consultee Full Name	Mr Chris dalziel
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP36
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Highway Agency review required due to only single lane access to site unsuitable for vehicles over 7.5 ton. Access to site via residential area not suitable for through construction traffic and large vehicles. Site is situated above old mine workings mortgage lenders require indemnity in place due to possible subsidence. Due to St Andrew's Gardens elevation water supply is pumped under pressure. This means water pressure in the area is very poor. Southern Water are unwilling to address also water supply from the chalk aquifer is depleted and southern water are unwilling to invest in alternate water collection methods.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will	

make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House, Shepherdswell (SHE004/ TC4S082)
Rep ID	SDLP1957
Rep Status	Processed
Consultee ID	1273994
Consultee Full Name	Mr David Walker
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP36
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Consultation does not conform to the statement of community involvement. Nobody has attempted to discuss with the people affected by TC45082, or with the protest group (SAD). The landscape impact is not met by the sustainability assessment SA10 or SA11. There will be substantial wildlife impact (7205), including loss to habitats. This area is a red high for migrating birds. Also disturbed will be bats and slow worms which are protected by fame and wildlife conservation trust law. Water resources and sewage have not been taken into account. Also, the impact on additional traffic in the village and yet more pollution and congestion in the narrow lanes. Perhaps rejuvenating Dover town rather than tearing up more green countryside would be more appropriate!!!
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness	

matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House, Shepherdswell (SHE004/ TC4S082)
Rep ID	SDLP1242
Rep Status	Processed
Consultee ID	1332975
Consultee Full Name	Ms Sarah Bates
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP36
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>Re housing; These numbers of houses should not be built on agricultural land and the transport issues involved with the various and roads etc make it especially unviable due to congestion and environmental concerns. The villages are small and there is little in the way of shops and other facilities. Car-use would be high – and a big increase on currently. Has the relative value of the land concerned been assessed in terms of value through agriculture and carbon capture versus covering with concrete.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House, Shepherdsweil (SHE004/ TC4S082)
<p>Rep ID</p>	SDLP1913
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1274251
<p>Consultee Full Name</p>	Patricia Goddard
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	SAP36
<p>2 - Do you consider this part of the Plan sound?</p>	No
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	Positively prepared Justified Consistent with National Policy
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	No

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Construction does not conform to the statement of community involvement. No attempt has been made to discuss with the people most affected by TC45082 or with the protest group (SAD). The sustainability assessment SA10 or SA11 Landscape impact is not met. Sustainability report admits a substantial wildlife impact (7205) including loss or damage to habitats. This area is a (red high) site for migrating birds. There is also a variety of wildlife that will be disturbed such as bats and slow worms. This is protected by Game and Wildlife Construction Trust (law). This plan misses the chance to bring prosperity to Dover.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House, Shepherdsweil (SHE004/ TC4S082)
Rep ID	SDLP1901
Rep Status	Processed
Consultee ID	1274390
Consultee Full Name	Mr and Mrs Young
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP36
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective

	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>As residents in Shepherdswell for 22 years we love living in this quite village. It has its problems of course, excess traffic being a main one. This has been mostly caused by the removal of the Barfreston turn off on the A2, causing all traffic to Eythorne/Barfreston etc to come through Shepherdswell. New housing in the proposed sites would certainly add to this. Most difficult would be Mill Lane, Church Hill, Village Green, into Eythorne Road at the crossroads. At present its almost impossible to get through to Hazling Dane off Mill Lane during pats of each day. Bus services have been curtailed greatly over the 22 years we've lived here. The drivers over those years have been brilliant dealing with regular 'snarl-ups' at the village green, overhanging branches, parking on narrow roads in and out of the village. So, the extra homes proposed for St. Andrews Gardens would not only cause more problems, making it even harder for folks to access their homes, or go about their business.</p> <p>We live at the bottom of the village and have always been grateful for the recreation ground and the fields that back onto it up to St Andrews Gardens. The reason being that huge amounts of water pour down Approach Road when it rains, into Eythorne road. The Rec and fields act as a catchment to absorb a lot of this water. If this 'flood plan' is built on built on, all that water will incur huge legal implications for the homes that will be affected downhill (even flooded). This would affect all Roads including Church Hill, Hill Avenue, Approach Road, Eythorne Road, Station Road, Meadowview Road, Bernards Gardens etc. Something surely to be seriously considered.</p> <p>For over 30 years, Aylesham has had permission to greatly expand their boundaries. They have built some new homes that seem to enhance their village and give the new and old dwellers good access to the A2 and a very large village green with excellent shops and space for many more. The roads within the village are wide and spacious, very different from Shepherdswell. We have just one shop and extremely limited parking and now space for any more shops. Our roads are narrow and often just single track. Traffic problems can cause tempers to fray, and an addition of more people, who deserve to live in a harmonious environment may not be able to.</p> <p>Overall, we think that this plan for development in Shepherdswell is completely unsuitable.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House, Shepherdswell (SHE004/ TC4S082)
Rep ID	SDLP1403

Rep Status	Processed
Consultee ID	1333226
Consultee Full Name	Dan Dobson
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP36
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We have sent 3 letters giving specific reasons why developing the above land is a bad idea. We hope you have received them. We are depressed and helpless at what you propose, so this email is an emotional reaction to the plan, which, as you are human beings, we hope you may accept.</p> <p>This land is the only green space in the village and it is right at the centre. It is ancient meadow land and its beauty and what it means to the community is beyond words. If you allow development on this land you will destroy something real and tangible and you will be destroying the village itself. Previous generations knew this: that is why it has never been built on before.</p> <p>Wars will end; diseases will be cured; poverty can be abolished - but once you build on this land it is dead - finished. What has contributed immeasurably to the character of the village and the wellbeing of its inhabitants over hundreds of years - and continues every day to do so - will be gone forever. PLEASE PLEASE PLEASE remove it from your Plan. In hope</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	PLEASE PLEASE PLEASE remove it from your Plan.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House, Shepherdswell (SHE004/ TC4S082)
Rep ID	SDLP1813
Rep Status	Processed
Consultee ID	1333679
Consultee Full Name	Mr Christopher Burke
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP36 (SHE004)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SHE004: The whole proposal is entirely inappropriate for a small village and will seriously undermine its infrastructure and traffic flows, accessibility etc. as well as destroying or damaging its character. <ol style="list-style-type: none"> 1 Transport access – from Mill Lane to Left Road (i.e. towards North) narrows substantially – becoming a single track lane; to the right south towards the green would cause congestion where building development has already taken place and block of houses is being constructed now (east side of Mill Lane) 2 Infrastructure – will rely on already existing infrastructure which is already overloaded (drainage etc.) 3 Amenities – schools, public transport, shops – services in general are currently designed for, or appropriate for a village – not an urban development of anything more than half a dozen houses.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	SDLP1813 Burke - Att 1 (redacted).pdf
Local Plan Consultation Point	SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House, Shepherdswell (SHE004/ TC4S082)
Rep ID	SDLP1916
Rep Status	Processed
Consultee ID	1272948
Consultee Full Name	Lynn Webb
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP36
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I do not consider there has been a commitment to public engagement by DDC. I am a local resident that will be most affected by this particular proposal/plan. I have never been written to or mailed a paper copy of the Local Plan as requested from DDC. It is, and has been, the village group Shepherdswell Against the Development that made me aware of the development and continues meaningful public engagement. The number of proposed dwellings has been increased to 50 since regulation 18 and again no contact from DDC regarding this even though I submitted a representation during Reg 18.</p> <p>Concerns that have been raised are being disregarded including an already overloaded waste water/sewage system causing some flooded gardens and an already low water pressure issue causing some types of boilers to malfunction.</p> <p>The road infrastructure is inadequate to support this development. The main access roads to Shepherdswell are single tracks with passing places. These roads are already in a constant state of disintegration. With the building of a further 50 houses, getting on towards another 100 cars will be added to an increasingly congested village centre. The lack of pavements on Church Hill and toward the Village Hall should also be considered for the road safety of pedestrians.</p> <p>The proposed development in Elvington should also be taken into consideration when assessing traffic volume along Eythorne Road through to the A2.</p>

	<p>The extensive long ranging views from the North Downs Way located near to the proposed site affords magnificent views, which stops walkers in their tracks, to be admired, enjoyed and soaked in.</p> <p>These views will be eradicated from the landscape, currently to the benefit of all, to become the 'property' of a few private citizens.</p> <p>The detrimental impact on the landscape and the wildlife that exists alongside human neighbours is being overwhelmingly underestimated. Already, with the felling of trees at Mill House, the variety of birds visiting has diminished, notably the green woodpecker.</p> <p>The historic reasons that were cited for rejecting previous planning applications are even more relevant today. Especially being able to easily access open countryside for exercise, clean air and fitness. Very relevant to our already overcrowded modern life is the benefit to positive mental health and wellbeing which is widely recognized. The development will be to the detriment of citizens and wildlife residing in and around St Andrews Gardens.</p> <p>It is a plan for unjustified new build housing on a green field site which should be retained as the heart of the village for grazing horses and as a natural habit for wildlife, flora and fauna.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Delete SAP36 – the allocation of land for 50 houses to the North and East of St Andrews Gardens and adjacent to Mill House and all references relevant to this site from the plan to comply with Council's Sustainability Assessment and to comply with the Council's Statement of Community.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House, Shepherdswell (SHE004/ TC4S082)</p>
<p>Rep ID</p>	<p>SDLP1941</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1333908</p>
<p>Consultee Full Name</p>	<p>Mr David Edward Sanderson</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>Shepherdswell</p>

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The research conducted into the proposed plan has not been carried out properly. Especially into the impact of traffic around Mill Lane and access into and out of St Andrews Gardens. Impact on water supplies, sewerage and area of outstanding natural beauty along the North Downs way
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	DDC Vision is environmentally sound transport access road to Shepherdsweil are in Pieces, especially along Mill Lane single Lane. Increased road traffic will cause more congestion along Mill Lane and Church Hill. The roads cannot be made wider, safety consideration for school children at Sibertswold Primary School should be taken into account. Water pressure in St Andrews Gardens is already low, there are problems with sewerage. Also the proposed buildings are close to the North Downs Way, and area of natural beauty.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I expect councillors and planners to do their job and enforce the obligations of developers to develop safely and to upgrade and future proof infrastructure.
Include files	
Local Plan Consultation Point	SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House, Shepherdsweil (SHE004/ TC4S082)
Rep ID	SDLP1896
Rep Status	Processed
Consultee ID	1274052
Consultee Full Name	Lorraine Stone
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP36
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	You intend to allow the building of over one hundred properties, at the end of my road. The infrastructure is not there. There is problems with sewerage the bottom of the village have overflow problems. There is not a pumping station in Shepherdswell, the nearest is at Coldred and that has to be pumped out every week. Water pressure is insufficient if anymore properties are built the gas boiler will not work. We had this problem some years ago. Access roads are inadequate, they are lanes not main roads. Safety for people with children no adequate pavements the school is well attended but cars and traffic around the village green is dangerous.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	My recommendation would be to look for alternative land not in Shepherdswell given the flooding and sewage issues. Not mentioning health and safety. Also, I would like to take the opportunity to point out the signage from highways that states not suitable for HGVs or large lorries, these are country lanes not roads. This village simply isn't big enough.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House, Shepherdswell (SHE004/ TC4S082)
Rep ID	SDLP1940
Rep Status	Processed
Consultee ID	1274293
Consultee Full Name	Jill Jones
Consultee Company / Organisation	

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP36
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>As I live in Shepherdswell, naturally, I am very concerned about proposals for housing here.</p> <p>Shepherdswell is very unique in that every road into the village is narrow and we cannot see any way of improving the infrastructure except at major cost.</p> <p>The arguments by which the proposal for houses in Westcourt Lane were rejected also apply to the proposal at the end of St Andrews Gardens. Mill Lane narrows considerably going out of the village and there have been quite a few accidents (mainly minor so will not have been reported) and we know of at least two of our neighbors who have had quite serious collisions leading to write offs of their vehicles.</p> <p>Also, as the landowner near Mill Lane does not wish to sell, all traffic (including construction traffic) will come down St Andrews Gardens and one of the access points designated is round a hairpin bend.</p> <p>The school run time is one to avoid even now as cars are parked all the way up Mill Lane to past Millfields, all round the Green and down Church Hill. It is naïve to suppose that people will walk or cycle to school. They will not, especially when it is raining. Also, the school is oversubscribed even now with families having to take their children elsewhere (by car)</p> <p>Transport in the village is very poor and I believe more cuts are on the way. Only the smaller buses are used due to access. There can be no possibility of cycle lanes, the roads are too narrow to allow for this.</p> <p>There are very few facilities in the village. We have a Co-op which is well used but has no designated parking and at busy times cars park illegally, a beauty salon and a pub which, as we all know, is probably under pressure from the financial crisis.</p> <p>The sewage system is constantly under pressure and the system cannot be fit for purpose with foul waste appearing in gardens in Eythorne and The Glen</p> <p>The train station is an asset to commuters but not so much so for shoppers, especially if you live in the top of the village. Walking up steep Church Hill and Approach Road with heavy shopping bags is not an option.</p> <p>To conclude, I feel that because of the above arguments, Shepherdswell is not the place for large-scale developments, and I hope you will take this into consideration.</p> <p>I also wish to express my concern about developments at Eythorne and Elvington. Eythorne Road in Shepherdswell is very busy during the rush hour and this will only get worse.</p> <p>If builders wish to build estates, they must be prepared to improve the infrastructure at their expense.</p>

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Shepherdswell is not the place for large-scale developments, and I hope you will take this into consideration. If builders wish to build estates, they must be prepared to improve the infrastructure at their expense.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House, Shepherdswell (SHE004/ TC4S082)
Rep ID	SDLP1533
Rep Status	Processed
Consultee ID	1333333
Consultee Full Name	Mr Colin Tearle
Consultee Company / Organisation	Shepherdswell-with-Coldred Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP36
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	Many residents have responded to the Dover District Council Local Plan. During public consultation the council has been made aware that while there is a recognised need for limited housing growth there are very strong concerns regarding the proposed sites in both Shepherdswell and Coldred and the consequential impact of proposed housing developments in the neighbouring villages of Eythorne and Elvington.

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

New housing without adequate local infrastructure puts significant strain on local amenities such as medical services, school and playgroup places as well as increasing traffic on our roads. The existing sewerage system is already overloaded and any future developments will only exacerbate this problem.

Far from being "sound" the Dover Local Plan is flawed. It contains many inaccuracies including:

- Shepherdswell now only has one public house.
- Shepherdswell is stated as being to the west of the A2 when in fact it is to the east .
- Traffic measurement flows were taken just post pandemic and clearly show a flow much lower than the parish's normal traffic volume.
- The plan states there is a bus service along Eythorne Road but this service was withdrawn many years ago and most other services have been withdrawn this year.

One must question the validity of much of the data and evidence attached to the plan, and how (and when) it was collected. Have DDC representatives visited the Parish in recent years to carry out surveys?

If development of any kind is to be permitted it should be linked to a S106 agreement to improve the facilities within Shepherdswell and Coldred.

The plan indicates that Dover District Council can fund parish councils from S106 monies when a case is made that this is a good use of funds. Shepherdswell with Coldred Parish Council would like to make a case for funding of community facilities, including improvements to the village hall, its parking facilities, the recreation ground, the cemeteries and improvements to the local school.

Sewerage and Drainage. The sewerage and foul water from the majority of properties in Shepherdswell drains into sewers connected to a pumping station at the rear of the East Kent Railway Station. Surface water from roads and paved areas also drain into these sewers and can add considerable load to the pumping station equipment . When the pumps cannot cope with this excess flow, foul flooding occurs in the houses and gardens of properties situated in The Glen. This has already been evidenced by frequent calls to DDC Environmental Services and Southern Water. Permitting the proposals at St Andrews Gardens will necessitate an immediate up-grade to this system to enable it to cope with the increased load, not even taking into account climate changes that result in increased rainfall.

Highways. As stated the current highway systems within our parish are totally inadequate for the current traffic levels and there are already congestion problems, especially with large and farm vehicles travelling through and trying to park within the villages. When we take into account new housing planned for our parish and also for Eythorne and Elvington (which will add even more vehicles from the 350+proposed dwellings there, travelling through Shepherdswell and Coldred to reach the A2), the traffic flow will again increase adding further to congestion and delays. Emergency response vehicles will be subject to these delays putting lives at risk. As previously stated traffic measurement levels were taken just post pandemic and clearly show flows much lower than normally experienced. Current Speedwatch reports show traffic flows much higher than those recorded with a peak of 224 vehicles per hour which was measured one way only. The highest speed recorded in the 30 mph limit was 64mph and 52mph in the 40 mph limit. These are current figures from November and December 2022.

Comments regarding poor access via single track roads with passing areas have been made by several residents. These narrow lanes inevitably lead to increased congestion and pollution.

We are advised that the Highways Department have no funds available for highway improvements and the current level of maintenance is inadequate. Shepherdswell has limited parking facilities near the village hall and Co-op area which frequently leads to congestion. This added congestion compounds the problems caused by the lack of pavements on three of the four roads at that junction. An expansion of the industrial site in Eythorne will undoubtedly lead to yet more congestion problems unless all heavy goods vehicles accessing that site are prohibited from using any access other than from the A258. There is already a problem with partial/temporary road blockages leading to significant congestion.

Transport. Whilst we are fortunate to have a railway station it does not offer reasonable access to disabled persons or those with limited mobility- it is difficult to envisage how access can be improved.

Most bus services have now been withdrawn apart from school services so residents will have to rely on cars for shopping etc. There are no dedicated cycle paths and many cyclists are reluctant to use their bikes because of this traffic congestion.

Those residents who want to use the train services must endure walking to the station on roads with limited or no footpaths. Residents in Eythorne and Elvington will have to either use cars to get to the station or walk along a very busy main road - again without footpaths.

SAP 37 transport statement specifies that the development must account for the cumulative impact of all developments in this plan on common road links. This makes a nonsense of the proposed plans for Elvington and Eythorne which would significantly increase traffic flow.

	<p>Village Services. The surgery situated in Mill Lane is oversubscribed and patients are very often referred to the Dover branch . There is no “walk in “ service .</p> <p>The village school is again nearly full with no current plans for extending present facilities. The location of the school causes severe traffic congestion at core times. Many parents taking their children to school have to walk up Church Hill which is a narrow, busy road with no footpath.</p> <p>The nearest secondary schools are located in Dover and parents experience considerable difficulty in transporting their children to school.</p> <p>Any proposed development around the Mill Lane/ St Andrew's Gardens areas do not comply with Policy T12-Transport Statements as this clearly states- “Developments that would generate significant traffic movements must be well related to primary and secondary school network. Proposals which would generate levels and types of traffic movements resulting in severe cumulative residual impacts in terms of capacity and road safety will not be permitted”. A large proportion of traffic from these proposed developments would have to pass along Mill Lane and Church Hill to access the A2. Because of the built up nature of these roads mitigation will not be sufficient to alleviate the impact of increased traffic.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>If development of any kind is to be permitted it should be linked to a S106 agreement to improve the facilities within Shepherdsweil and Coldred.</p> <p>The plan indicates that Dover District Council can fund parish councils from S106 monies when a case is made that this is a good use of funds. Shepherdsweil with Coldred Parish Council would like to make a case for funding of community facilities, including improvements to the village hall, its parking facilities, the recreation ground, the cemeteries and improvements to the local school.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	No
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	Hunt Shepherdsweil with Coldred PC 1441 Att2.pdf
<p>Local Plan Consultation Point</p>	SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House, Shepherdsweil (SHE004/ TC4S082)
<p>Rep ID</p>	SDLP1804
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1330508
<p>Consultee Full Name</p>	Mrs linda symes
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to?Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	SAP36
<p>2 - Do you consider this part of the Plan sound?</p>	No

<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified Effective Consistent with National Policy</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Not Applicable</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Not Applicable</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>SAP36 St Andrew//Mill Lane It is feared that the increase in additional traffic would be unacceptable from a proposed site increase of 50+ houses . This is simply too big and there are few, if any improvements that could be made to alleviate this . Allowing for an additional of a minimum vehicle use of , 4 journeys household per day x57 = 228 additional vehicle movements. More than the suggested 20% increase predicted . Existing traffic movements recorded in and out of St Andrews Gdns recorded 246 vehicles movements during a period 6am -9pm, Speedwatch have recorded a total of 130 vehicles coming into and exiting the village along Mill Laned during the period 7,30am-9.30am See photos attached of the issues of congestion along Mill Lane where the road is at points single track. This being the suggested exit proposed to Eythorne/Sandwich /256 . Should vehicles go in the opposite direction to Church Hill the road allows for single traffic at most times of the day. There is no footpath and pedestrian access is dangerous. Traffic would then enter on to Coxhill (see further details under Sec SAP37) KCC report states The development of this site for residential use would place additional pressure on the surrounding highway network, in particular St Andrews Gardens, Mill Lane and Church Hill. KCC Highways advice should therefore be sought as part of any development proposals to ensure that any cumulative impacts can be mitigated The local bus has recently been given a short term reprieve after Stagecoach decided the route was not viable and as yet no plans have been formulated to offer residents a viable alternative. Unless this is forthcoming current and any future residents will use their cars DDC acknowledge climate change issues do need to be tackled in a holistic manner There are no suitable cycle paths and in addition being a rural community we have many horse riders using the lanes which adds to the worry that more cars equals more dangerous conditions. The Transport Report whilst acknowledging the issues does not provide the necessary solutions. <i>(DDC note: This representation was originally made against the Infrastructure Delivery Plan consultation document but has been duplicated in relevant places against the Local Plan due to the specific site allocation/policy references made)</i></p>

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House, Shepherdswell (SHE004/ TC4S082)
Rep ID	SDLP1974
Rep Status	Processed
Consultee ID	1274220
Consultee Full Name	Tim Fagan
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP36
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	SAP36 – access insufficient, infrastructure (Mill Lane access) unsuitable, spoiling of amenities (view, wildlife, especially bats)

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	SA36 – consider building houses elsewhere and/or make access road from Eythorne Road
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House, Shepherdswell (SHE004/ TC4S082)
Rep ID	SDLP1978
Rep Status	Processed
Consultee ID	1274392
Consultee Full Name	Mr R Winter
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP36
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>Housing plan for Shepherswell</p> <p>I have the following comments that should be resolved prior to any development.</p> <ol style="list-style-type: none"> 1 The houses to be built alongside Cox hill road must have very clear signs for entry and exit to the site and clear views for leaving the site, and the speed limit must be reviewed. 2 The traffic along Mill Lane is already overloaded and the road must be widened before any build of more houses accessing the road is allowed to be considered 3 There is no need for a further seventy houses to be built and any houses built should be low cost 4 The water pressure is reduced now in the afternoons when school is over, meals being prepared, baths and showers in full use and this applies to the gas and electricity without a further eighty houses being added. <p>There is currently a parking shortage at the railway station resulting in cars blocking residents access to their own homes.</p> <p>The one shop in the village does not have any parking facilities, which makes the road junction, Church Hill, Westcourt Lane, and Eythorne road is a very dangerous place for residents and visitors who are blocked in by inconsiderate paring, not to forget the danger to all, due to total lack of vision for any vehicle joining the Eythorne road from Westcourt Lane/Church Hill, the addition of 70/80 houses with minimum 80 more cars will only add to the dangerous situation that exists.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Not Applicable
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House, Shepherswell (SHE004/ TC4S082)
<p>Rep ID</p>	SDLP1737
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1333497
<p>Consultee Full Name</p>	Cllr John Bulaitis
<p>Consultee Company / Organisation</p>	Shepherswell Against The Development
<p>Agent Full Name</p>	

Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP36
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note: The text below was extracted from the attachment. Names and addresses redacted. Will be made available to the Inspector on request. Group rep 111 Shepherdsweil residents</p> <p>1.1 This representation is presented on behalf of Shepherdsweil against the Development (SAD). It addresses specifically SAP36: the site allocation of Land to the north and east of St Andrews Gardens and adjacent to Mill House. It is presented by the following:</p> <p>[Names and addresses redacted]</p> <p>It is signed additionally by the over one hundred Shepherdsweil residents listed at the end of the representation. [Redacted]</p> <p>1.2 SAD was established in the autumn of 2019. SAD aims to ensure that villagers are engaged on issues relating to planning, the environment, sustainability, services and other issues that impinge on the quality of life. The group is not against development per se, but its aim is to oppose 'inappropriate and exploitative development in our village'. Since 2019, SAD has organised regular public events in the village, including a meeting of 400 residents in October 2019 (photograph redacted). During the Regulation 18 consultation, SAD organised events and discussion in the village, including zoom meetings, distribution of questionnaires, consultation boxes in the Co-op etc. Its members drew up the Parish Council's submission to the Regulation 18 Consultation. The group runs a Facebook page with close to 500 members. This Representation was drawn up after a consultation meeting attended by 60 residents in the Village Hall and then circulated for comments and amendments amongst supporters of SAD.</p> <p>2. We do not consider the Local Plan to be sound.</p> <p>3. We consider it unsound on the grounds that it is not been positively prepared, not justified and is not consistent with national policy.</p> <p>4. We do not consider the Plan to be legally compliant.</p> <p>5. We accept that the Plan complies with the Council's Duty to Cooperate.</p> <p>6. We consider that SAP36, which allocates land for 50 houses to the north and east of St Andrews Gardens and adjacent to Mill House, is unsound and not legally compliant for the following reasons:</p> <p>6.1 To be legally compliant the plan should follow the Council's Statement of Community Involvement (SCI). This includes a commitment to public engagement 'to include people whom we consider would be most affected by the particular proposals or plans, and where possible we will include known interest groups' (p.3). During the Regulation 18 Consultation there were 191 representations from 179 consultees on the proposed site allocation SHE004, which was made up of two parcels of land and a proposed 40 new dwellings. This number of comments is significant. Of the comments, 167 were objections and only 3 were agreement.</p> <p>6.2 The Regulation 19 draft makes some attempt to address the comments from consultees. The issue of wastewater was raised by many and Regulation 19 acknowledges the need to address the issue – though the details of how this will be done remain vague. But other main concerns raised by consultees are not seriously addressed. These are: character of the area (raised by 103 consultees), tree landscape impact (92 consultees); habitats impact (68); highways (167). Some residents who made comments received a standard letter as a reply, but many did not.</p>

6.3 SAP36 in the Regulation 19 draft has made significant changes to the SHE004 proposal. These increase the size of the site and adds a new parcel of land (TC4S082). They also increase the proposed number of dwellings to 50. Despite the significant number of representations about this site, there has been no attempt to discuss the impact of these changes in the Plan with those 'most affected' members of the community or their representatives, including 'the known interest group', SAD.

6.4 To be sound, the proposal must comply with the Council's Sustainability Assessment objectives. SA 10 is to 'conserve or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment'. SA 11 is to 'conserve and enhance the special qualities, accessibility, local character and distinctiveness of the District's settlements, coastline and countryside'. In relation to SA10, the Draft Plan recognises 'minor negative effects' (7.207). 3 In relation to SA11, the Draft Plan concedes that the proposed site has 'potential to moderately affect the District's landscapes, townscapes and seascapes'. It is our contention that these desk-top surveys underestimate the negative effects of SA10 and the 'potential' damage in relation to SA11. They ignore evidence provided from local residents during the Regulation 18 consultation.

6.5 Definitions of 'historic environment' include not only historic buildings, but a sense of location, of space and of past historical events. The proposed site contains these qualities. It is one of the few remaining spots in the Dover district granting residents easy access to view the eastern and northern Kentish coastline (See figure 1). The historical record shows the significance of this – or nearby now inaccessible vantage points – for Kentish history – some examples going back ten centuries. More recently, in 2012 the site was the assembly point for many local residents to view the demolition of the Richborough Power Station towers. The inclusion of the site would obliterate this historical viewpoint for the community, at best turning it into a private place for particular residents.

6.6 The site, as the Draft Plan notes, opens onto 'open rural countryside'. In so doing, it enables a sense of space that provides character and distinctiveness, as well as a sense of well-being. These qualities have previously been recognised by planners and Her Majesty's Inspectorate. Rejecting a proposal for building on the site in 1991, the Inspector noted: From my visit to the site and its surroundings and from the representations made, I consider the principal issue to be the impact of the development on the character and appearance of the countryside around Shepherdswell [...] If the development were permitted, it would expand the confines of the village into the open surrounding downland. [...] In my view, the scheme would create a harmful, visual intrusion into this attractive area, spoiling its character and appearance. (D.G. Hayes, Planning Inspectorate, Department of the Environment, 31 October 1991)

An earlier assessment noted: The development of this site would involve the sacrifice of considerable assets in respect of landscape. From a distance such development would be plainly seen occupying what is now open hillside upon which only very limited skyline building impinges, and the development on the site would also add to this to a limited degree, but the more serious loss would be in respect of the magnificent outward views now enjoyed from the 2 public footpaths which cross the site one of which is of national importance. S. M. J. Wallis, Department of the Environment, 22 May 1974, DDC CH/6/72/195.

Despite changes in planning laws, these assessments remain relevant. They are not 'outdated'. The inclusion of site SAP36 would be an inappropriate development that would have – not a moderate – but a serious effect on local character, distinctiveness and the landscape. The photos in the Appendix taken from the site are testimony to this fact. 4

6.7 Highways and Access. In the Regulation 18 consultation, 167 consultees raised problems relating to Highways and Transport Infrastructure. We do not believe that these concerns have been adequately addressed in the Regulation 19 draft plan. The Council previously noted (in its HELAA document) that 'secondary emergency access' to the site 'does not appear achievable'. This was one of the reasons why the site was flagged as 'yellow', rather than 'green' on the traffic light system. Regulation 19 states (p. 166) that 'primary vehicular, pedestrian and cycle access to the whole site shall be provided from St. Andrews Gardens, and therefore development of site SHE004 must provide vehicle access and servicing up the boundary with TC4S082 to enable a main access road to be created through the whole development'. It states that 'a secondary emergency access onto Mill Lane may be achievable from TC4S082' (our emphasis). We argue that the safety of residents must be prioritised and more than the possibility of a secondary emergency access is necessary before the site's inclusion is included.

6.8 The access issue is doubly important because of the road network system surrounding SAP36 and, more generally, in Shepherdswell. The village is accessed from almost every direction by country lanes – which are generally single-tracked. Within the village, sections of roads – including Church Hill, Mill Lane, Westcourt Lane, Cox Hill – are narrowed into single-track because of parked vehicles. The main thoroughfare through the village (Eythorne Road/Cox Hill) has well-documented difficulties at certain points. The only access to SAP36 is through Mill Lane – a road accessed through single-tracked lanes in all directions and often experiencing congestion due to the school run and activities involving the Village Green. Emergency vehicles accessing the proposed site will not only have to navigate difficult lanes (Church Hill, area surrounding The Green and Mill Lane) but have only one access points into the site, posing risks to the safety of both existing and new residents.

6.9 Environmental Impact Legal compliance requires abiding by sustainability and habitats regulations. The Regulation 19 sustainability report admits that there are 'precautionary significant effects on the site concerning the policy of 'conserving and enhancing the District's wildlife habitats and species' (7.205). It accepts that the proposal will lead to a 'loss and/or damage to habitats'. The Habitats Regulations Assessment

flags the site as Red – High – as a suitable habitat for migrating birds. The report claims that these losses can be mitigated. But the report is underestimating the extent of the damage the proposed site would do to the district's wildlife and species. The NPPF (para 182) states that 'presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site' unless 'an appropriate assessment' has been carried out. There is no evidence that anything other than a desk-bound assessment has been undertaken. Residents have viewed Golden Orioles visiting the Site during migration. Raptors, such as Sparrow Hawks, are seen hunting over the Site, which is a testament to the amount of wildlife the Site provides, including insects and small mammals. Three residents living adjacent to the site have identified the following amongst the wildlife using the site as a habitat.

- Bats (a growing population, which nest in properties adjacent to the site)
- Stoats
- Badgers (**DDC Redacted**)
- Foxes
- Slow worms (utilising disused rabbit/vole burrows around the perimeter of the site) (See photo)
- Newts and toads
- Owls
- Spotted woodpeckers
- Green woodpeckers
- Pheasants (visiting)
- Herons
- Male and female bullfinches and goldfinches
- Variety of tits, including long-tailed
- Song thrushes
- Wrens
- Jays
- Flora is varied – the summer months boasting a display of wild flowers.

Two other residents living adjacent to the site write: 'The land is used by wildlife, especially birds (I feed them year round, and regularly get 20-40 'red-listed' Starlings and up to 15 House Sparrows to my bird tables each day.) There is a variety of birds that use this land, including Collared Doves, Blue Tits, Blackbirds, Crows, Jackdaws, Rooks - all traditional farmland birds. Starlings alone have decreased by 66% since the mid 70s. By depriving them of this open meadow land, rich in the earthworms and insects on which they heavily depend, we would be driving increasingly frequent extinction events. The loss of this meadow land and its wildlife would be a blow to the people of the village. There have been widely publicised reports that access to and interaction with the countryside and wildlife contributes to mental health. I know that looking out of my window each morning and seeing all the birds lifts my heart.' [Name and addresses available on request.]

The changes proposed to make the Plan sound and legally compliant are to delete SAP36, which allocates land for 50 houses to the north and east of St Andrews Gardens and adjacent to Mill House, and all other references to this site from the Plan.

8. We would like to take part in the oral part of the examination.

9. This request is necessary in order to ensure that our points and evidence are presented to the Inspector.

See attachment for photographs

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The changes proposed to make the Plan sound and legally compliant are to delete SAP36, which allocates land for 50 houses to the north and east of St Andrews Gardens and adjacent to Mill House, and all other references to this site from the Plan.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

[SDLP1737.PDF](#)

Local Plan Consultation Point

SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House, Shepherdswell (SHE004/ TC4S082)

Rep ID

SDLP1850

Rep Status

Processed

Consultee ID

1333708

Consultee Full Name	susan pike
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP36
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The plan does not take into account the current lack of supporting infrastructure within the village. Roads are extremely narrow and cannot support repeated heavy haulage vehicles (at one point Mill Lane is only seven feet wide) Existing lack of school spaces; lack of medical practice facilities; lack of sufficient shops for the whole village. Ruination of the small amount of existing green spaces
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Planning consent for this development is neither sound or sensitive and should be refused on the grounds of my comments at part 6
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House, Shepherdswell (SHE004/ TC4S082)
Rep ID	SDLP1959
Rep Status	Processed
Consultee ID	1273725

Consultee Full Name	Revd Harvey Richardson
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP36
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p><u>Proper consultation</u></p> <p>To be legally compliant the plan should follow the Council's Statement of Community Involvement (SCI). This includes a commitment to public engagement 'to include people whom we consider would be most affected by the particular proposals or plans, and where possible we will include known interest groups.'</p> <p>During the Regulation 18 Consultation there were 191 representation from 179 consultees on the proposed site allocation SHE004, which was made up of two parcels of land and a proposed 40 new dwellings.</p> <p>This number of comments is highly significant, and unique. Of the comments, 167 were objections and only 3 were agreement.</p> <p>-</p> <p><u>Concerns of Consultees</u></p> <p>The regulation 19 draft makes some attempt to address the comments from consultees. The issue of waste water was raised by many, and Regulation 19 acknowledges the need to address the issue. But the other main concerns raised by consultees are not seriously addressed.</p> <p>These were:</p> <p>Character of the area(103 consultees)</p> <p>Tree landscape impact(92)</p> <p>Habitats impact(68)</p> <p>Highways(167)</p> <p>Some residents who made comments received a standard letter, but many did not.</p> <p><u>Changes to SHE004</u></p> <p>-</p> <p>SAP36 in the Regulation 19 draft has made significant changes to the SHE004 proposal. These have increased the size of the site and added a new parcel of land (TC4S082). They have also increased the proposed number of dwellings to 50.</p>

Despite the significant number of representations about this site, there has been no opportunity to discuss the impact of these changes with those 'most affected' members of the community or their representatives, including 'the known interest group', 'Shepherdswell Against the Development'

Sustainability Assessment Objectives

In order to be 'sound', the proposal must comply with the Council's Sustainability Assessment objectives.

SA 10 is to 'conserve or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment'.

SA 11 is to 'conserve and enhance the special qualities, accessibility, local character and distinctiveness of the District's settlements, coastline and countryside'.

In relation to SA10, the Draft Plan recognises 'minor negative effects' (7.207).

In relation to SA11, the Draft Plan concedes that the proposed site has 'potential to moderately affect the District's landscapes, townscapes and seascapes.'

It is my view that these surveys do not fully recognize the negative effects of SA10 and the 'potential' damage in relation to SA11. They totally ignore evidence provided from the local community during the Regulation 18 consultation.

Historic Environment

Definitions of 'historic environment' include not only historic buildings, but a sense of location, of space and of past historical events, the proposed site contains these qualities. It is one of the few remaining spots in the Dover District granting residents easy access to the eastern and northern Kentish coastline. The historical record shows the significance of this – or nearby now inaccessible vantage points – for Kentish history – some examples going back ten centuries. The inclusion of the site would obliterate a historical viewpoint for the community, at best turning it into a private place for particular residents.

The existence of the North Downs Way and the ancient Via Francigena Pilgrim path from Canterbury to Rome appears not to be mentioned or to be of any significance.

Distinctive Character of the Landscape

The site, as the Draft Plan notes, opens onto, 'open rural countryside'. In doing so, it enables a sense of space that provides character and distinctiveness as well as a sense of wellbeing. These qualities have previously been recognized by planners and Her Majesty's Inspectorate.

Rejecting a proposal for building on the site in 1991, the inspector noted:

From my visit to the site and its surroundings and from the representations made, I consider the principle issues to be the impact of the development on the character and appearance of the countryside around Shepherdswell (...). If the development were permitted, it would expand the confines of the village into the open surrounding downland. (...) In my view, the scheme would create harmful, visual intrusion into this attractive area, spoiling its character and appearance. (D.G. Haynes, Planning Inspectorate, Department of the Environment, 31 October 1991)

An earlier assessment noted:

The development of this site would involve the sacrifice of considerable assets in respect of landscape. From a distance such development would be plainly seen occupying what is now open hillside upon which only very limited skyline building impinges, and the development on the site would also add to this to a limited degree, but the more serious loss would be in respect of the magnificent outward views now enjoyed from 2 public footpaths which cross the site one of which is of national importance.

1 M. J. Wallis, Department of the Environment, 22 May 1974, DDC CH/6/72/195.

Despite changes in planning laws, these assessments are not 'outdated'. The inclusion of site SAP36 would be an inappropriate development that would have – not a moderate – but a serious effect on local character, distinctiveness and the landscape.

Environmental Impact

Legal compliance requires abiding by sustainability and habitats regulations

The regulation 19 sustainability report admits that there are 'precautionary significant effects on the site concerning the policy of 'conserving and enhancing the District's wildlife habitats and species' (7.205). It accepts that the proposal will lead to a 'loss and/or damage to habitats'.

The Habitats Regulations Assessment flags the site as Red – High – as suitable habitat for migrating birds.

The report claims that these losses can be mitigated. But the report is underestimating the extent of the damage the proposed site would do to the district's wildlife and species. The presence of an abundance of wildlife has been observed and noted by many local residents, including (DDC Redacted)

- Badgers
- Slow Worms (utilising disused rabbit/vole burrows around the perimeter of the site)
- Newts and toads
- Owls
- Spotted woodpeckers
- Pheasants (visiting)
- Male and female bullfinches
- Variety of tits, including long-tailed
- Song thrushes
- Wrens
- Jays
- Flora is varied – the summer months boasting a display of wild flowers

Infrastructure & Highways

When Highways are a top priority for the District Council, have the infrastructure needs of the area been met?

Now that an earlier proposal in the Westcourt Lane was abandoned because of lack of a pavement, how can it be possible for heavy construction traffic to travel in and out of St Andrews Gardens area when there is not only no pavement but also highly narrow and one-way restriction on the roadway in Mill Lane?

This is simply – beyond belief and comprehension!

The impact on increased road traffic created by more residents will be considered in an area which already struggles, especially at peak parts of the day and at traffic pinch points.

The drainage system in the village is already overloaded, with a potential sewerage risk.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order to make the plan legally compliant, section SAP36 needs to be deleted
Also, there is significance in today's 'hot off the press' news (Dec 6 2022) about the change of Central Government's housing policies which gives more freedom for District Councils to act with greater responsibility towards the local community

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House, Shepherdswell (SHE004/ TC4S082)
Rep ID	SDLP1914
Rep Status	Processed
Consultee ID	1333871
Consultee Full Name	Mrs Marion Adele Lewis
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP36
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I do not agree that any research carried out in respect of this development has been conducted properly. Total disregard to wildlife – birds, North Downs Way and Area of Outstanding Natural Beauty
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Infill is one thing; mass development of this scale is totally unacceptable. Already the sewerage, water, Drs, school are under considerable strain. The lanes in the village are unable to be widened. Cannot take the volume of traffic roads are already dangerous

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House, Shepherdswell (SHE004/ TC4S082)
Rep ID	SDLP1944
Rep Status	Processed
Consultee ID	1333910
Consultee Full Name	Mr David Jones
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Shepherdswell
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Dear Sir/Madam I am writing to object to comment on the above plan. I am very concerned about the amount of developments scheduled in and on the outskirts of villages, as opposed to the government's dictum that Brownfield sites should be the main focus for developments. I note that many of the proposals in towns are designated as medium timescale whereas many in the villages are designated short term. I feel that the brownfield sites in towns should be developed first then, if needed, the villages should be considered.

As I live in Shepherdswell, naturally, I am very concerned about proposals for housing here.

Shepherdswell is very unique in that every road into the village is narrow and we cannot see any way of improving the infrastructure except at major cost.

The arguments by which the proposal for houses in Westcourt Lane were rejected also apply to the proposal at the end of St Andrews Gardens. Mill Lane narrows considerably going out of the village and there have been quite a few accidents (mainly minor so will not have been reported) and we know of at least two of our neighbors who have had quite serious collisions leading to write offs of their vehicles.

Also, as the landowner near Mill Lane does not wish to sell, all traffic (including construction traffic) will come down St Andrews Gardens and one of the access points designated is round a hairpin bend.

The school run time is one to avoid even now as cars are parked all the way up Mill Lane to past Millfields, all round the Green and down Church Hill. It is naïve to suppose that people will walk or cycle to school. They will not, especially when it is raining. Also, the school is oversubscribed even now with families having to take their children elsewhere (by car)

Transport in the village is very poor and I believe more cuts are on the way. Only the smaller buses are used due to access. There can be no possibility of cycle lanes, the roads are too narrow to allow for this.

There are very few facilities in the village. We have a Co-op which is well used but has no designated parking and at busy times cars park illegally, a beauty salon and a pub which, as we all know, is probably under pressure from the financial crisis.

The sewage system is constantly under pressure and the system cannot be fit for purpose with foul waste appearing in gardens in Eythorne and The Glen

The train station is an asset to commuters but not so much so for shoppers, especially if you live in the top of the village. Walking up steep Church Hill and Approach Road with heavy shopping bags is not an option.

To conclude, I feel that because of the above arguments, Shepherdswell is not the place for large-scale developments, and I hope you will take this into consideration.

I also wish to express my concern about developments at Eythorne and Elvington. Eythorne Road in Shepherdswell is very busy during the rush hour and this will only get worse.

If builders wish to build estates, they must be prepared to improve the infrastructure at their expense.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House, Shepherdswell (SHE004/ TC4S082)
Rep ID	SDLP1950
Rep Status	Processed
Consultee ID	1334248
Consultee Full Name	Mrs Diana Plant
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP36
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	There were no consultations with Canterbury and also did not consult about adding extra were on St Andrews Gardens. Many flaws in the survey conducted by the applicant
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The impact on the roads – Shepherdswell is an ancient village with all lanes in and out of the village. Impact on wildlife and environment – the infrastructure could not support so many properties.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

SAP37 - Shepherdsweil Small Housing Sites

Local Plan Consultation Point	SAP37 - Shepherdsweil Small Housing Sites
Rep ID	SDLP222
Rep Status	Processed
Consultee ID	1331262
Consultee Full Name	Mrs Gill Vaughan
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 37
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SHE006, SAP37 The Land at Botolph Street Farm, Shepherdsweil Is not suitable for development it is a known flood plain. There are already flooding problems along CoxHill which is adjacent to this site. This site can only be accessed by single track road, with NO pedestrian path. The resultant extra traffic would put extra pressure on the current already under pressure single track road into the village. There is no pedestrian path, this part of the road is very dangerous for pedestrians. Not legal, there needs to be a full ecological species and habitat survey, over a full 12 month period 24 hours per day for; bats, wildlife and birds.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Not legal, you shouldn't build on a flood plain. Not legal, you shouldn't build where it is dangerous for pedestrians. And no room to make it safe for pedestrians.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP37 - Shepherdsweil Small Housing Sites
Rep ID	SDLP931
Rep Status	Processed
Consultee ID	1331262
Consultee Full Name	Mrs Gill Vaughan
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP37
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SAP 36, SHE004, TC4S082, SAP37 A full species and habitat survey has not taken place, which should take place over a full 12 month period, 24 hours day and night. A wintering bird survey must also be undertaken, again 24 hours every day. The ancient pilgrim trail between Canterbury and Rome must be fully acknowledged and totally protected.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	SAP 36, SHE004, TC4S082, SAP37 to make this proposal legally compliant in Shepherdsweil, there needs to be access to the Village by roads which are NOT single track with passing places the provision of pedestrian pathways must be made. All roads leading into the Village and the proposed development are not safe or adequate for the additional traffic which will result in additional houses. All roads into the village are Single Track. The water pressure issues in that area must be addressed - a water supply is a basic human need. And the sewage/waste water problems which have existed in the lower part of the village for over 40 years must also be addressed. Extra waste water cannot be accommodated by the present system.

<p>if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>There are no local jobs, therefore the new residents would need cars to get to their jobs and the roads into and out of the village do not have that capacity. There is no regular reliable bus service and what is already in place is under threat of removal.</p> <p>The train station provides one train per hour each way. If the track between Dover and Folkestone suffers another rockfall, this will not be repaired and Dover will become just a branch line. The fast track bus system from Whitfield would not be used for the purpose of getting a fast train from Dover to London.</p> <p>No fast link to London, equals more cars on the roads which is against government policy of reducing vehicle traffic and carbon emissions CC1.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Not Applicable</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP37 - Shepherdswell Small Housing Sites</p>
<p>Rep ID</p>	<p>SDLP920</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331862</p>
<p>Consultee Full Name</p>	<p>Sindy Denyer</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>Section 1. Category Infrastructure Delivery Plan Reference: Infrastructure Delivery Plan – Draft for Consultation October 2022 PART 1: Physical Infrastructure Theme 1: Transport SP12 - Strategic Transport Infrastructure- Local Road Network 3.39 As part of the Local Plan modelling work, the impacts of Local Plan growth on the Local Highway Network were assessed however site specific mitigation and policies need to be considered . The plan must address the adequacy of the Coxhill, Eythorne Road, Shepherdswell Roads, local road network and public transport services supporting the proposed SAP 36,37, 28, 29 and 30 developments.</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Justified Consistent with National Policy</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Yes</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Not Applicable</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>The draft local plan regulation 19 states under TI2 - Transport Statements, Assessments and Travel Plans section 10.7 the objective to ensure that traffic generated from new development can be accommodated on the highway network to promote the delivery of sustainable development. Section 10.8 states that traffic generated by development should normally be targeted towards the primary and secondary route network in the District. However other routes should not be subject to inappropriate levels of traffic generation or unsuitable traffic movements.</p>

In the event SAP 36,37, 28, 29 and 30 developments are implemented the Coxhill, Eythorne Road, Shepherdswell Roads will be the main route by car from Shepherdswell, Eythorne and Elvington to the A2 road network, we believe this will place significant pressure on local road traffic which needs to be addressed however there is no material consideration to implementing road improvements and assign funding in either the Dover Local Plan or SP12.

Access to Shepherdswell, Eythorne and Elvington from the A2 involves narrow single track road with passing place. Access at the top end of Shepherdswell village via Mill Lane connects to the lower end of the Shepherdswell Road restricted by road width, parked vehicles, speed humps and traffic. All access roads currently suffer from significant traffic congestion during peak commuter periods.

Shepherdswell has limited parking facilities around the village hall and local shop and heavy reliance on road parking further limits the width of Coxhill to single file traffic. Traffic bound for the Eythorne industrial estates includes a significant flow of large articulated lorries that regularly lead to partial/ temporary road blockages and significant road congestion.

The Local Plan SP12 - Strategic Transport Infrastructure focusses on improvements to the A2 highway network and key junctions only and decisions around improvements to the local road network are deferred. Regulation 19 Transport Modelling Forecasting Report, forecasts that traffic leading from the A2 through Coxhill, Shepherdswell and Eythorne, is projected to grow at 15-19% as a minimum scenario, our independent assessment based independent analysis of development proposals is this will be nearer 60%.

Analysis of Coxhill peak traffic flow conducted by Shepherdswell Speedwatch (in collaboration with the Metropolitan Police) in June and July 2022 recorded traffic flow of circa 550 vehicles per hour.

The Draft Local Plan Regulation 19 states that approved development must account for the cumulative impact of all developments allocated in the Plan on common road links. SAP 36,37, 28, 29 and 30 proposed developments will add 425 houses to the local area served by the A256 with residents needing to commute regularly to work, schools etc. during peak commuting periods. Shepherdswell has circa 700 houses so combined with the proposed plan increase of 425 houses in Shepherdswell, Eythorne and Elvington, this represents a 60% increase in property numbers which we project will be mirrored by an equivalent increase in road traffic. An increase of 60% on current commuter peak traffic flow translates to circa 590 vehicles per hour or 10 vehicles per minute along largely single-track road with road speed impacted by slow moving heavy goods traffic.

Compounding significant road congestion there is a lack of pedestrian footways in Shepherdswell leading to key routes i.e. school, local shop, health centre and village hall, peak footfall along pavement less roads occurs when traffic flow is at its highest presenting a significant road safety concern.

There are specific road access concerns relating to St Andrews Gardens (SAP 36 SHE004) a development of 57 houses served by one road access and exit point. The Local Plan Reg 19 proposes to increase the number of properties by 50 on this estate effectively doubling its size without addressing & mitigating emergency access and road safety design.

KCC's Kent Design, Creating the design, Step 3- Design recommends that minor access roads generally serving up to 100 dwellings, including those in other residential areas which feed on to it should either be a through road or, if a cul-de-sac, serve no more than 50 dwellings unless an alternative access route, to serve motorists, pedestrian and cyclists, can be provided. Previous development surveys of SHE004 access points used the Housing and Economic Land Availability Assessment traffic light system which rated this site as Amber with an assessment proviso that "secondary emergency access is required however this does not appear achievable".

St Andrews Gardens access road links into Mill Lane which is restricted at points to single track road with passing places. Mill Lane is heavily used constituting one of the main access routes to the Shepherdswell Health Centre, School and Church.

The Draft Local Plan Regulation 19 states under section E1 that for designated industrial settlements new employment development will be supported within existing employment sites as identified on the Policies Map or on land within or immediately adjoining the settlement confines of designated settlements. While employment for villagers is essential it should be considered without a viable public transportation network such development will further challenge the stressed A256 local road network.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The Draft Local Plan Regulation 19 must propose improvements that address the adequacy of the A256 and local road network and public transport services supporting the proposed SAP 36,37, 28, 29 and 30 developments and ensure funding for these needs is addressed in the final plan.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP37 - Shepherdswell Small Housing Sites
Rep ID	SDLP746
Rep Status	Processed
Consultee ID	1331840
Consultee Full Name	Mr M Page
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP37 - Shepherdswell Small Housing Sites
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible.	SAP37 - Shepherdswell Small Housing Sites Site SHE006 NPPF states that when considering development proposals, it should be ensured that 'safe and suitable access to the site can be achieved for all users' and that developments 'give priority first to pedestrian and cycle movements'.

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

In the Regulation 18 draft plan DDC noted that the site had 'no footway' and that DDC had concerns over this. It should also be noted that the part of site sits at a lower ground level than Coxhill Road and that this could potentially cause issues around access 'for all users'.

In the current plan, no mention is made of this as a 'site specific issue'

In the Regulation 18 draft plan, the site SHE012 (immediately opposite) was shown as rejected on the grounds that:
 Site is in a remote location
 Development here would be unsustainable

Both comments are clearly applicable to SHE006, especially given the potential risks to pedestrians using Coxhill Road, a narrow road subject to increasing vehicular movements (including HGVs), something that the development would clearly add to.

Associated DDC evidence also states that the site is less than 300m from a bus stop. What this fails to observe, is that there is no regular bus service within the village, with the exception of a daily school service.

The site has previously been rejected by the Planning Inspectorate.

DDC evidence states that the site is at risk from 1 in 30 year risk of surface water flooding, considered by the Environment Agency to be at 'High Risk'.

NPPF states that 'inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk'.

In the Regulation 18 draft plan, DDC noted that Coxhill Road would need 'widening at the access point' to the site. Yet the current plan states that 'existing trees and hedges should be retained and enhanced'. Given that these abut Coxhill Road, this would appear to be a contradictory position. Pedestrian access would also require the loss of hedging. Any loss of existing trees/hedgerow plants, would go against DDC's policy of 'conserving and enhancing the district's wildlife habitats'. Given the hedgerow's length, age, species and proximity to a PROW, it is also likely to be protected by the Hedgerow Regulations 1997. It should also be noted that hedgerows can significantly help to reducing flooding.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The removal of site SHE006

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Local Plan Consultation Point SAP37 - Shepherdswell Small Housing Sites

Rep ID SDLP997

Rep Status Processed

Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP37
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The County Council requests that the policy includes reference to improvements required to Footpath ER81.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The County Council requests that the policy includes reference to improvements required to Footpath ER81.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP37 - Shepherdsweil Small Housing Sites
Rep ID	SDLP1560
Rep Status	Processed

Consultee ID	1252218
Consultee Full Name	Cllr Linda Keen
Consultee Company / Organisation	DDC WARD - Aylesham, Eythorne and Shepherdswell
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP37
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I write in support of the comments made by Shepherdswell Parish Council.</p> <p>1. Evidence errors – the Parish Council points out several inaccuracies in the Local plan statements, un relation to various local amenities (which do not actually exist), and the village's location, which are rather worrying. The Council is also concerned about the validity of the traffic survey results in relation to these surveys being taken just pandemic when traffic flows were significantly lower – and this is very significant because a main objection to the house building is the inadequate road structure. The Council quotes current Speedwatch reports which show traffic flows much higher than those recorded with a peak of 224 vehicles per hour – and which was measured one way only.</p> <p>2. Highways infrastructure and transport - the existing local highway network is already inadequate for the number of houses in the village and surrounding areas. More houses will mean be significant adverse effects on the already heavily congested and dangerous Cox hill crossroads by the Co-op, and Coxhill road running through Shepherdswell, This road is already over stretched, and extensively used as a rat run between the Sandwich/Dover main road and the A2. There will also be a knock-on effect from the 350 houses planned for Eythorne, which will make this problem even worse – these should not be built – plus the expansion of the industrial estate planned there. SAP 37 transport statement specifies that the development must account for the cumulative impact of all developments in this plan on common road links, but the proposed plans for Elvington and Eythorne, which will obviously significantly increase traffic numbers, utterly invalidate this statement. Nothing can be done about all this, unless you build a by-pass, for which funding will simply never be available, and which would be undesirable anyway, given the rural and beautiful nature of the area.</p> <p>Kent Highways has no cash to undertake mitigation works – such as improving junctions and dealing with congestion caused by on-street parking – and the number of houses will not generate enough Developer funding to pay for such attempts to resolve these problems. . There is also a problem with sustainable transport – there are no cycle tracks, and the bus service has recently been cut – and there are no footways or cycleways along dangerously narrow and bendy roads. The Coldred SHE013 proposals suffer, too, from such drawbacks. Again, there are no funds to improve these problems, despite the (unachievable) aspirations in the Local Plan. While there is a railway station at Shepherdswell, disabled access urgently requires improvement.</p> <p>3. Sewage and drainage – the Parish Council statement explains fully the serious problems already existing here, and , as a DDC ward Cllr, I am currently trying to get something done about the regular flooding problems affecting the houses next to St Andrew's development which will worsen the situation. Kent County Council say the Developers should pay for this but there are insufficient funds – and Kent Council has no plans for new drainage systems, as far as I am aware. The Local Plan does not deal adequately with these problems.</p>

	4. Village amenities – the Parish Council outlines the problems with the limitations on these – especially with regards to local school places, and inadequate transport arrangements for pupils to get to the secondary schools in Dover, Deal or Sandwich. Access to the shops, school, village hall etc are difficult and dangerous because of some roads without proper footways, such as Church Hill. The capacity of the local surgery is also clearly insufficient to cope with existing demand.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The Highways, draining and public transport problems are understated in the Local Plan, where there appears to be no coherent strategy for achieving improvements in the rural road network or rural transport or local drainage – or for achieving sustainable travelling through cycling, walking and public transport use. We need a specific strategy on these important matters, which should clearly set out the problems and solutions - and, most importantly, identify clearly where funding is to be obtained , as there appears to be no future funding available in the foreseeable future for any of these areas from Dover or Kent Councils, or the Government. Aspirations are meaningless without a realistic chance of implementation – which means CASH. Without such strategies, there should be little or no further housing development in this rural area of Shepherdswell and Eythorne, and attention should be focused on other larger villages - with better facilities than Shepherdswell, and better road and transport links - and on brownfield sites.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP37 - Shepherdswell Small Housing Sites
Rep ID	SDLP1472
Rep Status	Processed
Consultee ID	1255333
Consultee Full Name	Mr Richard Woods
Consultee Company / Organisation	Coxhill Rd Residents
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SHE006
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

This rep is submitted on behalf of Coxhill Road Residents, a group consisting of 23 members. A list of members names, addresses and method of consenting to be included has been provided

It is good to note that DDC will act positively to ensure that development and infrastructure needs are met. This is to ensure that new development is delivered sustainably, in a way that is properly planned. Also that "Kent County Council continues to ensure that highway safety is one of its top priorities." The newVision Zero objectives state Partners will all follow the 'Safe System Approach', which is designed with the human being at its core. And that KCC will seek to understand the risks of injury that are posed to road users by the environment and seek to minimise those risks before they become problem locations that result in injury.

As about 25% of rural collisions occurred on 30mph roads, in village settlements. The proposal for another 10 dwellings is of concern along this particular stretch of road.

It is interesting to note the data gathered from Community Speed Watch can also be used to monitor tra c speed and support the case for further speed reduction measures.

So I hope the latest statistics are taken seriously -

Shepherdswell Speedwatch group carried out an observation this morning (25/11/22) on Coxhill Rd by Oast House . between 07:30-09:00 A total of 336 vehicles were counted heading SW towards the A2. A similar number traveled into the village. This indicates about 200 vehicle movements an hour in each direction pre any new developments.

There was considerable congestion, (see photos) due to a number of lorries, which slowed tra c, but 69 vehicles (1 in 5 - 20%) was exceeding 30mph, of which 7 will be reported for traveling in excess of 34mph (3 at 40/41mph)

Coxhill and the lower end of the village do not have access to a bus service as indicated in the DDC Plan , There is NO bus running along Eythorne Road as mentioned in the Plan .

Whilst this part of the village is nearer to Railway Station , the proposed development SHE006 would mean extra pedestrians having to walk along the non existent pavement

until they reach the junction of Westcourt Lane. Something already highlighted as a potential dangerous hotspot.

See photos of pedestrians having to go into residents gardens to avoid tra c.

This is not only the major route out of the village for our residents but also those from our neighboring villages ,SAP28/29/30 at Eythorne and Elvington face even larger scale developments .

These will undoubtedly have the effect of increasing tra c going through Shepherdswell on roads not designed for this amount of tra c.

DDCs own document highlights potential issues with this site such as:-

Some widening works may be required at the access point. KCC looked at this and the possibility of a mini roundabout was dismissed. So it is di cult to see where this can be achieved.

Coxhill Road is narrow, and is particularly constrained to the east of the site by on-street parking.

Whilst the latter part of this statement is true this also acts ,at the moment , as a means of slowing tra c at the point where residential properties , the local pre school and Village Hall are situated.

The yet to be completed Community Land Trust development of 13 dwellings will create another exit along this busy stretch of road , approximately 50 meters from the proposed SHE006 development, and measures to ensure the visibility splay will result in yellow lines being put in place, reducing the parking availability for existing residents.

Requests for a junction box at the entrance to this site have been discounted by KCC recently.

Concerns acknowledged by DDC :-

Any proposals coming forward on the site should seek the views of KCC Highways at an early stage to ensure that the cumulative impacts of development can be accommodated by the surrounding roads .

No footway serving site.

Concern regarding cumulative impact from potential allocation sites on wider highway network, particularly routes through to A2/A256 (issues with width, on-street parking and significant increase in use of junctions)

. More than recommended 400 meter walking distance to nearest bus stops in Mill Lane, but limited services and no footway.

SAP37
Flooding She006

It is noted by DDC , there may be issues around flooding .

This is not a maybe but a reality.

Please see KCC reports regarding flooding outside Whittington Terrace which is adjacent to the land identified for additional 10 houses at Botolph Street Farm .

This has required urgent action to clear recently as water was up to the front door of at least 3 of the properties .

This being after routine maintenance a few months ago so there is obviously an underlying problem that needs addressing .

This has been a continued issue over the past few years and has recently been brought to the attention of DDC Cllr Linda Keen by both residents and Parish Councillors. She has had to intercede on behalf of residents .

Further development is ongoing opposite these houses and it is feared that this may exacerbate the problem . The impact of this must be fully assessed before any further development is contemplated..

Please see photos attached

Basically Coxhill residents are concerned that the infrastructure is not and cannot be put in place to service the proposed builds .

It is fully appreciated that Public transport is the safest form of transport, so DDC working with Kent's public transport team to promote public transport where it offers an alternative to driving is good news but simply not available .

The Parish Council have asked for safety improvements within the area to address existing issues and have highlighted the dangerous situation along Coxhill, speeding, volume of tra c and no pavements but as yet this situation has not been addressed.

Shepherdswell Station - There is currently an hourly service from this station which Network Rail are looking to increase to half hourly due to increased demand.

The following improvements would be beneficial:

- o DDA compliant access;
- o First and last mile improvements (car parking, cycling parking, pedestrian access improvements).

It is hard to see how these recommendations can be implemented .

GP SURGERY

There is existing lack of GP capacity within the villages of Lydden and Shepherdswell

Which means at the moment many Shepherdswell residents are seen at the practice surgery in Dover. .Which is accessed by car in contravention of DDCs own policy of reducing travel in this way.

SCHOOLS

The Local Plan would suggest 430 dwellings leading to 93 primary aged pupils. Extant permission of 41 dwellings leading to a further 9 pupils (total 102 pupils). This is equivalent to around 0.5FE of additional primary school provision..

Our local Primary is almost at capacity and there are no plans for expansion. The DDC Plan states an increase in provision at Eythorne is anticipated . There is no bus service between the villages so there would be an increase in car usage.

In conclusion we , the residents of Coxhill , are extremely worried about the impact of this and the other developments proposed both in Shepherdswell and our neighboring villages .

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Not Applicable

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	SDLP1472 Woods Att3.pdf SDLP1472 Woods Att1_Redacted.pdf Woods photos.docx
Local Plan Consultation Point	SAP37 - Shepherdswell Small Housing Sites
Rep ID	SDLP1265
Rep Status	Processed
Consultee ID	1271353
Consultee Full Name	Church Commissioners
Consultee Company / Organisation	
Agent Full Name	Mr Andrew Watson
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SHE006
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Text Extracted from Document sent from Savills on Behalf of the Church Commissioners. Representation has been split across relevant areas of the Local Plan. Full attachment and introduction to Policy comments can be found under reference SDLP1265 for Shepherdswell Site and SDLP1266 for Eastry Site.) Introduction Savills has been instructed by the Church Commissioners to submit representations to the Draft Dover District Local Plan Regulation 19 Consultation. The consultation on the Local Plan commenced on 21st October and closes at 5pm on 9th December 2022. These representations focus primarily on the Land at Botolph Farm but also cover the Church Commissioners other landholdings in the district, including Land East of Eastry. These representations support the allocation of the Land at Botolph Street Farm and explain why it is suitable for additional residential development. Additionally, these representations identify why the Land East of Eastry should be considered as a site for future residential development. The Church Commissioners also own smaller land holdings within various settlements across the district which are considered suitable for conversion for residential use or via windfall housing. The Church Commissioners are promoting these sites in line with the Government agenda to deliver much needed new homes quickly and efficiently. These land holdings will guide the representations made in regards to the Regulation 19 Consultation Document. The National Planning Policy Framework (NPPF) explains that the planning system should be plan-led. Paragraph 16 sets out the Plans should: a) be prepared with the objective of contributing to the achievement of sustainable development;

- b) be prepared positively, in a way that is aspirational but deliverable;
- c) be shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
- d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
- e) be accessible through the use of digital tools to assist public involvement and policy presentation; and
- f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant). At examination, a Plan will be found 'sound' if it is considered to be positively prepared, justified, effective and consistent with national policy, as set out within paragraph 35 of the NPPF. As such, ensuring that the Local Plan meets the tests of soundness is important throughout the Local Plan process - including at Regulation 19 stage.

Structure of the Representation The structure of this representation is as follows:

Section 2: Summary of the site at Botolph Street Farm: Sets out a broad outline of the Land at Botolph Street Farm, its surroundings and provides a brief description of the draft allocation.

Section 3: Summary of the site at Eastry: Sets out a broad outline of the Land East of Eastry, explaining its surroundings and potential for residential development.

Section 4: Representations on the Draft Local Plan: Makes observations on the Evidence Base Documents; Provides comments and recommendations on key elements of the Draft Local Plan.

Section 5: Conclusion: Summarises the observations within the representations and outlines the next steps in the draft Local Plan process. Additional Documents A number of documents have been submitted in conjunction with this representation. These are listed below and labelled in regards to which site they are supporting:

Botolph Street Farm

Vision Document

Report 106578-PEF-XX-XX-TN-TR-000804 Rev P01 – Access Optioneering

Report 106578-PEF-ZZ-XX-RP-YE-000010 Rev P03 – Flood Risk and Drainage Statement

Report 106578-PEF-ZZ-ZZ-PR-Y-00001 Rev A - Preliminary Ecological Appraisal

Report AN0586_1 – Heritage Appraisal

Land East of Eastry

Vision Document

Report 104906-PEF-DO-XX-RP-Y-000004 Rev D01 – Transport and Access Strategy

Report 104906-PEF-ZZ-ZZ-RP-Y-00002 Rev A - Preliminary Ecological Appraisal

Report 104906-PFC-ZZ-XX-RP-YE-000010-S0-P01_FRDS Rev P01 - Flood Risk and Drainage Statement

2. Botolph Street Farm - The Site, The Surrounding Area and The Draft Allocation The site lies adjacent to the village of Shepherdswell, approximately 8 miles north-west of Dover. The allocated site comprises approximately 0.82 Ha of greenfield land (see Figure 2.1) and is currently used for agricultural purposes.

(DDC Note - Unable to display image - see attachment for full representation)

The site is bounded by residential development to the north, agricultural buildings to the south, Coxhill Road to the east, and open fields to the west. Planning permission was granted on 26th July 2022 for the 'Erection of 13no. dwellings of which 10 are proposed as affordable rent (rural exceptions housing) with associated parking and new access road' on the land to the east of Botolph Street Farm (Ref: 20/01508). The boundary with Coxhill Road is formed by a mature field hedge which is circa 3-4m in height. There is a small gap in the hedge which allows access to a footpath (Ref: ER81) which runs north-westwards through the site. The northern boundary adjoins the southern edge of the village and the properties of Whittington Terrace (which currently forms the settlement boundary). The western boundary of the site is currently undelineated, however the boundary of the wider field is defined by a native field hedgerow with a small gap to allow access for the footpath. There is potential for the development site to be extended to include the agricultural land directly south of the allocated site (see the redline in Figure 2.2, the blue area is other land in the Church Commissioner's ownership). This land is currently occupied by dated farm buildings, thereby providing an opportunity for re-development. Access to these buildings exists off Coxhill (see Figure 2.3). This would create an overall site area of 1.39 Ha.

(DDC Note - Unable to display image - see attachment for full representation)

Topography The site generally falls from the south to north, with the lowest point on the site being in the north-west corner. The highest points of the site are along the southern boundary at approximately 91.25m AOD. From there the land falls north towards the lower part of the site to levels of approximately 88.75m AOD.

Access Access to the development site is key to ensuring a successful scheme. Through extending the redline, suitable access to the site can be achieved via the existing access from Coxhill Road. By upgrading the existing farm access, this maximises the retention of the existing hedgerows at the front of the site and still achieves highways compliant visibility splays to both sides of the access.

Heritage There are three Grade II Listed Buildings located within 150m of the site (see Figure 2.4). Further information can be found in the attached Heritage Report. The report concludes that the majority of the designated heritage assets in close proximity to the site would not be affected by development. However, for the few which could be potentially sensitive, suitable mitigation measures would be required such as the retention of hedgerow boundaries.

(DDC Note - Unable to display image - see attachment for full representation)

Drainage The site lies within Flood Zone 1 where there is a very low risk of flooding from rivers or the sea. The area has a chance of flooding of less than 0.1% each year. The site is susceptible to surface water flooding. Figure 2.5 demonstrates that the western boundary of the site is partially classified as a high risk to flooding. This means that the area has a chance of flooding of greater than 3.3% each year. However, as discussed below, technical studies suggest that the risk of surface water flooding is actually only low to medium and can be mitigated.

(DDC Note - Unable to display image - see attachment for full representation)

The site was initially allocated in the draft Regulation 18 Local Plan for Dover for 20 dwellings. However, it is now only allocated for 10 dwellings in the recently published draft Regulation 19 Local Plan. This reduction in development capacity is due to perceived issues surface water flooding issues. Significant technical work has been conducted to explore potential flooding mitigation options. The submitted drainage drawings show suitable SuDS options for the allocated site and for a larger development site of approximately 25 dwellings. Pell Frischmann has conducted a desk-based review of the risk of the site to all types of flooding. The report found that the site is unlikely to be affected by tidal influences due to its location in Flood Zone 1. However, considering the aquifer designation, underlying geology and information on groundwater provided with local documentation, the risk of flooding from groundwater is considered to be moderate and mitigation is recommended to address this risk. The risk of surface water flooding is only deemed to be 'Low to Medium Risk'. The report concluded that the risk of surface water flooding is significantly less than that suggested by the Environment Agency (EA) due to the EA's methodology only taking into account initial, conservative losses to infiltration. The report suggests that the superficial and bedrock geologies in the area are highly permeable. This is further evidenced by an absence of surface water sewers in the area. A review of nearby approved planning applications also suggests high rates of permeability in the immediate vicinity. Furthermore, the watershed draining to the site is relatively large, and any regular flow of surface water would likely form some surface feature like a ditch or stream. None is present within the site, suggesting that overland flows do not occur regularly. The report concludes that the site is therefore exposed to a 'Low to Medium Risk' of surface water flooding. Pell Frischmann recommend that suitable mitigation should be considered in the form of sustainable surface water management, appropriate landscaping, and maintenance of flow routes where possible.

The proposed Surface Water Drainage Strategy will ensure that run-off from the site will be managed in a sustainable way now and in the future. The drainage strategy assumes an infiltration-based solution, managing runoff for all events up to the 100-year storm, including a 40% increase in rainfall intensity to allow for climate change. Site-specific infiltration testing and groundwater monitoring will be required as part of any future planning application to ensure the drainage arrangements are suitable for the proposed development in line with conditions on site. The proposed Surface Water Drainage Strategy proposes the use of infiltration as the source of outfall from the site, with infiltration basins as the collection point. This is due to the bedrock comprising Seaford Chalk, which is extremely porous and permeable. The strategy also includes an initial drainage concept plan which shows suitable locations for infiltration basins, in line with site topography. The strategy also recommends a range of SuDS features which can be incorporated into the final design. Therefore, it can be demonstrated that the risk of surface water flooding can be suitably mitigated against to propose a sustainable development of approximately 25 units on a larger site.

The Surrounding Area Shepherdswell is a well-serviced, village located approximately equidistant from the larger settlements of Deal, Dover and Canterbury. The Settlement and Confines Topic paper (August 2022) that supports the Regulation 19 Local Plan, explains that Shepherdswell has a railway station on the Dover to London Victoria line, a bus service, a village shop, a public house, a hairdressers, a post office twice a week in the village hall, a cash point, a church, village hall, play area, recreation ground, primary school and doctor's surgery. The paper scored Shepherdswell 26 points, ranking the village as 6th out of the 38 tested settlements. Shepherdswell is therefore a sustainable location for development due to the range of community facilities and public transport options already available. Paragraph 5.4 of the paper concludes that Shepherdswell is a rural local centre and:

'given the wide range of services present in such villages each has the capability to act as a principle focus for services in its rural catchment area.' Shepherdswell was also classified as a 'Local Centre' in the adopted Core Strategy 2010. Policy CP1 of the Core Strategy 2010 defines Local Centres as:

"Secondary focus for development in the rural area; suitable for a scale of development that would reinforce its role as a provider of services to its home and adjacent communities."

Planning History The allocated site has not been subject to any previous planning applications. A number of minor applications have been made for extensions and maintenance to the nearby property of St Sibert's Place.

Draft Allocation The site (SHE006) has been allocated under policy SAP37 for an indicative housing capacity of 10 units. A total of three sites have received draft allocations in Shepherdswell, see Figure 2.6, equating to a total of 70 dwellings. However, site SHE006 was previously allocated for 20 units in the Regulation 18 draft Local Plan. The Church Commissioners will deliver a landscape-led development that seeks to support, enhance, integrate with the surrounding community and landscape. The site is sustainably located in a high-ranking Local Centre which has existing facilities and public transport links. The submitted vision document sets out the vision and objectives of the proposal and provides further information concerning landscaping and design. Overall, the site is suitable, available and achievable for residential development within the first five years of the Plan Period. The Church Commissioners are committed to delivering a sympathetic and resilient development of the site, seeking to ensure that the proposal is fully compatible with and supportive to the wider village. This is demonstrated by a nearby scheme. Planning permission was granted on 26th July 2022 for the 'Erection of 13no. dwellings of which 10 are proposed as affordable rent (rural exceptions housing) with associated parking and new access road' on the land to the east of Botolph Street Farm (Ref: 20/01508). Application 20/01508 is a joint venture in which the Church Commissioners are the landowner and English Rural is bringing forward the development. Therefore, there is a precedent of the Church Commissioners reliably helping DDC to meet the housing needs in Shepherdswell and the wider district, including affordable provision.

(DDC Note - Unable to display image - see attachment for full representation)

Conclusion

This representation to the Dover District Council (DDC) Regulation 19 Local Plan Consultation is written on behalf of The Church Commissioners in relation to the Land at Botolph Street Farm in Shepherdswell, the Land East of Eastry and a number of rural sites also in the Client's ownership. The allocation of the Land at Botolph Street Farm is supported as the site is available, developable and deliverable. The site is in a sustainable location and forms part of a logical residential extension of the local centre of Shepherdswell, according with the approach to plan-making as set out in the NPPF. The development would make a valuable contribution to the future of the village and help DDC meet its housing need. The Land East of Eastry is provided as an option for a future strategic allocation or an alternative option for the emerging Local Plan. The site is located in a sustainable location with easy walking access to a range of amenities in the local centre of Eastry. A range of technical reports have already been conducted, demonstrating significant potential for a major residential development and are submitted with this representation. This document provides representations on the Regulation 19 Local Plan and includes observations on the supporting evidence base. Several recommendations have been made throughout these representations. The most notable recommendations include:

Local Plan SP1 (Climate Change) – DDC should clarify the meaning of what constitutes as 'qualifying development' and what a 'climate change statement' constitutes. It is recommended that the proposed wording changes suggested in Section 4 are adopted.

Local Plan SP3 (Housing Growth) - DDC should reconsider their reliance on larger allocations given the delivery history in these locations. Instead, DDC should seek to allocate more smaller sites to reliably meet this housing need since these sites can be delivered earlier in the Plan Period.

Local Plan SP4 (Residential Windfall Development) – DDC should provide greater flexibility for windfall development in all locations and each site should be judged on its own merits.

Local Plan SP5 (Affordable Housing) – DDC should provide a larger buffer than 8% on the required housing need due to the over-reliance on the Whitfield Urban Expansion and to ensure that the affordable housing needs of the district are met.

Local Plan SP6 (Economic Growth) – DDC should provide evidence that the housing strategy set out in SP3 is supportive of the economic growth aspirations set out in SP6.

Local Plan SP11 (Infrastructure and Developer Contributions) - DDC to ensure that any developer contributions meet with the tests set out in paragraphs 56 and 57 in the NPPF.

Local Plan Policy SAP37 (Shepherdswell Small Housing Sites) – DDC should increase the allocation of the Land at Botolph Street Farm to 25 dwellings.

Local Plan PM1 (Design) – DDC should provide further clarification on what is meant by 'relevant and appropriate' and remove any reference to 'rhythm'.

Local Plan PM3 (Providing Open Space) – DDC should update Draft Policy PM3 to reflect that a scheme to secure long term management and maintenance of the open space must be secured via planning obligation. DDC should also provide greater flexibility for the requirement of smaller sites to provide set open space measures.

Local Plan H2 (Rural Local Housing Needs) – DDC should adopt the wording changes suggested in Section 4 of this representation in relation to viability assessments.

Local Plan CC8 (Tree Planting and Protection) – DDC should provide greater flexibility for smaller development sites and clarify against the requirement for tree-lined streets.

Sustainability Appraisal (2022) – Amend the sustainability ratings of site SHE006 to match that illustrated in Figure 4.4 of this report.

	Housing and Economic Land Availability Assessment (2022) - Increase the capacity of site SHE006 and update the name of the site to 'Land at Botolph Street Farm'. This representation clearly demonstrates that there is scope to increase the dwelling capacity across the Land at Botolph Street Farm and improve its contribution to the housing needs of the district. This is supported by national policy, specifically in its emphasis on the capacity for small to medium development sites to contribute to the housing requirement of the district in the earlier part of the Plan Period.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	Eacott Savills (Botolph Street Farm)1426 Att2.pdf Eacott Savills (Botolph Street Farm) Floodrisk and Drainage.pdf Eacott Savills (Botolph Street Farm) Preliminary Ecological Appraisal.pdf Eacott Savills (Botolph Street Farm) Access.pdf Eacott Savills (Botolph Street Farm) Heritage Appraisal.pdf Eacott Savills (Botolph Street Farm) Updated L Eacott Savills (Botolph Street Farm) Vision Document Att4.pdf
Local Plan Consultation Point	SAP37 - Shepherdswell Small Housing Sites
Rep ID	SDLP1327
Rep Status	Processed
Consultee ID	1274097
Consultee Full Name	Marita Bates
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 37
2 - Do you consider this part of the Plan sound?	No

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Concern over housing proposals for Shepherds Well. Loss of farmland to development Roads busy, little or no traffic calming, lack of lit cycle routes, safe routes for families, dogs walkers, horse riders Pressure on local school places Limited bus service and trains do not link with on-going services Threat to wildlife with loss of trees and hedgerows
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Suggest bat boxes, bird boxes for all new builds and retention of hedging, trees Suggest provision of local sheltered housing for elderly which would free up family housing in village.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP37 - Shepherds Well Small Housing Sites
Rep ID	SDLP1331
Rep Status	Processed
Consultee ID	1274099
Consultee Full Name	Rebekah Bates
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 37
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The recent policy change on mandatory numbers for new housing means that individual developments for houses should be reviewed and that current plans are not sound, they do not comply with policy.</p> <p>The South east is under pressure and does not have the infrastructure to cope with the demands that new housing developments bring. It is one of the driest counties and so water stress will become a more serious issue.</p> <p>In Shepherdswell access from the A2 is by two narrow lanes. Both are unsafe for pedestrians, cyclists and horses. There is nowhere local for people to ride. I often struggle to walk the 50 m from the village hall to the shop with my two dogs. There is no traffic calming and cars do not slow down.</p> <p>The many extra houses expected at Elvington will increase this traffic as will the houses planned for the village itself. This is a major concern. I support the Green Party proposal for safe, well lit cycle lanes to link villages with stations but this does not help dog walkers.</p> <p>People move to the countryside to be able to access and enjoy green spaces but this is difficult with so many cars. We don't see children playing out as they used to.</p> <p>I am concerned about the destruction of hedges for new build projects. Tho the plan proposes to maintain as many as possible we have recently seen the ripping out of a perimeter hedge for the community trust housing next to the village hall. I do not trust that hedges and trees will be maintained and emphasise that mature hedging and trees offer so much more habitat than new planting which would need to be on a much greater scale if it is to offer the same benefits in terms of carbon capture as well as habitat.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Policy on housing has changed and so plans should change to comply with this. The housing which our village needs is sheltered housing for the elderly, many of whom are single, living alone, wanting to stay in the village. Providing purpose built accommodation for them would free up many houses for families. Have the needs of the often ageing population of villages been considered? A limited number of affordable housing is included in larger developments but this does not meet the needs of our ageing villagers.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP37 - Shepherdswell Small Housing Sites
Rep ID	SDLP1245

Rep Status	Processed
Consultee ID	1274099
Consultee Full Name	Rebekah Bates
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 37
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The recent policy change on mandatory numbers for new housing means that individual developments for houses should be reviewed and that current plans are not sound, they do not comply with policy.</p> <p>The South east is under pressure and does not have the infrastructure to cope with the demands that new housing developments bring. It is one of the driest counties and so water stress will become a more serious issue.</p> <p>In shepherdswell access from the A2 is by two narrow lanes. Both are unsafe for pedestrians, cyclists and horses. There is nowhere local for people to ride. I often struggle to walk the 50 m from the village hall to the shop with my two dogs. There is no traffic calming and cars do not slow down.</p> <p>The many extra houses expected at Elvington will increase this traffic as will the houses planned for the village itself. This is a major concern. I support the Green Party proposal for safe, well lit cycle lanes to link villages with stations but this does not help dog walkers.</p> <p>People move to the countryside to be able to access and enjoy green spaces but this is difficult with so many cars. We don't see children playing out as they used to.</p> <p>I am concerned about the destruction of hedges for new build projects. Tho the plan proposes to maintain as many as possible we have recently seen the ripping out of a perimeter hedge for the community trust housing next to the village hall. I do not trust that hedges and trees will be maintained and emphasise that mature hedging and trees offer so much more habitat than new planting which would need to be on a much greater scale if it is to offer the same benefits in terms of carbon capture as well as habitat.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>Policy on housing has changed and so plans should change to comply with this. The housing which our village needs is sheltered housing for the elderly, many of whom are single, living alone, wanting to stay in the village. Providing purpose built accommodation for them would free up many houses for families. Have the needs of the often ageing population of villages been considered? A limited number of affordable housing is included in larger developments but this does not meet the needs of our ageing villagers.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP37 - Shepherdswell Small Housing Sites
Rep ID	SDLP1271
Rep Status	Processed
Consultee ID	1271353
Consultee Full Name	Church Commissioners
Consultee Company / Organisation	
Agent Full Name	Mr Andrew Watson
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP37
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Text Extracted from Document sent from Savills on Behalf of the Church Commissioners. Representation has been split across relevant areas of the Local Plan. Full attachment and introduction to Policy comments can be found under reference SDLP1265 for Shepherdswell Site and SDLP1266 for Eastry Site.) Policy SAP37 is the housing allocation for the 'Land at Botolph Street Farm, Shepherdswell'. The policy is largely supported, however, there are aspects to the policy over which amendments are sought. The policy seeks the delivery of Land at Botolph Street Farm, Shepherdswell, for approximately 10 dwellings. This is a significant reduction from the 20 dwellings previously set out in the Regulation 18 Consultation Document. Policy SAP37 sets out that this reduction in units is due to the risk of surface water flooding and the requirement of SuDS. Technical drainage work has been undertaken to identify the most suitable location for a SuDS pond to be constructed on site. Pell Frischmann has identified the northern area of the site, above the existing PRow, as the most effective location for an infiltration basin to be located. Although the inclusion of a SuDS pond does reduce the overall developable area of the site, technical work has been completed to identify the potential development capacity of 25 units. The technical reports which have been completed have also included the land to the south of the allocated site. This additional land currently comprises agricultural land and farm buildings. The additional 0.57 Ha could accommodate an overall site total of 25 units. This could be incorporated into the allocation to help DDC meet its overall housing need and encourage much-needed development in settlements outside of Dover. Given the scale of the development, DDC can be confident that it will come forward within the early part of the plan period in accordance with NPPF paragraph 69 and our comments on Draft Strategic Policy SP3.

	<p>The Regulation 18 consultation document allocated 170 dwellings across 4 sites around the village of Shepherdswell. However, the draft Regulation 19 consultation document has reduced these allocations to result in a total of 70 dwellings. Site SHE003 had been allocated for 100 units in the draft Regulation 18 consultation document but was consequently removed at the Regulation 19 consultation stage due to significant objections and highways safety concerns raised by KCC highways. This demonstrates that Shepherdswell had been deemed to have the capacity to support an additional 100 dwellings in the emerging Local Plan period. Therefore, the additional units which could come forward on the land next to Botolph Farm can also be deemed sustainable as there was sufficient services and infrastructure to allow an additional 100 dwellings on another site within the village. The increase in land and unit numbers on the Land at Botolph Street Farm could help to compensate some of this loss in units and help to meet the housing need of the district in a sustainable and deliverable location. With regards to the additional land, paragraph 68 of the NPPF outlines that:</p> <p>“Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.” Increasing the number of units in the allocation creates a more efficient use of available land. This is supported by paragraph 124 of the NPPF:</p> <p>“Planning policies and decisions should support development that makes efficient use of land, taking into account:</p> <p>a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;</p> <p>b) local market conditions and viability;</p> <p>c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;” DDC need to ensure that a suitable range of sites, of varying sizes and scales, are allocated in the emerging Local Plan to ensure the delivery of a sufficient number of new homes to create a robust position when measured against their five year housing land supply or the Housing Delivery Test. DDC need to ensure that the Plan is able to meet the demands both in terms of providing for housing need but also delivering at a sufficient rate. Increasing the size of the allocation of the Land at Botolph Street Farm can help meet this housing need in a deliverable timeframe. There is a clear emphasis in national policy to produce an effective plan that is deliverable over the Plan Period. It is considered that the allocation of the entirety of Botolph Street Farm is available, suitable and deliverable, and will make a positive contribution to the development of an effective Local Plan.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	SAP37 - Shepherdswell Small Housing Sites
<p>Rep ID</p>	SDLP1247
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1274097

Consultee Full Name	Marita Bates
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 37
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Concern over housing proposals for Shepherds Well. Loss of farmland to development Roads busy, little or no traffic calming, lack of lit cycle routes, safe routes for families, dogs walkers, horse riders Pressure on local school places Limited bus service and trains do not link with on-going services Threat to wildlife with loss of trees and hedgerows
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Suggest bat boxes, bird boxes for all new builds and retention of hedging, trees Suggest provision of local sheltered housing for elderly which would free up family housing in village.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP37 - Shepherds Well Small Housing Sites

Rep ID	SDLP1539
Rep Status	Processed
Consultee ID	1333333
Consultee Full Name	Mr Colin Tearle
Consultee Company / Organisation	Shepherdswell-with-Coldred Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP37
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Many residents have responded to the Dover District Council Local Plan. During public consultation the council has been made aware that while there is a recognised need for limited housing growth there are very strong concerns regarding the proposed sites in both Shepherdswell and Coldred and the consequential impact of proposed housing developments in the neighbouring villages of Eythorne and Elvington.</p> <p>New housing without adequate local infrastructure puts significant strain on local amenities such as medical services, school and playgroup places as well as increasing traffic on our roads. The existing sewerage system is already overloaded and any future developments will only exacerbate this problem.</p> <p>Far from being "sound" the Dover Local Plan is flawed. It contains many inaccuracies including:</p> <ul style="list-style-type: none"> • Shepherdswell now only has one public house. • Shepherdswell is stated as being to the west of the A2 when in fact it is to the east . • Traffic measurement flows were taken just post pandemic and clearly show a flow much lower than the parish's normal traffic volume. • The plan states there is a bus service along Eythorne Road but this service was withdrawn many years ago and most other services have been withdrawn this year. <p>One must question the validity of much of the data and evidence attached to the plan, and how (and when) it was collected. Have DDC representatives visited the Parish in recent years to carry out surveys?</p> <p>If development of any kind is to be permitted it should be linked to a S106 agreement to improve the facilities within Shepherdswell and Coldred.</p> <p>The plan indicates that Dover District Council can fund parish councils from S106 monies when a case is made that this is a good use of funds. Shepherdswell with Coldred Parish Council would like to make a case for funding of community facilities, including improvements to the village hall, its parking facilities, the recreation ground, the cemeteries and improvements to the local school.</p> <p>Sewerage and Drainage. The sewerage and foul water from the majority of properties in Shepherdswell drains into sewers connected to a pumping station at the rear of the East Kent Railway Station. Surface water from roads and paved areas also drain into these sewers and can add considerable load to the pumping station equipment . When the pumps cannot cope with this excess flow, foul flooding occurs in the houses and gardens of properties situated in The Glen. This has already been evidenced by frequent calls to DDC Environmental Services and Southern Water. Permitting the proposals at St Andrews Gardens will necessitate an immediate up-grade to this system to enable it to cope with the</p>

increased load, not even taking into account that result in increased rainfall.

climate changes

Highways. As stated the current highway systems within our parish are totally inadequate for the current traffic levels and there are already congestion problems, especially with large and farm vehicles travelling through and trying to park within the villages. When we take into account new housing planned for our parish and also for Eythorne and Elvington (which will add even more vehicles from the 350+proposed dwellings there, travelling through Shepherdswell and Coldred to reach the A2), the traffic flow will again increase adding further to congestion and delays. Emergency response vehicles will be subject to these delays putting lives at risk. As previously stated traffic measurement levels were taken just post pandemic and clearly show flows much lower than normally experienced. Current Speedwatch reports show traffic flows much higher than those recorded with a peak of 224 vehicles per hour which was measured one way only. The highest speed recorded in the 30 mph limit was 64mph and 52mph in the 40 mph limit. These are current figures from November and December 2022.

Comments regarding poor access via single track roads with passing areas have been made by several residents. These narrow lanes inevitably lead to increased congestion and pollution.

We are advised that the Highways Department have no funds available for highway improvements and the current level of maintenance is inadequate. Shepherdswell has limited parking facilities near the village hall and Co-op area which frequently leads to congestion. This added congestion compounds the problems caused by the lack of pavements on three of the four roads at that junction. An expansion of the industrial site in Eythorne will undoubtedly lead to yet more congestion problems unless all heavy goods vehicles accessing that site are prohibited from using any access other than from the A258. There is already a problem with partial/temporary road blockages leading to significant congestion.

Transport. Whilst we are fortunate to have a railway station it does not offer reasonable access to disabled persons or those with limited mobility- it is difficult to envisage how access can be improved.

Most bus services have now been withdrawn apart from school services so residents will have to rely on cars for shopping etc. There are no dedicated cycle paths and many cyclists are reluctant to use their bikes because of this traffic congestion.

Those residents who want to use the train services must endure walking to the station on roads with limited or no footpaths. Residents in Eythorne and Elvington will have to either use cars to get to the station or walk along a very busy main road - again without footpaths.

SAP 37 transport statement specifies that the development must account for the cumulative impact of all developments in this plan on common road links. This makes a nonsense of the proposed plans for Elvington and Eythorne which would significantly increase traffic flow.

Village Services. The surgery situated in Mill Lane is oversubscribed and patients are very often referred to the Dover branch. There is no "walk in" service.

The village school is again nearly full with no current plans for extending present facilities. The location of the school causes severe traffic congestion at core times. Many parents taking their children to school have to walk up Church Hill which is a narrow, busy road with no footpath.

The nearest secondary schools are located in Dover and parents experience considerable difficulty in transporting their children to school.

Any proposed development around the Mill Lane/ St Andrew's Gardens areas do not comply with Policy T12-Transport Statements as this clearly states- "Developments that would generate significant traffic movements must be well related to primary and secondary school network. Proposals which would generate levels and types of traffic movements resulting in severe cumulative residual impacts in terms of capacity and road safety will not be permitted". A large proportion of traffic from these proposed developments would have to pass along Mill Lane and Church Hill to access the A2. Because of the built up nature of these roads mitigation will not be sufficient to alleviate the impact of increased traffic.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

If development of any kind is to be permitted it should be linked to a S106 agreement to improve the facilities within Shepherdswell and Coldred.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP37 - Shepherdsweil Small Housing Sites
Rep ID	SDLP1243
Rep Status	Processed
Consultee ID	1332975
Consultee Full Name	Ms Sarah Bates
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 37
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Re housing; These numbers of houses should not be built on agricultural land and the transport issues involved with the various and roads etc make it especially unviable due to congestion and environmental concerns. The villages are small and there is little in the way of shops and other facilities. Car-use would be high – and a big increase on currently. Has the relative value of the land concerned been assessed in terms of value through agriculture and carbon capture versus covering with concrete.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance	

with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP37 - Shepherdswell Small Housing Sites
Rep ID	SDLP1805
Rep Status	Processed
Consultee ID	1330508
Consultee Full Name	Mrs linda symes
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP37
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails	SAP37 SHE006 Land at Botolph Street Farm

to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

Coxhill and the lower end of the village do not have access to a bus service ,without a walk up Church Hill ,with no pavements , to pick up the bus at Mill Lane, which as has been said is under threat ,
 Whilst this part of the village is nearer to Railway Station is via a non-existent pavement from Whittington Terrace , the nearest houses to the proposed development, to the junction of Westcourt Lane.
 See photos of pedestrians having to go into residents gardens to avoid traffic.
 This is not only the major route out of the village for our residents but also those from our neighbouring villages ,
(DDC note: This representation was originally made against the Infrastructure Delivery Plan consultation document but has been duplicated in relevant places against the Local Plan due to the specific site allocation/policy references made)

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Not Applicable

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Local Plan Consultation Point	SAP37 - Shepherdswell Small Housing Sites
Rep ID	SDLP1980
Rep Status	Processed
Consultee ID	1274392
Consultee Full Name	Mr R Winter
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP37 - SHE008
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Housing plan for Shepherswell</p> <p>I have the following comments that should be resolved prior to any development.</p> <ol style="list-style-type: none"> 1 The houses to be built alongside Cox hill road must have very clear signs for entry and exit to the site and clear views for leaving the site, and the speed limit must be reviewed. 2 The traffic along Mill Lane is already overloaded and the road must be widened before any build of more houses accessing the road is allowed to be considered 3 There is no need for a further seventy houses to be built and any houses built should be low cost 4 The water pressure is reduced now in the afternoons when school is over, meals being prepared, baths and showers in full use and this applies to the gas and electricity without a further eighty houses being added. <p>There is currently a parking shortage at the railway station resulting in cars blocking residents access to their own homes.</p> <p>The one shop in the village does not have any parking facilities, which makes the road junction, Church Hill, Westcourt Lane, and Eythorne road is a very dangerous place for residents and visitors who are blocked in by inconsiderate parking, not to forget the danger to all, due to total lack of vision for any vehicle joining the Eythorne road from Westcourt Lane/Church Hill, the addition of 70/80 houses with minimum 80 more cars will only add to the dangerous situation that exists.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	

Include files	
Local Plan Consultation Point	SAP37 - Shepherdswell Small Housing Sites
Rep ID	SDLP1902
Rep Status	Processed
Consultee ID	1274390
Consultee Full Name	Mr and Mrs Young
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP37
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>As residents in Shepherdswell for 22 years we love living in this quite village. It has its problems of course, excess traffic being a main one. This has been mostly caused by the removal of the Barfreston turn off on the A2, causing all traffic to Eythorne/Barfreston etc to come through Shepherdswell. New housing in the proposed sites would certainly add to this. Most difficult would be Mill Lane, Church Hill, Village Green, into Eythorne Road at the crossroads. At present its almost impossible to get through to Hazling Dane off Mill Lane during pats of each day. Bus services have been curtailed greatly over the 22 years we've lived here. The drivers over those years have been brilliant dealing with regular 'snarl-ups' at the village green, overhanging branches, parking on narrow roads in and out of the village. So, the extra homes proposed for St. Andrews Gardens would not only cause more problems, making it even harder for folks to access their homes, or go about their business.</p> <p>We live at the bottom of the village and have always been grateful for the recreation ground and the fields that back onto it up to St Andrews Gardens. The reason being that huge amounts of water pour down Approach Road when it rains, into Eythorne road. The Rec and fields act as a catchment to absorb a lot of this water. If this 'flood plan' is built on built on, all that water will incur huge legal implications for the homes that will be affected downhill (even flooded). This would affect all Roads including Church Hill, Hill Avenue, Approach Road, Eythorne Road, Station Road, Meadowview Road, Bernards Gardens etc. Something surely to be seriously considered.</p> <p>For over 30 years, Aylesham has had permission to greatly expand their boundaries. They have built some new homes that seem to enhance their village and give the new and old dwellers good access to the A2 and a very large village green with excellent shops and space for many more. The roads within the village are wide and spacious, very different from Shepherdswell. We have just one shop and extremely limited parking and now space for any more shops. Our roads are narrow and often just single track. Traffic problems can cause tempers to fray, and an addition of more people, who deserve to live in a harmonious environment may not be able to.</p> <p>Overall, we think that this plan for development in Shepherdswell is completely unsuitable.</p>

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP37 - Shepherdswell Small Housing Sites
Rep ID	SDLP1975
Rep Status	Processed
Consultee ID	1274220
Consultee Full Name	Tim Fagan
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP37
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	SAP37 – density too high. Access insufficient (Mill Lane too narrow – no parking spaces)

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	SA37 – reduce density of housing and specify parking provisions
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP37 - Shepherdsweil Small Housing Sites
Rep ID	SDLP1942
Rep Status	Processed
Consultee ID	1333908
Consultee Full Name	Mr David Edward Sanderson
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Shepherdsweil
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The research conducted into the proposed plan has not been carried out properly. Especially into the impact of traffic around Mill Lane and access into and out of St Andrews Gardens. Impact on water supplies, sewerage and area of outstanding natural beauty along the North Downs way
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	DDC Vision is environmentally sound transport access road to Shepherdsweil are in Pieces, especially along Mill Lane single Lane. Increased road traffic will cause more congestion along Mill Lane and Church Hill. The roads cannot be made wider, safety consideration for school children at Sibertswold Primary School should be taken into account. Water pressure in St Andrews Gardens is already low, there are problems with sewerage. Also the proposed buildings are close to the North Downs Way, and area of natural beauty.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I expect councillors and planners to do their job and enforce the obligations of developers to develop safely and to upgrade and future proof infrastructure.
Include files	
Local Plan Consultation Point	SAP37 - Shepherdsweil Small Housing Sites
Rep ID	SDLP1903
Rep Status	Processed
Consultee ID	1274390
Consultee Full Name	Mr and Mrs Young
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP37
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective

	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>As residents in Shepherdswell for 22 years we love living in this quite village. It has its problems of course, excess traffic being a main one. This has been mostly caused by the removal of the Barfreston turn off on the A2, causing all traffic to Eythorne/Barfreston etc to come through Shepherdswell. New housing in the proposed sites would certainly add to this. Most difficult would be Mill Lane, Church Hill, Village Green, into Eythorne Road at the crossroads. At present its almost impossible to get through to Hazling Dane off Mill Lane during pats of each day. Bus services have been curtailed greatly over the 22 years we've lived here. The drivers over those years have been brilliant dealing with regular 'snarl-ups' at the village green, overhanging branches, parking on narrow roads in and out of the village. So, the extra homes proposed for St. Andrews Gardens would not only cause more problems, making it even harder for folks to access their homes, or go about their business.</p> <p>We live at the bottom of the village and have always been grateful for the recreation ground and the fields that back onto it up to St Andrews Gardens. The reason being that huge amounts of water pour down Approach Road when it rains, into Eythorne road. The Rec and fields act as a catchment to absorb a lot of this water. If this 'flood plan' is built on built on, all that water will incur huge legal implications for the homes that will be affected downhill (even flooded). This would affect all Roads including Church Hill, Hill Avenue, Approach Road, Eythorne Road, Station Road, Meadowview Road, Bernards Gardens etc. Something surely to be seriously considered.</p> <p>For over 30 years, Aylesham has had permission to greatly expand their boundaries. They have built some new homes that seem to enhance their village and give the new and old dwellers good access to the A2 and a very large village green with excellent shops and space for many more. The roads within the village are wide and spacious, very different from Shepherdswell. We have just one shop and extremely limited parking and now space for any more shops. Our roads are narrow and often just single track. Traffic problems can cause tempers to fray, and an addition of more people, who deserve to live in a harmonious environment may not be able to.</p> <p>Overall, we think that this plan for development in Shepherdswell is completely unsuitable.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP37 - Shepherdswell Small Housing Sites
Rep ID	SDLP1979

Rep Status	Processed
Consultee ID	1274392
Consultee Full Name	Mr R Winter
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP37 - SHE006
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Housing plan for Shepherswell</p> <p>I have the following comments that should be resolved prior to any development.</p> <ol style="list-style-type: none"> 1 The houses to be built alongside Cox hill road must have very clear signs for entry and exit to the site and clear views for leaving the site, and the speed limit must be reviewed. 2 The traffic along Mill Lane is already overloaded and the road must be widened before any build of more houses accessing the road is allowed to be considered 3 There is no need for a further seventy houses to be built and any houses built should be low cost 4 The water pressure is reduced now in the afternoons when school is over, meals being prepared, baths and showers in full use and this applies to the gas and electricity without a further eighty houses being added. <p>There is currently a parking shortage at the railway station resulting in cars blocking residents access to their own homes.</p> <p>The one shop in the village does not have any parking facilities, which makes the road junction, Church Hill, Westcourt Lane, and Eythorne road is a very dangerous place for residents and visitors who are blocked in by inconsiderate parking, not to forget the danger to all, due to total lack of vision for any vehicle joining the Eythorne road from Westcourt Lane/Church Hill, the addition of 70/80 houses with minimum 80 more cars will only add to the dangerous situation that exists.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP37 - Shepherdsweil Small Housing Sites
Rep ID	SDLP1943
Rep Status	Processed
Consultee ID	1333910
Consultee Full Name	Mr David Jones
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Shepherdsweil
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Dear Sir/Madam I am writing to object to comment on the above plan. I am very concerned about the amount of developments scheduled in and on the outskirts of villages, as opposed to the government's dictum that Brownfield sites should be the main focus for developments. I note that many of the proposals in towns are designated as medium timescale whereas many in the villages are designated short term.

I feel that the brownfield sites in towns should be developed first then, if needed, the villages should be considered.

As I live in Shepherdswell, naturally, I am very concerned about proposals for housing here.

Shepherdswell is very unique in that every road into the village is narrow and we cannot see any way of improving the infrastructure except at major cost.

The arguments by which the proposal for houses in Westcourt Lane were rejected also apply to the proposal at the end of St Andrews Gardens.

Mill Lane narrows considerably going out of the village and there have been quite a few accidents (mainly minor so will not have been reported) and we know of at least two of our neighbors who have had quite serious collisions leading to write offs of their vehicles.

Also, as the landowner near Mill Lane does not wish to sell, all traffic (including construction traffic) will come down St Andrews Gardens and one of the access points designated is round a hairpin bend.

The school run time is one to avoid even now as cars are parked all the way up Mill Lane to past Millfields, all round the Green and down Church Hill. It is naïve to suppose that people will walk or cycle to school. They will not, especially when it is raining. Also, the school is oversubscribed even now with families having to take their children elsewhere (by car)

Transport in the village is very poor and I believe more cuts are on the way. Only the smaller buses are used due to access. There can be no possibility of cycle lanes, the roads are too narrow to allow for this.

There are very few facilities in the village. We have a Co-op which is well used but has no designated parking and at busy times cars park illegally, a beauty salon and a pub which, as we all know, is probably under pressure from the financial crisis.

The sewage system is constantly under pressure and the system cannot be fit for purpose with foul waste appearing in gardens in Eythorne and The Glen

The train station is an asset to commuters but not so much so for shoppers, especially if you live in the top of the village. Walking up steep Church Hill and Approach Road with heavy shopping bags is not an option.

To conclude, I feel that because of the above arguments, Shepherdswell is not the place for large-scale developments, and I hope you will take this into consideration.

I also wish to express my concern about developments at Eythorne and Elvington. Eythorne Road in Shepherdswell is very busy during the rush hour and this will only get worse.

If builders wish to build estates, they must be prepared to improve the infrastructure at their expense.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

Local Plan Consultation Point	St Margaret's-at-Cliffe
Rep ID	SDLP1013
Rep Status	Processed
Consultee ID	1331923
Consultee Full Name	Mr Carlo Nuvoletta
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP39 - Land to the West of Townsend Farm Road St. Margaret's at Cliffe (STM007 & STM008)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We believe that the proposed site is part of an "aerea of outstanding beauty" and therefore it would be "not consistent with National Policy".</p> <p>We believe that a new Development in the area of St Margaret's at Cliffe is deeply unsuitable because the Village has a very poor infrastructure (narrow and single lane roads, huge traffic issues, over subscribed surgery, no first aid facility, etc... etc...). Specifically Townsend Farm Road is a single lane road (with a disable parking) and wouldn't be suitable for any further increase of traffic)</p> <p>The main characteristic of this little village is the fact that it is a Historically important and a touristic area. Building new housing without improving first the infracture (such as new roads or eventually a bypass) would make this village lose its attraction and damage the economy of the area.</p> <p>In addition, a new Development at the entrance of the town would also have a negative visual impact causing the Village to lose its main characteristic of being a historical and touristic village.</p> <p>We also believe that the land where the Development should be built is a site of Archaeological importance and as a such not suitable for new buildings.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	<p>We would suggest to build any New Developments in Rural areas like it has been done at Richmond Park (Whitfield Dover) or Preston Grange near Wingham.</p> <p>Ultimately refuse planning permission SAP39.</p>

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

SAP38 - Land adjacent to Reach Road bordering Reach Court Farm, St Margarets-at-Cliffe (STM003)

Local Plan Consultation Point	SAP38 - Land adjacent to Reach Road bordering Reach Court Farm, St Margarets-at-Cliffe (STM003)
Rep ID	SDLP10
Rep Status	Processed
Consultee ID	1329653
Consultee Full Name	Ms Alison Mott
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP38 STM003 185
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	DO NOT build this side of the village the road are not suitable atall and there will be accidents and we fear fatalities.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I have lived in the village for 12 years and use its roads/infrastructures and resouces everyday therefore I feels very qualified to discuss the issues/problems this building development will cause
Include files	
Local Plan Consultation Point	SAP38 - Land adjacent to Reach Road bordering Reach Court Farm, St Margarets-at-Cliffe (STM003)
Rep ID	SDLP105
Rep Status	Processed
Consultee ID	1330859
Consultee Full Name	Mrs Jane Cook
Consultee Company / Organisation	St Margarets at Cliffe Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	page 186 para 4.248
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	N/A
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	N/A

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	Response to Regulation 19 Plan SAP38.pdf
Local Plan Consultation Point	SAP38 - Land adjacent to Reach Road bordering Reach Court Farm, St Margarets-at-Cliffe (STM003)
Rep ID	SDLP128
Rep Status	Processed
Consultee ID	1327865
Consultee Full Name	Dr Michael McLean
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP40, STM010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The proposed development of the land between The Droveaway and Salisbury Road for the building of "executive" homes is unsound for multiple reasons and should be deleted from the overall Plan.</p> <ol style="list-style-type: none"> We do not believe this proposal has been positively prepared in that it does not seek to meet Dover District's objectively assessed needs. <ul style="list-style-type: none"> There is clearly a need for more housing in the District, but there are many more suitable sites available. The biggest need is for affordable housing and this site, with its proposed maximum of ten executive houses, will not make any contribution to that need. One of the assessed needs is to increase the prosperity of the District and this aspect of the plan will not achieve that. The only people who would have their prosperity increased by this proposal are the current landowner (who does not live in the District) and the property developers. The plan does not take into account the local infrastructure and its incapacity to satisfy any further expansion. <ul style="list-style-type: none"> The permanent increase in traffic resulting from the construction of these houses, as well as the temporary (but long term) increase due to heavy construction traffic, will have significant adverse impacts on all existing residents. Since Salisbury Rd is private, access

	<p>to the site is likely to be along The Droveaway which is narrow in places and can become extremely congested - particularly at the Sea Street end.</p> <ul style="list-style-type: none"> • Heavy construction traffic will damage the road surface (and pavements) and will be a danger to the many pedestrians (not just local residents) who use this road. • The village of St Margaret's is accessed by a single road, which is already congested and can be difficult to negotiate. It is surprising that there are not more accidents already. The plan does not propose any improvements to this local infrastructure to accommodate the increased traffic that would result from adoption of this proposal. • The same argument applies to the proposal to build 40 houses along Reach Road (SAP38, STM003) and 10 houses to the west of Townsend Farm Road (SAP39, STM007 and STM008), which will exacerbate the traffic problem still further. • There appear to be no plans to increase the capacity of local amenities (GP surgery, dentists, schools...) to accommodate the increase in population. <p>3 The plan does not take into account the sustainability of the local environment.</p> <ul style="list-style-type: none"> • The proposed site is in open countryside, lying within the boundaries of the Kent Downs Area of Outstanding Natural Beauty. AONBs are entitled to extra protection from inappropriate development so as to preserve their beauty for all to enjoy. The site is very close to several important habitats for wildlife with highly protected status and is adjacent to the National Trust land at Bockell Hill. The site is an important buffer between these sensitive habitats and the existing residential areas of the Bay, and a housing development would severely damage that protection. • The proposed site is the highest point in the area and any housing development there will severely affect the visual beauty of the immediate and surrounding areas. There are public footpaths along three of the boundaries and these are very well used and enjoyed by residents and many visiting walkers and wildlife enthusiasts. The views from the proposed site extend eastward to Ramsgate and beyond, to the Dover Patrol Memorial and west to the South Foreland lighthouse. These views are unique and should be protected from being blocked by development. • The existing tree line of the site next to The Droveaway is sparse and will offer little to no mitigation of the damage of this proposed development. The proposal submitted by the Lander Group offers no solution to this. <p>4 Legal Compliance is uncertain.</p> <ul style="list-style-type: none"> • We understand that the inclusion of this site as being suitable for immediate development was made at the latest possible stage (i.e. the day before closure) in the previous iteration of the Local Plan process (Regulation 18) and we further believe that by doing so DDC made procedural mistakes in that the legally required public consultation was not carried out. This is particularly unfair, given the significant impact this proposed development would have on local residents who have not therefore had the chance to make our views known until this last stage. The absence of our views may lead the Council to assume that we have/had no objections to the proposals, whereas the opposite is abundantly clear. • We also question the further exploitation of this site should initial approval for its development be granted. Once the principle of housing on this site has been accepted, a developer could come back with a much larger development proposal. Local residents are well aware that it has been previously, and frequently, suggested that as many as 72 houses could be built on the field and, therefore, this proposal very much represents the thin end of a wedge.
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Perhaps not surprisingly, the simple solution to the issues cited above is to abandon this proposal of development of the land between The Droveaway and Salisbury Road and, indeed, any further development of the village of St Margaret's.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Given the importance of my objections to the proposed development, I do not consider it sufficient to leave this representation to those who do not live in the village nor who would be directly impacted by it. It doesn't have to be me, but there MUST be direct and personal representation of the villagers at the oral proceedings.
Include files	
Local Plan Consultation Point	SAP38 - Land adjacent to Reach Road bordering Reach Court Farm, St Margarets-at-Cliffe (STM003)
Rep ID	SDLP345
Rep Status	Processed
Consultee ID	1330952
Consultee Full Name	mrs karen block
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP38
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Roman Way forms a natural edge to the village leading onto the Area Of Natural Beauty, with its rolling landscape leading up to the White Cliffs. With its landscape, hedges, trees and open fields, it is home to much wildlife of which we are losing rapidly. I have seen a Munjac deer in the field of the proposed site. Being so close to The White Cliffs and National Trust Property I feel this could be detrimental to the whole area. The road through the village is not adequate for more traffic it is overloaded already. I understand the school and doctors surgery is already full to capacity. The bus service has recently been reduced.</p> <p>DDC note: Emil submitted 26.11.22 stated the following:</p> <p>I am writing to comment on the proposed development of 40 houses off Reach Road at the rear of Roman Way. I do not think this is a area where houses should be constructed. Roman Way forms a natural edge to the village leading onto the Area Of Natural Beauty, with its rolling landscape leading up to the cliffs. Obviously with its natural landscape, hedges, trees and open fields, it is home to much wildlife of which we are losing rapidly. " I have seen Munjac deer" in the field of the proposed sight. Being so close to The White Cliffs and Nation Trust property I feel this could also be detrimental to the whole area. I do believe that perhaps, brown sites are not used to their full potential. I cannot see how any type of building would "Blend" well with the existing settlement and landscape. There is also the problem of extra cars in the village, It is so narrow and there are difficulties already</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness	I understand the need for houses, possibly social or affordable but in an area where a main road is more accessible.

matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	It would be easier to oral express a comment and to receive an explanation
Include files	
Local Plan Consultation Point	SAP38 - Land adjacent to Reach Road bordering Reach Court Farm, St Margarets-at-Cliffe (STM003)
Rep ID	SDLP186
Rep Status	Processed
Consultee ID	1331043
Consultee Full Name	Mrs Veronika Rudd
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP40, STM010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	1. I do not believe this proposal has been positively prepared in that it does not seek to meet Dover District 's objectively assessed needs. One of the assessed needs is to increase the prosperity of the District and this aspect of the plan will not achieve that. The only people who would have their prosperity increased by this proposal are the landowner and the property developers. 2. The plan does not take into account the local infrastructure and its incapacity to satisfy any further expansion.

	<p>The permanent increase in traffic resulting from the construction of the houses, as well as increase due to heavy construction traffic, will have significant adverse impacts on all existing residents. Because Salisbury road is private, access to the site is likely to be along The Drove Way Rd ,which is narrow in places and can become extremely congested- particularly at the Sea Street end.</p> <p>Heavy construction traffic will damage the road surface and will be a danger to the many pedestrians who use this road.</p> <p>The village of ST.Margaret's is accessed by a single road, which is already congested and can be difficult to negotiate. The plan does not propose any improvements to this local infrastructure to accommodate the increased traffic that would result from adoption of this proposal.</p> <p>3. The plan does not take into account the sustainability of the local environment.</p> <p>The proposed site is in open countryside , lying within the boundaries of the Kent Downs Area of Outstanding Natural Beauty. The site is very close to several important habitats for wildlife with highly protected status and is adjacent to the National Trust land at Bockell Hill. The site is an important buffer between these sensitive habitats and the existing residential areas of the Bay, and a housing development would severely damage that protection.</p> <p>The proposed site is the highest point in the area and any housing development there will severely affect beauty of the immediate and surrounding areas. The views from the proposed site extend eastward to Ramsgate and beyond to the Dover Patrol Memorial and West to The South Foreland lighthouse. These views are unique and should be protected from being blocked by development. The proposal submitted by the Lander Group offers no solution to this.</p> <p>4. Legal Compliance is uncertain.</p> <p>I understand that the inclusion of this site as being suitable for immediate development was made at the latest possible stage in the previous iteration of the local plan process and I further believe that doing so DDC made procedural mistakes in that the legally required public consultation was not carried out. This is particularly unfair, given the significant impact this proposed development would have on local residents who have not therefore had the chance to make our views known until this last stage. I also question the further exploitation of this site should initial approval for its development be granted. Local residents are well aware that it has been previously , and frequently suggested that as many as 72 houses could be built on the field and , therefore , this proposal very much represents the thin end of a wedge.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Perhaps not surprisingly , the simple solution to the issues cited above is to abandon this proposal of development of the land between The Drove Way and Salisbury Road and, indeed , any further development of the village of ST.Margaret's .</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>Given the importance of my objections to the proposed development, I do not consider it sufficient to leave this representation to those who do not live in the village nor who would be directly impacted by it. There must be direct and personal representation of the villagers at the proceedings.</p>
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP38 - Land adjacent to Reach Road bordering Reach Court Farm, St Margarets-at-Cliffe (STM003)</p>
<p>Rep ID</p>	<p>SDLP265</p>

Rep Status	Processed
Consultee ID	1331383
Consultee Full Name	Mrs Katie Miller
Consultee Company / Organisation	Kent Downs AONB Unit
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP38
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	As recognised in the policy, the site lies partially within the Kent Downs AONB. The site would seem an appropriate extension of the settlement, reflecting the existing settlement pattern in this part of the village and in view of its relationship with the built confines of the existing settlement is considered acceptable in AONB landscape terms. The proposed requirements included in criteria a and b to help manage impacts on the AONB are supported. While we support the provision of a requirement for advanced planting along the western boundary of the site, we consider it unlikely that it will reach maturity prior to the completion of the development and we would recommend that this is amended to also allow planting prior to commencement of development.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	b iii Include provision for advanced tree planting. This should be undertaken on-site EITHER PRIOR TO THE COMMENCEMENT OF DEVELOPMENT or at the time the development of the site commences, to ensure trees are established and have reached maturity prior to the completion of the development, to mitigate the impact on the AONB;
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP38 - Land adjacent to Reach Road bordering Reach Court Farm, St Margarets-at-Cliffe (STM003)

Rep ID	SDLP934
Rep Status	Processed
Consultee ID	1331564
Consultee Full Name	Mrs Linda Carter
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP40 STM010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The Plan is Unsound</p> <p>The proposed development of the land between The Drove way and Salisbury Rod for the building of "executive" homes is unsound for multiple reasons and should be deleted from the overall plan.</p> <p>1. We do not believe that this proposal has been positively prepared in that it does not seek to meet the Dover Districts objectively assessed needs. There is clearly a need for more housing in the District but there are many more suitable sites available.. The biggest need is for affordable housing and this site with its proposed maximum of ten executive houses will not make any contribution to that need. One of the assessed needs is to increase the prosperity of the District and this aspect of the plan will not achieve that. The only people who will have an increase in prosperity are the current landowner (who does not live in the District, and the property developers.</p> <p>2. The plan does not take into account the local infrastructure and its capacity to satisfy any further expansion.</p> <p>The permanent increase in traffic resulting from the construction of these houses as well as the temporary (but long term) increase due to heavy traffic will have significant adverse impacts on all existing residents. Since Salisbury Road is private access to the site is likely to be only along The Drove way. The Drove way is a long and narrow road which only has a limited section of paving at the Sea Street end. The road is always very congested, especially at the Sea Street end, and so narrow there that large vehicles always drive on the pavement to get through. There is a constant stream of people walking in this beautiful area, but I have observed that when cars come through they often have to step into driveways in order to feel safe. The increase in traffic in this lane is potentially very dangerous. Heavy construction traffic will damage the road surface (and such pavements as there are) and will be an additional danger to the many pedestrians (not just local residents) who use this road.</p> <p>The village of St. Margarets is accessed by a single road, which is already congested and can be difficult to negotiate. The same argument applies to the 40 Houses along Reach Road (SAP38, STM003), 10 houses to the West of Towns end Farm Road (SAP39, STM007) and STM008) which will exacerbate the problem further. However, the development on the Drove way is by far the worst issue because there is no other access road to the bay area, and all additional traffic for the bay has to go via Sea Street past the Primary School, where</p>

	<p>frequent traffic issues occur and will cause additional risk for the children. Even if the Doctors surgery could accomodate additional patients there is no parking facility in the bay to deal with this.</p> <p>3. The plan does not take into account the Sustainability of the local environment. The proposed site is in open countryside, lying within the boundaries of the Kent Downs Area of Outstanding Natural Beauty. AONBs are entitled to extra protection from inappropriate development so as to protect their beauty for all to enjoy. The site is close to several very important habitats for wildlife with highly protected status and is adjacent to the National Trust Land at Bockhill. The site is an important buffer between these sensitive habitats and the existing residential areas of the Bay and a housing development would seriously damage the protection.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The simple solution to the issues cited above is to abandon this proposal of development of the land between The Drove way and Salisbury Road and , indeed, any further development of the village of St. Margarets.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>There must be direct and personal representation of villagers, and especially those living in roads concerned, at the oral proceedings.</p>
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP38 - Land adjacent to Reach Road bordering Reach Court Farm, St Margarets-at-Cliffe (STM003)</p>
<p>Rep ID</p>	<p>SDLP670</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331795</p>
<p>Consultee Full Name</p>	<p>Mrs Talina Wells</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP 39 and 38</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Effective</p>

4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Item 11.9 - The Kent Downs AONB I refer to the comment '...land which is visible from the AONB and from which the AONB can be seen.' Would the dark skies be compromised re the concentrated development planned STMO10 - land between Salisbury Road and The Droveaway. Or indeed other planned developments abutting or within the AONB.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Item 11.9 - The Kent Downs AONB I refer to the comment '...land which is visible from the AONB and from which the AONB can be seen.' Would the dark skies be compromised re the concentrated development planned STMO10 - land between Salisbury Road and The Droveaway. Or indeed other planned developments abutting or within the AONB.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP38 - Land adjacent to Reach Road bordering Reach Court Farm, St Margarets-at-Cliffe (STM003)
Rep ID	SDLP835
Rep Status	Processed
Consultee ID	1331908
Consultee Full Name	Sam Silcocks
Consultee Company / Organisation	Harris Lamb
Agent Full Name	Sam Silcocks
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP38 - Land adjacent to Reach Road bordering Reach Court Farm, St Margarets-at-Cliffe (STM003)
2 - Do you consider this part of the Plan sound?	Yes

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Harris Lamb Planning Consultancy has been instructed by the owner of proposed residential allocation STM003 to submit these representations in support of the proposed residential allocation of their land.</p> <p>Proposed Housing Allocation STM003 – Land Adjacent to Reach Road is a deliverable site that will contribute towards the Council's five-year housing land supply and meeting the housing requirement set out in the pre-submission plan. The site is available now, is a suitable location as evidenced by the Council's own assessment and is clearly of a scale that can be delivered in the first 5 years of the plan.</p> <p>Allocation STM003 is located on the edge of St Margaret's at Cliffe. It adjoins the existing settlement boundary on two sides, with the holiday park to the north and the existing houses in Roman Road to the north west. The role of St Margaret's at Cliffe as a Local Centre is clearly defined within the Pre-submission Plan and we support the delivery of housing in this location to help sustain the role and function of St Margaret's going forwards.</p> <p>Thereafter, site STM0003 is an incredibly logical location to deliver additional housing and it presents the opportunity to better integrate this edge of the village with the surrounding countryside which forms part of the Kent Area of Outstanding Natural Beauty (AoNB) and South Forelands Heritage Coast.</p> <p>For housing to be delivered in St Margaret's at Cliffe there is a requirement to release sites which are in the Kent Downs Area of Outstanding Natural Beauty. Paragraph 177 of the NPPF sets out when development should be considered appropriate in AoNB. In this context, it sets out how major developments should be considered. However, it is considered that the size of development in this allocation does not meet the definition of major development as set out in the footnote. This being the case whether it is considered against the scale of the village, the overall target for the rural area, or the amount of land that would need to be released relative to the size and nature of the AoNB. This is, therefore, an appropriate location to deliver housing.</p> <p>Emerging Policy SAP38 sets out the criteria against which this allocation will be considered when a planning application is submitted, and we consider this represents a sound basis for ensuring this allocation comes forward in a way that positively addresses the opportunities and constraints presented by this site. We set out our thoughts on the matters raised within these criteria below:</p> <ul style="list-style-type: none"> • An appropriate design and mix of materials can be secured at the application stage. The latter being particularly important given the stark white cladding on the dwellings in Roman Way that currently line the boundary of the village with the surrounding countryside. • The proposed housing scheme could be delivered in a way that would not only mitigate the impact on the surrounding AoNB, but would actually secure a betterment through better integrating the existing village into the surrounding countryside. • At present, the dwellings in Roman Way form a stark edge to the village and are readily visible from the public viewpoints to the east and south of the site. These include views from Reach Road as motorists travel towards the village and from the established Public Rights of Way to the south east and south west (i.e. ER33, ER40, and ER282). From these viewpoints, the white clad housing in Roman Way forms a very prominent feature within the view back towards the village. Beyond this the rooftops of the other houses in St Margaret's at Cliffe and St Margaret's Bay can be seen. In developing a housing scheme for the site, the allocation requires a tree belt to be provided along the southern and western boundaries of the site. This can be provided early on with mature specimens to provide filtered views from an early stage. In delivering this tree belt, the proposed houses would become largely screened in the summer months and views filtered during the Winter months from the public viewpoints to the west and south. In turn, views of the white clad properties in Roman will be screened and only the rooftops to the properties in behind would now be visible. The proposed tree belt would not completely screen views of the proposed housing, and this would not be the intent, however a combination of these and the use of more appropriate materials would better integrate this edge of the village into the surrounding countryside. It is considered that this is a notable benefit of the allocation and results in a positive impact on the Kent Downs AoNB and South Forelands Heritage Coast. • Vehicle access can be secured from Reach Road through a priority junction. This will be more than appropriate for the number of dwellings proposed and could be integrated with the existing farm access should this prove necessary. In this context, there is no reason to believe an appropriate access cannot be delivered when a more detailed study is undertaken. The tree belt to the west and south of the allocation would more than compensate for the loss of any landscape to create this access. • Between the land owned by Reach Court Farm and the adopted highway it will be possible to deliver the connection to the existing footway on the southern side of Reach Road as required by the policy.

- Pedestrian improvements can be secured through a planning obligation.
- The site is entirely in Flood Zone 1 and is an appropriate location to deliver housing in this context.
- Subject to an appropriate foul and surface water drainage system, the proposed houses would not have an unacceptable impact on the Groundwater Source Protection Zone in which the site is located. For surface water, this will require an appropriate level of filtration to take place within the drainage system design and this will be relatively easy on what is a new rectangular, greenfield site.

In accordance with the above, it is evident that acceptable solutions can be delivered to address all of the opportunities and constraints presented by this proposed allocation.

Delivery Statement

The owner of the site are actively supporting the delivery of this housing allocation. I can confirm that it is available now and that should the allocation be confirmed that owner intends to partner with a housebuilder at that time and allow them to bring it forwards through a full planning application. Allowing time for contracts to be agreed, full planning permission to be granted and conditions discharged, we can confirm that the site could comfortably be delivered within the first five years of the Plan and would contribute towards both the five year housing land supply and the overall housing target.

Timeline

- Contract agreed with housebuilder following confirmation of the allocation – 3 months
- Securing the grant of full planning permission – 9 months (12 months total)
- Completing the purchase and discharging the pre-commencement conditions – 6 months (18 months total)
- 6 months till the first completion on the allocation (24 months total)
- 12 months to the completion of the last dwelling (36 months total)

This timeline would see all the dwellings completed by 3 years from the confirmation of the allocation. This, of course, allows some flexibility for any delays that might occur for the site to still come forward within the first five years following the adoption of the Plan.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

We can be available to answers any questions the Inspector might have in relation to the deliverability of this proposed allocation.

Include files

Local Plan Consultation Point

SAP38 - Land adjacent to Reach Road bordering Reach Court Farm, St Margarets-at-Cliffe (STM003)

Rep ID

SDLP1500

Rep Status

Processed

Consultee ID

1252487

Consultee Full Name

Sandra

	Upton
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP38
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I think that the plan for Reach Farm land behind Roman Way involves too many houses. Reach Road is too narrow for the amount of increased traffic for the holiday parc, country hotel & country club, the housing developments already there such as Roman Way, Glebe close and Langdon close. The new development, like Glebe close and Langdon close will no doubt have traffic entering and exiting from Reach Road. The Local Authority should no encourage good agricultural land being used for development.</p> <p>The Local authority should use vacant lots in Nelson Park Estate for development. Being land originally sold in 1900 for development in particular along Collingwood Road where the highway is already tarmacked. Land both sides of Collingwood road could be used instead of Reach Road</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Land both sides of Collingwood road could be used instead of Reach Road
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	SDLP1500 Upton Att1.pdf
Local Plan Consultation Point	SAP38 - Land adjacent to Reach Road bordering Reach Court Farm, St Margarets-at-Cliffe (STM003)
Rep ID	SDLP1452

Rep Status	Processed
Consultee ID	1260127
Consultee Full Name	Maureen Woods
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP38
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Regarding the proposals registered under the above reference: I would like to register my objections in the strongest possible terms. These developments are totally inappropriate, given the surrounding infrastructure. The local primary school is oversubscribed. Some local children need to travel to other locations. The surgery is full The bus service is limited The roads are already a nightmare. Upper road is narrow, with hairpin bends, treacherous in bad weather. Sea Street is narrow with no adequate footpath. There are often delays at post box corner, if a bus or lorry is coming in/out of the village, especially if a post office van is parked outside the post office. Please recognise the major problems which will be caused if masses of extra families, together with their very necessary vehicles, take up residence here. In addition, this once lovely village, an ANOB, will simply become a massive housing estate. An annex to Dover. Many of the recent new builds which have been allowed are completely out of keeping with the village surroundings too. Please consider the very real dangers associated with heavy additional traffic which these plans will bring to the village. However great the need for housing is, I am afraid St Margarets is not the place for it! I sincerely hope that common sense will prevail over finance. DO NOT GIVE THESE PLANS THE GO AHEAD</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	SDLP1452 Woods Att1.pdf
Local Plan Consultation Point	SAP38 - Land adjacent to Reach Road bordering Reach Court Farm, St Margarets-at-Cliffe (STM003)
Rep ID	SDLP1424
Rep Status	Processed
Consultee ID	1271139
Consultee Full Name	Katy Wiseman
Consultee Company / Organisation	National Trust
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP38
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The National Trust is the owner and custodian of Langdon Cliffs and Foxhill Down which forms part of the Dover to Kingsdown Cliffs Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI). Qualifying features include vegetated sea cliffs of vegetated sea cliffs of the Atlantic and Baltic Coasts, and Semi-natural dry grasslands and scrubland facies on calcareous substrates.</p> <p>As identified at paragraph 3.256 of the draft Local Plan, the White Cliffs of Dover are one the country's most iconic landscapes, attracting visitors from across the country and from overseas. The National Trust has seen year on year increases in visitor numbers to the Dover to Kingsdown Cliffs SAC site and we are increasingly concerned about the designated areas being damaged through trampling and path widths spreading by the increased use of visitors to the site. The Trust is working hard to ensure that the integrity of the site is maintained and along with partner organisations is committed to an extensive and ongoing programme of visitor management and mitigation measures. As well as this, the National Trust is currently seeking planning permission to secure new parking outside of the designation at Wanstone with the aim of alleviating pressure on the qualifying natural habitats and to reduce footfall through the SAC.</p> <p>Policy SAP38 proposes 40 new dwellings which will be located approximately 350m from the Dover to Kingsdown Cliffs SAC. This is a major development on the edge of a rural settlement where the quantum of development in such a context could be considered significant. The National Trust primary concern is to conserve the integrity of the SAC, and although protection should be afforded through proposed Policy SP13 Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets, the Trust want certainty that the integrity of the Dover to Kingsdown Cliffs SAC qualifying features will be maintained and enhanced and that appropriate avoidance and mitigation measures will be in place.</p> <p>Recommend criterion added to policy wording which states, 'Due to the scale of development and close proximity to the Dover to Kingsdown Cliffs SAC and site of SSSI, a project level HRA is required. The HRA should consider the potential impact pathway of significantly increased recreational pressure and the relevant avoidance or mitigation measures required in line with Strategic Policy SP13'.</p>

	The western half of proposed site allocation SAP38 is located both within the Kent Downs AONB and land defined as Heritage Coast. The principle of major development in this location is not supported by national policy (paragraph 178, NPPF) which states that 'major development within a Heritage Coast is unlikely to be appropriate, unless it is compatible with its special character'. To be consistent with national planning policy it is recommended that the indicative capacity of development on this site is either revised down to minor development, or the allocation should only cover the area outside of the Heritage Coast with a revised indicative capacity to reflect appropriate densities in this sensitive rural location.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Recommend criterion added to policy wording which states, 'Due to the scale of development and close proximity to the Dover to Kingsdown Cliffs SAC and site of SSSI, a project level HRA is required. The HRA should consider the potential impact pathway of significantly increased recreational pressure and the relevant avoidance or mitigation measures required in line with Strategic Policy SP13'.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP38 - Land adjacent to Reach Road bordering Reach Court Farm, St Margarets-at-Cliffe (STM003)
Rep ID	SDLP1822
Rep Status	Processed
Consultee ID	1330232
Consultee Full Name	Dianne Marsden
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP38
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy

4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Re plan for 40 houses ref SAP 38 - as a resident of Reach Road I object to the proposal for the 40 houses . The resultant increase in amount of traffic along Reach and onto the High Street would be dangerous and unacceptable, especially beyond the village hall to The High Street. The High Street is narrow and without a footpath in sections and an increase of traffic will cause further danger to pedestrians, cyclists and motorists, This sole route in and out of the village is already congested as is the last stretch of Reach Road.</p> <p><i>(DDC note: This representation was originally made against the Infrastructure Delivery Plan consultation document but has been duplicated in relevant places against the Local Plan due to the specific site allocation/policy references made)</i></p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP38 - Land adjacent to Reach Road bordering Reach Court Farm, St Margarets-at-Cliffe (STM003)
Rep ID	SDLP1748
Rep Status	Processed
Consultee ID	1333579
Consultee Full Name	Ms Janet Eades
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	St Margarets at Cliffe
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Duplicate of SDLP1746) I think to consider planning for Reach Farm for housing is so wrong 1) Taking agricultural land. When we need land for food 2) Our roads are too narrow for traffic already. Either way into the village or towards the castle. Roads get flooded often further along. 3 Land at Nelson Park adjacent to Collingwood Road seems a much better idea The roads are already tarmacked. It was muted many years ago to develop that area, Village Roads frequently have traffic chaos when heavy goods or farm tractors use them I wish to register my objections to this planning for Reach Farm planning
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP38 - Land adjacent to Reach Road bordering Reach Court Farm, St Margarets-at-Cliffe (STM003)
Rep ID	SDLP1589
Rep Status	Processed
Consultee ID	1333365
Consultee Full Name	Susan

	Turner
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP38
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	With reference to the plan to create 40 new homes in St Margarets, I have to object. The village is too small to cope. We have a terrible bus service, so the number of cars that this will bring to the village is not feasible. We have trouble coping with the traffic already, without more being added. I appreciate that there are needs for new homes to be built, but not to the detriment of the village and the people who live here. These new homes will have a devastating impact on the village and the people who live there. So I am objecting to these proposals and ask you to reconsider these plans.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	So I am objecting to these proposals and ask you to reconsider these plans.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP38 - Land adjacent to Reach Road bordering Reach Court Farm, St Margarets-at-Cliffe (STM003)
Rep ID	SDLP2043
Rep Status	Processed

Consultee ID	1330633
Consultee Full Name	Ali and Ian SMITH
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP38
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note: 3 emails sent on 16th Oct, 30th Oct; 31st Oct. They appear to relate to the same site and Email dated 16th Oct</p> <p>My Partner and I wish to oppose and raise the following issues re the building of this development we live and work in the village, my partner is one of the village Postman so we feel we have first hand knowledge and know the villages problems. It's infrastructure cannot cope with any more vehicles or people which these homes will bring to the village and its resources are already beyond stretched.</p> <p>Reach Rd, Sea Street and the High Street are already totally congested and dangerous and cannot be altered due to St Margarets unique position, with this only one main road in and out for The Cliffe and The Bay.</p> <p>Upper Road out of the village is fraught with problems, its narrow with hairpin bends and has the following continually on it....</p> <p>Castle visitors including large groups of student and school parties.</p> <p>Castle events bring hundreds of visitors and cars. Cruise ships bring hundreds of visitors on foot, bikes and coaches.</p> <p>Two National Trust entrances with hundreds of visitors, in cars, coaches on foot and an additional overflow carpark for the Main center, The Lighthouse and the Continuing projects in the area at Wanstone which will bring even more visitors.</p> <p>The ever busy Coastguard</p> <p>The Farm vehicles</p> <p>Car and visitors, especially foreign visitors parking dangerously on the narrow road not knowing where they are going.</p> <p>Bikes and Walkers use this road as its a AONB and a visitor attraction for the Whitecliffs, The Bay, Cliffe walks and Historical sites</p> <p>The Parkdean Holiday Park visitors and residents which continually grows.</p> <p>The Wedding venue at Reach Court Farm = alot of traffic for every event which has grown.</p> <p>We use these roads 6 times a day back and forth and 8 times out of 10 we encounter some sort of problem/incident, which just get worse.</p> <p>There are no footpaths or only partly on these roads and often jammed so no emergency vehicles can only get through with difficulty if at all.</p> <p>The resources in the village, GPs, Schools etc are at over full capacity already along with the communication systems and gas supply.</p> <p>It would destroy even more of AONB, flora and fauna we have to and been told to protect.</p>

These houses should not be built on top of the iconic Whitecliffs in St Margarets which sits in a very unique position for these reason.
Please pass these objections onto the relevant person.

Emails dated 30th and 31st Oct

Myself and my Husband who is one of the Postman for the village live and work in St Margarets at Cliffe we therefore use Upper and Reach Road leading in the High Street etc upto 8 times aday so feel very qualified to say this:

We are writing to express are very real concerns and FEARS, we oppose the building of 40/50 houses this side of the Village because of the many vehicles and pedestrians these developments would add to these already dangerous and congested roads and an even bigger concern for Pedestrians both Adults and Chidren who use them.

These roads are UNIQUE with what they already and gave to cope with especially Upper Road with hundreds and hundreds of cars and pedestrians using it all year around visiting Dover Castle, Cruise Passengers, The National Trust and its Car Parks, The Coastguard, The Farms, Reach Court Farm Wedding Venue, The Holiday Park, St Margarets Bay and obviously visiting the iconic Whitecliffs, The Village itself and this area of AONB to name but afew.

In addition locals from the Village, "Cliffe and Bay" and Dover plus visitors from further afield going about their daily lives taking their children to school and getting to work etc plus for Walkers, dog walking, cycling and exercise and getting out into a green space. Alot of foreign visitors also use these roads not always knowing where they are going or where to park etc.

All these factors make these EXTREAMLY BUSY DANGEROUS, HAZARDOUS roads, like no other which are also very exposed, narrow with hairpin bends and no or only partial pavements and lighting.

There is always alot of congestion and que's restricting emergency vehicles access and entrance.

Due to the uniqueness and layout there is no way of changing this infrastructure.

As we said we travel on these roads everyday in all weathers and 8 out of 10 times there is an incident from dodging pedestrians, swerving coaches to bad accidents, there are already memorials on the road we don't want any more.

These roads cannot cope and it would be extreamly irresponsible to add to it by building on/off them adding and causing more health and safety risks and ultimately we fear more fatalities. PLEASE listen to us the people who know these roads and use them.

PLEASE acknowledge this email and assure us it will be read and seriously considered by the right people. We would be very happy to talk to whomever face to face about our real concerns and fears, by adding more traffic and people to this side of the village when other options are available and far more suitable without adding to risk of life

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Local Plan Consultation Point	SAP38 - Land adjacent to Reach Road bordering Reach Court Farm, St Margarets-at-Cliffe (STM003)
Rep ID	SDLP1746
Rep Status	Processed
Consultee ID	1333579
Consultee Full Name	Ms Janet Eades
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP38
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I think to consider planning for Reach Farm for housing is so wrong 1) Taking agricultural land. When we need land for food 2) Our roads are too narrow for traffic already. Either way into the village or towards the castle. Roads get flooded often further along. 3 Land at Nelson Park adjacent to Collingwood Road seems a much better idea The roads are already tarmacked. It was muted many years ago to develop that area, Village Roads frequently have traffic chaos when heavy goods or farm tractors use them I wish to register my objections to this planning for Reach Farm planning
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP38 - Land adjacent to Reach Road bordering Reach Court Farm, St Margarets-at-Cliffe (STM003)
Rep ID	SDLP1811
Rep Status	Processed
Consultee ID	1333675
Consultee Full Name	Liz Marshall
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP38
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I object to STM3 for the following reasons: 1. St Margarets is a village, I want to keep it that way. We don't want or need it to expand. 2. The area considered is beautiful farmland, the views are enjoyed by many, we don't want a housing estate built on it. 3. Reach Road is already difficult to navigate during rush hour, having even more traffic will make it a nightmare. 4. I doubt the local primary school could cope with extra pupils, as far as I am aware it is already at full capacity. 5. Extra housing will impact on the water levels, we already have to endure hosepipe bans, this will only get worse.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

SAP39 - Land to the west of Townsend Farm Road, St Margarets-at-Cliffe (STM007/ STM008)

Local Plan Consultation Point	SAP39 - Land to the west of Townsend Farm Road, St Margarets-at-Cliffe (STM007/ STM008)
Rep ID	SDLP129
Rep Status	Processed
Consultee ID	1327865
Consultee Full Name	Dr Michael McLean
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP40, STM010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The proposed development of the land between The Droveaway and Salisbury Road for the building of "executive" homes is unsound for multiple reasons and should be deleted from the overall Plan.</p> <ol style="list-style-type: none"> We do not believe this proposal has been positively prepared in that it does not seek to meet Dover District's objectively assessed needs. <ul style="list-style-type: none"> There is clearly a need for more housing in the District, but there are many more suitable sites available. The biggest need is for affordable housing and this site, with its proposed maximum of ten executive houses, will not make any contribution to that need. One of the assessed needs is to increase the prosperity of the District and this aspect of the plan will not achieve that. The only people who would have their prosperity increased by this proposal are the current landowner (who does not live in the District) and the property developers. The plan does not take into account the local infrastructure and its incapacity to satisfy any further expansion. <ul style="list-style-type: none"> The permanent increase in traffic resulting from the construction of these houses, as well as the temporary (but long term) increase due to heavy construction traffic, will have significant adverse impacts on all existing residents. Since Salisbury Rd is private, access to the site is likely to be along The Droveaway which is narrow in places and can become extremely congested - particularly at the Sea Street end. Heavy construction traffic will damage the road surface (and pavements) and will be a danger to the many pedestrians (not just local residents) who use this road. The village of St Margaret's is accessed by a single road, which is already congested and can be difficult to negotiate. It is surprising that there are not more accidents already. The plan does not propose any improvements to this local infrastructure to accommodate the increased traffic that would result from adoption of this proposal.

	<ul style="list-style-type: none"> • The same argument applies to the proposal to build 40 houses along Reach Road (SAP38, STM003) and 10 houses to the west of Townsend Farm Road (SAP39, STM007 and STM008), which will exacerbate the traffic problem still further. • There appear to be no plans to increase the capacity of local amenities (GP surgery, dentists, schools...) to accommodate the increase in population. <p>3 The plan does not take into account the sustainability of the local environment.</p> <ul style="list-style-type: none"> • The proposed site is in open countryside, lying within the boundaries of the Kent Downs Area of Outstanding Natural Beauty. AONBs are entitled to extra protection from inappropriate development so as to preserve their beauty for all to enjoy. The site is very close to several important habitats for wildlife with high protected status and is adjacent to the National Trust land at Bockell Hill. The site is an important buffer between these sensitive habitats and the existing residential areas of the Bay, and a housing development would severely damage that protection. • The proposed site is the highest point in the area and any housing development there will severely affect the visual beauty of the immediate and surrounding areas. There are public footpaths along three of the boundaries and these are very well used and enjoyed by residents and many visiting walkers and wildlife enthusiasts. The views from the proposed site extend eastward to Ramsgate and beyond, to the Dover Patrol Memorial and west to the South Foreland lighthouse. These views are unique and should be protected from being blocked by development. • The existing tree line of the site next to The Drove way is sparse and will offer little to no mitigation of the damage of this proposed development. The proposal submitted by the Lander Group offers no solution to this. <p>4 Legal Compliance is uncertain.</p> <ul style="list-style-type: none"> • We understand that the inclusion of this site as being suitable for immediate development was made at the latest possible stage (i.e. the day before closure) in the previous iteration of the Local Plan process (Regulation 18) and we further believe that by doing so DDC made procedural mistakes in that the legally required public consultation was not carried out. This is particularly unfair, given the significant impact this proposed development would have on local residents who have not therefore had the chance to make our views known until this last stage. The absence of our views may lead the Council to assume that we have/had no objections to the proposals, whereas the opposite is abundantly clear. • We also question the further exploitation of this site should initial approval for its development be granted. Once the principle of housing on this site has been accepted, a developer could come back with a much larger development proposal. Local residents are well aware that it has been previously, and frequently, suggested that as many as 72 houses could be built on the field and, therefore, this proposal very much represents the thin end of a wedge.
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Perhaps not surprisingly, the simple solution to the issues cited above is to abandon this proposal of development of the land between The Drove way and Salisbury Road and, indeed, any further development of the village of St Margaret's.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>Given the importance of my objections to the proposed development, I do not consider it sufficient to leave this representation to those who do not live in the village nor who would be directly impacted by it. It doesn't have to be me, but there MUST be direct and personal representation of the villagers at the oral proceedings.</p>
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP39 - Land to the west of Townsend Farm Road, St Margarets-at-Cliffe (STM007/ STM008)</p>

Rep ID	SDLP106
Rep Status	Processed
Consultee ID	1330859
Consultee Full Name	Mrs Jane Cook
Consultee Company / Organisation	St Margarets at Cliffe Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	page 186 para 4.251
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	N/A
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	Response to Regulation 19 Plan SAP39.pdf

Local Plan Consultation Point	SAP39 - Land to the west of Townsend Farm Road, St Margarets-at-Cliffe (STM007/ STM008)
Rep ID	SDLP185
Rep Status	Processed
Consultee ID	1331043
Consultee Full Name	Mrs Veronika Rudd
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP40, STM010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>1. I do not believe this proposal has been positively prepared in that it does not seek to meet Dover District 's objectively assessed needs.</p> <p>One of the assessed needs is to increase the prosperity of the District and this aspect of the plan will not achieve that. The only people who would have their prosperity increased by this proposal are the landowner and the property developers.</p> <p>2. The plan does not take into account the local infrastructure and its incapacity to satisfy any further expansion.</p> <p>The permanent increase in traffic resulting from the construction of the houses, as well as increase due to heavy construction traffic, will have significant adverse impacts on all existing residents. Because Salisbury road is private, access to the site is likely to be along The Droveaway Rd ,which is narrow in places and can become extremely congested- particularly at the Sea Street end.</p> <p>Heavy construction traffic will damage the road surface and will be a danger to the many pedestrians who use this road.</p> <p>The village of ST.Margaret's is accessed by a single road, which is already congested and can be difficult to negotiate. The plan does not propose any improvements to this local infrastructure to accommodate the increased traffic that would result from adoption of this proposal.</p> <p>3. The plan does not take into account the sustainability of the local environment.</p> <p>The proposed site is in open countryside , lying within the boundaries of the Kent Downs Area of Outstanding Natural Beauty. The site is very close to several important habitats for wildlife with high protected status and is adjacent to the National Trust land at Bockell Hill. The site is an important buffer between these sensitive habitats and the existing residential areas of the Bay, and a housing development would severely damage that protection.</p> <p>The proposed site is the highest point in the area and any housing development there will severely affect beauty of the immediate and surrounding areas. The views from the proposed site extend eastward to Ramsgate and beyond to the Dover Patrol Memorial and West to The South</p>

	<p>Foreland lighthouse. There views are unique and should be protected from being blocked by development. The proposal submitted by the Lander Group offers no solution to this.</p> <p>4. Legal Compliance is uncertain.</p> <p>I understand that the inclusion of this site as being suitable for immediate development was made at the latest possible stage in the previous iteration of the local plan process and I further believe that doing so DDC made procedural mistakes in that the legally required public consultation was not carried out. This is particularly unfair, given the significant impact this proposed development would have on local residents who have not therefore had the chance to make our views known until this last stage. I also question the further exploitation of this site should initial approval for its development be granted. Local residents are well aware that it has been previously, and frequently suggested that as many as 72 houses could be built on the field and, therefore, this proposal very much represents the thin end of a wedge.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Perhaps not surprisingly, the simple solution to the issues cited above is to abandon this proposal of development of the land between The Droeway and Salisbury Road and, indeed, any further development of the village of ST.Margaret's.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>Given the importance of my objections to the proposed development, I do not consider it sufficient to leave this representation to those who do not live in the village nor who would be directly impacted by it. It there must be direct and personal representation of the villagers at the proceedings.</p>
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP39 - Land to the west of Townsend Farm Road, St Margarets-at-Cliffe (STM007/ STM008)</p>
<p>Rep ID</p>	<p>SDLP266</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331383</p>
<p>Consultee Full Name</p>	<p>Mrs Katie Miller</p>
<p>Consultee Company / Organisation</p>	<p>Kent Downs AONB Unit</p>
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP39</p>

2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	As recognised in the policy, the site lies partially within the Kent Downs AONB. The site is relatively well contained within the wider landscape and relates well to the existing settlement. The proposed requirements included in criteria a and b to help manage impacts on the AONB are supported.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP39 - Land to the west of Townsend Farm Road, St Margarets-at-Cliffe (STM007/ STM008)
Rep ID	SDLP905
Rep Status	Processed
Consultee ID	1258837
Consultee Full Name	Mrs Angie Brown
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP39(STM007\STM008)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p><i>I consider the selection of this site as unsuitable as it is not compliant with NPPF paragraph 174/176/177. It is in the Kent Downs Area of Outstanding Natural Beauty and I feel that any development would not enhance the landscape. The development would be clearly visible when approaching the village of St Margaret's via Dover Rd. A view which is currently open countryside. The site has also been of archaeological interest HER Numbers: TR34 SE 368/369/385 refer on Kent County Council website.</i></p> <p><i>Access to the site via Townsend Farm Rd would seem totally unsuitable. The junction at The High Street end is narrow and it would not be possible to widen it as there is housing on both sides. This end of the road is not only used for parking by residents but by others locally when visiting the village as the parking bays and spaces on The High St are often full. There is also a designated disabled parking space used by a resident of Townsend Farm Rd. I would also like to say that there is often a queue of stationary traffic opposite that junction due to congestion in the village when there are high volumes of traffic coming out of the village. Something that happens on a daily basis.</i></p> <p><i>I believe that any development of this site would result in an unacceptable traffic impact on the local vicinity and the village. It would mean the introduction of yet more cars which is something the village most definitely does not need. It will just add to the congestion already affecting the village as a whole. Something which becomes more dangerous and problematic at weekends and with tourism. The bus service connecting St Margaret's to Dover and Deal has recently been significantly reduced by Stagecoach which is also likely to contribute to an increase in traffic.</i></p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Removal of SAP 39
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

Local Plan Consultation Point	SAP39 - Land to the west of Townsend Farm Road, St Margarets-at-Cliffe (STM007/ STM008)
Rep ID	SDLP774
Rep Status	Processed
Consultee ID	1331531
Consultee Full Name	Ms Kate Jackson
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	STM007/STM008 (SAP39 Land to the west of Townsend Farm Road. St Margaret's at Cliffe)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Infrastructure: There is no mention in the plan of any improvements to be made to the village infrastructure to support this large number of additional houses and the number of extra vehicles and people this development will bring. Apart from the narrowness of the road through the village, the absence of footpaths and pedestrian walkways and the increasing volume of cars and delivery vans passing through each day, the plan does not take into any account the tourist nature of St Margaret's and its rapidly growing popularity with summer visitors. The village will need considerable re-modelling and new roads and services if it is to cope with this added influx and I do not see any details on infrastructure to support the plan. It is very short termist to just build more houses without considering where the traffic will go, what facilities there are for families, schools, doctors, dentists, shops, etc- obviously presuming the houses are for local families and not to be sold as second homes or to foreign investors. There is a high number of holidays homes in the village already with only part-occupancy during the year. These underprepared and ill-thought out developments will take away the attraction of St Margaret's. Long queues to go through the village will detract visitors and make life even more difficult and dangerous for the people already living here. The plan does not seem to address these issues of sustainability and infrastructure.</p> <p>AONB: The fact that the village is in an AONB is not given enough importance in the plan- what will be the view as visitors approach the village to be met by a large scale housing estate, 36 terraced house in SAP39 blocking the views to the church, the memorial and the famous cliffs. The high density will change the landscape, the aspect of the village and contravenes the Dark Skies Policy that is within the village. There is no mention of the effect of light pollution in the plan- no provision for the environment and how this plan will irrevocably change the nature of the village and the landscape. It is short- termist and ill-conceived. We should not simply be meeting a housing quota- once lost there is no going back. and an ancient historic village is changed forever.</p> <p>Access & Sustainability: At a more specific level, the SAP39 proposed plot has not addressed the issue of accessibility to the new development. How will the greatly increased number of cars access the high street? Townsend Farm Road is too narrow at the junction and cannot be widened as the parking is needed for the disabled resident and for village parking. There is often a bottleneck now as cars and delivery vans queue to pass through the narrowest point at the shop so another 60 +cars from the 36 houses will only make it considerably worse. This plan will more</p>

	<p>than double the number of users on a very small narrow road which only allows single file traffic at the junction. Furthermore, at the development stage how will construction traffic access the plot? Meadow View is an unadopted road and unsuitable for heavy traffic turning around or unloading; there is the very real likelihood of causing costly damage to be paid for by the residents. The plan does not address the facilities and services required by such an increase in the population of the village.</p> <p>Over recent years, there has been much increased interest in St Margaret's as a tourist destination, in particular as a WW2 historical site attracting international visitors as well as national. There is evidence of WW2 tunnels and hospital complex on the SAP39 site and it would be very short-sighted to lose this potential future tourist attraction. Costly archeological investigations are accounted for in the plan but the existence of these heritage sites is already known. Why even consider building houses on an historical site when they could be built on a more neutral piece of land without incurring any historical loss? Once lost it is gone for good and it is important to remember that tourism is the main attraction of the area.</p> <p>In conclusion, the plan should address these issues of sustainability and infrastructure before considering proceeding with building on plot SAP39 and in general developing anywhere in STM010.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	Removal of site STM007/STM008 from the Local Plan.
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	To be able to put by objections forward in person along side others in the village.
Include files	SDLP774 Jackson Att1_Redacted.pdf
Local Plan Consultation Point	SAP39 - Land to the west of Townsend Farm Road, St Margarets-at-Cliffe (STM007/ STM008)
Rep ID	SDLP540
Rep Status	Processed
Consultee ID	1273200
Consultee Full Name	mr John Flowerdew
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	STM010 location SAP39, fields west of Townsend Farm Road, St Margaret's at Cliffe
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Site access - the current road (Townsend Farm Road) is totally unsuitable for proposal SAP39. The plan indicates widening of the road and reconfiguration of the Ash Grove junction. However, this would not in any way resolve access from the High Street as the road cannot be widened at the High Street junction end and the road is effectively only one lane as it is used for local residents parking, including designated disabled parking. The proposal would more than double the existing number of properties in Townsend Farm Road, Ash Grove and Meadowview and accordingly the traffic in what is a new through road country lane. There is also mention of improved pedestrian access to the services in the village, namely a pram crossing. There is currently no pedestrian access from the western side of the village to other village services in the eastern side including the local GP, the school and the village hall. Therefore any pedestrian improvement at the Townsend Farm junction will have minimal impact and traffic through the village will increase as residents try to access services on the other side of the village. Any access via Dover Road would require removing part of an established thick hedgerow. Another issue for the residents of Meadowview is that it is an unadopted road. There are implications for vehicle access and liability insurance in relation to this if the road is damaged or there is an accident.</p> <p>Local services - The few local services in the village are stretched and there is nothing in the plan to improve or increase the services which will only increase the pressure on them. Local bus services to Deal and Dover have recently been reduced to the extent that no one can use public transport within normal travel to work hours and the new timetable severely hinders the ability of children in the village traveling to and from school. The likely result is a substantial increase in traffic to and from the village during peak hours and the plan does not take account of this significant change which only took place at the end of November 2022.</p> <p>AONB - Part of SAP39 falls within the Kent Downs AONB. Although the plan indicates the use of certain designs, materials and landscaping to mitigate the impact, it fails to cover some very important aspects. The proposed development would have no environmental buffer or screening along the southern boundary of SAP39 and it would be clearly visible on the approach from Dover Road. The land slopes steeply westwards and any attempts to naturally screen the development across long views from a westerly direction would take decades. The site is of particular significance visually and environmentally because it is permanent pasture (a priority habitat) and is currently used for grazing and, it currently forms an important visual and environmental contribution to open countryside on the edge of the village. It is not "infill" as it lies on the edge of the village. There is no mention of the environmental impact in the plan in relation to the pastureland nor the fact that the site has an old field boundary running through the middle of it with numerous mature trees along its edge. It only vaguely refers to impact on the site boundary hedges and trees and not the fields themselves. Being on the edge of the village, the site has an important function in the AONB dark skies policy and this is significant for the local known bat population and roosting birds. There is no mention of a local impact study on the bats and other wildlife in relation to this.</p> <p>There is a footpath and bridleway in the AONB that runs the length of the western boundary of SAP39. The proposal would have a negative effect on this amenity for villagers and tourists alike in terms of the view and the traffic generated by the development. SAP 39 would also have a significant impact on the visual aspect of the village church from southern and western approaches to the village and there have been planning restrictions on development in relation to these views and vistas in the recent past (Meadowview development).</p> <p>The development would also be contrary to the national planning policy position that it must comply in the first instance with the primary requirement of conserving and enhancing the landscape and scenic beauty of the settlements in, surrounded or adjoining an AONB.</p> <p>Archaeological considerations - There is no mention in the plan of the existing archaeological observations in the site vicinity. These are detailed below.</p>

Planning reference CON/16/00866 had an archaeological report carried out for MeadowView development on the eastern side of Townsend Farm Road. It identified Anglo Saxon activity had been recorded west of Meadowview where these two site references are located. 12 Anglo Saxon burials had been identified and this was likely part of a bigger cemetery/burial ground on the site. The area was also identified as having a high archaeological potential. During the archaeological dig carried out at the Ash Grove development opposite, evidence of late neolithic, Bronze age and medieval remains were found despite the housing foundations already being laid before the dig could be carried out.

Historic England Monument no. 1520749 - An underground tunnel system on the site or in the vicinity of the site is thought to be a military hospital from WW2. Although the exact dimensions are not known, it is thought to be significant with 6 entrances and over 275ft in length. The site has a wealth of other defence related constructions from this period including deep air raid shelters and the recoil spur for the long range gun. There is a lack of historical information regarding this site due to it previously being a military site which restricted detailed investigation of the site. The site and vicinity should be protected from development because of the historical heritage significance and the future tourism potential which would be lost if this development takes place.

A detailed archaeological survey should take place before consideration is given for such a sensitive site but is only given a passing reference in the plan if approval is given.

Other considerations - Tourism and the visitor experience are key aims of the plan according to DM24. It already plays a significant role in the local economy and is seen as a valuable part of future economic growth. Such a development in a village this size would significantly detract against such aims. The White Cliffs and the Bay would lose its appeal if those wishing to visit have to navigate long queues to pass through the village and are faced with a prominent housing estate as you enter the village, and is not in keeping with the rest of the village which is typically made up of individual dwellings or small developments.

Summary and conclusion - The development of SAP39 for housing would represent a major intrusion into the countryside of the Kent Downs AONB and village surrounds and would be of severe detriment to the local landscape. Steps to mitigate the impact of the proposal as set out in the plan are either non-existent or wholly inadequate and it would leave a lasting scar on the village landscape. It would also have an unacceptable traffic impact on the local vicinity and the rest of the village. The increase in traffic in recent years as a result of minor incremental building development in the village regularly causes traffic jams, noise and air pollution and it is no longer a safe place to cycle around. Recognising the need for local housing, SAP39 is unsuitable in terms of scale and location within the village.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The removal of SAP39 from STM010 in the local plan.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Local Plan Consultation Point

SAP39 - Land to the west of Townsend Farm Road, St Margarets-at-Cliffe (STM007/ STM008)

Rep ID

SDLP791

Rep Status

Processed

Consultee ID	1331711
Consultee Full Name	Mr Tony Condon
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	STM010 location SAP39 land west of Townsend Farm Road St Margaret's at Cliffe
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>It relates to the inclusion of policy number SAP39 of the draft local plan which allocates the site references STM007 and STM008 west of Townsend Farm Road for 36 dwellings. In my view, the site is unsuitable for development for the reasons outlined below.</p> <p>I further note that Reg.18 of the draft plan proposed 11 dwellings for the site and the new plan increases this more than threefold. It is unclear how this proposal can be supported by the Plan since, during the same time, village services have suffered perceptible decline and the transport infrastructure is totally inadequate given the increasing strains placed upon it. It is my contention that this development is not required based on local needs and will serve to degrade the local environment given that it will exacerbate increasing village deficits.</p> <p>St. Margaret's is an important part of the Dover Area of Outstanding Natural Beauty which the DDC and the National Trust have been at great pains to promote as a tourist destination, whether to enjoy the world renowned clifftop views of the Strait of Dover or to visit the important components of our national heritage made up of such elements as South Foreland Lighthouse, Second World War tunnels or the Dover Memorial. At the same time, the beach at St. Margaret's Bay has become ever busier thanks in part to the enhanced car parking, refreshment kiosk and pub which also offers overnight motorhome camping. During the summer and at weekends, there is now a seamless stream of vehicles passing through the village where (on street) parking and road width make the experience dangerous for both road users and pedestrians due to the absence of pavements. It seems contradictory to seek to build on a site that will markedly increase traffic on the High Street which invariably backs up from the single track 'pinch point' of the village shop several times a day and therefore cannot do anything but routinely impede access to the beauty spots and heritage sites being promoted. This is, of course, without reflecting on the quality of the living environment of local inhabitants which, with respect to the roads, is perilous.</p> <p>Other reasons for why the proposed site is unsuitable follows:-</p> <p>AONB - Part of SAP39 falls within the Kent Downs AONB. Although the plan indicates the use of certain designs, materials and landscaping, it fails to cover some very important aspects. The proposed development would have no environmental buffer or screening along the southern boundary and it would be clearly visible on the approach from Dover Road. The land slopes steeply westwards and any attempts to naturally screen the development across long views from a westerly direction would take decades. The site is of particular significance visually and environmentally because it is permanent pasture (a priority habitat) and currently used for grazing, and it currently forms an important visual and environmental contribution to open countryside on the edge of the village. It is not "infill" as it lies on the edge of the village. There is no mention of the environmental impact in the plan in relation to the pastureland nor the fact that the site has an old field boundary running through the middle of it with numerous mature trees along its edge. It only vaguely refers to impact on the site boundary hedges and trees. Being on the edge of the village, the site has an important function in the AONB dark skies policy and this is significant for the local known bat population. There is no mention of a local impact study on the bats and other wildlife in relation to this. There is a footpath and bridleway in the AONB that</p>

runs the length of the western boundary of SAP39. The proposal would have a negative effect on this amenity for villagers and tourists alike in terms of the view and the traffic generated by the development. The development would also be contrary to the national planning policy position that it must comply in the first instance with the primary requirement of conserving and enhancing the landscape and scenic beauty of the settlements in, surrounded or adjoining an AONB.

Site access - the current road (Townsend Farm Road) is totally unsuitable for this size of development. The plan indicates widening of the road and reconfiguration of the Ash Grove junction. However, this would in no way resolve access from the High Street as the road cannot be widened at the junction end and the road is effectively only one lane as it is used for local parking, including designated disabled parking. 36 units will more than double the existing number of properties in Townsend Farm Road, Ash Grove and Meadowview and accordingly the traffic. There is also mention of improved pedestrian access to the services in the village, namely a pram crossing. There is currently no pedestrian access from the western side of the village to other village services in the east including the local GP, the school and the village hall. Therefore any pedestrian improvement at the Townsend Farm junction will have minimal impact and traffic through the village will increase as residents try to access services in the village. Any access via Dover Road would require removing part of an established thick hedgerow.

Another issue for the residents is that Meadow View is an unadopted road. There are implications for vehicle access and liability insurance in relation to this if the road is damaged or there is an accident.

Local services – The few local services in the village are stretched and there is nothing in the plan to improve or increase the services which will only increase the pressure on them. Local bus services to Deal and Dover have recently been reduced to the extent that no one can use public transport within normal travel to work hours and severely hinders the ability of children in the village travelling to and from school. The railway station is three miles distant and requires a car to access. The likely result is a substantial increase in traffic to and from the village during peak hours and the plan does not take account of this significant change.

Archaeological considerations - There is no mention in the plan of the existing archaeological observations in the site vicinity. These are detailed below. Planning reference CON/16/00866 had an archaeological report carried out for Meadow View development on the eastern side of Townsend Farm Road. It identified Anglo Saxon activity had been recorded west of Meadowview where these two site references are located. 12 Anglo Saxon burials had been identified and this was likely part of a bigger cemetery/burial ground on the site. The area was also identified as having a high archaeological potential. During the archaeological dig carried out at the Ash Grove development opposite, evidence of late neolithic, Bronze age and medieval remains were found despite the housing foundations already being laid before the dig could be carried out. Historic England Monument no. 1520749 - An underground tunnel system on the site or in the vicinity of the site is thought to be a military hospital from WW2. Although the exact dimensions are not known, it is thought to be significant with 6 entrances and over 275ft in length. The site has a wealth of other defence related constructions from this period including deep air raid shelters and the recoil spur for the long range gun. There is a lack of historical information regarding this site due to it previously being a military site which restricted detailed investigation of the site. The site and vicinity should be protected from development because of the historical heritage significance and the future tourism potential which would be lost if this development takes place.

Other considerations - Tourism and the visitor experience are key aims of the plan according to DM24. It already plays a significant role in the local economy and is seen as a valuable part of future economic growth. Such a development in a village this size would significantly detract from such aims. The White Cliffs and the Bay would lose its appeal if those wishing to visit have to navigate long queues to pass through the village and are faced with a prominent housing estate as you enter, not in keeping with the rest of the village made up of individual dwellings or small developments. Summary and conclusion - The development of SAP39 for housing on the scale outlined would represent a major intrusion into the countryside of the Kent Downs AONB and the village surrounds and thus would be of severe detriment to the local landscape. Steps to mitigate the impact of the proposal as set out in the plan are either non-existent or wholly inadequate and it would leave a lasting scar on the village. Such a development would also have an unacceptable traffic impact on the High Street and surrounding access points.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Removal of SAP39 from STM010 in the local plan.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP39 - Land to the west of Townsend Farm Road, St Margarets-at-Cliffe (STM007/ STM008)
Rep ID	SDLP935
Rep Status	Processed
Consultee ID	1331564
Consultee Full Name	Mrs Linda Carter
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP40 STM010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The Plan is Unsound</p> <p>The proposed development of the land between The Drove way and Salisbury Rod for the building of "executive" homes is unsound for multiple reasons and should be deleted from the overall plan.</p> <ol style="list-style-type: none"> 1. We do not believe that this proposal has been positively prepared in that it does not seek to meet the Dover Districts objectively assessed needs. There is clearly a need for more housing in the District but there are many more suitable sites available.. The biggest need is for affordable housing and this site with its proposed maximum of ten executive houses will not make any contribution to that need. One of the assessed needs is to increase the prosperity of the District and this aspect of the plan will not achieve that. The only people who will have an increase in prosperity are the current landowner (who does not live in the District, and the property developers). 2. The plan does not take into account the local infrastructure and its capacity to satisfy any further expansion. <p>The permanent increase in traffic resulting from the construction of these houses as well as the temporary (but long term) increase due to heavy traffic will have significant adverse impacts on all existing residents. Since Salisbury Road is private access to the site is likely to be only along</p>

	<p>The Droveaway. The Droveaway is a long and narrow road which only has a limited section of paving at the Sea Street end. The road is always very congested , especially at the Sea Street end, and so narrow there that large vehicles always drive on the pavement to get through. There is a constant stream of people walking in this beautiful area, but I have observed that when cars come through they often have to step into driveways in order to feel safe. The increase in traffic in this lane ipotentially very dangerous. Heavy construction traffic will damage the road surface (and such pavements as there are) and will be an additional danger to the many pedestrians(not just local residents) who use this road.</p> <p>The village of St. Margarets is accessed by a single road, which is already congested and can be difficult to negotiate. The same argument applies to the 40 Houses along Reach Road(SAP38,STM003), 10 houses to the West of Townsenbd Farm Road (SAP39, STM007) and STM008) which will exacerbate the problem further. However, the development on the Droveaway is by far the worst issue because there is no other access road to the bay area, and all additional traffic for the bay has to go via Sea Street past the Primary School, where frequent traffic issues occur and will cause additional risk for the children. Even if the Doctors surgery could accomodate additional patients there is no parking facility in the bay to deal with this.</p> <p>3. The plan does not take into account the Sustainability of the local environment. The proposed site is in open countryside, lying within the boundaries of the Kent Downs Area of Outstanding Natural Beauty. AONBsare entitle to extra protection from inappropriate development so as to protectr their beauty for all to enjoy. The site is close to several very important habitats for wildlife with highly protected staus and is adjacent to the National Trust Land at Bockhill.The site is an imoportant buffer between these sensitive habitatsand the existing residential areas of the Bay and a housing development would seriously damage the protection.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The simple solution to the issues cited above is to abandon this proposal of development of the land between The Droveaway and Salisbury Road and , indeed, any further development of the village of St. Margarets.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>There must be direct and personal representation of villagers, and especially those living in roads concerned, at the oral proceedings.</p>
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP39 - Land to the west of Townsend Farm Road, St Margarets-at-Cliffe (STM007/ STM008)</p>
<p>Rep ID</p>	<p>SDLP973</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331795</p>
<p>Consultee Full Name</p>	<p>Mrs Talina Wells</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	

Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 39 and 38
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Item 11.9 - The Kent Downs AONB I refer to the comment '...land which is visible from the AONB and from which the AONB can be seen.' Would the dark skies be compromised re the concentrated development planned STMO10 - land between Salisbury Road and The Droveaway. Or indeed other planned developments abutting or within the AONB.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Item 11.9 - The Kent Downs AONB I refer to the comment '...land which is visible from the AONB and from which the AONB can be seen.' Would the dark skies be compromised re the concentrated development planned STMO10 - land between Salisbury Road and The Droveaway. Or indeed other planned developments abutting or within the AONB.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP39 - Land to the west of Townsend Farm Road, St Margarets-at-Cliffe (STM007/ STM008)
Rep ID	SDLP818
Rep Status	Processed
Consultee ID	1331901
Consultee Full Name	miss Angela Condon
Consultee Company / Organisation	Meadowview residents

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP39, land west of Townsend Farm Road, St Margaret's at Cliffe.
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>RESPONSE TO DOVER DISTRICT COUNCIL LOCAL PLAN REG.19 CONSULTATION NOVEMBER 2022</p> <p>This response is submitted on behalf of the residents of Meadow View, Townsend Farm Road, St Margaret's at Cliffe. It relates to the inclusion of policy number SAP39 of the draft local plan which allocates the site references STM007 and STM008 west of Townsend Farm Road for 36 dwellings. In the view of residents, the site is unsuitable for development for the reasons outlined below.</p> <p>We further note that Reg.18 of the draft plan proposed 11 dwellings for the site and the new plan increases this more than threefold. It is unclear how this proposal can be supported by the Plan since, during the same time, village services have suffered perceptible decline and the transport infrastructure is totally inadequate given the increasing strains placed upon it. It is our contention that this development is not required based on local needs and will serve to degrade the local environment given that it will exacerbate increasing village deficits.</p> <p>St. Margaret's is an important part of the Dover Area of Outstanding Natural Beauty which the DDC and the National Trust have been at great pains to promote as a tourist destination, whether to enjoy the world renowned clifftop views of the Strait of Dover or to visit the important components of our national heritage made up of such elements as South Foreland Lighthouse, Second World War tunnels or the Dover Memorial. At the same time, the beach at St. Margaret's Bay has become ever busier thanks in part to the enhanced car parking, refreshment kiosk and pub which also offers overnight motorhome camping. During the summer and at weekends, there is now a seamless stream of vehicles passing through the village where (on street) parking and road width make the experience dangerous for both road users and pedestrians due to the absence of pavements. It seems contradictory to seek to build on a site that will markedly increase traffic on the High Street which invariably backs up from the single track 'pinch point' of the village shop several times a day and therefore cannot do anything but routinely impede access to the beauty spots and heritage sites being promoted. This is, of course, without reflecting on the quality of the living environment of local inhabitants which, with respect to the roads, is perilous.</p> <p>Other reasons for why the proposed site is unsuitable follows:-</p> <p>AONB - Part of SAP39 falls within the Kent Downs AONB. Although the plan indicates the use of certain designs, materials and landscaping, it fails to cover some very important aspects. The proposed development would have no environmental buffer or screening along the southern boundary and it would be clearly visible on the approach from Dover Road. The land slopes steeply westwards and any attempts to naturally screen the development across long views from a westerly direction would take decades. The site is of particular significance visually and environmentally because it is permanent pasture (a priority habitat) and currently used for grazing, and it currently forms an important visual and environmental contribution to open countryside on the edge of the village. It is not "infill" as it lies on the edge of the village. There is no mention of the environmental impact in the plan in relation to the pastureland nor the fact that the site has an old field boundary running through the middle of it with numerous mature trees along its edge. It only vaguely refers to impact on the site boundary hedges and trees. Being on the edge of the village, the site has an important function in the AONB dark skies policy and this is significant for the local known bat population. There is no mention of a local impact study on the bats and other wildlife in relation to this. There is a footpath and bridleway in the AONB that runs the length of the western boundary of SAP39. The proposal would have a negative effect on this amenity for villagers and tourists alike in terms of the view and the traffic generated by the development. The development would also be contrary to the national planning policy position that it must comply in the first instance with the primary requirement of conserving and enhancing the landscape and scenic beauty of the settlements in, surrounded or adjoining an AONB.</p>

Site access - the current road (Townsend Farm Road) is totally unsuitable for this size of development. The plan indicates widening of the road and reconfiguration of the Ash Grove junction. However, this would in no way resolve access from the High Street as the road cannot be widened at the junction end and the road is effectively only one lane as it is used for local parking, including designated disabled parking. 36 units will more than double the existing number of properties in Townsend Farm Road, Ash Grove and Meadowview and accordingly the traffic. There is also mention of improved pedestrian access to the services in the village, namely a pram crossing. There is currently no pedestrian access from the western side of the village to other village services in the east including the local GP, the school and the village hall. Therefore any pedestrian improvement at the Townsend Farm junction will have minimal impact and traffic through the village will increase as residents try to access services in the village. Any access via Dover Road would require removing part of an established thick hedgerow.

Another issue for the residents is that Meadow View is an unadopted road. There are implications for vehicle access and liability insurance in relation to this if the road is damaged or there is an accident.

Local services – The few local services in the village are stretched and there is nothing in the plan to improve or increase the services which will only increase the pressure on them. Local bus services to Deal and Dover have recently been reduced to the extent that no one can use public transport within normal travel to work hours and severely hinders the ability of children in the village travelling to and from school. The railway station is three miles distant and requires a car to access. The likely result is a substantial increase in traffic to and from the village during peak hours and the plan does not take account of this significant change.

Archaeological considerations - There is no mention in the plan of the existing archaeological observations in the site vicinity. These are detailed below. Planning reference CON/16/00866 had an archaeological report carried out for Meadow View development on the eastern side of Townsend Farm Road. It identified Anglo Saxon activity had been recorded west of Meadowview where these two site references are located. 12 Anglo Saxon burials had been identified and this was likely part of a bigger cemetery/burial ground on the site. The area was also identified as having a high archaeological potential. During the archaeological dig carried out at the Ash Grove development opposite, evidence of late neolithic, Bronze age and medieval remains were found despite the housing foundations already being laid before the dig could be carried out. Historic England Monument no. 1520749 - An underground tunnel system on the site or in the vicinity of the site is thought to be a military hospital from WW2. Although the exact dimensions are not known, it is thought to be significant with 6 entrances and over 275ft in length. The site has a wealth of other defence related constructions from this period including deep air raid shelters and the recoil spur for the long range gun. There is a lack of historical information regarding this site due to it previously being a military site which restricted detailed investigation of the site. The site and vicinity should be protected from development because of the historical heritage significance and the future tourism potential which would be lost if this development takes place.

Other considerations - Tourism and the visitor experience are key aims of the plan according to DM24. It already plays a significant role in the local economy and is seen as a valuable part of future economic growth. Such a development in a village this size would significantly detract from such aims. The White Cliffs and the Bay would lose its appeal if those wishing to visit have to navigate long queues to pass through the village and are faced with a prominent housing estate as you enter, not in keeping with the rest of the village made up of individual dwellings or small developments. Summary and conclusion - The development of SAP39 for housing on the scale outlined would represent a major intrusion into the countryside of the Kent Downs AONB and the village surrounds and thus would be of severe detriment to the local landscape. Steps to mitigate the impact of the proposal as set out in the plan are either non-existent or wholly inadequate and it would leave a lasting scar on the village. Such a development would also have an unacceptable traffic impact on the local vicinity and the rest of the village.

(No list of the other residents supplied)

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Removal of SAP39 from STM010 in the local plan.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Because this is a resident's group response.
Include files	
Local Plan Consultation Point	SAP39 - Land to the west of Townsend Farm Road, St Margarets-at-Cliffe (STM007/ STM008)
Rep ID	SDLP872
Rep Status	Processed
Consultee ID	1331923
Consultee Full Name	Mr Carlo Nuvoletta
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP39 - Land to the West of Townsend Farm Road St. Margaret's at Cliffe (STM007 & STM008)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We believe that the proposed site is part of an "aerea of outstanding beauty" and therefore it would be "not consistent with National Policy".</p> <p>We believe that a new Development in the area of St Margaret's at Cliffe is deeply unsuitable because the Village has a very poor infrastructure (narrow and single lane roads, huge traffic issues, over subscribed surgery, no first aid facility, etc... etc...). Specifically Townsend Farm Road is a single lane road (with a disable parking) and wouldn't be suitable for any further increase of traffic)</p> <p>The main characteristic of this little village is the fact that it is a Historically important and a touristic area. Building new housing without improving first the infracture (such as new roads or eventually a bypass) would make this village lose its attraction and damage the economy of the area.</p> <p>In addition, a new Development at the entrance of the town would also have a negative visual impact causing the Village to lose its main characteristic of being a historical and touristic village.</p> <p>We also believe that the land where the Development should be built is a site of Archaeological importance and as a such not suitable for new buildings.</p>

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	We would suggest to build any New Developments in Rural areas like it has been done at Richmond Park (Whitfield Dover) or Preston Grange near Wingham. Ultimately refuse planning permission SAP39.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP39 - Land to the west of Townsend Farm Road, St Margarets-at-Cliffe (STM007/ STM008)
Rep ID	SDLP998
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP39
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	The County Council requests that the policy includes reference to improvements required to Footpath ER21.

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The County Council requests that the policy includes reference to improvements required to Footpath ER21.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP39 - Land to the west of Townsend Farm Road, St Margarets-at-Cliffe (STM007/ STM008)
Rep ID	SDLP1678
Rep Status	Processed
Consultee ID	1331863
Consultee Full Name	Hannah Ling
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP39
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>This will cause more traffic up and down the road along Townsend farm road. Ruin our countryside.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	

SAP40 - St Margaret's-at-Cliffe Small Housing Sites

Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP14
Rep Status	Processed
Consultee ID	1330252
Consultee Full Name	Mr. Colin Sumner
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	STM010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I am commenting on STM010. It is unsound because the land is outside of the Village confines in an AONB and part of the North Downs.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Remove this land from a proposed building site and instead purchase it as a wildlife area, as it is adjacent to the National Trust wildlife area.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP45
Rep Status	Processed
Consultee ID	1330401
Consultee Full Name	Dr Robin Thornes
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy SAP40
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>In my view, site STM010 in St. Margaret's at Cliffe is unsuitable for housing development for the following reasons:</p> <p>Firstly, the Landscape Impact of any development of the site would have a very detrimental impact on the surrounding landscape. The field in question rises to 90 metres and is the highest point of land on the cliffs at the north end of the village (see contour map attached). Any houses built it would be visible from a considerable distance. In the assessment carried out by Dover District Council out in 2012 for the Local Plan adopted in 2015 (SAD28) the council itself argued with that Landscape Impact of any development would be unacceptable, pointing out: "The site is on the crest of a hill and, despite screening, would be visible from a long distance". It then went on to declare that "Any development on the site would, therefore, have a highly detrimental impact on the surrounding landscape". Since the hill has not shrunk in the past 10 years this valid objection still stands and Dover CC should stand by the argument they made at that time.</p> <p>Secondly, any development on the site would have a serious impact on the setting of the adjacent grade 2* listed Dover Patrol Memorial, an important heritage asset on the popular Frontline Britain Trail. The listing description makes the point that the memorial is "intact in its original coastal setting". The land on which the memorial is sited is several metres lower than STM010 and any housing development is would have a negative effect on this important coastal setting.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance	Site STM010 should not be allocated for housing and should therefore be deleted from Policy SAP40.

with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	IMG-3349.jpg IMG-3138.JPG
Local Plan Consultation Point	SAP40 - St Margaret's-at-Ccliffe Small Housing Sites
Rep ID	SDLP62
Rep Status	Processed
Consultee ID	1327865
Consultee Full Name	Dr Michael McLean
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP40, STM010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The proposed development of the land between The Drove way and Salisbury Road for the building of "executive" homes is unsound for multiple reasons and should be deleted from the overall Plan. 1 We do not believe this proposal has been positively prepared in that it does not seek to meet Dover District's objectively assessed needs. <ul style="list-style-type: none"> There is clearly a need for more housing in the District, but there are many more suitable sites available. The biggest need is for affordable housing and this site, with its proposed maximum of ten executive houses, will not make any contribution to that need.

- One of the assessed needs is to increase the prosperity of the District and this aspect of the plan will not achieve that. The only people who would have their prosperity increased by this proposal are the current landowner (who does not live in the District) and the property developers.
- 2 The plan does not take into account the local **infrastructure** and its incapacity to satisfy any further expansion.
- The permanent increase in traffic resulting from the construction of these houses, as well as the temporary (but long term) increase due to heavy construction traffic, will have significant adverse impacts on all existing residents. Since Salisbury Rd is private, access to the site is likely to be along The Droveaway which is narrow in places and can become extremely congested - particularly at the Sea Street end.
 - Heavy construction traffic will damage the road surface (and pavements) and will be a danger to the many pedestrians (not just local residents) who use this road.
 - The village of St Margaret's is accessed by a single road, which is already congested and can be difficult to negotiate. It is surprising that there are not more accidents already. The plan does not propose any improvements to this local infrastructure to accommodate the increased traffic that would result from adoption of this proposal.
 - The same argument applies to the proposal to build 40 houses along Reach Road (SAP38, STM003) and 10 houses to the west of Townsend Farm Road (SAP39, STM007 and STM008), which will exacerbate the traffic problem still further.
 - There appear to be no plans to increase the capacity of local amenities (GP surgery, dentists, schools...) to accommodate the increase in population.
- 3 The plan does not take into account the **sustainability** of the local environment.
- The proposed site is in open countryside, lying within the boundaries of the Kent Downs Area of Outstanding Natural Beauty. AONBs are entitled to extra protection from inappropriate development so as to preserve their beauty for all to enjoy. The site is very close to several important habitats for wildlife with highly protected status and is adjacent to the National Trust land at Bockell Hill. The site is an important buffer between these sensitive habitats and the existing residential areas of the Bay, and a housing development would severely damage that protection.
 - The proposed site is the highest point in the area and any housing development there will severely affect the visual beauty of the immediate and surrounding areas. There are public footpaths along three of the boundaries and these are very well used and enjoyed by residents and many visiting walkers and wildlife enthusiasts. The views from the proposed site extend eastward to Ramsgate and beyond, to the Dover Patrol Memorial and west to the South Foreland lighthouse. These views are unique and should be protected from being blocked by development.
 - The existing tree line of the site next to The Droveaway is sparse and will offer little to no mitigation of the damage of this proposed development. The proposal submitted by the Lander Group offers no solution to this.
- 4 **Legal Compliance is uncertain.**
- We understand that the inclusion of this site as being suitable for immediate development was made at the latest possible stage (i.e. the day before closure) in the previous iteration of the Local Plan process (Regulation 18) and we further believe that by doing so DDC made procedural mistakes in that the legally required public consultation was not carried out. This is particularly unfair, given the significant impact this proposed development would have on local residents who have not therefore had the chance to make our views known until this last stage. The absence of our views may lead the Council to assume that we have/had no objections to the proposals, whereas the opposite is abundantly clear.
 - We also question the further exploitation of this site should initial approval for its development be granted. Once the principle of housing on this site has been accepted, a developer could come back with a much larger development proposal. Local residents are well aware that it has been previously, and frequently, suggested that as many as 72 houses could be built on the field and, therefore, this proposal very much represents the thin end of a wedge.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful

Perhaps not surprisingly, the simple solution to the issues cited above is to abandon this proposal of development of the land between The Droveaway and Salisbury Road and, indeed, any further development of the village of St Margaret's.

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Given the importance of my objections to the proposed development, I do not consider it sufficient to leave this representation to those who do not live in the village nor who would be directly impacted by it. It doesn't have to be me, but there MUST be direct and personal representation of the villagers at the oral proceedings.
Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP66
Rep Status	Processed
Consultee ID	1330681
Consultee Full Name	Mr David Lothhouse
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 40
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	A development on this site will be extremely detrimental to an AONB site (of which there are few enough already). it will also be extremely detrimental to the wildlife in the area to which the fields , trees etc are vital. the infrastructure of the town (in terms of width of roads , parking , buses to schools, and recreational amenities now that the White Cliff hotel , Red Lion and Hope has been allowed to change use for housing) are insufficient to warrant the building of housing estates.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will	

make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP65
Rep Status	Processed
Consultee ID	1330303
Consultee Full Name	mrs joan thompson
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	ST M010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The plan for site ST M 010 is not sound as the plan was rushed through last year under Article 18 with no time for consultation. The plan now doesn't take into consideration the siting of the proposed homes in an area of already congested traffic, no infrastructure for the number of people in the village as it is now! This area is an area of outstanding natural beauty. The footpaths around the field have been used by walkers both local and from other areas of the country and abroad. We are in need of areas like this more now than ever since the pandemic for the need to be able to exercise in open spaces of beauty! Also this is an historic area right across from the Dover Patrol War Monument.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Remove ST M 010 from the Local District Plan
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP7
Rep Status	Processed
Consultee ID	1329346
Consultee Full Name	Mr Gerald Irvine
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	STM010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No

6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

We believe, as evidenced in the submission, that due process has not been followed and that there have been material procedural and legal flaws (including non-compliance with applicable planning law and the European Convention on Human Rights) in the consultation with regard to STM010 that mean it's inclusion in the plan should be withdrawn.

- 1 The inclusion of STM010 does not meet the tests of soundness in the NPPF and other applicable mandatory requirements of the NPPF, as set out in detail in the submission.
- 1 Breach of ECHR Article 10 – Expression. The information displayed on the Local Plan Portal explicitly implied that site STM010 was not available or under consideration. It required a subsequent FOI request to ascertain from the LPA that a submission was made by the landowner at the very end of the Regulation 18 consultation period. The parish council of St. Margaret's at Cliffe was one of fourteen parish councils that were listed in Regulation 19 as not participating or commenting during the consultation stages of Regulation 18. In fact, St. Margaret's at Cliffe parish council did comment on Regulation 18 matters, but not on this site. Other residents as well as the Parish Council were totally unaware of site STM010's inclusion and acceptance into the Local Plan until Regulation 19 was commenced and the evidence released. A further FOI request to ascertain the facts before the promulgation of Regulation 19 was denied. The engagement with communities has been by-passed. The submission of Regulation 18 comments has been bypassed. The assessment and decision making based on contemporary evidence has been by-passed. The resultant decision is flawed. All members of the public were mis-informed and as the direct result I allege denied their rights of "expression" in accordance with Article 10.
- 2 Breach of ECHR Article 1 Protocol 1. Everyone has the right to own property alone as well as in association with others and to quietly enjoy such property(s). This, in St. Margaret's at Cliffe, includes private properties, the common roads and footpaths and pavements that connect them and includes all aspects of the AONB. The AONB is for the nation to enjoy and experience well-being and tranquillity. It is not a private asset that can be sold for development and financial gain. Its unique designation laid certain responsibilities on the landowner, bequeathing it to all and marking it as something not to be sold and speculatively developed. I allege that the removal of the protections on site STM010 and the resultant development processes are a breach of Article 1 for not only the residents but also the nation.
- 3 Non-compliance with Duty to Co-operate. As evidenced in 1 above and in the narrative below.

- 1 Not in Compliance with the present Local Development Scheme and DDC's planning

decisions in Council that have arisen from its implementation over more than one decade in this area of St. Margaret's at Cliffe. There exists a disconnect between the existing Local Plan and LPA decisions over the years and the future Local Plan. If the plan is formed and connected to the past it should, and would, seamlessly move forward with full accord. The fact that I am having to submit this comment tells me it has not.

- 1 Sustainability Appraisal Irregularities. I have difficulty in comprehending how the sustainability appraisals at different times in the plan can give differing results. For the Regulation 18 appraisal, site STM010 had two, or more, caveats imposed resulting in the site being ringed in red and shown in the narrative as unavailable. These caveats were long established, recognised barriers to development by the LPA and their resolution was necessary to enable the sites to be considered. There exists no safe and suitable road access to the site along either of the two roads that pass along its length. The caveats have not been met yet somehow the appraisal assessment methodology can, in secret, move the site from not only "red" to approved "green".

- 1 Unsafe for residents. The village and especially, The Droveaway, were the product of pedestrian and animal traffic. The Droveaway, an ancient highway, would not have been closed on two sides. Housing would have been scarce or non-existent. We now have narrow roads, ribbon width footpaths with pedestrians and all forms of transport from combine harvesters to baby buggies trying to co-exist. There exist no mitigating measures other than removing the vehicles or providing very substantial new infrastructure which would totally destroy the AONB.

- 1 Has not been positively prepared. The parish of St. Margaret's at Cliffe is one of a number of parish's that have been actively formulating a Neighbourhood Plan. "Neighbourhood planning gives communities the power to develop a shared vision for their area." Consultation has taken place and DDC has known that this site is considered as "protected" by the parish council. It does not reflect well on DC that this site has deliberately, and in secrecy, been included in the Local Plan at regulation 19. The time for submission of arguments of substance is over. We are now left to deal with mere protocol.

8. Sustainability Appraisal Reg 18 2021

Stage B: Developing and refining options and assessing effects

"Indeed, there will often be an equal number of positive or negative effects identified by the SA for each option, such that it is not possible to rank them based on sustainability performance in order to select a preferred option. Factors such as public opinion, deliverability and conformity with national policy will also be taken into account by plan-makers when selecting preferred options for their plan."

The site STM010 has 11 negative scores against 2 positive scores of equal weight. I do not see how this has been valued to advance inclusion into the plan.

1 Unreasonable within the settings and the parameters. The inclusion of this site, STM010, within the proposed local development plan is not consistent with paragraph 3.405 of the current Dover Local Plan which emphasises that there only very limited opportunities for development within the Cliffe/Bay areas that would not harm the AONB. The inclusion of this site, within the AONB, will cause the very harm to the AONB that the existing local plan says should not happen and seeks to avoid.

1 The planned 10 houses on this site within the AONB constitutes a major development which would be seriously detrimental to the AONB. The village has seen, in my time in the village, the demise of three public house, a number of shops including a greengrocers and a butchery, a garage and petrol station, a large bakery, a pharmacy and a post office, etc. The bus service could close tomorrow. The train station is a car journey for most residents. Public houses are scored the same whether they are open restricted days, restricted hours and whether they offer food or limited food. There is no provision for new facilities such as proper dedicated doctor surgeries or dental practices or anything else in this Plan. Nothing proposed for this site will bring these services back or revitalize this community. The development of this site brings nothing of benefit to the community. All non-strategic housing for its own sake brings is to the detriment of all and all that its many visitors presently enjoy.

1 STM010 is not deliverable at this moment in time. What leads DDC to believe it will be deliverable at some future date? The previous section 18 consultation stated categorically that development of this site would only occur in conjunction with the adjoining STM011. The owners of STM011, who live in The Droveaway, had to, after being alerted to their land being allocated for development, positively instruct DDC to remove their site from the plan. In later versions of the plan both sites were removed as potential development sites.

2 Inconsistent with National Policy in more ways than can be listed here.

The evidence is laid out in the narrative below which was prepared for Regulation 18 but not submitted. This narrative comment has been amended and updated as further evidence has become available.

Comment on the proposal for development of site STM010 in St Margaret's at Cliffe, now submitted as part of the Regulation 19 (submission version), comments on Non Strategic Housing Allocations of the Local Plan.

Date: 24.10.2022.

I previously submitted a late comment, on behalf of the residents of The Droveaway, on the 30.12.2021, in relation to the proposed development of site STM010 as it was included in the Regulation 18 Consultation version of the Draft Dover District Local Plan but was coloured orange. This indicated that it was considered but not selected as were both STM003 and STM006. STM007 and STM008 were coloured green showing that they had been considered and selected. It had been considered by the LPA and then publicly posted as refused, prior to the closure date on the 17th March, 2021. STM010 was not a chosen site. The Local Plan has been advanced since then to the next stage, Regulation 19 and site STM010 has now been listed for inclusion in the final plan, without due process being followed, along with three other sites in the parish's AONB, in the plan. Further specific evidence supporting this allegation is found within Reg 19 of the Local Plan. In the Evidence Base on page 13, STM010 is listed as "allocated." On page 62 it says "STM010 and STM011 are unavailable." In late 2021, it required an FOI request to ascertain that the application had been resubmitted at the "last minute." A subsequent FOI request this year was rejected on the grounds that the information sought would be found in the supporting evidence of Reg 19. I have sought but not found it. How anyone is meant to navigate this uncharted "shoal" and derive answers and engage with the Local Plan has become foggy. It is certainly testing this simple sailor!

Additionally, STM011, was originally listed as being available. The lady who owned the field read this in the plan and rang DDC to ascertain why it was in the plan. She was told that they assumed it was for development because STM010 had been made available. She could not ascertain from DDC who had informed them that it was available and instructed DDC to remove it. STM011 was subsequently listed as unavailable as was STM010.

In my earlier late submission to Regulation 18 I wrote, almost solely, of the detrimental social amenity effects of permitting such a development. I wish to comment initially on a technical aspect and then the AONB and SPA's before returning to my earlier submitted statements.

On the 10.10.2022 I found on Natural England's web-site their Planning Consultation with DDC dated 17th March, 2021, reference 340831. In it, sites STM003, STM 006, STM 007, STM 008, but not STM 010, are listed as being consulted. I have no knowledge if NE has been consulted regarding STM010 at any relevant time during the proceedings of this Local Plan as I cannot find on DDC's web-site any such details. The National Trust has recently replied to me confirming the absence of consultation. There appears to exist a total lack of transparency in relation to information about this site with this site being initially under consideration, removed and then re-instated following the last day for applications by DDC. This site has special considerations when compared with the above listed sites as further detailed below. Consequently, it appears, not to have been assessed as required, or an assessment has not been made public for consultees and officials to be better informed and comment on. Chapter 11 of the Local Plan, pages 279 to 294, contains specific policies NE1 (Bio-Diversity Net Gain) and NE2 (Landscape Character and The Kent Downs AONB). I cannot find that these policies have been followed for STM010 in the Local Plan. I cannot find the assessments available for consultees and others. I find a decision made in favour of allocation grounded on the basis of 11 negatives and 2 pluses irrational. What mitigations can balance the mathematics? Has this just been a desk top exercise by officialdom or has any meaningful assessment been recently made by on-site visits by responsible and knowledgeable parties? The Local Plan Policy Team seem to have been acting in isolation, and, without reference to the Planning department. Past contemporary decisions by the planning department consultee advice reinforced at Inspector level regarding sites adjacent to this field are now questioned. This was recognised by the Local Planners when the site was listed as unavailable and coloured in "orange" on the map in Reg 18. The field STM010 was considered not suitable for development and the evidence is fully in the Local Plan Evidence base if you only search for it!

I ask the inspector to separately assess this aspect in consideration of STM010?

AONB and SPA Status

Impacts to site as it stands

STM010 has several characteristics which need careful consideration within an LVIA (Landscape and Visual Impact Assessment) on the AONB before the allocation can be recommended. Namely the site is directly connected via a footpath (approx. 300 metres) to a popular stretch of the England coast path which is a key feature of the South Foreland heritage coast based around the Dover Patrol Memorial near Leathercote Point. It also has a second footpath (approx. 75metres) running along another boundary and a shorter footpath (approx. 30 metres) leading to the kissing gate access directly from The Droveaway. Leathercote Point is a popular base and destination point for many visitors to the heritage coast with a prominent English heritage war memorial, car parking and panoramic views of the coast line. Inland from the car park and England coastal path, a footpath leads through an area of land (Bockhill) which is under conservation management by the National Trust to improve its grassland habitats. The SSSI coastal strip has been broadened deliberately by The National Trust between Leathercote Point and Hope Point to create an even greater bio-diversity habitat than previously existed. This broadened coastal strip has also been created by The National Trust to the west of the Lighthouse towards Dover. This picturesque area provides an inland expansion of the cliff top grassland landscape intrinsic of this part of the heritage coast and AONB and provides a direct connection both in terms of landscape and access to the proposed STM010 development site. The arable land and woodland of the site provides an important transition and buffer between the important open cliff top landscape and the built environment of St. Margaret's at Cliffe village meaning development in the STM010 site could therefore have significant effects on the landscape of the AONB/Heritage coast.

Whilst the AONB designation does not preclude housing development on the site, an important consideration is that fact that the AONB and heritage coast boundaries were drawn to explicitly include the area of STM010. The settlement boundaries excluded it from development. The site is not an incidental inclusion into a large AONB but the result of a deliberate intention to protect this land as it offered some benefit to the objectives of the site. A housing development would be a clear separation from the intended purpose of the AONB designation for this area.

Restoration potential and contribution to Biodiversity Net Gain resource

The prime purpose of the AONB designation is to conserve and enhance the natural and scenic beauty of the landscape. In relation to STM010, it's important to not only consider what would be lost by developing the area, i.e., the benefits it currently offers the AONB and Heritage coast but also what potential for enhancement it provides as this will be lost permanently with any development. The National Planning policy framework makes reference several times to the responsibility, authorities, such as DDC, have for not only protecting, but **enhancing**, the natural environment. Specifically, it states in 176, *Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues.* This site, by DDC's own submissions, has UK and European recognition status in the form of AONB and SPA's giving it very high levels of protection. This site must be given this consideration.

With regard to restoration, an important consideration is that the site is 300 meters from the Dover to Kingsdown cliffs Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) which protects cliff top grassland and scrubland habitat which is also a key natural and landscape feature of the AONB and heritage coast. This habitat is constrained along a thin corridor by housing development and land use except

in areas where specific land management allows its progression inland. If the arable land (STM010) could be restored to natural cliff top grassland and scrub then it could serve to create more of this national scarce habitat. Furthermore, the location of the STM010 site adjacent to the land under conservation managed at Bockhill by the National Trust would create a natural corridor to internationally important cliff top grassland habitats of the Dover to Kingsdown SAC. Such restoration would directly contribute to the management plan objectives of the Kent Downs AONB and Dover local plan's natural environment policies. Importantly this site could represent an important location where the **biodiversity net gain (BNG)** obligations of other developments could be targeted. Its proximity aids connectivity to designated conservation sites and possible high importance of the habitat restored could mean the site represents a high value site for biodiversity net gain. In short, by retaining its very high intrinsic value, it would aid and assist the development of strategic development sites in settings where the developments are purpose built to high residential standards and with full and proper amenities. The minimum, ten percent offset, could aid the development of as much as 25 hectares of Strategic Housing development!

General Points

- The Dover Area of Outstanding Natural Beauty runs from Dover to Kingsdown and also enjoys Special Protected Area status (protection of birds). It is a contiguous coastal corridor, and located in it are the four AONB which are in consideration for development in the parish of St. Margaret's at Cliffe. They were established and have been protected for some decades by repeated agreement between National Bodies such as Natural England, local bodies, Dover District Council and landowners. It has been agreed and protected, nationally and internationally, as migratory birds are not the property of any country and I will leave it to others with fuller knowledge to comment on the exact details and the enhanced protections that such status brings. It is now being very seriously considered by the LPA that these smaller parts of the AONB should be removed from the greater AONB, have their established protections revoked and for them to be brought within the settlement boundaries. All for the sole purpose of creating, by their own plan objectives, Non-Strategic Housing. In short, housing that has no special needs other than it would be nice to have or to make up the numbers game.
- The overall AONB is important to migratory birds, particular the smaller more vulnerable species. The meeting of the Dover Straits and the North Sea, Leather-cote Point (the monument) to the Walde Light House (near Calais Harbour Entrance), was the narrowest point until the formation of the sandbanks off Calais when Cap Blanc became the nearer option. It is the route which certain species followed and still follow during their twice-yearly migrations from Europe to the British Isles and back. Migratory birds are most vulnerable over open water and close to exhaustion. Leather-cote Point is the choke-point of their migration route! On a foggy damp late October morning at about 0800, as I walked in the field under consideration into the grazing field next to the monument, I witnessed enormous flocks of swallows, swifts and house martins lifting up over the cliff edge and turning inland to crash down within a few hundred metres of the cliff edge. Returning from all along the south coast of England on their annual migration south they found themselves damp, exhausted, with no insects aloft to feed on and settled for the morning to wait for the sun to break through and the fog to clear. The cliffs are slowly receding, hard housing, hard landscaping and hard fencing is proliferating, the AONB is shrinking by all means, natural and man-made and the LPA wants to make it even more difficult for our feathery friends. When the last 25 metres of cliff path finally succumbs to the elements and tumbles down these parts of the SSSI will cease to exist, visitors will only have the roads to continue their journey across St. Margaret's Bay and the birds will need to seek refuge further inland.
- Mitigation in such areas is a requirement for development to proceed. National policies and the Local Plan tell us this. What mitigation exists for the irreversible destruction of critical protected habitat? There exists none and for the LPA to pretend otherwise is a fallacy.
- New housing will bring with it the associated light pollution that goes with additional development of the AONB. On this most prominent site on the ridge this will have the associated detrimental effects on countryside character and an overall negative impact for all forms of insect and animal life in respect of migration patterns, wake-sleep habits, and habitat formation. Evidence exists, that it can be a deadly factor for migratory birds. (Reference National Geographic Society 15.07.2022) Street lighting is almost, or is, totally absent from St. Margaret's at Cliffe within 750 metres of the cliff edge. At night, darkness blankets the landscape.
- Additionally, the creation of new housing will bring with it some years of noise, dust, obstructions and inconvenience for residents and nature. It will not be seamless. It will be a total disconnect between the decades before and the years to follow. It will leave an enduring legacy during and following the builds that will not reflect well on the LPA. Trust and respect are precious commodities.

- The views of the Royal Society for the Protection of Birds should be sought at the earliest opportunity. Their members are frequently, certainly daily in the field in question and adjoining parts of the greater AONB monitoring the bird-life. They will, I am sure, corroborate all that I have written here and be able to supply important additional information. Additionally, the particular species, of which, I have previously written are all, on the British Trust for Ornithology, 2021 Red-List (Birds of Conservation Concern).
- The field STM010 with its inter-connecting footpaths leading to other lanes and paths is an important part of the pedestrian network used by local and visiting national and international tourists. These footpaths connect to others not only parallel to the coastal path but also inland via footpath ER27 to Hogg's Bush lying along Otty Bottom. Traversing along these interconnecting paths and lanes with their associated views of scenery and all life-forms gives the user a feeling of wellness and freedom which cannot be quantified.
- The land between Salisbury Road and The Droveaway was bought by Brian Powell for the express reason that he did not want it to be developed, especially for housing, as it would impact his privacy and the value of both the property that he owned and resided in, "Margarita" and his parents who owned and resided in "Jasmine". Both properties are along Salisbury Road and are adjacent to the field. With the field standing considerably higher than both properties, any buildings would dwarf their properties, have a view into their rooms, obscure the late afternoon and evening sun and be detrimental to their well-being. The land was passed onto his son, David Powell about the time when Brian Powell passed away in 2014. David Powell does not live in the village and as such the site has become a speculative and profitable site to develop for him.
- It is pivotal and vital for future migrations that STM010, in particular, is not desecrated by Non-Strategic development. We should be enjoying our natural landscape and aiding the greatest of avian natural movements, not hindering them. Once this route is irreversibly choked, the irrevocable loss to our fragile ecosystem will be felt all around the globe.

Infra-Structure And Social Amenities (STM 010 Only)

- The Droveaway is officially classified on the county's registry as an ancient highway. As such it is a public road along which residents and farm vehicles travel. As it is a "no exit" road vehicles enter and exit by the same route which maximises the traffic movements of The Droveaway, Salisbury Road, The Rise, Norman Road, Convent Close, Kennelworth Close, Droveaway Gardens and Downside at the only public entry\exit point onto Sea Street at the top of Bay Hill.

The landowner of site SM010, Mr David Powell, may have a legal access to the site from The Droveaway at the field's north eastern extremity. Farm vehicles are the only ones which have been noticed using this access. The part of The Droveaway that borders the entire length of this field was poorly maintained and consequently thought to be private until the 1990's when residents lobbied for it to be entertained by KCC as public in the fullest sense of the word. The road surface was skimmed but it has never been provided with drainage or substrate as laid down in the subsequent legislation of 2006. Footpaths, pavements and kerbs are also most difficult to find. Consequently, it has required frequent remedial repairs though traffic here is the lightest to be encountered along the Droveaway.

Salisbury Road has been a private Road maintained by its residents for some decades. The enjoys no access onto or along this road.

- The proposed development would affect the three established footpaths that lie along three sides of the field to be developed. These paths can be found in the KCC register and two are presently sign posted.
- The field to the north east of site STM010 contained the largest post WW2 underground fortifications ever built in the British Isles to accommodate thousands of military personnel. They were on more than one level. A bunker at the SW extremity of site STM010 is reported to have a tunnel leading in a north easterly direction. If so, some underground fortifications run under this field. This extensive underground works under the National Trust field is privately owned, is not protected, but needs consideration and may be a factor in why no development has been permitted to date anywhere on adjoining fields.
- All vehicular traffic from The Droveaway and Salisbury Road needs to pass in its entirety along the section of The Droveaway extending from the Salisbury Road junction to Sea Street. On road parking by residents and visitors to the village surgery for approx. 100 metres of road frontage effectively makes this part of the road one-way only. Droveaway Gardens also meets The Droveaway here resulting in the residents of the Droveaway Gardens (approx. 15 properties) being required to turn at right angles into the traffic flow. At the junction with

Sea Street there exist a bar and tea room (First Light) which have limited/no parking so vehicles are parked at or near this junction, both in Sea Street, Granville Road and The Droveaway) from 0800 to evening hours.

- The junction with Sea Street at the top of Bay Hill is a complex and challenging one. It comprises a number of roads meeting at the crest of a hill with the associated hazards of blind spots, a bus stop, pedestrians and the tearoom traffic. On modern designed highways this would be regulated by traffic lights or a round-about. It is not so here.
- The Droveaway has pavements, often parked over, along approximately one third of its length. A very short section, approx. 25 metres has pavements both sides, the remainder one. Salisbury Road has no dedicated pavements. Large and small vehicles frequently mount the pavements and verges for considerable distances to gain access.
- Any increase in vehicular traffic will also need to pass through the village along one of two routes, that of Sea Street or that of Reach Road. Vehicular traffic is a particular issue in Sea Street which, in part, is a narrow village street with shops and two schools along its length, inadequate or no pavements and doesn't even boast a pedestrian crossing at any of the points that one would be expected, or a lower than 30mph speed limit! This may be because almost nowhere exist opposing pavements to connect them to. No improved infrastructure is contemplated by KCC in this future plan, yet DDC seems to be assessing the situation as "the more the merrier". I have written and spoken in council chambers of "abrogation of responsibilities" in the past and will leave it here.
- Almost all vehicles, especially heavy farm machinery, have become bigger. With their extra wide bodies and tyres to spread the load they are too wide to pass along many lanes and roadways and mount the banks and pavements where they may exist. This is the frequent situation along The Droveaway with no mitigation possible. Construction traffic just adds to the problem.
- The site STM010 lies at the highest point on the ridge. It enjoys a small wood and is tree and thicket lined on two sides with two being open giving extensive views in north\south directions, i.e., the memorial to the lighthouse. Previous developments along this ridge, historical and much more recent, have revealed archaeological treasures in the form of graves. It will very likely require extensive "digs" to prove this site and the associated part of the field clear of artefacts with the associated total destruction of habitat.
- The proposed site, STM010, as previously detailed, forms a vital part of the greater Dover AONB which surrounds the parish settlement boundaries at a prominent height on the ridgeline of 86 metres. It has, and continues, to lie outside the settlement boundaries for many reasons, including all of those listed above.

Each and every part of the Local Plan, as submitted and required by regulation 19, has to meet four tests for the Inspector to approve them. These tests are detailed in the Soundness Self-Assessment Checklist as summarised below -

- 1 Positively Prepared: based on a strategy which seeks to meet objectively assessed development and infrastructure requirements
- 2 Justified: the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence
- 3 Effective: deliverable over its period based on effective joint working on cross-boundary strategic priorities
- 4 Consistent with national policy: enabling the delivery of sustainable development

When the evidence is assessed against the tests listed above, each and every-one fails to meet, let alone pass the test. Whichever objective is chosen, be it infrastructure requirements, reasonable alternatives, strategic priorities or consistent with national policy the tests result in failures.

The plan is not deliverable in any meaningful manner, it does not deliver sound infrastructure and it has regulatory and national barriers to its delivery.

Dover District Council have confirmed publicly at the council meeting held on the 12th October, 2022, to pass the Local Plan, that there existed 17 village sites, in total, for inclusion in the Local Plan. This is only one! I ask the inspector to view and assess each and every one of these similarly for an approach that may have mis-interpreted or disregarded the necessities of the Soundness Test.

I reaffirm my absolute opposition and objection to any development on this site for the stated reason of Non-Strategic Development.

	Gerald Irvine.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The change sought are – <ol style="list-style-type: none"> 1 For the site STM010 to be removed from the Local Plan and the site returned to the status it has enjoyed for many years or even be granted further protections. 2 That all other windfall sites are reviewed with a critical eye to ensure that the alleged non-compliances listed in 6 are not present and to ensure compliance.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I wish to participate in the oral part of the examination because I believe that I can assist and satisfy the Inspector's requirements and examinations to properly investigate and assess the issues raised and alleged by me in the way the Local Plan has been administered and implemented, especially in relation to STM010 and STM011.
Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP97
Rep Status	Processed
Consultee ID	1330252
Consultee Full Name	Mr. Colin Sumner
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	ST MO10
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>I am writing concerning ST M010 (land between The Droveaway and Salisbury Rd. St. Margarets). This is an area of Outstanding Natural Beauty on the North Downs. The land is elevated and any development would be very unsightly. Any extra houses would result in even more traffic at the beginning of the Droveaway and would cause even more congestion in the village. You state that existing trees should be retained. Should does not mean must and the trees will in time be removed. (I was our village Tree Warden for 12 years and have seen this happen).</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Remove STM010 from being suitable for development.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP40 - St Margaret's-at-Cliffe Small Housing Sites</p>
<p>Rep ID</p>	<p>SDLP111</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1330926</p>
<p>Consultee Full Name</p>	<p>Mr Michael Perschky</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP40, STM010</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified Effective Consistent with National Policy</p>

4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The development between The Droveaway and Salisbury Road should be deleted from the plan.</p> <p>There are many more suitable sites available in the District. One of the needs is to increase the prosperity of this village, this only makes the current land owner and the developer prosperous</p> <p>This plan does not address the LOCAL INFRASTRUCTURE to satisfy further expansion. The Droveaway (which is a cul-de-sac) is narrow in places which at present causes problems for pedestrians as well as motorists. This plan does not suggest any improvement to The Droveaway/Salisbury Road/Sea Street junctions. In The Droveaway we have a cafe, bar, doctors surgery and a Catholic church, hence there is continuous movement of traffic attending these establishments. The traffic includes large agricultural vehicles which use the full length of The Droveaway to work on the land. There is NO ALTERNATIVE ROUTE to use</p> <p>SUSTAINABILITY</p> <p>The site is in open countryside, this is important to the wildlife. A development on this site would severely damage the existing vista. These views are unique and should be protected from being blocked by a development. This site is the highest point in the area any housing would affect the visual beauty of this and the surrounding area. The ambience of the area is demonstrated by the number of visitors, a development would harm the existing Green Infrastructure and the opportunities for enhancement</p> <p>This inclusion is particularly unfair as this was made at the last possible stage, and could have given the Council to assume that I had no objections to this plan. Whereas the opposite is abundantly clear</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Abandon this proposal development and, any further development of the village
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	This does not have to be me, but there must be representation from the villagers at the oral examination. I don't consider this hearing to be left to those who do not live in the village
Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP92
Rep Status	Processed
Consultee ID	1330823
Consultee Full Name	Mr Michael

	Nee
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 40 St Margarets-at-Cliffe, STMO10 Land between Salisbury Road and The Droveaway
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>This is the first time this allocation has been made public and the background information generally, for the area, is out of date.</p> <p>The proposed site is part of the AONB and is significant within the area as it is about the highest point and contains important views from a public right of way towards the nationally important Dover Patrol memorial. Any buildings on this site will dominate the entire area.</p> <p>Planning Policy Statement 7 in the Dover District Settlement and Review Hierarchy document sets out an ambition for development in or near local service centres where employment, housing, services and other facilities are provided close together. Some limited development may be permitted to meet local business and community needs to maintain the vitality of communities.</p> <p>None of these tests are met by this proposal</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>The background information needs to be accurate and proper consideration given to the proposed allocation. For example, the background information describes a bus service timetable that no longer exists. The site cannot be considered sustainable with a limited bus service. I cannot see any reference in the background information discussing the access to this site. The Droveaway is narrow and difficult to navigate. Even if the carriageway is fit for purpose, the junction with Sea Street is not coping with current levels of traffic and further down the hill and through the village centre there is congestion.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP98

Rep Status	Processed
Consultee ID	1330850
Consultee Full Name	Mrs Valerie Kernick
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP40 (STM010)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The narrow and often pavementless roads through the village are unsuitable for the volume of heavy site traffic which this housing development would create. This would not only create traffic congestion but would endanger pedestrians using the village amenities, parents and children crossing Sea Street at school drop-off and pick up time, pedestrians using our vibrant and lively cafe on the corner of The Droveaway - much loved by walkers! Of grave concern are those residents using the Drs. Surgery a little further along The Droveaway. Patients arriving by car particularly the elderly and frail have no choice but to walk in the narrow road to access the Surgery because there is no pavement. The excess plant and site traffic would greatly increase the risk of accidents in both Sea Street and the Droveaway. Heavy plant and site traffic would break up the road surface and what pavements there are, increasing the danger for pedestrians. The site for development is next to an area of outstanding natural beauty which attracts visitors from all over the world. I consider it is socially, aesthetically and environmentally inappropriate for this site to be used for development.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	I feel that the last minute decision to include this site without local consultation in the Local Plan was underhand.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP130
Rep Status	Processed
Consultee ID	1327865
Consultee Full Name	Dr Michael McLean
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP40, STM010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The proposed development of the land between The Droveaway and Salisbury Road for the building of "executive" homes is unsound for multiple reasons and should be deleted from the overall Plan.</p> <ol style="list-style-type: none"> We do not believe this proposal has been positively prepared in that it does not seek to meet Dover District's objectively assessed needs. <ul style="list-style-type: none"> There is clearly a need for more housing in the District, but there are many more suitable sites available. The biggest need is for affordable housing and this site, with its proposed maximum of ten executive houses, will not make any contribution to that need. One of the assessed needs is to increase the prosperity of the District and this aspect of the plan will not achieve that. The only people who would have their prosperity increased by this proposal are the current landowner (who does not live in the District) and the property developers. The plan does not take into account the local infrastructure and its incapacity to satisfy any further expansion. <ul style="list-style-type: none"> The permanent increase in traffic resulting from the construction of these houses, as well as the temporary (but long term) increase due to heavy construction traffic, will have significant adverse impacts on all existing residents. Since Salisbury Rd is private, access to the site is likely to be along The Droveaway which is narrow in places and can become extremely congested - particularly at the Sea Street end. Heavy construction traffic will damage the road surface (and pavements) and will be a danger to the many pedestrians (not just local residents) who use this road.

	<ul style="list-style-type: none"> • The village of St Margaret's is accessed by a single road, which is already congested and can be difficult to negotiate. It is surprising that there are not more accidents already. The plan does not propose any improvements to this local infrastructure to accommodate the increased traffic that would result from adoption of this proposal. • The same argument applies to the proposal to build 40 houses along Reach Road (SAP38, STM003) and 10 houses to the west of Townsend Farm Road (SAP39, STM007 and STM008), which will exacerbate the traffic problem still further. • There appear to be no plans to increase the capacity of local amenities (GP surgery, dentists, schools...) to accommodate the increase in population. <p>3 The plan does not take into account the sustainability of the local environment.</p> <ul style="list-style-type: none"> • The proposed site is in open countryside, lying within the boundaries of the Kent Downs Area of Outstanding Natural Beauty. AONBs are entitled to extra protection from inappropriate development so as to preserve their beauty for all to enjoy. The site is very close to several important habitats for wildlife with highly protected status and is adjacent to the National Trust land at Bockell Hill. The site is an important buffer between these sensitive habitats and the existing residential areas of the Bay, and a housing development would severely damage that protection. • The proposed site is the highest point in the area and any housing development there will severely affect the visual beauty of the immediate and surrounding areas. There are public footpaths along three of the boundaries and these are very well used and enjoyed by residents and many visiting walkers and wildlife enthusiasts. The views from the proposed site extend eastward to Ramsgate and beyond, to the Dover Patrol Memorial and west to the South Foreland lighthouse. These views are unique and should be protected from being blocked by development. • The existing tree line of the site next to The Droveaway is sparse and will offer little to no mitigation of the damage of this proposed development. The proposal submitted by the Lander Group offers no solution to this. <p>4 Legal Compliance is uncertain.</p> <ul style="list-style-type: none"> • We understand that the inclusion of this site as being suitable for immediate development was made at the latest possible stage (i.e. the day before closure) in the previous iteration of the Local Plan process (Regulation 18) and we further believe that by doing so DDC made procedural mistakes in that the legally required public consultation was not carried out. This is particularly unfair, given the significant impact this proposed development would have on local residents who have not therefore had the chance to make our views known until this last stage. The absence of our views may lead the Council to assume that we have/had no objections to the proposals, whereas the opposite is abundantly clear. • We also question the further exploitation of this site should initial approval for its development be granted. Once the principle of housing on this site has been accepted, a developer could come back with a much larger development proposal. Local residents are well aware that it has been previously, and frequently, suggested that as many as 72 houses could be built on the field and, therefore, this proposal very much represents the thin end of a wedge.
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Perhaps not surprisingly, the simple solution to the issues cited above is to abandon this proposal of development of the land between The Droveaway and Salisbury Road and, indeed, any further development of the village of St Margaret's.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>Given the importance of my objections to the proposed development, I do not consider it sufficient to leave this representation to those who do not live in the village nor who would be directly impacted by it. It doesn't have to be me, but there MUST be direct and personal representation of the villagers at the oral proceedings.</p>

Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP104
Rep Status	Processed
Consultee ID	1330882
Consultee Full Name	Mr Ian Turner
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP40, STM010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I do not believe that the plan is sound and am of the opinion that it should be deleted. The proposal has not been positively prepared and does not meet DDC's assessed needs' A maximum of 10 "executive houses is in no way a "need" and the site has been wrongly described as an "infill".</p> <p>The name of the road reminds us of it's original use and it remains a narrow road leading to the farm and the Downs. The road is narrow and for the most part has no footpath. Parking is allowed in places where there is a footpath, from Salisbury Road to Sea Street, and farm vehicles and contractor's lorries frequently are obliged to mount the narrow pavement in order to pass.</p> <p>Any development to the seaward side of the village of St. Margaret's at Cliffe is unwise as it will only add to the amount of traffic which is forced to go through the already congested centre of the village.</p> <p>The proposed site is in an area of outstanding beauty and may be of archeological interest.</p> <p>Whether the application is legally compliant is a moot point. It was submitted on the day of closure which gave no opportunity for public consultation.</p> <p>If permission were granted there would be nothing to stop a developer applying for approval of a larger number of houses thus adding a greater burden of traffic to the Droeway and the Village.</p> <p>No thought at all seems to have been given to the infrastructure.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s)	Changes? Abandon the plan and seek suitable sites on the landward side of the village which would have access to main roads and space for suitable infrastructure.

you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	I am sure that the site looks feasible to the desk-bound observer. The reality is different and I would ask that the Inspector visit the and see for himself.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP109
Rep Status	Processed
Consultee ID	1330880
Consultee Full Name	Mrs Helen Paulett
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	STM010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	Regulation 19 Consultation for STM010 comments on Item 3

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

I consider the plan to be unsound.

3a) NOT positively prepared

NOT Consistent with National Policy

STM010 is an AONB on the South Foreland Heritage Coast, adjacent to National Trust land and has unique ecological status as a corridor for migratory birds from the continent.

Adjacent to the Kent Coastline Walk, this field gives access at the North East corner of the field to the Frontline Britain Trail leading to the Dover Patrol Memorial. The landscape of the White Cliffs of Dover is treasured nationally and unique in the history of the nation, particularly in respect of lives lost in the Straits of Dover in WW1 and WW2

The NPPF states

Para 195

Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

This development would impact the Dover Memorial by dominating the landscape and overlook the Heritage coastline

Para 174

- 1 protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan)

The landscape across the valley from the lighthouse to the memorial should be protected. Two houses No's 80 and 78 built along then Drove way adjacent to this site, were reduced in height by DDC planners, as they would affect the landscape and would be seen from across the valley. The proposed development has a ground level starting at the base roofline of these properties. They would tower above these properties and deface the landscape. Natural England were consulted and helped enforce this change. Where is the consultation with Natural England for this site?

Biodiversity would be affected, as human activity, cars and light pollution would deter migratory and resident birds, wildlife and butterflies from using the hedgerows.

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

This would be another green field site, used for crops to be lost and destruction of the ecosystem.

c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;

The character of this undeveloped site would be destroyed, not maintained and an established footpath along the field lost to the public, reducing accessibility to the National Trust chalk grasslands.

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

This would be a 'net loss' for biodiversity, create more pressure on the ecosystem, and reduce resilience of migratory birds reaching this country.

Para 176

Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and **Areas of Outstanding Natural Beauty** which have the highest status of protection in relation to these issues.

The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas.

This would destroy, not enhance, the unique landscape. It would impact the cultural heritage of the Frontline Britain Trail. Scenic beauty would be lost, as it is on the highest ground of the coastline ridge and would be seen from all directions.

Para 177

When considering applications for development within National Parks, the Broads and **Areas of Outstanding Natural Beauty**, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.

We do not believe this is in the public interest. A small development of large houses, no significant gain for housing stock, poor infrastructure, poor access, increases pressure of vehicles through the village centre, reduces land for crops and destroys the ecosystem.

Consideration of such applications should include an assessment of:

- 1 the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy.

This development would not benefit the community, only the pocket of the land owner and Developer.

- 1 the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way.

Other less harmful sites could be found, reducing the ecological and scenic impact.

- 1 any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

This would have a detrimental effect on the environment, landscape and recreational walking space. It could not be moderated to mitigate these effects

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

Development for housing on this part of the Heritage Coast, is NOT consistent with the special character of the area and the coast's character should be preserved.

Habitats and biodiversity

179. To protect and enhance biodiversity and geodiversity, plans should:

- 1 Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas

identified by national and local partnerships for habitat management, enhancement, restoration or creation.

This site is part of a wildlife corridor to Europe, unique, as it is the closest part of the British coastline to Europe. Biodiversity would be lost forever and should be safeguarded.

b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

The DDC should be promoting the conservation of this area, if anything, restoring it to chalk grassland to enhance the habitat of endangered species and many migratory birds that are under threat from our urbanisation of biodiverse habitat.

The National Trust have bought land adjacent to and along the length of the cliffs from the Dover Memorial, encouraging and preserving wildlife habitat.

3b) We believe this development is NOT JUSTIFIED or an appropriate strategy based on the evidence above, of the damage it would inflict to an Area of Outstanding Beauty and our unique Heritage Coastline.

3c) We believe it is NOT EFFECTIVE,

It has not been planned with joint working or consultation with the Parish Council, local residents, Natural England, The National Trust the RSPB or other interested parties.

3d) We believe it is NOT CONSISTANT WITH NATIONAL POLICY.

The policy framework, as set out above, is not being adhered to and the development is detrimental to every part of the National Policy.

It does not meet the requirements for:

policy 15 - Conserving and enhancing the natural environment, Habitats and biodiversity, policy 16 - Conserving and enhancing the historic environment

or Proposals affecting heritage assets.

It does not Consider the potential impact - on visitors to the White Cliffs Country, visitors on the Kent Coastline Walk or Frontline Britain Trail.

4) We do NOT consider the Local Plan is legally compliant.

It has not followed the national guidelines as set out above, so we do not think it is legally compliant.

5) We do NOT consider the Local Plan complies with the Duty to Co-operate.

This area has always been outside the village planning envelope and specifically excluded from plans for building.

At Regulation 18 in 2021, information on the Local Plan Portal explicitly implied that STM0101 was not available or under consideration , St Margaret's Parish Council were only made aware that it had been included when regulation 19 was commenced.

Consultation with the Parish Council and community has been bypassed and its inclusion is flawed. We were denied our 'Right of Expression'.

	We would like to register our complete opposition to this plan, due to its long term effect on the destruction of the natural environment, loss of biodiversity, visual impact across the coastline view, light pollution and lack of infrastructure improvements.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Remove this site from the Local Plan
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	NO
Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP144
Rep Status	Processed
Consultee ID	1330181
Consultee Full Name	John Kirby
Consultee Company / Organisation	
Agent Full Name	John Kirby
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	STM010.
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective

	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I understand that the field in question was included in the previous Plan for Dover District, but was considered unsuitable for development and withdrawn. At the last minute it was re-entered into the latest plan, thereby allowing no time for the legally required public consultation, or for residents to make their views known. This appears to have been very underhand and shoddy behaviour by Dover District Council.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>Dear Sir / Madam,</p> <p>I request that you please reject all proposals for any housing development in the field located between The Droveaway and Salisbury Road at their eastern ends, - as outlined in Section SAP 40, STM010 of the New Dover District Local Plan. My reasons for opposing the project are as below:</p> <p>The field is within an area of outstanding natural beauty. It borders the National Trust land of Bockhill Farm which is adjacent to the iconic and symbolic white cliffs of Dover. The site is on the highest ground in the area and additional housing would ruin the skyline when seen from the Dover Patrol Memorial and also the splendid views across to the South Foreland Lighthouse, the Bay, Inland and beyond. Surely, we have a moral duty not to spoil such vistas for future generations.</p> <p>The field under consideration is adjacent to and part of the area's wild life habitats. For many birds flying across the Channel in the Spring this is the first place where they land after departing from France. This means that it is a favourite spot for "Twitchers," (Bird Watchers). It is not unusual to find groups of enthusiasts enjoying their hobby after travelling here from all over the country and even from the Continent after word has spread of an unusual arrival. I have personally seen rare Water Rails and an Osprey nearby.</p> <p>Footpath No. 26 runs along the south-western edge of the field and there is another well used track running between the Droveaway, Salisbury Road and National Trust land. These need to be preserved.</p> <p>My wife and I have been very fortunate to live in the pleasant Droveaway for the past forty-seven years. During this period, we have witnessed a substantial increase in traffic following additional building in this locality. The Droveaway is a narrow road, with a single lane in places and either narrow, or non-existent pavements. Even where the road consists of two narrow lanes, one of these is usually blocked by the parked vehicles of residents who have no alternative space near their property.</p> <p>Additionally, there is often solid parking outside the Doctor's surgery which necessitates residents in vehicles attempting to enter, or leave The Droveaway, backing and filling in order to get through. Frequently one car is forced to reverse into the Salisbury Road entrance. There is a similar situation at the junction with Sea Street where parked customers of the First Light Café habitually restrict the road and dangerously reduce visibility.</p> <p>At its Eastern end, The Droveaway leads to the busy and successful Bockhill Farm with its need for heavy agricultural vehicles. All other movement ceases when this equipment is traversing The Droveaway. Only yesterday I was stopped for a genuine 15 minutes whilst the Owner's of parked cars had to be found to move them and allow passage of an enormous beet picking machine.</p> <p>The Droveaway cannot cope with the extra traffic it already has to bear. The Rise, Norman Road, Convent Close, Kenilworth Close and Salisbury Road all feed into it with no alternative means of escape. The Droveaway, Salisbury Road, Granville Road, Bay Hill, Lighthouse Road and St. Margaret's Road, (The five roads containing all traffic from the entire Bay area), then meet in a bottleneck at the top of Bay Hill. The situation is already dire and an additional twenty (Say), or perhaps more, cars from any new estate would make things even worse. <u>In these circumstances, there is absolutely no way that an ambulance, or fire engine would be able to reach us in an emergency.</u></p> <p>It is not just The Droveaway which is over stuffed with traffic. St. Margaret's village itself is a bottleneck nightmare, especially at the Chicane by the Newsagents. I believe that additional traffic travelling from the Bay area is unsustainable and any new estates should now only be permitted on the North side of the village. Their Residents would be able to freely access Dover and Deal without the need to pass through St. Margaret's congested village centre. I further consider that even these new developments should only be permitted if additional Medical Facilities are provided.</p> <p>For the above reasons, I request that you please reject all proposals to build any housing development in the field located between The Droveaway and Salisbury Road at their eastern ends, - as outlined in Section SAP 40, STM010 of the New Dover District Local Plan.</p>

	<p>Thank you for your attention.</p> <p>Yours faithfully,</p> <p>John Kirby.</p> <p>(DDC Note: Address and contact details were removed)</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP64
Rep Status	Processed
Consultee ID	1330303
Consultee Full Name	mrs joan thompson
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	ST M 010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	see #7

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	I am just wanting to coment on SAP 40 10 Land between The Droveay and Salisbury Road. This proposal is not viable because the Village of St. Margaret's at Cliffe and St. Margaret's Bay is way over crowded and overbuilt on already!! The traffic problems on our small roads is always in a mess. We have no real infrastructure to support the number of people here already and certainly not more from all the proposed houses. This is not to mention that the site for building between The Droveay and Salisbury Road is a sight of beauty that has been enjoyed by walkers and wildlife for years. It is very important to have these few open spaces especially since the pandemic where we have all found a need to have room to walk on the footpaths around the proposed field!!!
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP147
Rep Status	Processed
Consultee ID	1329498
Consultee Full Name	Dr Claire Owen
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP40: STM010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>STM010 sits outside the settlement confines of St Margaret's and is within an area designated as AONB, adjacent to National Trust land which has special scientific interest. The inclusion of STM010 in the Local Plan for housing development would contravene national policy with regards to AONB's (NPPF 117) since there are no "exceptional circumstances" which would justify its inclusion. This therefore brings into question the legal compliance of the local plan.</p> <p>Its inclusion is also completely unjustified. The following extracts from the SHLAA assessment of this site in the preparation of the 2012 version of the local plan explain why this site was not deemed suitable for inclusion in 2012. Since that time there has been no lessening or mitigation of the reasons given; indeed the reasons for not including this site for housing development have been further heightened.</p> <p>"Landscape Impact: The site lies within the AONB and close to the Heritage Coast. It abuts National Trust land to the NE. The site is on a crest of a hill and, despite the screening, would be visible from a long distance. Any development on this site would, therefore, have a highly detrimental impact on the designated landscape."</p> <p>"Biodiversity: The site is identified as chalk grassland to the NE which is a priority habitat under the Natural Environment and Rural Communities Act 2006 and is a material consideration..... The arable land is chalk based and maybe amenable to reversion to chalk grassland with appropriate management. The site could provide foraging and flight lines for bats."</p> <p>"Green Infrastructure: The site provides a wide range of recreational walking opportunities, together with the biodiversity associated with chalk grassland and its associated hedges and scrub. The ambience of the area is demonstrated by the numbers of visitors to the coastal area and the levels of usage of paths, both public and permissive. The site is within the "Restore and Conserve" area of the GI network, reflecting the real opportunities for GI. Development would harm the existing GI and the opportunities for enhancement."</p> <p>"Proximity to Road Networks: The two roads that lead to this site appear to be unadopted and not well maintained. There is no access onto the site. The site is located in the area between Salisbury Road and The Droveaway. Salisbury Road is a single track unadopted road and there are no footways along its length. The Droveaway is also a single track road but is adopted. However, the road already serves a large number of dwellings and there are no footways beyond the junction with Salisbury Road. Pedestrian access to services, including the local bus stop, is therefore poor and reliance on the car is likely to be high as a consequence."</p> <p>"Access to Services: This site is located on the edge of the Bay area, and as a consequence the majority of the services and facilities would be over a ten minute walk."</p> <p>"Analysis: The site is located in the AONB in a highly visible location at the top of a hill on a plateau. Any development would have a detrimental impact on this designation. Access to the site is unsuitable on unadopted roads."</p> <p>There has been a noticeable increase in local traffic in the area of The Droveaway since 2012 and an increase in the amount of on-street parking. In recent years there have been a number of minor accidents resulting from this. Indeed, the September 2022 HELAA report for this site recognises the issues with access:</p> <p>"The Droveaway is geometrically constrained and is subject to a large amount of on street parking which reduces effective width, whilst in theory waiting restrictions could be imposed, this would have a significant impact on local parking amenity. The junction of The Droveaway/Sea Street is subject to constrained visibility (southbound), as such an increase in turning movements at this junction will increase the likelihood of vehicle conflict and there is limited scope to provide meaningful improvements."</p> <p>The issues regarding access are therefore greater than when the 2012 study was undertaken. Similarly, the potential impact of any development of STM010 on the surrounding area has been heightened since 2012 due to the increased loss of chalkland nationally (a loss of 80% in the past 60 years) and hence the increased scarcity value of this land in terms of rare habitat.</p> <p>STM010 was considered unsuitable for inclusion in the local plan in 2012. To now propose that STM010 is suitable for inclusion in the 2022 plan is contradictory and unjustified.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful</p>	<p>Remove STM010 from the Local Plan</p>

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I believe that it is important that someone is present to ensure that the points raised are given due consideration
Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP157
Rep Status	Processed
Consultee ID	1331021
Consultee Full Name	Mr David Lambeth
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP40, Housing development at the end of The Droveaway
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	As residents of Salisbury Road. my wife and I consider this element of the Plan to be unsound and it is a cause of grave concern. There are two primary reasons for this. Firstly, the level of construction traffic will not just create a problem but a real hazard. Traffic through the village can be tricky at the best of times. Traffic on Sea Street is restricted to a single lane for some of the day during School Terms as children are dropped off or collected. The junction of Bay Hill , The Droveaway and Sea Street already has blind spots with vehicles parked at the end of The Droveaway and the top of Sea Street. A lot of the Droveaway itself is restricted to a single lane as residents naturally park outside their homes and as the Droveaway is a dead end, any traffic travelling along it must also travel back along the same piece of road. The existing level of traffic, with its mixture of domestic, trade and farm vehicles as well as builders and construction vehicles supporting ongoing home developments and improvements can already cause real problems. Adding a new construction site at the end of The Droveaway would not just make matters significantly worse but would we believe represent a very real and dangerous hazard to the village and school area.

	<p>Secondly, the proposed development borders the Kent Downs Area of Outstanding Natural Beauty (AONB). Any development at this local highpoint adjacent the this AONB could only have a detrimental effect on access to and the enjoyment of this area, which is very popular with locals and visitors alike. It is our understanding that AONBs should only be impinged upon in exceptional circumstances.</p> <p>There are of course other major concerns, relating to infrastructure, the archaeology of the area etc and we trust that these are already being given due consideration</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Do not proceed with this development.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP346
Rep Status	Processed
Consultee ID	1252221
Consultee Full Name	Cllr Martin Bates
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP40 - STM010 Land located between Salisbury Rd and The Drove way, St Margaret's at Cliffe
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable

<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Not Applicable</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>There is little doubt that this allocation conflicts with national planning policy particularly with respect to paragraph 176 of National Planning Policy Framework which states that:</p> <p>“Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. “</p> <p>The allocation of this site fails to meet the requirements for development in AONBs as set out in that paragraph and those of 174,175 and 177</p> <p>Paragraph 174 of the NPPF requires planning policies to:</p> <p>1 a) protect and enhance valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);</p> <p>and</p> <p>1 b) recognise the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;</p> <p>This proposal has failed to give sufficient weight to this requirement, and means that a valued landscape, in a protected area, will be lost forever, and the biodiversity of the area damaged.</p> <p>Paragraph 175 of the NPPF stipulates that local authorities should:</p> <p>allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; to take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure and where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.</p> <p>This proposal to develop a prime agricultural site within the AONB, for just 10 houses that could be built on other far less sensitive sites, clearly brings it into conflict with the requirements of this paragraph</p> <p>As stipulated above paragraph 176 of the NPPF requires that “Great weight should be given to conserving and enhancing landscape and scenic beauty in ... Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues”. However, for the reasons as stipulated above that requirement has been disregarded in this and the proposal will neither conserve nor enhance the landscape and scenic beauty of the area.</p>

Paragraph 177 of the NPPF states that:

When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- 1 a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- 1 b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
- 1 c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

The footnote to this paragraph states that :

“whether a proposal is ‘major development’ is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.”

DCC has not indicated how it believes that the allocation of STM010 constitutes a “major development” under NPPF. Consequently, it needs to show how the development will be in the public interest and that the allocation will not have a significant adverse impact on the landscape within the AONB. DDC has failed to do this within the draft Local Plan whilst all the evidence would indicate that the provision of 10 properties along the line of the AONB within a sparsely populated area would constitute considerable damage to the current landscape.

Furthermore, development of housing on this site will not comply with the requirements of national and local planning policy that new development should be focused at accessible and sustainable locations. The site is more than 400 metres from the nearest bus stop and at least 1000 metres away from the amenities and facilities in the village centre, which is likely to result in more car journeys and increased carbon emissions. This location, on the very edge of the settlement boundary of St. Margaret’s, cannot be described as sustainable.

The promoters of the site have referred to its prospective development as “infill”, but this is not an appropriate description. It lies on the edge of the built-up area of St. Margaret’s, and between the northern ends of the residential roads of the Droveaway and Salisbury Road. But where those roads abut this site, both are only very lightly developed, each with a slender strip of ribbon development on one side of the road: 10 houses in Salisbury Road and 14 in the Droveaway. The size of this site, with an area of 2.2 hectares, is much too large to be considered proportionate development in such a sparsely built-up area and cannot reasonably be regarded as “infill”. Due to the site’s elevation, any houses built on it would rise well above surrounding properties and would not be visually integrated with the existing development. I would refer you to a recent refusal by DDC Planning of a similar site within St Margaret’s at Cliffe. This site was on a similar piece of land which was also referred to as an “infill” along the Station Rd by the junction with Dover Rd. It also lay within the AONB and was refused by the planning officer for the following reasons:

“The proposed development would result in an unjustified intrusion of built development into an undeveloped countryside location, which would harm the prevailing rural character at this point and result in significant and demonstrable harm to the character and appearance of the AONB and the setting of St Margaret’s within it’s rural context. The proposal would therefore conflict with policies

	<p>DM15 and DM16 of Dover District Local Plan that seeks to protect the character of the countryside and paragraphs 170 and 172 of the NPPF as well as policies SD1, SD2, SD3 and SD9 of the Kent Downs AONB Management Plan.”</p> <p>This application was for the construction of only four houses and the decision was upheld by the Planning Committee. If the planning authority considered this application to equate to considerable harm then one must question how they can propose the creation of a much larger development within another area of the AONB within the same village.</p> <p>Finally, I would refer you to the assessment that took place when this allocation was previously considered during the creation of the current Local Plan (Site code SAD28). The analysis rejected its suitability as follows:</p> <p>“The site is located in the AONB in a highly visible location at the top of a hill on a plateau. Any development would have a detrimental impact on this designation. Access to the site is unsuitable on unadopted roads.”</p> <p>Little has changed since the site was considered unsuitable in 2012 and I would therefore propose that it be removed from the current draft of the Local Plan.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>As stated above I would strongly suggest that this site be removed from the Local Plan.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>I am the District Ward Councillor for the parish wherein this proposed allocation is situated.</p>
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP40 - St Margaret's-at-Cliffe Small Housing Sites</p>
<p>Rep ID</p>	<p>SDLP148</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1330847</p>
<p>Consultee Full Name</p>	<p>Kevin Beckett</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	

Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP40 Land between Salisbury Road and The Droveaway, St Margarets at Cliffe (STM010)
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>As a resident and community charge payer living directly opposite the proposed site I have not been provided with an opportunity to comment on the development prior to regulation 19.</p> <p>This is contrary to Dover District Councils publish guidance regarding their statement relating to how they will involve the community in plan making as part of the Development Plan and DDC's Statement of Community Involvement documents.</p> <p>It is also at odds with the Town and Country Planning (Local Planning) England Regulations Section 18 "Preparation of a Local Plan" which states inter alia:</p> <p>18 (1) – a local Planning Authority must –</p> <p>a) Notify each of the bodies or persons specified in para (2) of the subject of a Local Plan which the LPA propose to prepare, and</p> <p>b) invite each of them to make representations to the LPA about what a local plan with that subject ought to contain.</p> <p>18 (2) – the bodies or persons referred to in para (1) are</p> <p>A) such of the specific consultation bodies as the LPA consider may have an interest in the subject of the proposed plan</p> <p>B) such of the general bodies as the LPA consider appropriate and</p> <p>C) such residents or other persons carrying on business in the LPA area from which the LPA consider appropriate to invite representations</p> <p>18(3) In preparing the local plan the LPA must take into account any representations made to them in response to invitations under paragraph (1)</p> <p>Had such an opportunity been provided I would have objected to the proposed development on the site (STM010) with the following reasons:</p> <ul style="list-style-type: none"> • The site is within a designated AONB and borders National Trust land. Development would be detrimental to the aesthetic of the surrounding landscape and wildlife habitats • Given the elevation / height of the site the open space acts as a natural drainage area for rainfall, which is becoming increasingly heavier with climate change. The surrounding established undergrowth and trees act as a natural windbreak with increasingly stronger winds being experienced with climate change. Both of these natural defences are protecting the surrounding residential areas at the Bockhill end of the Droveaway. Hard landscaping and covering the site in brick, tarmac and concrete will severely increase the risk of flood and storm damage on existing properties and infrastructure. • Given the height of the site (STM010) any buildings put thereon will severely impact natural light and privacy on 71 The Droveaway and surrounding properties. • The Droveaway road itself adjacent to the site is not suitable for the burden of additional traffic. It is a no through road and used as access by residents and is access only at the far end to Bockhill Farm. It would not support additional on road parking for a housing development and is unsuitable for heavy plant and machinery associated with housing developments, Salisbury Road being a private road. Navigating on road parking on the Droveaway towards Sea Street is currently hazardous and dangerous.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP163
Rep Status	Processed
Consultee ID	1278959
Consultee Full Name	Mr Gary John Muirhead
Consultee Company / Organisation	Salisbury Road Association SMB
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Page 188. SAP40 - St Margarets-at-Cliffe Small Housing Sites. Section 4.254, Site STM010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note: Attachment with names available on request</p> <p>Salisbury Road Association, St Margarets Bay</p> <p>Response to Dover District Council Local Plan Regulation 19 Consultation</p> <p>This representation is being submitted on behalf of the Salisbury Road Association SMB, which consists of all of the 81 residents of Salisbury Road. I am a member of the Salisbury Road Association committee and also the treasurer and was re-elected to this position at our recent annual general meeting (AGM), held on the 28th October 2022. During the AGM there was a discussion on the DDC Local Plan and the inclusion of the STM010 site in the Regulation 19 version. During that meeting a motion was put forward that I should submit a representation, on behalf</p>

of the Salisbury Road Association and thus all the residents, as part of the public consultation. This motion was carried unanimously and constitutes authorisation from the residents of Salisbury Road for this submission. A list of all the residents and their addresses is included as an attachment to this submission.

Site STM010 was not included in the Regulation 18 version of the Local Plan and was therefore not available for representation to be made during the public consultation period for this version of the plan. As such, residents, the Parish Council, Natural England, the National Trust, Kent Downs AONB etc etc were unable to review and comment on the proposal for site STM010 to be included in the Regulation 19 version of the Local Plan. Given this, we believe that the process for public engagement for the Local Plan is not in general accordance with the Statement of Community Involvement and in fact contravenes it and would therefore question if it is legally compliant?

Given the lack of public consultation and agreements with the likes of Natural England, the National Trust and the Kent Downs AONB and the public for Site STM010, we would also claim a lack of Soundness for this aspect of the plan. As such, we believe that this part of the plan does not demonstrate that it is Positively prepared, Justified, Effective and Consistent with National Policy and has therefore not followed due process.

Based on the above, it is our opinion that site STM010 should be removed from the Regulation 19 version of the DDC Local Plan.

We have been advised that we should include here the comments that we would have made during the Regulation 18 public consultation if the STM010 site had been included in that version:

- Salisbury Road is a Private Road the upkeep and maintenance of which is undertaken by the Salisbury Road Association SMB, managed by an elected committee. Annual payments are collected from all residents to finance any works required and to pay for Public Liability insurance. The Salisbury Road Association has been in existence for over 50 years.

It is the view of the Salisbury Road Association that the landowner of site SM010, Mr David Powell, would have no legal right to create an access road and/or junction with Salisbury Road. Neither Mr Powell nor the farmer currently renting the field have ever accessed the field via Salisbury Road and there is currently no access in existence. In addition, neither Mr Powell nor the farmer have ever contributed to the upkeep or maintenance of Salisbury Road.

- The proposed development access road and junction as shown on page 19 of the landowners proposal is also not reasonable, feasible or achievable. The junction with Salisbury Road would be immediately opposite the drive and/or frontage of the existing properties, wherever it was placed on this section of the road. In addition, Salisbury Road is only 4.7m wide at its widest point and this, together with the fact that the residents park their cars on the road outside of their properties, results in the road being single track and would essentially make turning in and out of such a junction highly hazardous and likely impossible.
- Given the above, the Salisbury Road Association would not grant right of access or agree to the proposed access/junction between Salisbury Road and the proposed site. In addition, we would also not allow access to the site for any construction plant if the site were ever to be developed.
- It is our view that the impact of the proposed development and the resultant increased traffic flow has not been fully evaluated and that it would certainly significantly worsen what is already a system that barely copes with the current traffic flow, especially at the narrow and congested junctions between Salisbury Road and the Drove way and the Drove way and Sea Street.
- The Drove way, like Salisbury Road, is no more than single track at many points along its length and as such does not provide any reasonable access to the site for construction plant or future residents of that site.
- Analysis of the Title deeds of the proposed STM010 site reveals that it is in fact land locked, with its boundaries completely inside of the hedgerow and tree line along its borders with both Salisbury Road and the Drove way. As such, the landowner has no obvious access to the site that is in his ownership and therefore renders the site as undeliverable and unachievable.
- The ground level of the proposed site is in excess of 5 metres higher than the ground level of the properties opposite the proposed site on Salisbury Road. As such, the houses adjacent to Salisbury Road in the proposed development at Option B (D, page 16) will be of the order of 11-12 M higher and dominate the existing properties. This will significantly impact the access to sunlight due to the inevitable shading by these new properties. In addition, the proposed properties will have direct line of site into the front aspects of the existing properties, which include bedrooms, bathrooms, living rooms and kitchens. It is our view that this development proposal would therefore significantly adversely impact the residential amenities of these properties.
- Further to the above point we would also like to highlight the Landscape Sensitivity Assessment of proposed development sites FINAL REPORT January 2021, page 139 where under the Mitigation heading it is stated that –‘Any development should also be one story to minimise visual impact.’ Thus, confirming that the height of this site is a significant issue.
- The proposed site, whilst currently used agriculturally is part of the Kent Downs AONB and constitutes a buffer zone between the residential aspects of Salisbury Road and the Drove way and the North Downs SLA, the Heritage Coast, National Trust land, the Site of Special Scientific Interest (SSSI) and the Biodiversity Opportunity Area. In fact, the site is only 300 meters from the Dover to Kingsdown cliffs Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) which protects cliff top grassland and scrubland habitat

which is also a key natural and landscape feature of the AONB and heritage coast. Any development on this site would remove that buffer and significantly impact these extremely important and sensitive conservation areas.

- The AONB and heritage coast boundaries were drawn to explicitly include the area of STM010 to protect this land from development. A housing development would be a clear separation from the intended purpose of the AONB designation for this area.
- We also believe that the proposed development in an AONB is in complete conflict with National Planning Policy Framework (paragraphs 174 to 178).

In particular paragraph 174 states that Planning policies and decisions should contribute to and enhance the natural and local environment by;

- protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils.
- recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services.
- maintaining the character of the undeveloped coast, while improving public access to it where appropriate.
- minimising impacts on and providing net gains for biodiversity.

Paragraph 175 states that plans should allocate land with the least environmental or amenity value.

Para 176 states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues.

In our view the allocation of site STM010 in the Local Plan is contrary to all of the above and could therefore be deemed as not being legally compliant and is further evidence that the site should be removed.

- The Local Plan Policy NE2 clearly states that; '*Major development proposals within the AONB will only be permitted in exceptional circumstances and where it is demonstrated they are in the public interest*'. In addition, NE2 also states that any development in the AONB should achieve the following:
 - Be sensitively located and designed to avoid or minimise adverse impacts on the AONB and its setting.
 - The location, form, scale, materials and design should conserve and where appropriate enhance or restore the special character of the landscape.
 - The development should enhance the special qualities, distinctive character and tranquillity of the AONB and the Heritage Coasts
 - The development has regard to the AONB Management Plan and any associated guidance.

It is our view that the proposed STM010 development site does not meet any of the above criteria.

- In addition, any development of this site would impact on the long and medium view of the extremely important Dover Patrol Memorial from many aspects of the surrounding area.
- DDC will be aware of the number of Saxon burial sites that have been identified both on and adjacent to the Droveaway and Salisbury Road. It is widely accepted that the proposed development site, given that it constitutes the highest point in the locale, will contain a significant concentration of Saxon burial sites and is therefore of high archaeological significance and value.

In summary, the Salisbury Road Association, which consists of all 81 residents of the road, believes that any housing development on site STM010 would have significant impact on this component of the Kent Downs AONB and the Heritage Coast and will be highly detrimental to the nationally and internationally important SSSI and SAC areas that it abuts. We believe that allocation of the site for development conflicts with national and local planning policy. In addition, any such development would have a significant impact on the residents of the area with respect to residential and visual amenity and further exacerbate the already significant traffic issues.

In conclusion, we believe that, for all of the reasons discussed above, Site STM010 should be removed from the DDC Local Plan.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful

Remove site STM010 from the Regulation 19 version of the Local Plan and this will negate the issues we have identified above.

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	If site STM010 is not removed from the Regulation 19 version of the Local Plan, I would like the opportunity to represent the views of the Salisbury Road residents as detailed in the above representation.
Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP369
Rep Status	Processed
Consultee ID	1252075
Consultee Full Name	Mrs Jane Cook
Consultee Company / Organisation	St Margarets at Cliffe Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	page 188 para 4.254
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	STM010 was added as a small housing allocation on the last day of public consultation thus not permitting the normal period for consultation
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will	We believe STM010 should be removed from the Plan

make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	Response to Regulation 19 Plan SAP40.pdf (1)
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP102
Rep Status	Processed
Consultee ID	1329858
Consultee Full Name	Mr Mark Febery
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	STM010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	No legal access to site. Highways insufficient to cope with development Iconic war memorial will no longer be visible and AONB damaged forever
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	Remove STM010

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Yes, local residents need to be consulted
Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP160
Rep Status	Processed
Consultee ID	1331036
Consultee Full Name	Mrs Julia Main
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP40, STM010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I wish to object in the strongest terms to the proposed development of the land between The Droveaway and Salisbury Road for the building of 10 executive homes, for the following reasons which I believe make the plan Unsound. <ol style="list-style-type: none"> 1 The GP surgery ("Tara") on The Droveaway is at capacity and can not accept new patients. There is no proposal in the Local Plan to fund the recruitment of new GPs nor nursing staff, hence any new residents will not have access to medical care. Further, there is insufficient parking outside the surgery as things stand, even if the surgery were to be expanded. 2 The school in St Margaret's, which has a very good reputation, is full and unable to take in more children.

	<p>3 Traffic is already very heavy along The Droveaway, and speeding is a recurrent serious problem. It is now difficult to turn into and negotiate a route along The Droveaway due to customers of the First Light cafe parking in and around the junctions with Sea Street, Lighthouse Road and Bay Hill. Any further traffic along the Droveaway will only make this problem worse, despite what the Lander group's plan says.</p> <p>4 There are children that live in The Droveaway, Salisbury Road (a private road with a 20mph limit) and roads off them, and there are long stretches of road with no pavement, meaning they need to walk in the road. Agricultural traffic speeds along the road and is an accident waiting to happen. The Droveaway is the only route of access for these agricultural vehicles and any further residential traffic would only add to these dangers.</p> <p>5 Regarding public transport, the bus service has been severely reduced to one single decker bus every two hours, with the last bus to St Margaret's leaving at 2.30pm. There is no service at all on Sundays nor on Bank Holidays! This is wholly inadequate and there is no proposal in the Local Plan to rectify this situation.</p> <p>6 The disruption caused by development over the last few years from a succession of DDC planning decisions on new homes as well as extensions/modifications of existing houses has been detrimental to the quality of life of local residents. Proposing to repeat this, and worse, with these plans would make living here intolerable.</p> <p>7 Local residents were not consulted in the inclusion of this site in the Regulation 18 stage, since the proposal now referred to as STM010 was only included on the last day of the previous consultation period.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The only acceptable solution to these issues is to remove STM010 from consideration in the Local Plan</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>There has to be direct representation by local residents, as this is far too important to leave to the representations of those who do not live in the village.</p>
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP40 - St Margaret's-at-Cliffe Small Housing Sites</p>
<p>Rep ID</p>	<p>SDLP164</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331043</p>
<p>Consultee Full Name</p>	<p>Mrs Veronika Rudd</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP40, STM010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>1. I do not believe this proposal has been positively prepared in that it does not seek to meet Dover District 's objectively assessed needs.</p> <p>One of the assessed needs is to increase the prosperity of the District and this aspect of the plan will not achieve that. The only people who would have their prosperity increased by this proposal are the landowner and the property developers.</p> <p>2. The plan does not take into account the local infrastructure and its incapacity to satisfy any further expansion.</p> <p>The permanent increase in traffic resulting from the construction of the houses, as well as increase due to heavy construction traffic, will have significant adverse impacts on all existing residents. Because Salisbury road is private, access to the site is likely to be along The Droveaway Rd ,which is narrow in places and can become extremely congested- particularly at the Sea Street end.</p> <p>Heavy construction traffic will damage the road surface and will be a danger to the many pedestrians who use this road.</p> <p>The village of ST.Margaret's is accessed by a single road, which is already congested and can be difficult to negotiate. The plan does not propose any improvements to this local infrastructure to accommodate the increased traffic that would result from adoption of this proposal.</p> <p>3. The plan does not take into account the sustainability of the local environment.</p> <p>The proposed site is in open countryside , lying within the boundaries of the Kent Downs Area of Outstanding Natural Beauty. The site is very close to several important habitats for wildlife with high protected status and is adjacent to the National Trust land at Bockell Hill. The site is an important buffer between these sensitive habitats and the existing residential areas of the Bay, and a housing development would severely damage that protection.</p> <p>The proposed site is the highest point in the area and any housing development there will severely affect beauty of the immediate and surrounding areas. The views from the proposed site extend eastward to Ramsgate and beyond to the Dover Patrol Memorial and West to The South Foreland lighthouse. These views are unique and should be protected from being blocked by development. The proposal submitted by the Lander Group offers no solution to this.</p> <p>4. Legal Compliance is uncertain.</p> <p>I understand that the inclusion of this site as being suitable for immediate development was made at the latest possible stage in the previous iteration of the local plan process and I further believe that doing so DDC made procedural mistakes in that the legally required public consultation was not carried out. This is particularly unfair, given the significant impact this proposed development would have on local residents who have not therefore had the chance to make our views known until this last stage. I also question the further exploitation of this site should initial approval for its development be granted. Local residents are well aware that it has been previously , and frequently suggested that as many as 72 houses could be built on the field and , therefore , this proposal very much represents the thin end of a wedge.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s)	Perhaps not surprisingly , the simple solution to the issues cited above is to abandon this proposal of development of the land between The Droveaway and Salisbury Road and, indeed , any further development of the village of ST.Margaret's .

you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Given the importance of my objections to the proposed development, I do not consider it sufficient to leave this representation to those who do not live in the village nor who would be directly impacted by it. It there must be direct and personal representation of the villagers at the proceedings.
Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP330
Rep Status	Processed
Consultee ID	1330317
Consultee Full Name	Mr Alan Smalley
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	STM010 (SAP40) p188
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	Site STM010 was not included in Regulation 18 of the Local Plan. There was no public consultation, so local residents and interested parties were unable to comment.

<p>possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>The Salisbury Road Association submission highlights road infrastructure concerns with access, poor visibility and congestion on the Droveaway, in particular at the junction with Salisbury Rd. This stretch has become a chokepoint in recent years, with on-road parking making it effectively one track from Sea St to Droveaway Gardens. In my experience these concerns are well-founded.</p> <p>I have lived in Salisbury Rd for over 20 years, driven extensively in Britain and abroad, and only ever been involved two accidents - both occurred at the junction with the Droveaway, both as a result of poor visibility and restricted access. Additional traffic will only increase the danger. The existing road infrastructure is incompatible with a residential development on the proposed scale.</p> <p>The development is also in an imposing position, considerably higher than the surrounding properties and would dominate the landscape. It is part of the Kent Downs AONB; a designation specifically created to protect such areas.</p> <p>This site should therefore be removed from the Local Plan.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	No
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
<p>Rep ID</p>	SDLP195
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1331034
<p>Consultee Full Name</p>	Mr Phillip Houckham
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	SAP40 STM010 land between The Droveaway and Salisbury Road
<p>2 - Do you consider this part of the Plan sound?</p>	No

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>With regard to STM 010 land between The Droveaway and Salisbury Road being developed for housing I object to this on access and traffic movement grounds and believe it should be removed from the Dover plan</p> <p>Let me first quote your own recommendations</p> <p>Developments that would generate significant traffic movements must be well related to the primary and secondary road network.</p> <p>Proposals which would generate levels and types of of traffic movements resulting in severe cumulative residual impacts in terms of capacity and road safety will not be permitted.</p> <p>New accesses and intensified use of existing accesses onto the road network will not be permitted if it would result in a clear risk of crashes or traffic delays unless the proposals can incorporate measures that provide sufficient mitigation.</p> <p>Applicants must demonstrate that traffic movements to and from the development can be accommodated, resolved or mitigated to avoid severe cumulative residual impacts.</p> <p>My objections are</p> <p>All traffic, truck deliveries, specialist transport would need to pass through the village centre. The area by the village shop and church will not take trucks and cars at the same time and has seen several instances of trucks hitting buildings also there is limited pavement in this area requiring pedestrians to cross the road or walk on the road .</p> <p>Vehicles would then need to pass the entrance to two local schools where parking is allowed necessitating single lane traffic. There is also limited visibility in this area due to a bend in the road.</p> <p>Traffic would then enter The Droveaway. This is a multi access junction with 5 roads leading off to it, yet another traffic hazard. Once in the Droveaway vehicles would need to pass the village surgery. This area of the road is particularly narrow being only 2.4 to 2.6 mtrs wide in places when cars are parked which is always the norm. I would point out that a standard UK truck is 2.55 mtrs wide and 3.26 mtrs wide including driving mirrors . This would mean driving mirrors would overhang the narrow pathway with possible injuries to pedestrians. Should a high sided van be parked, the truck would have no choice other than to mount the kerb or it's driving mirrors strike the van. Pedestrians would have to trespass onto private drives to be clear of HGV traffic. There is also limited pavement in this area and patients leaving the surgery would need to cross the road at this point to access the pavement, yet another danger bearing in mind these people have just exited the GO surgery and they may not be as mobile as some. Also there is the entrance to Droveaway Gardens with very limited viewing for drivers onto the Droveaway itself.</p> <p>I would also point out there is a pavement only on approximately 1/3rd of The Droveaway again putting pedestrians at risk from vehicle traffic. To compound this issue there are only 2 street lights along the whole length of the Droveaway.</p> <p>Heavy farm traffic also use the Droveaway to access land and farm buildings and many times the road has been blocked by trucks and farm vehicles.</p> <p>Approximately vehicles of 190 properties already use the lower end of the Droveaway. This figure includes Salisbury Road, The Rise, Norman Road, Convent Close, Kenilworth Close but does not include any visitor to the Catholic Church or First Lighr cafe/bar in the Droveaway Ar a suggested average of 1.4 cars per household or 8 out of 10 houses having 2 cars this means potentially either 268 or 342 cars use this road at any time.</p> <p>This photo supports my comment about road widths you will note a utility company vehicle the measurement from the vehicles door mirror to the dropped kerb is 2.3mtrs a standard up truck is 2.55mtrs without a door mirror. You will note the van is parked next to the nearside kerb . This is the area just beyond the entrance to the Droveaway .</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness	Remove land STM 010 between The Droveaway and Salisbury Road from the Dover Plan

matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I do not wish to take part but people who are affected by this proposal must be allowed to participate, it is important to be left to people not affected
Include files	SDLP195 Houckham Att1.jpg SDLP0195 Houckham - Att1.jpg
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP251
Rep Status	Processed
Consultee ID	1331040
Consultee Full Name	Mr Gary Muirhead
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Page 188. SAP40 - St Margarets-at-Cliffe Small Housing Sites. Section 4.254, Site STM010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	Page 188. SAP40 - St Margarets-at-Cliffe Small Housing Sites. Section 4.254, Site STM010 Site STM010 was not included in the Regulation 18 version of the Local Plan and was therefore not available for representation to be made during the public consultation period for this version of the plan. As such, no-one was able to review and comment on the proposal for site

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

STM010 to be included in the Regulation 19 version of the Local Plan. Given this, I think that the process for public engagement for the Local Plan is not in general accordance with the Statement of Community Involvement and in fact contravenes it and therefore think that it is not legally compliant.

Based on the lack of public consultation for Site STM010, I believe that there is a lack of Soundness for this aspect of the plan. As such, the plan does not demonstrate that it was Positively prepared, Justified, Effective and Consistent with National Policy and has therefore not followed due process.

Based on the above, it is my opinion that site STM010 should be removed from the Regulation 19 version of the DDC Local Plan.

Please find below the reasons why I believe that site STM010 should not be included in the Regulation 19 version of the Local Plan:

- This site was proposed as a potential development site in 2012 for inclusion in the current version of the Local Plan. After due consideration DDC concluded that it was not a suitable site for housing development, and it was therefore not included. I have included the SAD28 SHLAA assessment as an attachment such that you can read the reasons why the site was rejected. No material changes have occurred in the last 10 years with respect to this site and as such I believe that DDC should have come to the same conclusion during the consideration of this site during the current process. In fact, the Sustainability Assessment for Site STM010 indicates that only two of the eleven identified Objectives are deemed to be a Minor Positive (Housing and Economy) whilst all of the other nine Objectives are deemed to be Minor Negative. As such, this beggars the question as to how this site warrants being included in the Regulation 19 version of the Local Plan? In my view this evaluation demonstrates that this site is not suitable for development and should be removed from the Local Plan.
- Salisbury Road is a Private Road the upkeep and maintenance of which is undertaken by the Salisbury Road Association SMB. Access to and from the proposed STM010 site from Salisbury Road will not be possible as the residents have decided not to allow it and as frontagers we have the legal right to do so.
- I believe that the impact of the proposed development and the resultant increased traffic flow has not been fully evaluated and that it would certainly significantly worsen what is already a system that barely copes with the current volume of traffic, especially at the narrow and congested junctions between Salisbury Road and the Drove way and the Drove way and Sea Street.
- The Drove way, like Salisbury Road, is no more than single track at many points along its length and as such does not provide any reasonable access to the site for construction plant or future residents of that site.
- I have examined the Title deeds of the proposed STM010 site and have found that it is in fact land locked. Its boundaries are completely inside the hedgerow and tree line along its borders with both Salisbury Road and the Drove way. As such, the landowner has no obvious access to the site that is in his ownership and therefore renders the site as undeliverable and unachievable.
- The ground level of the proposed site is approximately 5 metres higher than the ground level of the properties opposite it on Salisbury Road. As such, any houses adjacent to Salisbury Road will be of the order of 11-12 M higher and dominate the existing properties. This will significantly impact the access to sunlight due to the inevitable shading by these new properties. In addition, the proposed properties will have direct line of sight into the front aspects of the existing properties, which include bedrooms, bathrooms, living rooms and kitchens. It is my view that this development proposal would therefore significantly adversely impact the residential amenities of these properties. This was further highlighted in the Landscape Sensitivity Assessment of proposed development sites FINAL REPORT January 2021, page 139 where under the Mitigation heading it is stated that –‘Any development should also be one story to minimise visual impact.’ Thus, confirming that the height of this site is a significant issue.
- The proposed site, whilst currently used agriculturally is part of the Kent Downs AONB and constitutes a buffer zone between the residential aspects of Salisbury Road and the Drove way and the North Downs SLA, the Heritage Coast, National Trust land, the Site of Special Scientific Interest (SSSI) and the Biodiversity Opportunity Area. In fact, the site is only 300 meters from the Dover to Kingsdown cliffs Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) which protects cliff top grassland and scrubland habitat which is also a key natural and landscape feature of the AONB and heritage coast. Any development on this site would remove that buffer and significantly impact these extremely important and sensitive conservation areas.
- The AONB and heritage coast boundaries were drawn to explicitly include the area of STM010 to protect this land from development. A housing development would be a clear separation from the intended purpose of the AONB designation for this area.
- I also believe that the proposed development in an AONB is in complete conflict with National Planning Policy Framework (paragraphs 174 to 178), which I am sure you are aware of. As such the allocation of site STM010 is not legally compliant and is further evidence that the site should be removed.
- The Local Plan Policy NE2 clearly states that; ‘Major development proposals within the AONB will only be permitted in exceptional circumstances and where it is demonstrated they are in the public interest’. In addition, NE2 also states that any development in the AONB should achieve the following:
- Be sensitively located and designed to avoid or minimise adverse impacts on the AONB and its setting.

	<ul style="list-style-type: none"> • The location, form, scale, materials and design should conserve and where appropriate enhance or restore the special character of the landscape. • The development should enhance the special qualities, distinctive character and tranquillity of the AONB and the Heritage Coasts • The development has regard to the AONB Management Plan and any associated guidance. <p>In my view the proposed STM010 development site does not meet any of the above criteria and should be removed.</p> <ul style="list-style-type: none"> • In addition, any development of this site would impact on the long and medium view of the extremely important Dover Patrol Memorial from many aspects of the surrounding area. <p>In summary, any housing development on site STM010 would have significant impact on this component of the Kent Downs AONB and the Heritage Coast and will be highly detrimental to the nationally and internationally important SSSI and SAC areas that it abuts. I believe that allocation of the site for development conflicts with national and local planning policy. In addition, any such development would have a significant impact on the residents of the area with respect to residential and visual amenity and further exacerbate the already significant traffic issues.</p> <p>In conclusion, for all the reasons highlighted above, Site STM010 should be removed from the DDC Local Plan.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Removal of site STM010 from the Regulation 19 version of the Local Plan.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	To fully represent the facts and views expressed in my submission.
Include files	LALP HELAA PS11 Maps by Settlement St Margarets sites.pdf (1) SAD28 SHLAA assessment.pdf (2)
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP201
Rep Status	Processed
Consultee ID	1331046
Consultee Full Name	Mr Gerald Irvine
Consultee Company / Organisation	STM010 Residents Group
Agent Full Name	
Agent Company / Organisation	

<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP40 (Site STM010)</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Justified Effective Consistent with National Policy</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>No</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Yes</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>DDC Note: This is a group representation on behalf of 135 residents. The spreadsheet of names and addresses and emails will be made available to the Inspector on request.</p> <p>We consider that the Dover Local Plan is not legally compliant for the reasons set out in our response below. We consider that the plan is unsound due to the inclusion of Site STM010 in Policy SAP40 which for the reasons set out below renders that policy unjustified, ineffective and inconsistent with national planning policy.</p> <p>Response to Dover District Council Local Plan Regulation 19 Consultation November 2022</p> <p>This response is submitted on behalf of 124 (DDC EDIT 135 residents) residents of St. Margaret's at Cliffe and other areas (the STM010 Residents' Group), whose names and addresses are listed in Attachment 1 and who have supplied the spokesperson for the Group with their written authority to make these representations. The response relates to the inclusion of site STM010 in Policy SAP40 of the draft Local Plan, which allocates the site for housing.</p> <p>In the view of the signatories to this response, this site is entirely unsuitable for housing development for a number of reasons, and its inclusion in this policy is unjustified and inappropriate, based on the relevant evidence and taking into account the reasonable alternatives. Access to the site is problematic, and it may not be deliverable within the plan period, making this allocation potentially ineffective. The allocation of the site for housing also conflicts with national and local planning policy, and is inconsistent with material considerations such as the policies of the draft Local Plan itself and the Kent Downs AONB management plan. Its inclusion in Policy SAP40 renders the Local Plan unsound to that extent, and we request that this allocation be deleted from the Plan.</p> <p>Our arguments in support of this request are set out below. They are made at some length due to the fact that this is the first time we, as residents, have been properly consulted on this proposal, and the first time that we have had the opportunity to put them forward. This is because the site was not included as a selected site for housing in the published Regulation 18 document, only as one which had been considered. It was only very shortly before the Regulation 18 consultation process closed that the site was added to the list of sites allocated for housing in St. Margaret's, and so far, as we are aware, no local resident nor the Parish Council was aware of this inclusion until the Regulation 19 document was published. It appears, from the response to a freedom of information request to DDC, that on the last day of the Regulation 18 consultation, 16 March 2021, agents acting for the site owner submitted a letter to DDC putting forward this site for housing.</p> <p>Although its subsequent allocation may not have been a technical breach of the requirements of the consultation process, local residents perceive it as unfair and a breach of natural justice. They had a legitimate belief and expectation that the site would not be allocated due to its omission from the published Regulation 18 document. This was reinforced by the fact that the HELAA suitability assessment for STM010 stated that the site was only to be taken forward with STM011. The latter site is a paddock which adjoins STM010. The owners of STM011, who are signatories to this letter, have always indicated their paddock is not available and should never have even been considered for allocation, and this was well-known locally. We would question whether these flaws in the consultation process mean that the required process for public engagement as set out in the Statement of Community Involvement has not been followed, and whether this means that the Local Plan is not legally compliant.</p> <p>However, there are also many compelling reasons based on the planning merits of the case as to why this site should not be allocated for housing, and these are set out below.</p> <p>Characteristics of the site and effect of proposed development</p>

STM010 is in open countryside and lies entirely within the bounds both of the Kent Downs Area of Outstanding Natural Beauty (AONB) and of the Heritage Coast.

The site is a field of 2.2 hectares, currently used for arable crops, which borders an area of open access land owned by the National Trust (NT) known as Bockell Hill. This adjoining land is of high conservation, wildlife and landscape value. STM010 is also within 400 metres of several important habitats for wildlife that have highly protected status: Dover to Kingsdown Cliffs is both a Site of Special Scientific Interest and a Special Area of Conservation. The site is an important buffer between these protected areas and the residential area of St. Margaret's Bay. The site is within a Biodiversity Opportunity Area as defined by SP14 of the draft Local Plan, and the field with its associated hedgerows and trees forms an important part of the biodiversity of the AONB in this area. (See Google Map entitled "Field 2006" **Attachment 2**).

The whole of the site was, from the outset, included within the AONB designation. The boundaries of the AONB in this area generally follow the settlement boundary of St. Margaret's village, but the site justifies its inclusion in the AONB for very specific reasons. It contains the highest point in the locality, as can be seen from the contour map at **Attachment 3**, and lies prominently in the landscape, being higher even than Bockell Hill or the land on which the Dover Patrol Memorial is built to the north. Old maps show the field as being called Snag Burrows (Tithe Map of 1840) or Snag Barrow Mount (1876 OS Map). The term "Mount" confirms its prominence, and the 1876 map shows the site of a prehistoric barrow in the field: such barrows are normally found on local high points. The area is known by old-established residents of the village as "Up-on-top", and a modern house built close by in the Drove way echoes this name.

The prominence of the site means that from the field and the footpaths around it, there are wide-ranging coastal and countryside views, including across the Straits of Dover to the French coast, to the coast of Thanet and the Goodwin Sands, and to the South Foreland lighthouse to the south and to the Dover Patrol Memorial to the north. Both the lighthouse and the memorial are designated heritage assets, being listed buildings (Grade II and Grade II* respectively). There are also extensive views across parts of the site southwards from the NT access land at Bockell Hill, stretching as far as the South Foreland lighthouse. The sightlines required for these iconic views would be adversely impacted by built development and associated screening on the site. The Landscape Assessment carried out in 2020 for HELAA (Appendix 3(a)) recognised that built development on the site would be visible from a long distance away, and would have an impact on the landscape.

Although currently used as productive farmland, the site with its hedgerows and trees makes an important visual contribution as open countryside to the neighbouring highly sensitive landscape. In terms of its value to wildlife, it is functionally linked with the scrubland and grassland of Bockell Hill and via that land, with the Dover/Kingsdown cliffs SSSI and SAC beyond. The Sustainability Assessment confirms that it intersects with a relevant SSSI Impact Risk Zone. It thus provides a valuable corridor for wildlife, including migratory and resident bird species, bats and other fauna. The site is within the "restore and conserve" area of the Green Infrastructure Network as defined in the draft Local Plan, and the Landscape Assessment carried out for HELAA in 2020 (Appendix 3(c)) refers to the "real opportunity for Green Infrastructure" in relation to the site.

The site is also important for local informal recreation. Paths within the site and along its boundaries are used extensively by walkers, as an alternative to walking along the Drove way, and to gain access to the Bockell Hill NT site. There is a gate giving access to Bockell Hill in the north-eastern boundary of the site, presumably installed by the National Trust. The official Frontline Britain Trail, developed by the White Cliffs Countryside Partnership, runs from the Dover Patrol Memorial across Bockell Hill and emerges at this gate, continuing along the north-eastern boundary of the site to the Drove way. Although current editions of local OS maps do not show these paths as public footpaths, there are certainly rights of public access along the Frontline Britain Trail, and other customary rights of access across the site also appear to have been established. The 2020 Landscape Assessment referred to above refers to the wide range of walking opportunities in the vicinity of the site. The plans put forward by the promoter of the site do not recognise this use of the land, and make no reference as to how the established recreational amenity of the site is to be protected. In the absence of protection for this amenity, walkers seeking access to Bockell Hill and the English Coastal Path beyond are likely to be displaced on to the paths on the adjoining coastal habitats of the SSSI and SAC. These are already recognised in the Habitats Assessment as being under potentially unsustainable pressure from recreational use.

It seems that the particular characteristics of this site, and the significance of its location within the AONB, have not been properly considered by DDC when assessing its suitability for housing development. This is evidenced by the fact that the site is described in the Housing Site Assessments of HELAA 2022 (Appendix 1(a), page 18) as "**adjacent** to the AONB and Heritage Coast". The site is in fact completely within

both these designated areas. This misapprehension (indeed glaring error) appears to have informed the judgment made in the same assessment that the site was of “low to medium sensitivity”. In our view, this opinion is totally incorrect and cannot be sustained.

The site lies on a high point of the AONB, and it will be impossible to build houses on any part of this exposed field without intruding upon and adversely impacting the sensitive landscape of which it is an essential component. As can be seen from the contour map at **Attachment 3**, the site is a gently sloping plateau, and there are effectively no “lower slopes” where locating buildings would materially lessen the visual impact of development (contrary to the suggestion made in the course of consultations by the Kent Downs AONB unit). The drop from the summit of the site to the level of its boundaries is only a few metres: see the contour map. The potential for unacceptable visual impact from development in this area was recognised when housing was built in the Droveaway on the southern boundary of the site: this land is lower, but still only single-storey development was permitted. In addition, this site had to be excavated and lowered by approx. 3 metres to permit this development to proceed. **Attachment 4** is a computer simulation showing the single storey development looking north-east from the Droveaway. **Attachment 5** is another computer simulation showing how new housing development on this site would tower above and dominate the existing single storey-development.

As Site STM010 rises above all the surrounding development, only the rooftops of the surrounding houses can be seen from most parts of the site, as illustrated by the photograph at **Attachment 6**. **Attachment 7** is an artist’s impression of the likely visual impact of a new house built on this corner of the field, which would be visible from a considerable distance from all directions.

Our view that the suitability of this site for housing has been incorrectly assessed is strengthened by comparison with other assessments made in the same HELAA 2022 in respect of sites in St. Margaret’s which are also within the AONB: see Appendix 1c. For example, land at New Townsend Farm (site STM006) is described as a site which sits prominently in the landscape, and where development of the whole site would have an unacceptable impact on the AONB. Other sites considered were rejected outright on the basis of unacceptable impact on the landscape. It is difficult to see why a similar judgment was not made in respect of STM010, which also sits prominently in the landscape, is closer to important designated sites such as the SAC and SSSI, and is also part of the highly sensitive landscape of the Heritage Coast. This lack of consistency in the suitability assessments for sites in different parts of the AONB amounts to a breach of the soundness criteria applying to the Local Plan, requiring that its policies be justified and consistent with national policy.

The promoters of the site have referred to its prospective development as “infill”, but this is not an appropriate description. It lies on the edge of the built-up area of St. Margaret’s, and between the northern ends of the residential roads of the Droveaway and Salisbury Road. But where those roads abut this site, both are only very lightly developed, each with a slender strip of ribbon development on one side of the road: 10 houses in Salisbury Road and 14 in the Droveaway. The size of this site, with an area of 2.2 hectares, is much too large to be considered proportionate development in such a sparsely built-up area, and cannot reasonably be regarded as “infill”. Due to the site’s elevation, any houses built on it would rise well above surrounding properties, and would not be visually integrated with the existing development: see **Attachments 5, 7 and 9** as evidence of the likely impact.

Attachment 8 shows the existing view over site STM011 (the paddock) and STM010 towards the south-west, taken from the Frontline Britain Trail which crosses the NT land at Bockell Hill. **Attachment 9** is an artist’s impression of the likely impact of housing development on this view, based on the proposals made by the promoter of the site. It can be seen that this important view, an integral component of the iconic views of the Heritage Coast available from the site, would effectively be lost if such development were permitted.

We consider that due to the special characteristics of this site, including its elevation and landform (not immediately apparent from a desk-based review) it is essential that the inspector should visit the site to reach a properly-informed view of its suitability for the proposed allocation, and we request that such a visit be arranged.

Conflict with policies relating to the AONB

Due to the special characteristics of this site, and its status as an integral part of a highly protected landscape, any housing development on the site would amount to an unjustifiable intrusion into open countryside and would have an unacceptable impact on the landscape and scenic beauty of the AONB, which could not be satisfactorily mitigated. Such development would be in conflict with many of the policies of the existing and draft Local Plans, with national planning law and guidance and with the provisions of the Kent Downs AONB Management Plan.

The current Local Plan, adopted by DDC in January 2015, provides for the protection of sites within St Margaret's at Cliffe (including St Margaret's Bay) that fall within the AONB. Section 2.18 of the DDC Land Allocations Local Plan emphasises that AONBs have the highest status of protection and the plan states that there are very limited development opportunities in St. Margaret's Bay 'that would not harm the setting of the AONB.' For this reason, no sites within the AONB in St Margaret's Bay were allocated for housing in the current Local Plan.

It is accepted that the current Local Plan requires updating, and that there is a need for more housing in the District. However, it is not clear why the AONB should be entitled to less protection now than in 2015, nor how building on sites within the AONB such as STM010 will not still cause unacceptable harm to its setting: no convincing explanation is given in the draft Local Plan for this change in policy.

The proposed allocation of the site for housing also conflicts with several policies in the current draft of the Local Plan (the Regulation 19 submission document). Although many of these policies relate to the way in which future proposals for development in the district should be assessed and managed, rather than to the allocation of specific sites for development within the Local Plan itself, there should obviously be consistency between these related aspects of the local planning system, particularly with regard to development within the AONB.

It is a stated Strategic Objective of the draft Local Plan to conserve and enhance the District's important natural landscapes. Policy SP4 of the draft Plan re-states the well-established legal and national planning policy position that proposals for residential development in settlements in, adjoining or surrounded by, the Kent Downs AONB or Heritage Coasts, **must comply in the first instance with the primary requirement of conserving and enhancing landscape and scenic beauty.** This principle should also apply to the allocations for housing made in the Local Plan itself. The housing development proposed for STM010 will in no way conserve or enhance the landscape in which it lies, or the scenic beauty of the AONB in this area. For the reasons set out in this submission, it will on the contrary amount to an unwarranted intrusion into highly attractive and sensitive open countryside, and have a very significant adverse effect on the landscape of the AONB and the scenic beauty of the area.

Policy NE2 of the draft Local Plan reinforces the principle above, and sets out how the impact of development proposed within or affecting the setting of the AONB should be mitigated. Proposals will only be supported where:

"Development is sensitively located and designed to avoid or minimise adverse impacts on the AONB and its setting;

The location, form, scale, materials and design would conserve and where appropriate enhance or restore the special character of the landscape;

The development would enhance the special qualities, distinctive character and tranquillity of the AONB and the Heritage Coasts; and

The development has had regard to the AONB Management Plan and any associated guidance."

So far as the first three requirements are concerned, it is not possible, given the sensitive location and special characteristics of this site, to achieve any significant mitigation of the adverse impact of housing development. The landowner's submission refers to suggested screening of the visual impact of the site by landscaping: it seems commercially unlikely that this will be carried out, given that the magnificent sea views from this site are likely to be an important marketing advantage for any properties built on it. Any such screening would in itself be deleterious, as it would block the important views across the site from public access points to the coast, countryside and historic monuments in the vicinity. It is therefore impossible to see how any such development could enhance the "special qualities, distinctive character and tranquillity of the AONB and Heritage Coast": these qualities can only be damaged by built development on the site.

The fourth requirement above requires that proposals should have regard to the Kent Downs AONB Management Plan. The allocation of STM010 is inconsistent with the provisions of this Plan. At section 1 of the Plan, particular emphasis is given to tranquillity and remoteness. It states: "Much of the AONB provides surprisingly tranquil and remote countryside - offering dark night skies, space, beauty and peace. Simply seeing a natural landscape, hearing birdsong, seeing and hearing the sea, watching stars at night or 'bathing' in woodland are important perceptual

qualities of the AONB.” St Margaret’s Bay has a Dark Skies Policy at local level, and there are very few streetlights. The building of houses on this site will forever remove that tranquillity and sense of remoteness, not just for the site but also the surrounding protected landscape. In such a prominent position, houses will inevitably add substantial light pollution, contrary to Sustainability Development Principle 7 of the Plan. That light pollution will also have an adverse impact on local wildlife, particularly on the birds and bats which frequent the hedgerows and copse on the site, and the adjacent conservation land owned by the National Trust.

The Kent AONB Management Plan refers to the “breath-taking long-distance panoramas from clifftops and plateaux” in the District as one of its most iconic features: these views should be given the highest levels of protection, but the development proposed for STM010 would deprive local residents and visitors of one of the most valuable points in the locality for appreciating them.

The AONB Management Plan also specifically warns against the cumulative effect of small-scale developments on the special character and qualities of the AONB. Paragraph 3.1.4 states: “each individually small impact taken cumulatively is progressively diminishing the qualities and character of the AONB at a strategic scale”. This proposed allocation in a particularly prominent part of the coastal AONB may only provide 10 houses, but would contribute significantly to the cumulative diminution of the AONB.

This allocation is also in conflict with national planning policy. Under the National Parks and Access to the Countryside Act 1949) and the National Planning Policy Framework (paragraph 176), AONBs are entitled to the **highest status of protection**, and great weight should be given to conserving and enhancing the landscape and scenic beauty of such areas. The same considerations apply to land designated as Heritage Coast (of which Dover District contains the only such designations in Kent).

The allocation of this site fails to meet the requirements for development in AONBs set out in the National Planning Policy Framework paragraphs 174, 175 and 176. Paragraph 174 of the NPPF requires planning policies to contribute to and enhance the natural and local environment, in particular by protecting and enhancing valued landscapes and sites of biodiversity. This allocation has the completely opposite effect, and means that a valued landscape, in a protected area, will be lost forever, and the biodiversity of the area damaged.

Paragraph 175 of the NPPF requires authorities to allocate land with the least environmental or amenity value, in the interests of conserving and enhancing the natural environment. Paragraph 3.4 of the draft Local Plan reflects this requirement in stating that “a key aim of the growth strategy is to focus development in the least sensitive areas of the District in order to conserve and enhance the District’s rich natural and historical environment”. This allocation within the AONB, for just 10 houses that could be built on other far less sensitive sites, will be of land that has extremely high environmental and amenity value, and accordingly conflicts with both national and local planning policy.

Paragraph 176 of the NPPF requires that “Great weight should be given to conserving and enhancing landscape and scenic beauty in ... Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues”. No such ‘great weight’ has been given in deciding on this allocation, as the proposal will neither conserve nor enhance the landscape and scenic beauty of the area. The lack of weight given to these factors is also demonstrated by the incorrect assessment of the site as “low to medium sensitivity” in the assessment of its suitability for housing, and its original incorrect identification as being outside the AONB and Heritage Coast. Additionally, no site-specific assessment has been made by DCC of whether the allocation of STM010 constitutes a “major development” under NPPF Paragraph 177 and is thereby subject to the additional public interest test for such developments under the NPPF. No evidence has been put forward to show why this allocation is in the public interest.

Traffic and access issues

Developing this site for housing will have unacceptable impacts on traffic on roads in the village of St. Margaret’s. In addition, there is no safe and suitable access to the site. Due to these issues, the allocation of STM010 for housing is inconsistent with local and national planning policy, and in particular, does not enable the delivery of sustainable development. The access problems mean that development of the site is likely to be unachievable and undeliverable over the Local Plan period.

Traffic issues

The promoter of the site has claimed that access to the site could be obtained either from Salisbury Road or from the Droveaway. However, Salisbury Road is a private unadopted road, owned and maintained collectively by the residents whose properties front the road. Those residents would not be prepared to grant rights of access to the developer to allow construction of houses on the site, nor to any eventual residents of the site. They will be submitting separate representations to this effect in the Regulation 19 consultation process.

All access to the site would therefore need to be along the Droveaway. The Droveaway is narrow for a considerable distance from its junction with Sea Street, and as parking is unrestricted, parked cars normally line most of the road up until its junction with Convent Close and beyond. The pressure on parking is increased by customers visiting the café-bar First Light at the Sea Street junction, and patients visiting the doctors' surgery near Droveaway Gardens. Salisbury Road, as a private road, provides no available parking to alleviate these pressures.

Due to the parking situation, the Droveaway is effectively only the width of one vehicle for much of its southern stretch. This already results in congestion, enforced reversing and other dangerous situations involving conflict between vehicles, particularly at the Sea Street junction. As there is no exit point for vehicles at the northern end of the Droveaway, all traffic must enter and leave by the route to Sea Street, which increases the congestion. This is further increased by the fact that all traffic to properties in Salisbury Road must enter and leave that road via its junction with the Droveaway, and then via the Droveaway/Sea Street junction.

If STM010 is developed for housing, the additional traffic along the Droveaway of heavy construction vehicles, and subsequently of more residential traffic, plus delivery and utility vehicles, will result in unacceptable and dangerous levels of vehicle movements, with their associated congestion, noise and potential for accidents. As STM010 is located at the furthest (northern) end of the Droveaway, all traffic from and to the site would have to travel the full length of the road.

As the Droveaway connects to several public footpaths, including the Frontline Britain Trail and others leading seawards to the English Coastal Path, it also carries a high level of pedestrian traffic, including recreational walkers and local dog-walkers. As there are no pavements beyond the junction with Convent Close, the road from that point is for all practical purposes a shared surface. Any increase in traffic would result in increased danger to pedestrians, and a loss of amenity for those recreational walkers enjoying what is effectively still a country lane.

Many of these serious traffic issues were recognised by the highway authority in earlier consultations: it is pointed out in the highways assessment carried out for HELAA 2020 (Appendix 3b in the Evidence Base) that the increase in traffic at the Droveaway/ Sea Street junction resulting from the development of STM010 would increase the likelihood of vehicle conflict at that junction. This assessment also states: "Both roads are at their narrowest in the vicinity of the site, although there may be scope for some localised widening along the site frontages". However, as far as local residents are aware, the owner of the site does not own or control any land between the site and the highway which would allow for such widening. (See below for the issues this raises as to access to the site generally.)

In view of the concerns raised, it is stated that if this site ever came forward for development, it would need to be in consultation with KCC.

These and other highways concerns are raised again in the housing site assessments in HELAA 2022 (Appendix 1a in the Evidence Base). Again, the highway authority points out that "the junction of The Droveaway/Sea Street is subject to constrained visibility (southbound), as such **an increase in turning movements at this junction will increase the likelihood of vehicle conflict and there is limited scope to provide meaningful improvements.** - General concern over traffic levels within the Village given the constrained nature of the High Street which is subject to narrow sections and on street parking, this would need to be considered in tandem with other potential allocation sites in the locality".

In relation to another site proposed to be developed for housing in St. Margaret's (STM006 at New Townsend Farm), the highway authority commented in its highway assessment in HELAA 2020 (Appendix 3c) that the site "is located some distance away from the services and amenities within the village, which could lead to an increase in demand for parking within the village as residents are likely to drive rather than walk or cycle." This consideration would apply even more strongly to the proposed development of STM010, which is considerably further from the village centre than STM06. Parking within the village is very limited.

Unlike most of the other proposed housing sites for St. Margaret's, which are situated on the landward side of the village centre, most of the increased traffic resulting from the development of this site would have to pass along Sea Street, past the entrance to two schools, and then along the very narrow road through the centre of the village (which lacks a pavement for long stretches and is single-width in parts) in order to enter or leave the village. This would increase the existing danger to pedestrians (including children at the schools), congestion, delays, air pollution, traffic noise and potential for vehicle conflict throughout this area of the village, which already suffers badly in these respects.

The bus service connecting St Margaret's to Dover and Deal has recently been reduced significantly by its operators Stagecoach. There are now only 5 buses a day to Dover, and 3 to Deal (none on Sundays). These reductions are already affecting the ability of children in the village to travel to school by bus, and of residents to travel to work. This is likely to result in a substantial increase in traffic in all parts of the village, particularly at peak hours, and this will add to the congestion already affecting the Droveaway, Sea Street and the village centre, making the

addition of further traffic from the proposed site even more problematic. As a recent development, this has not been taken into account in any of the traffic assessments carried out to date.

An additional relevant consideration is the future maintenance of the Droveway. Residents of the road cannot recall the last time it received any maintenance from the highway authority, and the surface is very patched and uneven in parts due to work by various utility companies. This would be exacerbated by all the works necessary to bring services to the site, and the impact of heavy construction traffic. In the current economic climate, it seems unlikely that the highway authority will have sufficient funds in future to maintain the road to a proper standard, and its deterioration will continue to the detriment of residents.

Access

As mentioned above, the only potential access to the site would be via the Droveway, in view of the unwillingness of the residents of the private and unadopted Salisbury Road to grant access over that road. The highways assessments referred to above made it clear that the promoter would need to ensure that there was a right of access to the site. However, this right of access has not been clearly established by the promoter.

In DDC's stakeholder engagement document, included in the Evidence Base for the Local Plan at Appendix 3g, the highway authority comments that "there does appear to be a gap between the red line boundary [of the proposed site] and the adopted highway which will need to be clarified." The site can only be accessed from the adopted highway (the Droveway) by crossing the area of land comprised in this gap. The promoter of the site has not stated that this area of land is in its ownership (indeed failing to answer this question in the submission correspondence with DDC. From the local knowledge of many of the residents on whose behalf this response is submitted, the promoter does not in fact own this area of land: its actual ownership is historically obscure, and the land does not appear in any Land Registry title.

The land in question is a long wide strip which runs along the entire western boundary of the arable field comprising the site, and is occupied by a wide hedgerow, with associated scrub and small trees. The present agricultural access has been formed by making a gap in this hedge at the northern end. However, part of the access area thus created falls within the boundaries of the adjacent property to the north-west of the site, known as Lomea, as can be seen from the Land Registry title map for the western part of that property (see **Attachment 10**). The owners of Lomea are not prepared to grant access over their land to the promoter of this site, and will be submitting separate representations to confirm this. The present agricultural access is informal and not documented as an easement binding Lomea: any rights relating to it are personal to the farmer cultivating the land, and do not extend to any use beyond that needed for agricultural purposes.

In the absence of a right to use the full extent of the current access area, development of this site could only proceed by removing part of the existing thick hedgerow bordering the Droveway. Assessments of the suitability of the site for housing have stated that this hedgerow and neighbouring vegetation should be retained if the site is ever developed, due to its value for wildlife, the landscape and screening for neighbouring properties. Its removal would have an unacceptable adverse impact on these features. The promoter has not in any event demonstrated that it has any right of ownership over any part of this area of land, or any consent from the owner of the land to remove the hedgerow, or to access the site for development or any other purpose.

In view of the absence of any such rights or consent, there is no safe and suitable access to the site, as required by national and local planning policy. Without such access, the site cannot be developed, and should therefore not be treated as being deliverable, or its development as being achievable, within the period of the Local Plan.

Other material considerations

Housing development on this site will adversely affect the setting of a heritage asset, as it will interfere with the long views across the site, and from other vantage points, of the Dover Patrol Memorial, which is a Grade II* Listed Building. Grade II* buildings are particularly important buildings of more than special interest: only 5.8% of listed buildings are Grade II*. In the listing description, Historic England make clear the value of the memorial's setting, stating that "it is an impressive example of a commemorative War memorial, intact in its original coastal setting".

Development on the site also has the capacity to impact adversely on the long views from the Bockell Hill access land to the South Foreland Lighthouse, also a Grade II Listed Building. Policy SP15 of the draft Local Plan, reflecting national planning policy, states that "applications that will affect a heritage asset should ensure that asset, including its setting, is conserved and enhanced in a manner appropriate to its significance". This proposal will neither conserve nor enhance the settings of these heritage assets, rather the contrary.

Housing development on this site will not comply with the requirements of national and local planning policy, reflected in the draft Local Plan at page 19, that new development should be focused at accessible and sustainable locations. The Sustainability Appraisal carried out in respect of the site produced scores of "minor negative" for all Objectives apart from Objectives 1 and 3, relating to Housing and Economy, for which all sites appraised scored minor positives by definition. The site is more than 400 metres from the nearest bus stop, and is at least 1000 metres away from the amenities and facilities in the village centre, which is likely to result in more car journeys and increased carbon emissions. This location, on the very edge of the settlement boundary of St. Margaret's, cannot be described as sustainable.

In terms of providing for housing need in the District, the 10 houses proposed for this site contribute a negligible amount to overall numbers, and are not necessary to fulfil the housing objectives of the Local Plan. Table 3.2 of the draft Plan sets out DDC's 5-year housing land supply based on the strategy and sites proposed in the Plan, and demonstrates a 6.16-year supply with a 10% buffer, well above the required 5-year supply. Neither is housing development on this site likely to contribute to fulfilling the undoubted need for affordable housing in the District. The surrounding area is one of mainly high-value properties, and houses in this extremely desirable countryside location will undoubtedly be priced accordingly. The promoter of the site has not offered any such housing, and the illustrative drawings suggest that none will be provided here. Despite the requirement in the draft Local Plan that 30% of housing in the AONB should be affordable, it is very difficult in reality to envisage this aim being fulfilled in relation to this site: many arguments are available in practice to developers to avoid these requirements.

Summary and Conclusion

The development of site STM010 for housing would represent an unwarranted intrusion into the countryside of the Kent Downs AONB and the Heritage Coast, to the severe detriment of a sensitive landscape setting. The adverse impact of this intrusion could not be successfully mitigated, due to the special characteristics of the site. Such development would also have unacceptable traffic impacts on the locality and on the village of St. Margaret's. Other material considerations as set out above also indicate strongly that the site should not be developed for this purpose.

These adverse impacts considerably outweigh any potential benefit accruing from the addition of the 10 houses proposed for this site to the local housing stock. The allocation of this site for housing is contrary to national and local planning policy, is inappropriate and unjustified, and reasonable alternatives are available. The inclusion of this site in Policy SAP40 renders the Local Plan unsound to that extent. We submit that STM010 should therefore be deleted from this policy and from the Local Plan.

Schedule of Attachments

- 1 Spreadsheet showing names and addresses of residents on whose behalf this response is submitted.
- 1 Google Map showing site, entitled "Field 2006"
- 1 Contour map showing elevation of STM010, including spot heights
- 1 Computer simulation showing single-storey development adjacent to site, looking north-east from the Droveaway
- 1 Computer simulation showing likely impact of new housing development on the site, looking north-east from the Droveaway

	<p>1 Photograph showing existing view of housing development on the Droveaway adjacent to the site, looking south-west.</p> <p>1 Artist's impression of the likely visual impact of a new house built on the south-west corner of the site, adjacent to the Droveaway</p> <p>1 Photograph showing existing view over sites STM011 and STM010 towards the south-west, taken from the Frontline Britain Trail on Bockell Hill</p> <p>1 Artist's impression of the likely impact of housing development on the view shown in Attachment 8, based on promoter's proposals</p> <p>1 Land Registry title plan for Lomea (western part)</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>We suggest that to make the Dover Local Plan legally compliant and sound, site STM010 should be deleted from the housing site allocations made in policy SAP40.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>For the reasons set out in our response above, we feel that local residents have not been adequately consulted on the proposal to allocate site STM010 for housing. We consider that it is imperative that the inspector hears directly from representatives of our group at the examination in public, so that she/he is fully apprised of the reasons for our objection to this allocation.</p>
<p>Include files</p>	<p>SDLP0201 STM010 Residents Group - Att 10.jpeg SDLP0201 STM010 Residents Group - Att 2.jpg SDLP0201 STM010 Residents Group - Att 3.jpg SDLP0201 STM010 Residents Group - Att 6.jpg SDLP0201 STM010 Residents Group - Att 5.pdf SDLP0201 STM010 Residents Group - Att 4.pdf SDLP0201 STM010 Residents Group - Att 7.jpg SDLP0201 STM010 Residents Group - Att 8.jpg SDLP0201 STM010 Residents Group - Att 9.jpg</p>
<p>Local Plan Consultation Point</p>	<p>SAP40 - St Margaret's-at-Cliffe Small Housing Sites</p>
<p>Rep ID</p>	<p>SDLP196</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1329545</p>

Consultee Full Name	Mr Neil Buckley
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	The allocation of site STM010 within SAP40
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC note: the full representation without redaction will be made available to the inspector on request.</p> <p>We are the owners of xx The Drove way, St Margarets Bay, which directly adjoins site STM010 which has been allocated in policy SAP40 of the Dover District Council (DDC) Regulation 19 local plan submission document. Indeed, the proposed extent of STM010 is such that it would appear that it includes land owned by us.</p> <p>We object strongly to the inclusion of Site STM010 in policy SAP40 of the DDC Local Plan. This site is not appropriate or suitable for housing. A housing development on this site would severely damage and conflict with the legal protections that have been put in place to protect this site. The inclusion of this site has, as explained further below, been the subject of multiple flaws and errors in the Regulation 18 and 19 process that mean the tests of soundness in the National Planning Policy Framework (NPPF) have not been met.</p> <p>Moreover, the inclusion of STM010 is not justified and is inconsistent with local and national planning policy, including the NPPF, as well as being inconsistent with the current DDC local plan and the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012 (the Regulations). The basis for these contentions are set out in three sections below relating to access, the AONB and process flaws.</p> <p>We would ask that the planning inspector should visit the site to understand its importance in the landscape. We would also ask, as parties directly impacted severely and adversely by this allocation, to give oral evidence to the planning inspector.</p> <p>STM010 - the site and access to it</p> <p>Our house is the final house on the Drove way; it was an old RAF guard house. Uniquely for houses on this road (and Salisbury Road which is the other side of STM010), our home is within the boundary of both the Kent Downs AONB ('AONB') and the Heritage Coast, as well as being within a few hundred metres of the Dover to Kingsdown Cliffs Special Area of Conservation (SAC) and SSSI.</p> <p>Our back garden directly adjoins site (STM010). STM010 is a field which lies within the bounds of the AONB as well as the Heritage Coast. The rest of our garden is contiguous with national trust owned farmland (also within the AONB/Heritage Coast) as well as Bockell Hill (also within the AONB/Heritage Coast). There is a footpath (within STM010) along the back of our garden which connects via a gate to the National Trust land of Bockell Hill. This footpath is very heavily used.</p> <p>A key consideration about STM010 is that it sits prominently above the surrounding land. Our house and gardens are much lower than this field and our back garden slopes upwards to it. The field which is STM010 (Snag Burrows Mount) is a plateau. The contour map shows that STM010 is higher than all the surrounding land including Bockell Hill. Any houses on this site will be visible throughout this part of the AONB, Heritage Coast and SAC. The large houses that are proposed will not only seriously impact the sensitive landscape and dark skies but will also significantly impede views towards both the Grade 2 listed Dover Patrol (one of three special WW1 Memorials located in the UK, France and the USA) and</p>

the Grade 2 listed South Forelands Lighthouse. The significant detriment to this sensitive landscape caused by this intrusion is discussed more in the AONB section.

The key issue in this section of our submission is the extent of the land owned by those who put forward Site STM010 at the close of the Regulation 18 consultation.

As can be seen quite clearly in the DDC 2015 Land Allocations Local Plan Adopted Policies Map, the promoters of this site own a piece of land, the legal boundaries of which do not join either of the two roads (The Droveaway and Salisbury Road). Correspondence between the promoters of STM010 and DDC (obtained under FOI) shows that the promoter has not disclosed their lack of ownership of any access to any road and DDC does not seem to have pursued this issue, nor has it asked whether the owners of the land that could provide access, namely ourselves, are willing to do so.

In relation to Salisbury Road, this is a private road whose owners, we know, are not prepared to give any access. This means the sole viable access to this site would be on The Droveaway, a public road, where there is currently a small break in the extensive and deep hedgerow (under separate ownership to the field) which runs the whole of the way along The Droveaway.

The promoter of STM010 submitted to DCC a document on 16 March 2021 which proposed the allocation of STM010. This document was not made public and was obtained via FOI. It includes access drawings by a company called Transport Dynamics. The drawing for the access to The Droveaway (on which DDC presumably have relied to establish 'suitable and safe access' under NPPF Paragraph 110) shows a road, including a splay, over land which is owned by us and the separate owners of the adjoining hedgerow. The owners of the field own none of this land. This is a fact they have failed to mention and which DDC seem to have not ascertained.

Indeed, in relation to the proposed Droveaway access, most of the proposed left side splay is within our garden and currently has trees, grass, daffodils and bluebells on it. The central part of the proposed access road is also, as to about 50% of that land, within our legal boundary. The attached photo shows the extent of our legal boundary. The person in the photo is standing where the boundary lies. The owner of the field has absolutely no right of access, no easement or covenant allowing access. The tenant farmer has limited and very infrequent access for a tractor to this field, strictly personal to the tenant farmer and only for agricultural purposes, which permission can be withdrawn by us at any time.

We object very strongly to the allocation of site STM010 within SAP40. We also very strongly object to the inclusion of land owned by us within the scope of STM010. DDC should have established whether the owners of the land through which there is proposed access to the highway consent to that access before allocating the site within SAP40.

The promoters of site STM010 own a 'land locked' field with absolutely no access to a road. It is noteworthy that this very issue of the need to confirm how access would be provided was raised by Kent County Council (KCC) in the highways assessment. A reasonable person might have expected DDC to check this point, including crucially who owns the land which is to provide access and whether they consent to such access before allocating it within the SAP40 policy.

The site owner of the field within STM010 cannot provide safe and suitable access for all users. Allocation of this land within SAP 40 is therefore unsound under the NPPF and the Regulations because it is not justified and because there is no safe and suitable access to this site for all users as required under NPPF Paragraph 110.

Related to access, there is also the significant traffic issues which were noted in the initial HELAA 2020 for STM010 (appendix 3b in the evidence base). At the point of the proposed access to The Droveaway, the road is essentially single track, in a poor state of repair and completely unsuitable for increased road traffic. There are no footpaths. There are no street lights because the village has a dark skies policy. The pedestrians, including dog walkers, who currently access Bockell Hill via the footpath at the back of our garden (across STM010) walk in the middle of The Droveaway. If allocated and then developed, there could easily be up to 30-40 cars using this part of The Droveaway multiple times per day, plus delivery vans etc (see the St Margarets Cliffe PPC's submission on the reality of how many cars are owned by residents of houses such as that which would be built on the allocated land). DDC have suggested no measures are required for this site in the draft Infrastructure Delivery Schedule document attached to the Regulation 19 Local Plan. No footpaths, no road widening, no measures for dealing with the serious traffic problems further up The Droveaway. It is inconceivable that a small housing estate could be built on the basis of the current infrastructure without the access to it being unsuitable and unsafe for many different types of users of that access. Again, this reinforces the conclusion that there can be no safe and suitable access to this site and its allocation in SAP40 is unsound because it is unjustified and not consistent with national planning policy.

AONB

Areas defined as AONB are entitled to extra legal protection (including from inappropriate allocation under a Local Plan) to preserve their beauty and sensitive landscape for everyone to enjoy. The site is also very close (within a few hundred metres) of a Special Area of Conservation which is meant to give additional protection for important habitats for wildlife, flora and fauna as well as wildlife and birds. This status has been given

insufficient weight and consideration in all aspects of the sustainability assessment, landscape evaluation and proposed allocation within SAP40.

As stated in the introduction above, a housing development on this site would severely damage and conflict with the legal protections that have been put in place to protect this site.

Old ordinance survey maps show the field as being called Snag Burrows Mount. The field is higher than surrounding land, which is why it was termed a Mount. The prominent position of this field, over and above even Bockell Hill, is shown in the contour map. This prominence means that from the footpaths across the field there are iconic views across to the Grade 2 listed South Foreland lighthouse, the Straits of Dover and the Grade 2 listed World War One Memorial of the Dover Patrol. Any development will intrude and impact severely and negatively on this protected landscape.

The land which encompasses STM010 was, from the creation of the AONB, included within its boundary. It was intended to mark a separation between the houses of St Margarets Bay (which in this area were not included in the AONB) and the open countryside. Although used for farmland, the field is an integral part of this incredibly beautiful, and sensitive, landscape for which world heritage status is currently being sought. The field may have an agricultural purpose but its inclusion within the extent of the AONB was very deliberate. The elevated landscape of the field is itself beautiful. It adds to the surrounding landscape with its footpaths giving access for walkers, providing far reaching vistas, together with its tranquility and nighttime 'darkness'.

The site seamlessly adjoins the land (both scrubland and farmland) which forms part of the Dover to Kingsdown Cliffs, which are a Designated Special Area of Conservation (SAC) and a Site of Special Scientific Interest (SSSI). The field is within a few hundred metres of this very sensitive Coastal SAC/SSSI (a fact which, extraordinarily, seems not to have formed part of the DCC Habitat Assessment nor the Sustainability Assessment). The field is an important part of the biodiversity of the AONB. Indeed, the site is within a Biodiversity Opportunity Area and part of the Green Infrastructure Network.

The designation of STM010 for planning purposes is in contravention of the Regulation 19 Plan's policies regarding the natural environment with reference to the Kent Downs AONB. Paragraph NE2 of the Local Plan requires that 'proposals' - including allocations - should demonstrate regard to the particular characteristics of the land. No such regard seems to have been made to these characteristics in the proposed allocation. This is evidenced not least by the fact that the characterisation of this site as low to medium sensitivity in the sustainability assessment cannot be commensurate with the special characteristics of this prominent site which should have been fully assessed and taken into account. This is a high point of the AONB, it will not be possible to build houses on this elevated field without intruding upon and adversely impacting significantly the sensitive landscape of which it is an essential component. That impact will not just be on the AONB and Heritage Coast but also the SAC.

There is also a lack of consistency in the sustainability assessments for different parts of the AONB (which amounts to a breach of the soundness criteria of being justified and consistent with national policy). This can be seen from the fact that a less elevated site, namely STM006 [New Townsend Farm] which is also further from the SSSI and SAC, was considered highly sensitive. A similar assessment should have been made for STM010.

Paragraph NE2 of the Local Plan also requires that allocations should have regard to the AONB Management Plan. The inclusion of site STM010 means DDC have not properly considered their agreement to abide by the Management Plan for the Kent Downs AONB.

At section one of the AONB Management Plan (Management Plan) particular emphasis is given to 'Tranquillity and remoteness'. The Management Plan states: 'Much of the AONB provides surprisingly tranquil and remote countryside – offering dark night skies, space, beauty and peace. Simply seeing a natural landscape, hearing birdsong, seeing and hearing the sea, watching stars at night or 'bathing' in woodland are important perceptual qualities of the AONB'.

This part of St Margarets Bay has no streetlights, and this field enhances and extends the dark skies, space, beauty, and peace that the AONB and DDC have pledged to protect. Allocation within SAP40 – and subsequent building of multiple homes - will forever remove that tranquillity and sense of remoteness not just for the site but also the surrounding protected landscape which includes our home. In such a prominent position, these houses will be seen from far around and will inevitably add substantial light pollution. This should have been considered, not least in the landscape evaluation and the Sustainability Assessment, as the Management Plan says dark skies are a key priority to protect (See the Management Plan's Sustainability Development Principle 7).

The Management Plan also specifically warns against the cumulative effect of small-scale developments on the special character and qualities of the AONB (See paragraph 3.1.4 of the Management Plan). That paragraph states: 'each individually small impact taken cumulatively is progressively diminishing the qualities and character of the AONB at a strategic scale'. The proposed allocation of a site which is over two hectares in an elevated part of the coastal AONB would, contrary to the Management Plan, be a significant diminution of the AONB.

Furthermore, the Management Plan requires both a landscape led approach (page 26) and net gains for biodiversity (page 27). Allocation of a prominent site within the AONB seems incompatible with such a landscape led approach, not least when the landscape to be designated is of such a sensitive nature (just a few hundred metres from a SAC and an SSSI).

The inclusion of site STM010 is also not in compliance with the requirements for local planning allocations and developments within Areas of Outstanding Natural Beauty. No site-specific assessment has been made by the decision maker, namely DDC, of whether the allocation of site STM010 within SAP40 constitutes a major development under NPPF Paragraph 177 and is thereby subject to the additional public interest test for such allocations under the NPPF. No evidence has been put forward to show why this allocation is in the public interest.

Even if it had been assessed that it is not a major development (and no such assessment has to date taken place), it still fails to meet the requirements for AONBs under the national planning policy framework paragraphs 174, 175 and 176. Allocation of this site would represent an unwarranted intrusion into AONB/Heritage Coast countryside to the detriment of a sensitive landscape setting.

Paragraph 174 of the NPPF requires allocations to contribute to and enhance the natural and local environment, in particular by (as set out in Para 174 (a)) 'protecting and enhancing valued landscapes and sites of biodiversity'. This allocation has the completely opposite impact and effect. This allocation means an elevated and valued landscape, with protected status, will be lost forever. The inclusion of requirements, such as screening (which in any event would block the iconic views) in the proposed allocation are completely inadequate to meet this statutory obligation. Many large houses on a prominent site cannot and will not protect and enhance the landscape.

Paragraph 175 of the NPPF requires authorities to allocate land with the least environmental or amenity value. Yet this allocation, for 10 houses that could be built in other far less sensitive sites, will be of land that has the absolutely highest environmental and amenity value.

Paragraph 176 of the NPPF requires that 'Great weight should be given to conserving and enhancing landscape and scenic beauty in ... Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues'. No such 'great weight' has been applied to this allocation. The landscape assessment and sustainability assessment for this site have both failed to put any real weight on the sensitive nature of the landscape and its scenic beauty. The assessment of the site as low to medium sensitivity demonstrates the lack of weight that has been applied by DDC (again in contrast to other allocation of AONB sites within the St Margarets area).

In failing to meet all the requirements of the NPPF, the allocation of STM010 within SAP40 means the allocation also does not fulfil the soundness obligations of being justified and consistent with national policy.

Process flaws and errors

The process for the inclusion of this site has been flawed from the outset and we object to this allocation and seek deletion of site STM010 from SAP40 of the local plan.

The National Planning Framework requires a Housing and Economic Assessment (HELAA) to be undertaken. This was done by DCC and its publication was the first indication for local residents that STM010 was being considered as potentially available for allocation and subsequent development. The contents of the HELAA 2020 suitability assessment for STM010 represents the commencement of the omissions, flaws and errors.

The initial suitability assessment for STM010 is clearly based on the incorrect assertion, set out in that assessment, that the site '**adjoins**' the AONB and Heritage Coast. This was and is completely wrong. The land is, as set out within this submission, an intrinsic part of the AONB and the Heritage Coast. As such, the requirements under the NPPF, including Paragraphs 174, 175 and 176, should have been the legal basis for that initial HELAA suitability assessment. They do not seem to have been used. This means the land seems to have been assessed under the wrong legal basis. It was assessed as potentially suitable because the DCC omitted to consider that it was AONB/Heritage Coast land, very close to a SAC and subject to specific legal requirements under the NPPF in relation to assessment and allocation.

Moreover, it seems to have been this initial incorrect assessment that then informs the characterisation of the landscape as low to medium sensitivity (as set out in the Regulation 19 suitability assessment for STM010). That is an incorrect assessment. This initial HELAA assessment of the landscape sensitivity has subsequently been repeated throughout the Regulation 18 and 19 process.

As set out in the AONB part of this submission, if proper consideration had been given to the requirements of Paragraphs 174, 175 and 176 of the NPPF, the true sensitivity of the landscape characteristics of this site would have been recognised in the landscape evaluation and the Sustainability Assessment. It was not and there was therefore failure to adhere to the NPPF.

As set out in the AONB section, the inconsistent way in which sites within the AONB just within the St Margarets Bay Area have been assessed is clear from comparison of the assessments for STM010 and STM006. STM010 is a more prominent landscape, part of the Heritage Coast, a Biodiversity opportunity area and, critically, much closer to the Dover to Kingsdown Cliffs SAC and should at least have the same landscape sensitivity assessment as STM006.

In particular, the landscape sensitivity assessment should have been informed not only by its status as an AONB but also by the closeness of this site to the SAC. As mentioned above, this proximity seems to have not been considered by the DDC as it is not mentioned in any of the landscape or suitability assessments, nor has it informed consideration of the habitat assessment for this site. The habitat assessment for STM010 references an SSSI miles away but omits to consider one within a few hundred metres of this site. The failure to consider the SAC and SSSI just a few hundred metres from the site means the habitat assessment for STM010 should be considered as failing to be a proper assessment of that habitat.

The Sustainability Assessment for this site has also not been undertaken properly and contains multiple omissions, errors, and flaws such that no proper sustainability appraisal has been carried out.

In addition, and importantly there has been no Regulation 18 consultation proposing the allocation of site STM010 within SAP40. Indeed, for the local community there was the belief based on natural justice and legitimate expectation that site STM010 would not be the subject of any allocation within SAP40.

When the Regulation 18 Consultation on the draft Dover District Local Plan was published, although STM010 was referenced as having been considered, it was indicated in the Regulation 18 consultation that it had not been selected for allocation.

The proposed allocation of this site solely at the Regulation 19 stage means not only that there has been no proper consultation. It has also meant that DCC has allocated this site within SAP40 without giving consideration to the many requirements under the NPPF which would and should have been properly considered and explored if there had been a Regulation 18 consultation.

How this site was designated at the Regulation 19 stage has become apparent through Freedom of Information (FOI) requests to DDC. On the last day of the Regulation 18 consultation, 16 March 2021, the site's agents submitted a letter to DDC putting forward this site (plus another site in Kingsdown) for allocation within the local plan for housing. This letter was not made public.

The Regulation 18 consultation process for allocation of site STM010 never took place. Indeed, the Regulation 18 consultation had created the legitimate expectation that this site was not to be allocated because that is what it had said in that consultation. Moreover, the HELAA 2020 had stated that STM010 was only to be taken forward with STM011, an adjoining paddock also in the AONB. The owners of that paddock, who live on The Droveaway had made it absolutely clear that their paddock is not and never was available for allocation or development.

The first therefore that anyone locally knew that DCC was proposing allocating STM010 within SAP40 was when the DDC Regulation 19 document was published.

The absence of a Regulation 18 consultation, the failure to adhere to the principles of natural justice and legitimate expectations, plus the process flaws in both the Regulation 18 and 19 process means that there has not been a proper process for public engagement as required by the Statement of Community Involvement (Planning – SCI- 2019 Dover.Gov.UK).

It would also appear that DDC may have placed considerable reliance upon the submission by the site owner's agents and it is not clear that DDC have made their own independent assessment of a range of matters that should have informed their appraisal of this site. This includes the issue of whether the site and access to the adjoining roads is in the 'sole ownership' of the landowner. This is significant because in the absence of the owners of site STM010 having any land with road access, there is, as explained above, no 'safe and suitable access to the site...for all users' as required by Paragraph 110 of the NPPF. The access suggested by the site owner's agents is over land owned by others who strongly object to this allocation.

The failure to consider properly the issue of safe and suitable access, including the concerns raised by KCC about vehicular access and the impact on traffic along The Droveaway, is exemplified by the fact that while for other allocated sites in St Margarets (and other sites throughout the Regulation 19 Dover Local Plan) there is supporting analysis in the Draft Infrastructure Delivery Schedule of what actions need to be taken in relation to access (local highways, walking, cycling etc), there is a total absence of any such analysis or infrastructure proposals for STM010. DDC does not seem to have properly considered the issue of safe and suitable access and has therefore not complied with its obligations under NPPF Paragraph 110.

The apparent disregard for the NPPF can also be seen in the fact that STM010 has been allocated as a small housing site. The area of STM010 is just over two hectares. Paragraph 69(a) of the NPPF says small (and indeed medium) sites should be 'no larger than one hectare'. No explanation is provided of why there has been a departure from the NPPF for this site.

Inclusion of site STM010 is also contrary to the current policies for both the North Downs AONB and the development of St Margarets Bay as set out in the current local development scheme. The current local plan adopted by DCC in January 2015 provides for the protection of sites within St Margarets Cliffe (including St Margarets Bay) that have the status of AONB. The relevant provisions can be found at Section 2.18 of the 2015 DCC Land Allocations Local Plan which emphasises that AONBs have the highest status of protection and this is then applied to St Margarets Bay at Section 3.6.9, paragraph 3.405 on page 127. The current plan states that there are very limited development opportunities

	<p>'that would not harm the setting of the AONB' This was why under the 2015 plan no sites within the AONB in St Margarets Bay were chosen for allocation. The allocation of STM010 within SAP40 departs from this policy. It is not explained why a site within the AONB should no longer be protected due to its AONB status, nor is it explained how the choice of this site would not harm the AONB.</p> <p>The allocation of site STM010 within SAP40 would also seem to be a breach of the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012. Section 8 of these Regulations has not been met: (a) The Regulation 19 allocation of STM010 within SAP40 does not contain a reasoned justification of why this site in an AONB and Heritage Coast has been allocated; (b) The Regulation 19 allocation of STM010 within SAP40 conflicts with the DCC's current adopted development plan – see above; (c) The current local plan protects site STM010. The Regulation 19 allocation within SAP40 supersedes the previous protection offered by the current local plan and this should have been identified in both the Regulation 18 and 19 proposed plans and in breach of this requirement it should have stated that fact and identified and explained the superseded policy.</p> <p>In conclusion, the multiple procedural flaws have been so serious in the Regulation 18 and 19 process that the tests of soundness have not been met. The allocation of STM010 within SAP40 is unsound, it is not justified and it is not consistent with national policy.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The deletion of STM010 from SAP40
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We would also ask, as parties directly impacted severely and adversely by the allocation of site STM010 within SAP40, to give oral evidence to the planning inspector. Our house directly adjoins STM010 and the extent of that allocation includes land that we own and which purportedly would be used for access to the rest of the site. Our permission has never been sought and we strongly object to the proposed allocation.
Include files	SDLP0196 attachment.pdf
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP225
Rep Status	Processed
Consultee ID	1330598
Consultee Full Name	Mrs carine verstraete
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	STM010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I am writing to express my objections on the proposal for development of site STM010 in St Margaret's at Cliffe, now submitted as part of the Regulation 19 (submission version) for the following reasons:</p> <ol style="list-style-type: none"> 1 Site STM010 was included in the Regulation 18 consultation version of the Draft Dover District Local Plan but was coloured orange i.e.: it was considered but not selected as a suitable site for development and publicly posted as refused by the LPA prior to the closure date of 17th March 2021. However the day before the end of the consultation period a new proposal was submitted and as a result site STM010 was suddenly included and changed status from orange to green. Local residents and even the Parish council were not aware of this late submission until Regulation 19 was released. As such local residents were misinformed and denied their legal right of expression. (ECHR Article10) Furthermore there have been no changes to the infrastructure, services, road layout that could have made a significant justification to include site STM010 in the Regulation 19. I fail to detect any evidence based reason for the inclusion of this site. 2 The site is in open countryside and lies within the boundaries of the Kent Downs Area of Outstanding Natural Beauty (AONB). AONBs are entitled to extra protection from inappropriate development to preserve their beauty for everyone to enjoy. The site is also very close to several important habitats for wildlife with highly protected status, and borders the National Trust land at Bockell Hill. It is an important buffer between these sensitive habitats and the residential areas of the Bay. A housing development would severely damage that protection. 3 The site is the highest point in the surroundings, and a housing development with its associated light pollution will severely affect the visual beauty and amenity of the area. Previous developments along this ridge have been height restricted; in fact the last two houses at the end of the Droveaway adjoining the site have had to excavate several meters deep as the roof line could not exceed neighbouring houses. The ground level of the proposed site is at least 5 meters higher than the ground level of the surrounding properties. As such the houses would be at least 11 to 12 meters higher and severely impact on access to light as well as privacy as the new properties would have direct line of site into the opposite houses. It has public footpaths running around three of its boundaries, and these are well-used and much valued by residents and visiting walkers. The views from the site of the Dover Patrol Memorial round to the South Foreland lighthouse and over large areas of surrounding countryside and coast are unique, and should be protected from being blocked by development. 4 Existing traffic along the Droveaway is already an issue. The road is a "no exit" road with vehicles using the road as an entry and exit road which maximises road traffic. Several other roads along the Droveaway flow into the Droveaway with the only exit point into the village being Sea Street. Only the first part of the Droveaway benefits from pavement and as the road is already narrow in places vehicles are often parked on the pavement. Wide farm vehicles also use the road to and from their fields and frequently mount the banks and pavements. The increased traffic resulting from both the construction of the houses and their occupation will have a major adverse impact on all existing residents. The only access to the site will be along the Droveaway, as Salisbury Road is a private road and no access will be granted. Heavy construction traffic will damage the road surface and will be a danger to the many pedestrians and schoolchildren who use this road. 5 In the last couple of years social amenities in the village have been dramatically reduced. During the pandemic the hotel was closed and sold off as several individual residential properties. We now only have one pub/restaurant in the village and one on the seafront. Both are only open a couple of days a week with restricted hours. There is no provision for new facilities such as a proper doctor's surgery with adequate car parking or a dental practice. Bus routes have been reduced or completely axed, which has contributed to more traffic during school peak times in the morning and afternoon. There are no parking facilities or drop of zones for parents ferrying their children to and from school, consequently Sea Street becomes completely blocked during peak times. There is no bus service to the train station and there is no bus service on a Sunday. There is one local shop which stocks bare essentials, hence a car is indispensable. Subsequently

	<p>we experience already high levels of traffic and congestion in the village due to a poor infrastructure which was not designed to accommodate the level of traffic we now experience let alone heavy construction traffic in the future.</p> <p>There might be a need for more housing in the Dover District; however there are many more suitable sites available. The biggest need is for affordable housing and this site, with a maximum of 10 executive houses proposed, is not going to make any meaningful contribution to that need or to Dover District Council's housing targets generally. Dover District Council confirmed publicly at their council meeting on the 12th October 2022 that there were 17 village sites, in total, for inclusion in the Local Plan. With that in mind and considering that the proposed plan will not bring anything to the local village community in terms of improved infrastructure, better services and or social amenities but on the contrary will be detrimental to the community and the visitors alike currently enjoying this area of outstanding natural beauty I cannot see any meaningful reason to support this development.</p> <p>In my view this development plan does not meet any of the criteria in the Soundness test, be it positively prepared, justified, effective and consistent with national policy. I have illustrated in the points above why I believe this plan is not deliverable and should be seriously scrutinised by the inspector.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>To remove site STM010 from the local plan and return the site to its former status and enjoyed by all residents of St Margarets as well as tourist, rambles and dog walkers . To ensure that in the future all sites are reviewed and scrutinised and above all that AONB sites are respected and protected as they should be .</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP40 - St Margaret's-at-Cliffe Small Housing Sites</p>
<p>Rep ID</p>	<p>SDLP401</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1330189</p>
<p>Consultee Full Name</p>	<p>Douglas Johnston</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP 40 STM010</p>

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>STM10 has been added to the Local Plan, after the close of Reg 18, following an HELAA (Housing and Economic Land Availability Assessment) review. Whilst it is disappointing not to have been able to comment, I will now take the opportunity to make my views known.</p> <p>I have read the outline reasons using the various SA Objectives; however, I would beg you to consider some points in more detail.</p> <p>I am upset you do not seem to place much emphasis on the AONB boundaries. I am led to believe there are many migratory birds which pass over our cliffs – buildings and additional lights will certainly have an adverse effect on their wellbeing – I would hope you ensure proper consultation with the National Trust, Natural England, and RSPB before finalising this review.</p> <p>Regarding the location of the site. I appreciate this should have been visited by council staff as part of the HELAA review, however I believe they have not understood the full effect of this proposal on the community.</p> <p>This land is situated above the Drove way and Salisbury Road where previous applications have been rejected due to height restrictions. Surely this development would be higher than surrounding houses and be a complete contradiction to previous decisions.</p> <p>The site measures 20,358m2 (approx. per google earth). If we assume there will be 10 houses, this equates to 2035m2 per plot. (I appreciate there will be some roads and service areas included, therefore a small adjustment may be needed!)</p> <p>It is very difficult to understand why 10 bungalow style houses would be an economic development for this site. Obviously, there is no requirement to provide affordable housing however I fail to understand the need for such expensive style homes in this area. In addition Salisbury Road is a private road and there can be no access from that side. The only access is therefore via The Drove way.</p> <p>The site is situated at the end of what is a very narrow road with houses on both sides and only a small section serviced by a pavement. Most of the road has no pavements and, obviously, when cars are parked on the side, it becomes a single carriage road.</p> <p>The regular traffic is currently cars and delivery vans, often with congestion issues when passing the parked vehicles. On the occasions when heavy vehicles must use the road, they invariably mount the pavements or run up the grass verges.</p> <p>If this development were to go ahead there would be circa 2/3 years of large construction vehicles making their way to/from the site. Post construction the increase in cars /delivery vans using The Drove way and Sea Street (past the St Margarets primary school) would be unconscionable. Mothers and children and older people especially will be at risk. (I can assure you, from experience, the drivers do NOT take extra care!). There is no way of mitigating this risk.</p> <p>This is a residential road leading to a farmyard and has not had the benefit of regular maintenance. Without doubt the continual heavy traffic will cause undue wear and tear – will there be a budget set aside to restore the inevitable damage.</p> <p>Access to the Drove way is through St Margaret's village and up to Bayhill via Sea Street. This involves navigating a very narrow passage between some old cottages on one side and the entrance to the village primary school on the other side.</p> <p>I ask a proper traffic usage survey is instigated to assess the impact the increased traffic will have on The Drove way and Sea Street – especially at the start and end of the school day- before authorisation is given.</p> <p>Your review also considers the infrastructure at the location.</p> <p>Water and sewage pipes have not been upgraded or replaced in over 30 years and it is unlikely they will cope with the additional demand.</p> <p>The review also states there is an NHS surgery. This is a small building (in The Drove way – parking issues!) and has to service the whole of St Margarets. It currently is struggling to cope. By adding four additional building developments, I believe it will be overwhelmed – perhaps this should be checked before just noting a surgery within 800m. The above-mentioned school suffers from the same problems, I would recommend their capacity is checked before accepting the application.</p> <p>In respect of local transport, the latest bus timetable has been issued which identifies only 5 buses per day to Dover and Deal – the last one to St Margarets leaves Deal at 2.30.</p>

	In respect of your transport criteria, especially re climate change, I would suggest this is not a suitable timetable.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	I believe if the prpoer consultation had been invoked with regulation 18, this project would not have been allowed. It is my belief Nelson Park St Margarets is a more appropriate area which would accomodate 10 dwellings - including affordable houses. STM010 should be deleted.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP209
Rep Status	Processed
Consultee ID	1330860
Consultee Full Name	Mrs Mary Bernadette Taylor
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to?Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP40
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No

<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>No</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>Site STM010 was not included in the Regulation 18 version of the Local Plan and was therefore not available for representations to be made during the public consultation period for this version of the plan. As such, residents and other interested parties were unable to review and comment on the proposal for site STM010 to be included in the Regulation 19 version of the Local Plan. Given this, I believe that the process for public engagement for the Local Plan is not in general accordance with the Statement of Community Involvement and, in fact, contravenes it and I would, therefore, question if it is legally compliant.</p> <p>Given the total lack of public consultation and agreements with interested parties for site SMT010, I must also claim a lack of Soundness for this aspect of the plan. As such, I would also claim that this part of the plan does not demonstrate that it is Positively prepared, Justified, Effective and Consistent with National Policy and has, therefore, not followed due process.</p> <p>Based on the above, I strongly believe that the site SMT010 should be removed from the Regulation 19 version of the DDC Local Plan.</p> <p>Below are comments I would have made if the STM010 site had been included in the Regulation 18 version of the plan:</p> <p>Salisbury Road is a private road maintained by the residents of the road . The landowner of site STM010 appears to have no legal right to create an access road and/or junction with Salisbury Road.</p> <p>The impact of the proposed development and the resultant increased traffic flow has not been fully evaluated. The narrow and congested junctions between Salisbury Road and The Drove way barely cope with the current traffic flow. Pavements are narrow or non existent.</p> <p>The height of the proposed site would impact greatly the important and sensitive conservation areas that abound.</p> <p>Any housing development on site STM010 would have significant impact on this component of the Kent Downs, AONB and the Heritage Coast and would be highly detrimental to the nationally and internationally important SSSI and SAC areas that it abuts.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP40 - St Margaret's-at-Cliffe Small Housing Sites</p>
<p>Rep ID</p>	<p>SDLP237</p>

Rep Status	Processed
Consultee ID	1331301
Consultee Full Name	Mr martin slocombe
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	STM010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I am writing to give my objections on the proposal for development of site STM010 in St Margaret's at Cliffe, now submitted as part of the Regulation 19 (submission version) for the following reasons:</p> <ol style="list-style-type: none"> 1 Site STM010 was included in the Regulation 18 consultation version of the Draft Dover District Local Plan but was coloured orange i.e.: it was considered but not selected as a suitable site for development and publicly posted as refused by the LPA prior to the closure date of 17th March 2021. The day before the end of the consultation period a new proposal was submitted and site STM010 was suddenly included. The status then changed from orange to green. The Parish council and local residents had no idea of this late submission until Regulation 19 was released. Therefore it is my believe that local residents were misinformed and denied their right of expression. Also I can't see any changes to services or road layout etc... that could have made a significant justification to include site STM010 in the Regulation 19. 2 The site is in open countryside and lies within the boundaries of the Kent Downs Area of Outstanding Natural Beauty (AONB). AONBs are entitled to extra protection from inappropriate development to preserve their beauty for everyone to enjoy. The site is very close to several important habitats for wildlife with highly protected status, and borders the National Trust land at Bockell Hill. Rare birds have been sighted; including hen harrier, peregrine falcons and shrike. It is also an important buffer between these sensitive habitats and the residential areas of the Bay. A housing development would severely damage that protection. 3 The site is the highest point in the surroundings, and a housing development will have a significant negative effect on the aesthetic of the AONB. Furthermore light pollution will severely affect the visual beauty and amenity of the area and be in direct conflict with the "dark skies policy" of the local plan. Previous developments along this ridge have been height restricted; in fact the last two houses at the end of the Drove way adjoining the site have had to excavate several meters deep as the roof line could not exceed neighbouring houses. The ground level of the proposed site is at least 5 meters higher than the ground level of the surrounding properties. As such the houses would be at least 11 to 12 meters higher and severely impact on access to light as well as privacy as the new properties would have direct line of site into the opposite houses. It has public footpaths running around three of its boundaries, and these are well-used and much valued by residents and visiting walkers. The views from the site of the Dover Patrol Memorial round to the South Foreland lighthouse and over large areas of surrounding countryside and coast are unique, and should be protected from being blocked by development. 4 The traffic along the Drove way is already a huge issue, being a "cul de sac" and the only access to Bockhill farm with the associated problem of being used by large, wide farm vehicles which frequently need to mount the pavement to be able to drive through. Several

	<p>other roads along the Droveaway flow into the Droveaway with the only exit point into the village being Sea Street. Only the first part of the Droveaway benefits from pavement and as the road is already narrow in places vehicles are often parked on the pedestrian pathway. The increased traffic resulting from both the construction of the houses and their occupation will have a major adverse impact on all existing residents all the way to the village high street which is also very narrow and only suitable for one vehicle at a time. The only access to the site will be along the Droveaway, as Salisbury Road is a private road and under no circumstances will access be granted. Heavy construction traffic will be a danger to the many pedestrians and schoolchildren who use this road as some sections of Sea Street have no footpath at all.</p> <p>5 Amenities in the village are poor. There is no provision for new facilities such as a proper doctor's surgery with adequate car parking or a dental practice. Bus routes have been reduced or completely axed, which has contributed to more traffic during school peak times in the morning and afternoon. There are no parking facilities or drop of zones for parents ferrying their children to and from school, consequently Sea Street becomes completely blocked during peak times. There is no bus service to the train station and there is no bus service on a Sunday. There is one local shop which stocks bare essentials, hence a car is indispensable. Subsequently we experience already high levels of traffic and congestion in the village. The poor infrastructure has not benefitted from development in the last 100 years was never designed to accommodate the level of traffic we now experience let alone heavy construction traffic in the future.</p> <p>There might be a need for more housing in the Dover District; however there are many more suitable sites available. The biggest need is for affordable housing and this site, with a maximum of 10 executive houses proposed, is not going to make any meaningful contribution to that need or to Dover District Council's housing targets generally. Dover District Council confirmed publically at their council meeting on the 12th October 2022 that there were 17 village sites, in total, for inclusion in the Local Plan.</p> <p>The proposed plan will not bring anything to the local village community in terms of improved infrastructure, better services and or social amenities but on the contrary will be detrimental to the community and the visitors alike who are currently enjoying this popular area of outstanding natural beauty. Therefore I see no reason to support this development.</p> <p>In my view this development plan does not meet any of the criteria in the Soundness test, be it positively prepared, justified, effective and consistent with national policy. I have illustrated in the points above why I believe this plan is not deliverable and should be seriously scrutinised by the inspector.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>That the site STM010 is deleted from the local plan and reinstated to its original status</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP40 - St Margaret's-at-Cliffe Small Housing Sites</p>
<p>Rep ID</p>	<p>SDLP220</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331267</p>

Consultee Full Name	Miss Sophie Byatt
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP40, STM010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I believe SAP40 STM010 is not legally compliant as we were not given an opportunity to object at Regulation 18 stage. I also believe it is not legally compliant as the area is in the Kent Downs Area of Outstanding Natural Beauty. This area has been designated as one which should be preserved for future generations. It sits next to the Dover Patrol Memorial and is a high point so clearly visible next to the protected White Cliffs. Any building on this land would infringe the rules of the AONB and this valuable special heritage site would be compromised.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	To make it legally compliant you would need to go back to Regulation 18 stage and offer chances for comment at that point - I don't know if you are able to do this but if you cannot, then you cannot make it legally compliant.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites

Rep ID	SDLP184
Rep Status	Processed
Consultee ID	1331043
Consultee Full Name	Mrs Veronika Rudd
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP40, STM010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>1. I do not believe this proposal has been positively prepared in that it does not seek to meet Dover District 's objectively assessed needs.</p> <p>One of the assessed needs is to increase the prosperity of the District and this aspect of the plan will not achieve that. The only people who would have their prosperity increased by this proposal are the landowner and the property developers.</p> <p>2. The plan does not take into account the local infrastructure and its incapacity to satisfy any further expansion.</p> <p>The permanent increase in traffic resulting from the construction of the houses, as well as increase due to heavy construction traffic, will have significant adverse impacts on all existing residents. Because Salisbury road is private, access to the site is likely to be along The Drove way Rd ,which is narrow in places and can become extremely congested- particularly at the Sea Street end.</p> <p>Heavy construction traffic will damage the road surface and will be a danger to the many pedestrians who use this road.</p> <p>The village of ST.Margaret's is accessed by a single road, which is already congested and can be difficult to negotiate. The plan does not propose any improvements to this local infrastructure to accommodate the increased traffic that would result from adoption of this proposal.</p> <p>3. The plan does not take into account the sustainability of the local environment.</p> <p>The proposed site is in open countryside , lying within the boundaries of the Kent Downs Area of Outstanding Natural Beauty. The site is very close to several important habitats for wildlife with high protected status and is adjacent to the National Trust land at Bockell Hill. The site is an important buffer between these sensitive habitats and the existing residential areas of the Bay, and a housing development would severely damage that protection.</p> <p>The proposed site is the highest point in the area and any housing development there will severely affect beauty of the immediate and surrounding areas. The views from the proposed site extend eastward to Ramsgate and beyond to the Dover Patrol Memorial and West to The South Foreland lighthouse. There views are unique and should be protected from being blocked by development. The proposal submitted by the Lander Group offers no solution to this.</p> <p>4. Legal Compliance is uncertain.</p>

	I understand that the inclusion of this site as being suitable for immediate development was made at the latest possible stage in the previous iteration of the local plan process and I further believe that doing so DDC made procedural mistakes in that the legally required public consultation was not carried out. This is particularly unfair, given the significant impact this proposed development would have on local residents who have not therefore had the chance to make our views known until this last stage. I also question the further exploitation of this site should initial approval for its development be granted. Local residents are well aware that it has been previously, and frequently suggested that as many as 72 houses could be built on the field and, therefore, this proposal very much represents the thin end of a wedge.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Perhaps not surprisingly, the simple solution to the issues cited above is to abandon this proposal of development of the land between The Droeway and Salisbury Road and, indeed, any further development of the village of ST.Margaret's .
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Given the importance of my objections to the proposed development, I do not consider it sufficient to leave this representation to those who do not live in the village nor who would be directly impacted by it. It there must be direct and personal representation of the villagers at the proceedings.
Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP189
Rep Status	Processed
Consultee ID	1331104
Consultee Full Name	Jane Pire
Consultee Company / Organisation	
Agent Full Name	Jane Pire
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	4.253 Policy Number SAP STM010 at St Margaret's-at-Cliffe
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified

4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>1. Site STM010 is in an Area of Outstanding Natural Beauty (AONB) giving onto the Heritage Coast. The proposed development would be an undesirable intrusion into the open countryside in this exposed location. The proposal would have an adverse effect on the natural beauty and landscape character of the area. It would also adversely affect the scenic beauty of the area. The White Cliffs are renowned worldwide and attract many overseas visitors, housing nearby would be a blot on the landscape and a huge shame.</p> <p>2. This field acts as a buffer between housing on the Drove way and Salisbury Road and the National Trust's White Cliffs countryside property Bockell Hill. The adjoining meadow, with its chalk downland wild flowers, is an amazing habitat, beneficial to many species of insects.</p> <p>3. There are footpaths on 3 sides of this field, which are used daily by both locals and visitors: Public Footpath number ER26 on 2 sides of the field and the Frontline Britain Trail on the third. We learned the value (to our physical as well as mental health) of walking in the countryside during the COVID pandemic and do not want housing to spoil this site.</p> <p>4. The ground is much higher in this field (probable ancient burial ground) than the surrounding land so housing on the mound would be extremely prominent and would destroy the quality of the open countryside here with its views out towards the Dover Patrol Monument and the sea. It would also be a source of light pollution.</p> <p>5. Road traffic/safety: On-road parking, by residents, patients attending the doctor's surgery and clients of the bar/café in the first 100 meters of the Drove way between Sea Street and the junction to Salisbury Road, means one relies on the courtesy of other drivers to slalom along it. As the road is not wide, one has to mount the pavement when there is a heavy/wide vehicle.</p> <p>6. In 2005 outline application DOV/05/1146 for a dwelling on the paddock STM011 (next to STM010) was refused and went unsuccessfully to Appeal in 2006. This was a smaller field and now in 2022 DDC should be even more aware of our environmental and ecological concerns. Therefore I feel that STM010 should be withdrawn from the Local Plan as totally unsuitable.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	AONBs should not have housing developments built on them. There is no justification for it.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP317
Rep Status	Processed

Consultee ID	1331403
Consultee Full Name	Jill Jordan
Consultee Company / Organisation	
Agent Full Name	Jill Jordan
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	STM010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>It looks as though due process has not been followed and that there have been procedural and legal flaws with regard to STM010 that would indicate the plan should be withdrawn.</p> <p>1. The inclusion of STM010 doesn't meet the soundness tests in the NPPF as set out in the submission.</p> <p>1. Breach of ECHR Article 10. A submission was made by the Landowner at the very last minute. Others e.g St. Margaret's at Cliffe Parish Council were unaware of this submission due to the last minute approach taken, local communities subsequently bypassed.</p> <p>2 Breach of ECHR Article 1 Protocol 1. The right to own property at St. Margaret's at Cliffe a quiet area of AONB is known for it's well-being, and tranquillity. That is why there are very few houses there - it is being protected for the nation. It is not something to be sold and developed speculatively.</p> <p>3. Non-compliance with duty to co-operate as indicated above.</p> <p>1. Not in compliance with present local development scheme and DDC's planning decisions in Council that have arisen in the last 10 years. Therefore there is a disconnect.</p> <p>1. Sustainability irregularities. Caveats were established some time ago to recognise barriers to development by the LPA. There is no suitable access by road to the site on either road.</p> <p>1. Unsafe for residents. The village of St. Margaret's at Cliffe is already a bottleneck, it is dangerous, and narrow road passing a school and a home for protected folk as well as local residents. Additional traffic in the village is not sensible. It is also unsafe in The Droveaway, as the Doctor's surgery is busy and parking along the road is difficult now. Additionally the junction of The Droveaway and Salisbury Road is not easy to negotiate now, let alone with additional traffic.</p> <p>The planned 10 houses within the AONB are a major development and would be detrimental to the AONB. The land is also adjacent to the National Trust and the Dover Patrol Monument - which should be respected and visible.</p> <p>The ground level of the proposed site is more than 5 metres higher than the level of the properties opposite the site on Salisbury Road. Subsequently those houses would lose privacy and light. Also the Landscape Sensitivity Assessment of the proposed developments sites FINAL REPORT J21 page 139 states that any development should also be one storey to minimise visual impact. This is significant.</p> <p>DDC will be aware of the number of Saxon Burial sites previously identified on the Droveaway and Salisbury Road. As the chosen site is at the highest point it is likely there will be a concentration of the Saxon sites which will be of great archaeological value and significance.</p>

	Lastly The White Cliffs area including this location is know for protecting the English coast from marauders. By inviting additional properties to be built in this particular location we may be undermining our security.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Remove STM010 from the Local Plan.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP240
Rep Status	Processed
Consultee ID	1330934
Consultee Full Name	Mrs Orla Checksfield
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	STM010 in Policy SAP40 of the draft local plan
2 - Do you consider this part of the Plan sound?	No

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I believe the inclusion of this site in the plan to be unjustified and inappropriate for a number of reasons which I will set out below.</p> <p>The site was not included in the original regulation 18 document which would have allowed for appropriate consultation instead it was, I understand, submitted on the last day of the regulation 18 document and so regulation 19 is the first time I, as a member of the public, have had an opportunity to comment. I also understand no local resident nor the Parish Council were aware of the site's inclusion until the regulation 19 document was published.</p> <p>The HELAA suitability assessment for STM010 clearly stated it could only be taken forward if STM011 was also included. The latter is not available as the owners have always stated and I am aware they are also confirming this in their submission.</p> <p>I also consider the site unsuitable as it does not "focus new development at accessible and sustainable locations which can utilise existing infrastructure, facilities and services nor does it "ensure a range of housing tenures, types and sizes ...to meet the needs of the local community". The site is located on a mostly single lane road which already struggles to accommodate the traffic for the existing housing and working farm located at the end. The houses are likely to be substantial in size and cost given the premium location (which I will also discuss further down) with panoramic views out to sea. A quick check with local agents will tell you we have a large number of substantial houses available for purchase in the area, however, what is needed is 2-3 bedroom family homes with good access to primary NHS services (doctors/dentists) and education. Considering the local doctors practice is no longer taking on patients, there isn't a local NHS dentist that I have managed to find. The bus services from the Village to attend Goodwin Academy in Deal have been withdrawn and the services to the schools in Dover are incredibly unreliable, let alone the lack of services for non school traffic to Deal / Dover for residents wishing to work in the local towns. One village resident is having to resign from her job in Deal as the last bus leaves the town returning to St Margarets at 1400. I don't consider the location sustainable at all.</p> <p>In terms of the national planning policy framework I would also challenge the inclusion of this site. Firstly let me just note the location of the site which is within, and not adjacent as the Regulation 19 Draft plan states, the AONB and Heritage Coast. Secondly the topography of this site means it is much higher than surrounding land and any properties built on it would therefore be significantly higher than the existing housing which would not only impact the privacy of surrounding houses but also impact the views of and from the AONB and the Heritage Coast. Any so called screening which would inevitably be suggested to lessen the impact of these properties would have a two fold impact, I suspect one would be of significant interest to the developers, and that is it would block the views from the Dover Patrol to the South Foreland Lighthouse from these homes which would likely significantly reduce and planned market price, but also obstruct the views from locals and tourists who regularly come to the area to admire our amazing coastline and walk the fields with its rare vegetation. I understand other sites where development was considered to have an unacceptable impact on the AONB due to the prominence of the site in the landscape were rejected and believe this should also be the case here if a member of DDC was to visit the site to understand the statements made above. This would then reflect the 'careful stewardship of [the areas] world class landscapes, thriving natural environments and wealth of historic sites' which the council prides itself on. Nothing about any potential development on this site would contribute positively to the existing character of the area. Remember this section of the cliff is also part of the international sites noted in the council's own plan.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	As the inclusion of STM010 does not comply in the first instance with the primary requirement of conserving and enhancing landscape and scenic beauty I would like this site removed from the plan.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP191
Rep Status	Processed
Consultee ID	1331108
Consultee Full Name	Mr Jean-Francois Pire
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy Number SAP regarding STM010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Houses would be unacceptable and out of character in such a beautiful spot. This is an Area of Outstanding Natural Beauty (AONB) and should remain so. This development proposal does not enhance the natural beauty of the AONB so should not be permitted. This Kent Downs AONB is of national importance and its character and qualities should be protected for everyone to enjoy. Previous Planning Decisions: One dwelling was refused in 2005 (Appication DOV/05/1146) on the paddock (STM011) next to this field (STM010).
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	Contrary to Policy CO2 AONB

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP315
Rep Status	Processed
Consultee ID	1331383
Consultee Full Name	Mrs Katie Miller
Consultee Company / Organisation	Kent Downs AONB Unit
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 40 STM 006 AND STM 010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>SAP 40 St Margarets STM 010 Salisbury Rd/The Droveaway:</p> <p>The site lies wholly with the AONB boundary and Heritage Coast designation. It is therefore imperative that if development of the site takes place, it would meet the purpose of AONB designation, i.e. the conservation and enhancement of natural beauty.</p> <p>In respect of landscape character, the land comprises an arable field with a small, wooded copse in its south-eastern corner and has vegetative enclosure along its boundaries with Salisbury Road and The Droveaway. While not containing any particularly notable landscape features, the site is rural in character and associates more closely with its surrounding rural environs than the housing associated with St Margarets to the south. Its rural character provides a green 'finger' into the settlement, softening the village's built up edge and the sense of transition between the village and the undeveloped countryside beyond.</p> <p>Notwithstanding these characteristics, the site is surrounded on three sides by existing built form, with a further dwelling also sited against the fourth boundary, although the majority of this northern boundary adjoins rural Open Access land. As stated above, it also has a relatively strong</p>

enclosure in landscape terms as a result of vegetation along much of its boundaries with residential development beyond. In these respects, the site could be regarded as being an appropriate and logical extension to the village and acceptable in landscape terms.

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

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

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

The potential impacts on the AONB landscape are acknowledged in the evidence base for the Local Plan with the Sustainability Appraisal acknowledging that '*The site has been judged by Council officers to have the potential to moderately affect the District's landscapes, townscapes or seascape.*' Further detail is provided in the HLAA Landscape Assessment DDC Landscape Assessment where it is stated '*The site lies within the AONB and close to the Heritage Coast. It abuts National Trust land to the NE. The site is on a crest of a hill and despite the screening, would be visible from a long distance. The site is bounded by footpath ER26 along the SW, the vehicular cul-de-sacs of The Drove way to the NW, Salisbury Road to the SE and by National Trust land to the NE, providing a wide range of recreational walking opportunities. The site is within the 'restore and conserve' area of the Green Infrastructure network, reflecting the real opportunities for Green Infrastructure. Any development on the site would need to be low density and to conform with surrounding street pattern, with generous landscaping required to mitigate the impact on the wider landscape.*' The site is given a yellow Rag Rating and the commentary advises '*The development of this site would have an impact on the landscape and further assessment is required to demonstrate whether this can be mitigated.*'

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

SAP 40 St Margarets STM 006 Land at New Townsend Farm:

As recognised in the policy, the site lies within the Kent Downs AONB. The site is relatively well contained within the wider landscape and relates well to the existing settlement, where the settlement pattern includes linear development extending eastwards from Station Road and the High Street. The proposed requirements included in site specific requirements to help manage impacts on the AONB are supported.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant

and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	To ensure the potential impacts of STM010 on the Kent Downs AONB are appropriately considered.
Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP453
Rep Status	Processed
Consultee ID	1331534
Consultee Full Name	Mr David King
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP40 - STM010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SAP40 STM010 This site is designated AONB and in an elevated position, the highest point in the locale. It is in fact it is between 4 and 7 metres higher over its area than the ground the Dover Patrol Monument 180 metres away stands on, a noted landmark sited to be seen from miles around. Housing here of even average height will be visibly dominant from much of the surrounding area.

	<p>It is also directly adjacent to National Trust's Bockell Hill, and development will totally change the natural feel and character of this tranquil place, much enjoyed by both visitors and locals, with views of housing replacing the current farmland vistas from every main path through it from the Monument. The habitat it provides for wildlife is very likely to be negatively affected by accompanying noise and particularly light pollution.</p> <p>The current proposal for 10 houses, presumably therefore large executive style properties, will make little contribution to Dover District's overall housing requirement, none at all where the greatest housing needs for lie, and seems very inadequate justification for developing AONB land at one of the highest points and most visited areas in the locale.</p> <p>Notes accompanying the proposed development acknowledge the importance of providing "a landscape buffer" to protect the surrounding landscape. This is the very role the undeveloped farmland-field site currently fulfills, and on enough scale to make it properly effective in providing a suitably gentle transition between existing village housing and landscape beyond, preserving open views across it in the process. Once built on, the idea that space will remain for a protective landscape buffer to be reinstated on any meaningful scale is entirely unconvincing.</p> <p>For these reasons I believe development here is unjustified, and that this site should be removed from the allocations list.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP376
Rep Status	Processed
Consultee ID	1331538
Consultee Full Name	Mr toby caufield
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	STM010

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The NPPF sets out in Government's planning policies retaining a presumption in favour of sustainable development in accordance with the development plan, unless material considerations indicate otherwise. On a number of counts I consider the proposal for 10 houses along The Droveaway inappropriate which i advise as follows.</p> <p>Due to the significant increase in size, scale and mass these houses would have an overbearing structure to the surrounding area. Previous planning for "Franconia" now 78 and 80 required a height line no higher and in alignment to its neighbours. For this field to be similar would require excavation of at least four meters before the laying of foundations, otherwise their sheer size and volume would overlook all surrounding properties in any compass direction.</p> <p>Properties already built in The Droveaway in the last three years include three 2/3 terrace houses and a pair of 3/4 bedroom houses (now all rented). Two newly built 5 bedroom executive homes are presently on the market. All these properties have failed to sell in the last 8 months (in outstandingly good market conditions) suggesting demand for such houses is not high and a further development would be inappropriate within this residential area.</p> <p>The prposal fails to protect or enhance the character and appearance of the area, which is contrary to local and national planning policy.</p> <p>Finally, whilst highways may have the last say with regard to traffic congestion, The Droveaway is a no through road providing access to the local farm. The road where planning is proposed narrows and already struggles with any parked cars on the road. This will become significantly worse where households of 2/3 cars will increase congestion and block access for large farm vehicles.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP323

Rep Status	Processed
Consultee ID	1331425
Consultee Full Name	Mrs Helen and Paul Thornton
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP40, STM010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We wish to object to the proposed development of STM010, the field at the end of The Drove way, and we feel that its inclusion in the Local Plan is unsound as there has been insufficient thought and consideration applied to it.</p> <p>We have lived here for 16 years, and although the village is far busier now than it was 16 years ago its infrastructure has not at all kept pace with that expansion.</p> <ul style="list-style-type: none"> • The doctor's surgery is already at capacity and could not cope with the inclusion of further patients from all the new housing proposed in the village • The school in the village is already full and cannot take any further pupils. • Traffic along The Drove way is already very heavy and simply passing along the road requires "negotiation" with oncoming traffic, frequently involving reversing along what is essentially a single track road. • In addition to passenger traffic, The Drove way is the only route available to the farm traffic - not only the frequent tractor movements, but also far larger items of equipment which have to drive along the pavements to get through. This is a risk to pedestrians as well as causing damage to the road/pavement structure. Any increase in passenger traffic (such as would be caused by increased housing) would only make this issue worse. • As it is, The Drove way is plagued by potholes and an uneven road surface caused by multiple "patchwork" repairs by local service providers (BT, electricity, gas, water) and the local authority has done nothing to rectify this. • Salisbury Road is a private road and will not grant access to any future construction traffic needed for site STM010. The only route for all the construction traffic therefore would be along The Drove way, increasing the risks to vehicular and pedestrian traffic and further damaging the roadway and pavements. • The site is within the Area of Outstanding Natural Beauty. AONBs are meant to be entitled to extra protection from inappropriate development so as to preserve their beauty for all. The site is also adjacent to the National Trust land at Bockell Hill, placing this natural wildlife habitat at increased risk.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant	None. The only way in which this proposal could become sound would be to remove it from consideration entirely.

and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP355
Rep Status	Processed
Consultee ID	1331484
Consultee Full Name	Mr. Geoffrey Quiddington
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 40 .STM010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible.	I answered "No" to section 2 and 5 and ticked all the boxes in section 3 without fully understanding the the questions but felt "No" was a more fitting answer than "Yes" (Section 3 . I Believe the plan is: Not positively prepared. Not Justified. Not Effective. Not consistent with National Policy.) Section 4 has been answered as "Not Applicable" as again I do not fully understand the jargon and full definition .I am obviously not a solicitor. (Poor start)

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

Please read on to hear my justification for my answers.

I wish to strongly object to the Planning Application to build 10 properties on STM010. and wish the site to be removed from the Local Plan.

1. My understanding is that the Application was submitted on the last day of the previous stage of submissions (Regulation 18) This did not allow for any consultation for local residents nor the St. Margaret's Parish Council , Natural England , The National Trust and Kent Downs AONB.

(Legal Compliance) "This includes public participation in the Local Plan "

The Application has been processed and moved to the next stage. Regulation 19. Is this application legally compliant? The above ; I feel undermines the Plans Soundness.

2. The site is within the boundaries of the Kent Downs Area of Outstanding Beauty and borders National Trust land. Currently the agricultural field acts as a buffer zone to this highly sensitive and precious Chalk Downs with its unique flora and fauna. These surrounding areas make St Margaret's a very special place for its residents and for the many visitors who walk in these areas to experience its stunning beauty. Development of STM010 would have a greatly detrimental effect to these highly sensitive areas.

3. The site is the highest point in the area. Any buildings would have a massive visual effect on the horizon and the surrounding area however much screening was put in place to try to mask it. Buildings and screening would take away sunlight and cast a huge shadow over the existing adjacent properties in The Droveaway. Even single storey properties would have a similar effect due to being greatly elevated on the raised ground. With the additional height the new properties will cause 'overlooking' and privacy problems, looking directly into existing Droveaway properties, bedrooms, living rooms etc.

4. While talking of high ground. St. Margaret.s has much evidence of Saxon past life and death. Many graves and sacred burial sites have been found in the area ,(The Droveaway and Salisbury Road) and consensus is the highest ground,(STM010) would have the highest concentration such burial sites

5. On looking at the Title Deeds of the site (STM010) it shows that the area is " land locked " on three sides. Both The Droveaway and Salisbury Road have a boundary verge/bank of grass/scrub/trees and a public footpath defining the westerly boundary. If access at all could be obtained it would likely be on The Droveaway. This road, like Salisbury Road is narrow in many places with many parked cars reducing the width to a single track in many places. Heavy construction vehicles and delivery lorries would cause damage and havoc to the roads resident users during a lengthy construction period. Not to mention vital access to emergency services. Any junction point from area STM010 to The Droveaway could be very problematic as it is potentially entering a single lane road. With the new extra traffic the situation becomes worse at the Sea Street junction. I have spent countless times waiting to pass parked school vehicles only to wait for jammed lorries and buses on the village roads. Additional traffic flow to and from STM010 will only exacerbate the situation.

6. I have been extremely fortunate to live in this wonderful and unique village for 50 years. I have seen many developments of individual houses -large gardens divided up and sometimes an extra property squeezed in. Not drastic changes. This development of 10 properties is a comparatively huge change to St. Margaret's Bay, particularly in such a sensitive area. Surely if this development is allowed , other applications will follow. The proverbial thin end of the wedge .

. 7. I believe the Dover District Council denied an application in 2015, then referred to as SAD28 for the same site. Circumstances are exactly the same now as then.....Nothing has changed . Please take site STM010 off the list of potential building sites. The Government want " affordable " housing. These 10 properties will not be "affordable."

8. As a resident of Salisbury Road I am a member of Salisbury Road Association, St Margarets Bay. A response to the Regulation 19 Plan has been submitted on behalf of the residence. This is a precise and detailed reply and I and Mrs. Peta Quiddington (My wife) concur with it.

Thank you for reading through my objection and hope you agree to delete STM010

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I answered "No" in section 8 not because I feel it is not important. Im passionate about stopping this plan,but anticipate the numbers allowed to attend will be limited and going will be taking the place of someone who is more articulate,effective and knowledgeable.
Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP475
Rep Status	Processed
Consultee ID	1331683
Consultee Full Name	Mrs. Lynda Keohane
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to?Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Page 188 SAP40 St Margarets-at-Cliffe Small Housing Sites STM101 (formerly SAD 28)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	1. STM010 (the "Site") was refused for inclusion in the 2012 Local Plan in 2012 following a qualitative assessment taking account of relevant Community Involvement. That assessment (copy attached) records the reasons why the Site should not be developed. As DDC records in its letter of December 1 2022 under cover of which it provided the 2012 assessment in response to a FOI Request, it has no further substantive documents in respect of the Site; i.e., it has no objective independent evidence to contradict the ongoing validity of the assessment made in 2012. Between 2012 and 2022 there has been no change in any of the factors which led to the assessment or in any other relevant circumstance. The only new influence has been the representation (the "Submission") on behalf of the owner of the Site, submitted to DDC on 16 March 2021, the day before consultation on Regulation 18 closed. This Submission was submitted by email and I suggest it is relevant to consider the timing of the email. It might be concluded that the professionally advised and supported Submission was deliberately timed to preclude consultation and Community Involvement and to achieve the result of having the Site included as suitable for development at Regulation 18 stage for housing without proper legal compliance by DDC. If the Submission had been provided to DDC in a timely fashion many of the issues in respect of consultation and challenge would have been dealt with at the time of Regulation 18 consultation, and the obligations of DDC could have been observed by the Council. "Sneaking" the application in, knowing of the 2012 objections and the very qualified and negative content of the 2015

HELAA in respect of the Site, might be seen as a tactic to preclude consultation and to achieve the illusion that the inclusion of the land as suitable for housing development was not opposed (as it undoubtedly is) by the various bodies representing Community Interests.

2. As the 16 March Submission would seem to be the only input to explain the reversal of policy in respect of inclusion of the Site as suitable for housing development between 2012 and 2022, it is appropriate to examine the accuracy of the contentions in the Submission and also the omissions of relevant facts from the Submission. Had consultation been possible at Regulation 18 stage the assumptions and assertions of the Submission masquerading as fact would have been challenged at that time rather than now being raised as a complaint that DDC has not complied with its statutory obligations in respect of legal compliance, and soundness of the plan.

(i) It is by no means certain that the Site falls within windfall development as the Submission seeks to imply; to regard it as falling within windfall development runs counter to the conclusions of the 2012 assessment. It is not supported by the 2015 HELAA.

(ii) The Site is not, as asserted, "available and deliverable", as contended in the Submission; The owner may wish it to be so but it does not in fact have access from either The Droveaway or Salisbury Road. Careful inspection of Ordinance Survey maps and the property deeds will confirm this. This fundamental failure is not remedied if STM011 is included as that plot (the owners of which have in any case stated that they have no intention of having the paddock site developed) does not include actual frontage to Salisbury Road.

(iii) The Site is not sustainably located, as the Submission contends; even if it had access to either The Droveaway or Salisbury Road, neither The Droveaway nor Salisbury Road can safely support any increase in vehicular or pedestrian traffic; the village facilities are a fifteen minute walk away, much of it on roads with no lighting or footpath. The Submission is not supported by any input from the utilities but local experience is that the gas infrastructure is at its limit. There is no evidence for the statement "Infrastructure can easily be connected to the site".

(iv) To suggest that housing on the Site would not harm the amenities of the countryside is totally at odds with the 2012 assessment and with the bulk of the comment in the 2015 HELAA and flies in the face of the facts. The 2012 assessment very specifically documents this "Any development on the land would, therefore, have a highly detrimental impact on the designated landscape."

(v) The Submission acknowledges but seeks to treat *de minimis* that the Site is immediately adjacent to an Area of Outstanding Natural Beauty and the Heritage Coast (the Submission states that it is in fact within the East Kent Area of Outstanding Natural Beauty, but seeks to reduce the impact of this by suggesting its importance is undermined by bordering ribbons of housing development - ignoring the levels of these in relation to the Site); it ignores that the Site is in an elevated position generally and in particular in relation to the "neighbouring developments", which follow the lay of the land so as not to intrude in the landscape as recorded in the Landscape Impact in the 2012 assessment. That assessment gives the lie to the totally inaccurate and unsupported assertion in the Submission that "There are no identified, insurmountable site constraints that would hinder the site coming forward for housing." The subsequent arguments in the Submission in respect of the impact of the proposed development, however 'sensitive' and low density, are fallacious, having ignored the central fact that the Site is an elevated area varying between 5 metres and 12 metres above adjacent land and any development, even single story, will not only adversely affect existing properties but will impact on the overall landscape viewed from the AONB and the Heritage Coast and in particular the Dover Patrol monument.

(vi) The Submission contains an assertion that the Site has access from The Droveaway. In fact the deeds for the Site show that not to be the case. The tenant farmer takes a tractor onto the Site using essentially a footpath as access. The Site has no access to Salisbury Road. The Submission misleadingly appends a drawing of an access road on to Salisbury Road. That drawing ignores that to achieve any access the owners of Salisbury Road would need to transfer ownership of land between the tarmac area and the edge of the Site to the developer; as the owners of the road have made clear they would not be willing to do this. Over the years since he inherited the Site the owner of the Site has by his conduct made it clear that he does not purport to be an owner of Salisbury Road. In reality the Site is not therefore "available and deliverable" as the Submission contends.

(vii) The assertion about the visibility at the junction of Salisbury Road and The Droveaway is neatly fudged in the Submission and to the extent that any actual range of visibility is offered it is not accurate. The Submission does concede that the visibility it claims "could be achieved" not that there is actually that visibility. At the point of the junction of Salisbury Road into The Droveaway The Droveaway is always a single width roadway as a result of the parking position on the north side of the road. Any vehicle travelling from Sea Road along The Droveaway is required to use the right-hand-side of the road, often from the First Light Cafe and always from Downside to the far side of the Salisbury Road junction. So to turn left out of Salisbury Road safely a driver needs visibility to the right and to the left. The realistic position given the proximity of the corner properties to the roadway is that this can only be achieved by advancing into the path of any vehicle coming from the left or the right. Regular users of the junction know not to stop close behind a vehicle attempting to turn out of Salisbury Road as often it will need to reverse swiftly to avoid a collision from approaching vehicles from the left or the right on The Droveaway, vehicles which were not visible until the car turning from Salisbury Road has advanced into the right-hand lane of The Droveaway. Vehicles supplying construction materials can only negotiate The Droveaway by mounting the pavement on the south side of The Droveaway. Smaller delivery vehicles, the drivers of which are not familiar with the issues and the local etiquette to handle the problems of access, often have to reverse considerable distances, or cause other

vehicles to have to reverse. The Submission refers to DDC HELAA as supportive of the Submission. In fact the reverse is the case. In respect of the Salisbury Road/The Drove junction HELAA says "Junction of Salisbury Road/The Drove is poor with insufficient sightlines with very limited scope for improvement. The Drove is geometrically constrained and is subject to a large amount of on street parking which reduces effective width, whilst in theory waiting restrictions could be imposed, this would have a significant impact on local parking amenity." The Submission and its Transport Dynamics appendage seeks to minimise traffic volumes and issues. Assuming any development is as the Submission indicates to be family houses the use of private cars will greatly exceed the volume predicted in the Submission, each child will need a lift to and from school or to the school bus stop, twice a day, all access to the world outside of the village involves passing the school, with the real parking issues this makes on Sea Road, and in reality through the village with its series of one-way stretches.

(viii) The Submission seeks to give credence to its reasonableness by suggesting both alternative proposals are low density. With the greatest of respect to the professional author of the Submission, that is no more than a device to get the Site into development status. Once the Site is included for development there is no guarantee to any Community Interest that the present or a subsequent owner of the Site would not make an actual application for much denser development, and DDC would be faced with a dilemma in respect of such an application particularly in respect of low cost housing. This would exacerbate the problems associated with any development of the Site, on Green Infrastructure, Landscape, etc., fully documented in the 2012 assessment and in HELAA. The issues with volume of traffic, the danger of The Drove/Sea Road junction and the congestion in the village are well recorded in both the 2012 assessment and the HELAA. They have been well illustrated in other comments which have been submitted in respect of the inclusion of this Site in Regulation 19; the issues which were seen as relevant in the past to the decision not to include the Site as suitable for development are still relevant.

(ix) Much is made in the Submission about the intention to retain the existing trees screening the Site, a statement of intention that is not borne out as being reliable by conduct to date. The wooded area to the south east of the Site has been neglected for many years and poses a hazard to the users of the public footpath. Efforts to interest the owner of the Site in giving some care to the trees and their under growth have been met with a negative response.

3. In conclusion as no representations at the Regulation 18 stage could be received and considered from the residents directly affected by the inclusion of the Site as being suitable for development, nor from the Parish Council, Natural England, the National Trust, Kent Downs AONB and other Community Interests, the inclusion of the site in the Regulation 19 version of the Dover Local Plan is not in accordance with the Statement of Community Involvement, in fact contravenes it, and is therefore not Legally Compliant. Further given the 2012 assessment and the exclusion from representation of all affected interests in the process of the inclusion of the Site as suitable for development, the Plan in respect of SMT010 is not Sound; the previous position of DDC and the known interests of Community Interests demonstrates that the Plan was not Positively Prepared, Justified, Effective or Consistent with National Policy. In short due process was not followed.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I suggest that to make the Dover Local Plan in respect of STM010 legally compliant and sound it is necessary for the steps which should have been taken at Regulation 18 stage to be conducted by DDC and that in the meantime the position in respect of the Site should revert to that determined in the 2012 assessment, which was properly conducted with due regard to the legal process in respect of consultation and objective assessment. I suggest the modification required is "In respect of STM010, previously designated SAD28, the site is not included in Local Plan as land designated for housing for the reasons specified in the assessment of the site in the 2012 assessment excluding the site from being designated for development."

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

I predict that the owner of the land will instruct his professional advisors to attend; the inspector deserves to have access to factual information with which he can assess the oral arguments advanced by those professional advisors, and although it is possible to predict some of what they may say, it is not possible to predict in total the information and argument they may seek to advance and to provide any appropriate rebuttal unless those of us with concerns about the accuracy of such arguments (as evidenced by the Regulation 18 submission) are present.

Include files	SAD28 SHLAA assessment.pdf (4)
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP389
Rep Status	Processed
Consultee ID	1331549
Consultee Full Name	Mr Guy Morgan
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Site STM010 Policy SAP40
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Site STM010 Policy SAP40 Reg 19 Local Plan (2022)</p> <p>This is additional to the group submission made by residents in The Droveway, St Margaret's Bay to which I am a signatory.</p> <p>This is the first practical opportunity for me to comment on the draft local plan for this site due to STM010 being removed from allocation in SAP40 Reg 18 by Dover DC before being re-allocated in Reg 19. I live within 30 meters of the site.</p> <p>The site STM010 in its present form has high natural beauty and recreational value and is worthy of its designation within the AONB. I frequently use and highly value the three footpaths that border the site and I very much appreciate and enjoy the beauty and openness of the field, for example as it gently rises from the north east corner or the view from footpath ER26 which looks across this undeveloped field to Bockell Hill and the Dover Patrol Memorial. The site is at a local high point, prominent and allowing many views which would be lost by building development. The adjoining houses in The Droveway and Salisbury Road are mostly at a lower level and screened by trees. The adjoining redevelopment at 78 and 80 The Droveway was required, for good reason, to dig into the chalk to lower the houses so that the roofline does not adversely impact STM010. This is not some forgotten corner of the AONB but widely used and appreciated by locals and visitors as the well trodden footpaths indicate. The inclusion of site STM010 for allocation as housing in SAP40 is therefore not justified due the significant loss of landscape and recreational value as described above, and particularly when compared with other housing sites outside the AONB.</p>

	<p>My experience of site StM010 is that it does feel part of the Heritage Coast within which it is included and is also distinct from the residential areas which it adjoins. It also borders and is environmentally linked to Bockell Hill where the National Trust has now advanced the management to a high level in the last few years as chalk grassland and scrub, greatly improving the flora and wildlife. This makes the maintaining of site STM010 as undeveloped land even more important and justified in land use policy for environmental sustainability. The future direction for site STM010 should be to enhance its wildlife habitat and not to compromise it with built development which would adversely impact Bockell Hill and the nearby SAC. The UK Government's stated aim is to target 30% of land for wilding/carbon capture. The inclusion of site STM010 for allocation as housing in SAP40 is therefore not justified or consistent with National Policy due to the damage and loss to the qualities which the AONB and Heritage Coast status are meant to protect, and for a site of this prominence and proximity to Bockell Hill and the SAC. In this respect it does not appear to be legally compliant.</p> <p>To quote from the assessment of the site by Dover DC in 2012 (obtained by FOI Request, the site then known as SAD28):- "Any development on the site would, therefore, have a highly detrimental impact on the designated landscape."</p> <p>The current description of the site by Dover DC in SAP40 (Reg 19, 2022) as medium to low sensitivity can only be seen as an error, along side the omission of AONB status when they first included it in SAP40 in the early stages of the current draft plan. The apparent major change of approach by Dover DC to this site within the draft plan compared to all previous approach by Dover DC has not been explained or justified and suggests lack of consistency and possible error.</p> <p>Finally, problems with road access to site STM010 are well covered in the group submission mentioned above. I wish to add that current problems with access (driving and walking) are very real for me and experienced daily, especially in the working week and school terms. To drive through the village centre and along the Drove way always involves stopping, pulling over, sometimes reversing and often waiting for blockages to resolve. It is my experience that this is getting worse. Also, to walk on long stretches of the Drove way or in the village centre where there are no pavements when cars are passing is not relaxing. To develop more housing and more car usage on this site at the end of the Drove way will add to all these traffic issues and is not sustainable, safe or compatible with sound Highways Policy. The focus for new housing should be on sites where good infrastructure is possible and not in villages with restricted historic access.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Site STM010 should be removed from the allocation as suitable for housing development in SAP40. This will then correct the mis-allocation of a site for the reasons given in 6 above.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP40 - St Margaret's-at-Cliffe Small Housing Sites</p>
<p>Rep ID</p>	<p>SDLP481</p>

Rep Status	Processed
Consultee ID	1331564
Consultee Full Name	Mrs Linda Carter
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP40 STM010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The Plan is Unsound</p> <p>The proposed development of the land between The Droveaway and Salisbury Rod for the building of "executive" homes is unsound for multiple reasons and should be deleted from the overall plan.</p> <ol style="list-style-type: none"> 1. We do not believe that this proposal has been positively prepared in that it does not seek to meet the Dover Districts objectively assessed needs. There is clearly a need for more housing in the District but there are many more suitable sites available.. The biggest need is for affordable housing and this site with its proposed maximum of ten executive houses will not make any contribution to that need. One of the assessed needs is to increase the prosperity of the District and this aspect of the plan will not achieve that. The only people who will have an increase in prosperity are the current landowner (who does not live in the District, and the property developers. 2. The plan does not take into account the local infrastructure and its capacity to satisfy any further expansion. <p>The permanent increase in traffic resulting from the construction of these houses as well as the temporary (but long term) increase due to heavy traffic will have significant adverse impacts on all existing residents. Since Salisbury Road is private access to the site is likely to be only along The Droveaway. The Droveaway is a long and narrow road which only has a limited section of paving at the Sea Street end. The road is always very congested, especially at the Sea Street end, and so narrow that large vehicles always drive on the pavement to get through. There is a constant stream of people walking in this beautiful area, but I have observed that when cars come through they often have to step into driveways in order to feel safe. The increase in traffic in this lane is potentially very dangerous. Heavy construction traffic will damage the road surface (and such pavements as there are) and will be an additional danger to the many pedestrians (not just local residents) who use this road.</p> <p>The village of St. Margarets is accessed by a single road, which is already congested and can be difficult to negotiate. The same argument applies to the 40 Houses along Reach Road (SAP38, STM003), 10 houses to the West of Townsend Farm Road (SAP39, STM007) and STM008) which will exacerbate the problem further. However, the development on the Droveaway is by far the worst issue because there is no other access road to the bay area, and all additional traffic for the bay has to go via Sea Street past the Primary School, where frequent traffic issues occur and will cause additional risk for the children. Even if the Doctors surgery could accommodate additional patients there is no parking facility in the bay to deal with this.</p>

	3. The plan does not take into account the Sustainability of the local environment. The proposed site is in open countryside, lying within the boundaries of the Kent Downs Area of Outstanding Natural Beauty. AONBs are entitled to extra protection from inappropriate development so as to protect their beauty for all to enjoy. The site is close to several very important habitats for wildlife with highly protected status and is adjacent to the National Trust Land at Bockhill. The site is an important buffer between these sensitive habitats and the existing residential areas of the Bay and a housing development would seriously damage the protection.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The simple solution to the issues cited above is to abandon this proposal of development of the land between The Drove way and Salisbury Road and, indeed, any further development of the village of St. Margarets.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	There must be direct and personal representation of villagers, and especially those living in roads concerned, at the oral proceedings.
Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP404
Rep Status	Processed
Consultee ID	1331601
Consultee Full Name	Mr Jonathan Olson-Welsh
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	STM010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy

4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I understand that Site STM010 was not included in the Regulation 18 version of the Local Plan and was therefore not available for representation to be made during the public consultation period for this version of the plan.</p> <p>I therefore consider that STM010 should be removed from the Regulation 19 version of the Local Plan.</p> <p>On the basis I understand that we did not have the opportunity to make representations on the Regulation 18 Local Plan, I would make the following points:</p> <p>1) Private Road. Salisbury Road is a private road with no existing access to the site. I understand the landowner has not contributed to the upkeep of the road (consistent with it not having any access from the road). I question how, from a legal perspective, the landowner intends to create an access road with access for multiple houses and construction traffic when taking into account the above?</p> <p>2) Access Issues. The purported potential "access" to the site from Salisbury Road is from a narrow, privately maintained, road with cars parked at various points in the vicinity of the proposed access way. Whilst the road is reasonably well maintained, it is not up to the standard of an adopted highway. Equally, the width and standard of the Drove way at the other suggested access points is not suitable for access for a multi-building site. In the consideration of the site for the 2012 Local Plan it was noted in the SHLAA Score comments that "the two roads that lead to the site appear to be unadopted and not well maintained. There is no access on to the site". It concludes "access to the site is unsuitable on unadopted roads". No facts have changed since the 2012 consideration and therefore the same conclusions should be drawn now.</p> <p>3) Ground level - the proposed site is somewhat higher than the surrounding road and houses - any proposed development will overshadow and dominate the existing properties on Salisbury Road and those abutting the site from the Drove way. See comments below.</p> <p>4) AONB - the site is within the AONB, in close proximity to the Heritage Coast, National Trust land and an SSSI. It is also in very close proximity to the Dover Patrol Memorial. Why should this land be included in the Local Plan when other, less sensitive areas, are no doubt available for development? It would seem that the site was included in the AONB to provide protection from future development. I understand that the site was removed from consideration in the 2012 Local Plan as it was considered that "any development on the site would, therefore, have a highly detrimental impact on the designated landscape".</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Remove STM010 from the Local Plan.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP268
Rep Status	Processed
Consultee ID	1331383
Consultee Full Name	Mrs Katie Miller
Consultee Company / Organisation	Kent Downs AONB Unit
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 40 STM 006 AND STM 010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>SAP 40 St Margarets STM 010 Salisbury Rd/The Droveaway:</p> <p>The site lies wholly with the AONB boundary and Heritage Coast designation. It is therefore imperative that if development of the site takes place, it would meet the purpose of AONB designation, i.e. the conservation and enhancement of natural beauty.</p> <p>In respect of landscape character, the land comprises an arable field with a small, wooded copse in its south-eastern corner and has vegetative enclosure along its boundaries with Salisbury Road and The Droveaway. While not containing any particularly notable landscape features, the site is rural in character and associates more closely with its surrounding rural environs than the housing associated with St Margarets to the south. Its rural character provides a green 'finger' into the settlement, softening the village's built up edge and the sense of transition between the village and the undeveloped countryside beyond.</p> <p>Notwithstanding these characteristics, the site is surrounded on three sides by existing built form, with a further dwelling also sited against the fourth boundary, although the majority of this northern boundary adjoins rural Open Access land. As stated above, it also has a relatively strong enclosure in landscape terms as a result of vegetation along much of its boundaries with residential development beyond. In these respects, the site could be regarded as being an appropriate and logical extension to the village and acceptable in landscape terms.</p> <p>However, this fails to take into account a key aspect of the site; its topography. The site comprises a mound of higher ground that rises significantly above the surrounding land levels (at least 4 metres), upto a high point of 90m AOD, which is by far the highest point within this part of St Margarets and some 5 metres higher than the ground level of the War Memorial monument sited north east of the proposed allocation.</p> <p>As such, the AONB Unit has concerns that a residential development in this location could introduce built form into the landscape that is much more prominent in views from the surrounding AONB than the existing built form associated with St Margarets, which could be visually damaging to this part of the Kent Downs AONB. This would include from the north and north-east where there is an extensive and well used public rights of way network, including the England Coast Path, a National Trail, along with several areas of Open Access land. It may also introduce housing development into views where there currently are none from the AONB to the south. The introduction of built form in this location could also impact on views of important historic features in the landscape in this location, such as the Dover Patrol Memorial monument and lighthouse at South Foreland, both iconic features that are located within the Kent Downs landscape. While there is no detail provided of the proposals at this stage, our concerns are exacerbated by development being likely to comprise larger size houses by virtue of the low density that is proposed.</p>

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

The potential impacts on the AONB landscape are acknowledged in the evidence base for the Local Plan with the Sustainability Appraisal acknowledging that '*The site has been judged by Council officers to have the potential to moderately affect the District's landscapes, townscapes or seascape*'. Further detail is provided in the HLAA Landscape Assessment DDC Landscape Assessment where it is stated '*The site lies within the AONB and close to the Heritage Coast. It abuts National Trust land to the NE. The site is on a crest of a hill and despite the screening, would be visible from a long distance. The site is bounded by footpath ER26 along the SW, the vehicular cul-de-sacs of The Drove way to the NW, Salisbury Road to the SE and by National Trust land to the NE, providing a wide range of recreational walking opportunities. The site is within the 'restore and conserve' area of the Green Infrastructure network, reflecting the real opportunities for Green Infrastructure. Any development on the site would need to be low density and to conform with surrounding street pattern, with generous landscaping required to mitigate the impact on the wider landscape*'. The site is given a yellow Rag Rating and the commentary advises '*The development of this site would have an impact on the landscape and further assessment is required to demonstrate whether this can be mitigated*'.

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

SAP 40 St Margarets STM 006 Land at New Townsend Farm:

As recognised in the policy, the site lies within the Kent Downs AONB. The site is relatively well contained within the wider landscape and relates well to the existing settlement, where the settlement pattern includes linear development extending eastwards from Station Road and the High Street. The proposed requirements included in site specific requirements to help manage impacts on the AONB are supported.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

To ensure the potential impacts of STM010 on the Kent Downs AONB are appropriately considered.

Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP489
Rep Status	Processed
Consultee ID	1331710
Consultee Full Name	Diane Baines
Consultee Company / Organisation	on behalf of Mr J Thorn
Agent Full Name	Diane Baines
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy SAP40 allocation of small housing site STM010 at The Drove way St Margaret's at Cliffe
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The evidence and justification for the selection of Site STM010 at Policy SAP 40 of the DLP is based on errors in the assessment of Site STM010. The allocation of the site for housing is unsound because:</p> <ol style="list-style-type: none"> 1. Allocation of Site STM010 in Policy SAP40 conflicts with other policies in the DDLP. 2. Site STM010 is not compatible with the Kent Downs AONB Management Plan 2021 – 2026. 3. The site is unsustainable - its allocation is based on errors within the DDLP Reg 19 Sustainability Appraisal Report. 4. Planning history demonstrates the site is inappropriate for development. 5. The site is not deliverable due to landownership and highway constraints. <p>For the above reasons the inclusion of site STM010 in Policy SAP40 renders the DDLP unsound and it should be removed from Policy SAP 40 and the DLP.</p> <p>A full objection and reasoning for the unsoundness of the DLP in relation to the allocation of site STM010 at Policy SAP40 for housing has been submitted direct to the Council via its localplan@dover.gov.uk email address and as attachments to this online submission. The objection has been prepared by DEB Town Planning and Development Ltd on behalf of Mr J Thorn of (address of resident local to the site has been redacted). This letter of objection on grounds of unsoundness is accompanied by Appendix 1 - Paul Mew Associates Transport Assessment of STM010.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	<p>Proposed change:</p> <p>Delete site STM010 as a housing allocation from Policy SAP40 of the Dover Local Plan</p>

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	Objection to DDLP Regulation 19 Submission Policy SAP40 STM010 Final v.pdf Appendix 1 Paul Mew Ass Transport Assesment STM010 The Droveaway.pdf
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP352
Rep Status	Processed
Consultee ID	1331500
Consultee Full Name	Mrs Tina Irvine
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	STM010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I am writing to question the evaluation, justification and soundness of the inclusion of the site, known as STM010, in the proposed DDC local plan. This site has recently been assessed by DDC as suitable and available and as meeting the necessary criteria for development to proceed. One of the tests for soundness is that the policy criteria should be consistent with past policies and the decisions taken to formulate these policies, i.e. the application and consistency of rational thought throughout the process. This site, in 2012, was assessed for inclusion in the existing current local plan under site code SAD28. It was not scored by DDC under SHLAA in part due to the site being in the AONB and therefore no individual or overall score was awarded.

	<p>Landscape Impact assessment concluded that “any development on the site would, therefore, have a highly detrimental impact to the designated landscape.”</p> <p>Biodiversity assessment “The site is identified as chalk grassland to the NE (STM09), which is a priority habitat under the Natural Environment and Rural Communities Act, 2006, and is a material consideration under PPS9. maybe amenable to reversion to chalk grassland with appropriate management.”</p> <p>Green Infrastructure “The ambience of the area is demonstrated by the numbers of visitors to the coastal area and the levels of usage of paths, both public and permissive. Development would harm the existing GI and the opportunities for enhancement.”</p> <p>Proximity to Road Network Here all the negative aspects are acknowledged. There existed no positives.</p> <p>Access to Services This acknowledges that the village is a large village but the majority of these services and facilities are more than a ten minute walk away.</p> <p>Analysis“The site is located in the AONB in a highly visible location at the top, of a hill on a plateau. Any development would have a detrimental impact on this designation. Access to the site is unsuitable on unadopted roads.</p> <p>Consider for Inclusion In The Submission Document “NO”</p> <p>Just ten years ago, the site was assessed by qualitative means and the decision not to proceed further with a quantitative assessment taken. Ten years later a quantitative assessment has been made without considering a qualitative assessment as being necessary. The different assessment processes have resulted in totally opposite answers. In the intervening ten years the policy numbers may have changed but the legislation has evolved and given greater protections for the landscape, biodiversity, green infrastructure etc. in revisions of the NPPF and joint stewardships such as that between DDC and Kent AONB. DDC’s own mission statements echo all that has been agreed as being good for communities and the landscape in which they live. Yet, in this one single included site, we see this “blind” number assessment method over-riding rational thought and legislation, local and national.</p> <p>I allege that the plan is unsound because irrational thought and assessment as detailed above have driven its direction without qualitative checks being in place to assess its soundness. Site STM010 has been incorrectly assessed and should be removed from the proposed Local Plan.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Removal of Site STM010 from the Local Plan</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>LALP HELAA PS11 Maps by Settlement St Margarets sites.pdf SAD28 SHLAA assessment.pdf (1)</p>
<p>Local Plan Consultation Point</p>	<p>SAP40 - St Margaret's-at-Cliffe Small Housing Sites</p>
<p>Rep ID</p>	<p>SDLP487</p>

Rep Status	Processed
Consultee ID	1331527
Consultee Full Name	Mr Peter Barratt
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 40 St Margaret's-at-Cliffe Small Housing Sites, STM010 Land located between Salisbury Road and The Droveaway, St Margarets-at-Cliffe
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p><u>Environmental Impact</u></p> <p>This site is within the Kent Downs AONB and is 150m from the Dover to Kingsdown SSSI and SAC, which is a European designated site. According to the Natural England citation, "The coastline from Dover harbour to Kingsdown is of extreme importance ... for its varied floral and faunal communities which include many rare species". "There are numerous breeding sea birds along the cliffs including fulmars, rock pipits and lesser-black backed gulls; kittiwakes have been established since 1967, their expanding population now exceeds 1100 pairs, but are still found nowhere else in Kent. The South Foreland valley at St Margarets is a significant landfall for migrant birds in the spring and a gathering point for dispersal in the autumn. More importantly many migrants breed here including whitethroat, blackcap, grasshopper and other rarer warblers."</p> <p>Any development this close to the SSSI / SAC would undoubtedly have a negative impact on the sensitive and rare flora and fauna so close by, not only from additional people walking here but especially from their pets. More cats and dogs in the area would put more pressure on the rare bird species close by, as well as contribute to nutrient enrichment to the detriment of the chalk grassland habitat.</p> <p>As stated in the Kent Downs AONB Management Plan 2021-2026, one of the main issues for the Heritage Coast is that "High and rapidly increasing visitor pressure, particularly at the Dover to Kingsdown Heritage Coast ... is degrading important habitats and placing the historic heritage at risk and reducing the valued sense of tranquillity as well as the visitor experience."</p> <p>This is a large site of over 2 hectares, so while only 10 houses may be in the plan now, what would stop an additional 50 or more being built in the future? Or if it is only to be 10 houses, does this really make a material contribution to the housing shortage that would outweigh the impact on the SSSI / SAC? These would likely be expensive executive homes, capitalising on the fantastic views from the site, thereby doing nothing to help with the affordable housing crisis.</p> <p>According to SP 13, "All proposals within, or affecting the setting of, the AONB and Heritage Coasts must have regard to the purpose of conserving and enhancing their natural beauty in accordance with the requirements of Policy NE2." Given that the site is the highest point in the surrounding area, it is surely not possible to put in any mitigation for a housing development here to conserve and enhance the natural beauty of the area; quite the opposite. Indeed, this site was excluded from the 2012 local plan and the SHLAA at the time concluded that "The site is located in an AONB in a highly visible location at the top of a hill on a plateau. Any development would have a detrimental impact on this designation".</p>

	<p>The site is currently chalk-based arable land with the potential for it to be returned to chalk grassland. According to the Kent Wildlife Trust: "Restoring chalk grassland is crucial in our vision to create a wilder Kent. Chalk grassland is Europe's version of the rainforest; up to 40 species of flowering plants can be found in just one square metre of this rich habitat. Incredibly, 2.5% of the UK's chalk grassland is found around Dover, so it is crucial that we protect our existing reserves and bring back other chalk grassland sites that have been neglected." Developing this site would remove this as a future possibility. Given that the site is within the 'restore and conserve' area of the Green Infrastructure network, this would be a sorely missed opportunity to make a meaningful contribution. The Green Infrastructure Strategy 2014 specifically mentions to "Encourage species-rich grassland and the reversion of arable land as key priority".</p> <p><u>Traffic</u></p> <p>Access to the site can only be via the Droveaway, since Salisbury Road is a private road. There is already considerable congestion at the Sea Street end of the Droveaway due to the large number of parked cars making the road effectively single track for approximately 200m. This results in road users often having to reverse back to allow oncoming traffic through, which is a safety concern. Additional housing will only make this situation worse. This section of road is used by many parents walking their children to and from the local schools via Droveaway Gardens. The risk of accidents caused by a large volume of heavy construction traffic which will likely need to mount the pavement to fit past the parked cars will be significantly increased. I have personally witnessed large agricultural vehicles and delivery lorries mounting the pavement in order to fit past the parked cars many times.</p> <p>In addition, there is already significant congestion in the village of St Margaret's at Cliffe, due to the restricted road width, lack of pavements over a large section, and frequent bus and delivery vehicle movements. Adding housing developments that have no choice but to use this road will make the situation worse, and there are no possibilities for widening the road or creating bypasses.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Remove SAP 40 STM010 (Land located between Salisbury Road and The Droveaway, St Margarets-at-Cliffe) from the local plan, to avoid the negative impact the proposed development would have on extremely critical SSSI and SAC habitat which is only 150m away.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Not Applicable</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP40 - St Margaret's-at-Cliffe Small Housing Sites</p>
<p>Rep ID</p>	<p>SDLP483</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331708</p>
<p>Consultee Full Name</p>	<p>Mr Stuart Walker</p>
<p>Consultee Company / Organisation</p>	

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	STM010 in Policy SAP40
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	In relation to SAP040 there was no period of consultation, it was inserted less than 24 hours before the deadline, with no notification to me living less than 100 metres from the land in question. In 2012, when the same application was made to build on the AONB, planning was refused. Nothing has changed. The Patrol Monument, an historical monument will be obscured and this view will be detrimental to the landscape, a landmark and the monument to our fallen heroes will be interrupted. There is no access to the land by road and no public ownership or permission has been granted. Wildlife will be disrupted, including birds, insects and animals. There are existing restrictions on the height our home can be built. The builder had to excavate to build my property adjacent to Snag Burrows, STM010 is considerably higher than my property, so it will be impossible to build the planned estate. The photos show the monument from near to my home and this estate will completely obscure the view. The 6 spotted Burnett moth in the photo is quite rare, but plentiful on Snag Burrows, I have recorded many sightings on DECIDE@ceh.ac.uk
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The plan should be removed because procedural errors or more sinister actions were taken to put this development estate into the plan, which may provoke an investigation.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I am in a house adjacent to Snag Burrows AONB and can put up a good case for this to be withdrawn from the Dover Plan
Include files	2A3599CC-D76F-4534-84E0-AAEA4262F11B.jpeg (3) 67B631CD-46FD-4232-9D2B-A605B1CA5A43.jpeg (3) 0F827652-3326-4FE9-AC9A-F4C3ADAF4D0E.jpeg (3)
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites

Rep ID	SDLP800
Rep Status	Processed
Consultee ID	1331099
Consultee Full Name	Rosie Cavalier
Consultee Company / Organisation	Esquire Developments
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3 SP4 SAP40
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>1.0 INTRODUCTION</p> <ul style="list-style-type: none"> • These representations have been prepared by Esquire Developments Ltd, a multi-award-winning SME developer based in Longfield, Kent. • Esquire Development has a number of land interests in Dover, including <ol style="list-style-type: none"> 1 New Townsends Farm, St Margaret's (Appendix 01); 2 Appleton Farm, East Langdon (Appendix 02) and 3 Ringwould Nurseries, Ringwould (Appendix 03) • New Townsend Farm is identified as an emerging allocation identified as SAP40 (STM006) in the Regulation 19 Local Plan. Appleton Farm and Ring would Nurseries are not identified as emerging allocations but put forward as suitable alternative sites. • As a local SME Housebuilder, the development of these sites brings forward the opportunity to help diversify the housing market and offer a wide choice of housing from different developers.

2.0 RESPONSE TO THE REGULATION 19 PLAN

A. New Townsend Farm, St Margaret's-at-Cliffe

- St Margaret's-at-Cliffe is recognised in the Regulation 19 Local Plan as a Local Centre along with Eythorne and Elvington, Eastry, Kingsdown, Shepherdswell, Wingham and Ash. These Local Centres are noted to be the largest of the district's rural settlements. The Local Centres are characterised by the range of services and facilities that they offer, serving the needs of their own residents and those of adjoining small villages and hamlets. We support the recognition within the plan that in order to help sustain and strengthen the role of these local centres, additional housing is considered appropriate. A total of 96 dwellings are allocated within the Regulation 19 Local Plan in St Margaret's-at-Cliffe.
- New Townsend Farm has been identified as an allocated site for 10 dwellings under SAP40 which allocates all small sites in St Margaret's-at-Cliffe. We support the identification of the site for development, and we consider this site to be deliverable in the lifetime of the plan.
- SAP40 includes two sites within St Margaret's-at-Cliffe Land at New Townsend Farm (referred to as STM006) and Land located between Salisbury Road and The Drove way (referred to as STM010). These are shown on the map at Figure 4.12 and are both referred to as SAP40. As a point of transparency, it would be beneficial to separately identify these allocations on the accompanying Plan in order to prevent any confusion.
- We consider that this area has the potential to deliver more dwellings than the allocated number of 10 dwellings as part of a more comprehensive form of development which would, overall, deliver a much enhanced scheme of approximately 20 dwellings alongside significant areas of open spaces offering net biodiversity gain and maintaining views and perceived areas of separation.
- The proposed development would be in keeping with the surrounding pattern of development, reflecting an extension of built form in an eastward direction away from Station Road/High Street in a linear character (see Nelson Park Road, Hardy Road, St Vincent Road and Kingsdown Road for example in Appendix 04)
- Appendix 01 demonstrates how this could come forward and facilitates the ability to deliver this allocation which has a covenant constraint that whilst is not a showstopper, would benefit from an increased capacity of dwellings.
- St Margaret's-at-Cliffe is recognised within SP4 Residential Windfall Development as an area where residential development or infilling will be permitted within or immediately adjoining the settlement boundaries. We consider that the wording of this policy is too restrictive (see SME Network Representations for full position) where it seeks to limit development unless within or immediately adjoining the settlement boundaries. We consider that the wording of this policy should be amended to reflect a more flexible approach. We would suggest that wording used by Ashford Borough Council in Policy HOU5 from the Ashford Local Plan 2030 adopted February 2019. A copy of this policy wording is provided at Appendix 05.

B. Appleton Farm, East Langdon

- East Langdon is recognised in the Regulation 19 Plan as a Larger Village and allocates Land adjacent Langdon Court Bungalow for 40 dwellings (LAN003). We consider that this site has a number of legal constraints that cannot be overcome and is therefore undeliverable. We suggest an alternative site should be proposed for allocation in Appleton Farm, East Langdon.
- East Langdon is categorised as a Larger Village within the Plan and distinguishes between the two distinct parts, the southern part and the northern part.
- East Langdon is recognised within SP4 Residential Windfall Development as an area where residential development or infilling will be permitted within or immediately adjoining the settlement boundaries.
- Paragraph 79 of the NPPF sets out that in order to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. It puts emphasis on the opportunities to grow where this will support local services. The key section of this paragraph is that where there are groups of smaller settlements, development in one village may support services in a village nearby. This is the case for East Langdon and Martin Mills, whereby services are interdependent on each other (by way of example the primary school is located in East Langdon, but the Railway Station is located in Martin Mills).
- We consider the allocated site in East Langdon, Land adjacent Langdon Court Bungalow (LAN003) to be undeliverable in the lifetime of the plan due to a number of restrictive covenants upon the land. The land is subject to restrictions which prevent the erection of any dwellinghouse or other buildings without consent from other parties. This is noted as a land charge and a copy can be found at **Appendix 06**. Our reading of the title indicates the following issues:
 - No sale is permitted until 30 September 2045 without consent of The Church Commissioners for England
 - Transfer dated 22 April 1970 contains Restrictive Covenants on over 5 parcels within the land to benefit and protect the part of the Langdon Court Farm House and farmlands adjoining the proposed land jointly and severally covenant with the personal representatives that they and their successors in title will not at any time erect or suffer to be erected any dwellinghouse or other buildings whatsoever upon the designated land without the written consent of the Personal Representatives.
- These restrictions are sufficient for a developer to not be able to purchase and develop the site.
- Accordingly, alternative sites should be found in East Langdon that are available, suitable and deliverable. Appleton Farm is such a site.
- Appleton Farm represents a parcel of land that is in total approximately 18.5 hectares. It extends from Holland Hill to the north to White Hill to the South. Whilst this is an extensive area, the site has the potential to deliver a modest scale of development of circa 30-35 dwellings on approximately 3.5ha that would offer a suitable alternative to the identified site – See **Appendix 02**.
- The proposal represent a reasonable alternative to the identified site and in a location that is recognised as being sustainable. Indeed, East Langdon and Martin Mills offer one of the few locations in the District outside of the main urban areas offering a railway connection and therefore a greater scale of development could be considered.

C. Ringwold Nurseries, Ringwold

	<ul style="list-style-type: none"> • Ringwould is identified as a Smaller Village and Hamlet within the Plan. It is noted that although there is a limited range of services and facilities available, it is served by a regular bus service and there is a Church within Ringwould. It has close connections to the services and facilities in Kingsdown. Ringwould is located on the A258, the main road connecting Dover and Deal. We support the recognition that in order to help sustain and strengthen the role of smaller villages and hamlets, additional housing is considered appropriate. There is one emerging allocation within Ringwould for 10 units (Land at Ringwould, Alpines, Dover Road). • Ringwould is identified in Policy SP4 Residential Windfall Development as a settlement appropriate for minor residential development or infilling of a scale that is commensurate with that of the existing settlement. • The Nursery site is located to the west of Ringwould, with a long frontage to the A258. It comprises approximately 9.2ha and is considered suitable to deliver a wide mix of uses, including residential, retail, care and affordable homes and/or potentially education. Appendix 03 demonstrates how a care/retirement facility could be delivered. • The mix of uses would help improve the services and facilities available to the existing community of Ringwould, as well as serve a wider catchment. The proposals would inherently improve the sustainability credentials of Ringwould as well as delving a mix of uses which are most in need, including care, affordable homes and potentially education. • Consideration should be given by the Council as to the opportunity the site presents - including working with the Council's own Housing department to deliver locally required housing needs in partnership with the Council itself. <p>Please see attached full representations including appedices</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Please see above and attached representations in full</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>Esquire Reps to Dover Reg 19 Nov 22 inc appendices.pdf</p>
<p>Local Plan Consultation Point</p>	<p>SAP40 - St Margaret's-at-Cliffe Small Housing Sites</p>
<p>Rep ID</p>	<p>SDLP548</p>

Rep Status	Processed
Consultee ID	1331117
Consultee Full Name	Mrs susan walker
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 40. STM010 Land located between Salisbury Road and The Droveaway, St Margarets Bay
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Not Legally Compliant and fails with Duty to Cooperate</p> <ul style="list-style-type: none"> Site not included in Regulation 18 until 16/03/2021. Regulation 18 closed to consultation 17/03/2021 so no time to raise objection. <ul style="list-style-type: none"> This was not transparent and I feel an internal investigation should be conducted to rule out any possible corruption within DDC. Our house, 78 The Droveaway did not originally gain planning permission. Approval was met when our house was lowered so that there would not be a visual impact on the surrounding area. This proposed site is much higher than any other property in the area and would obstruct the view across the landscape to the Historical site: the Dover Patrol Memorial. This can be viewed from the landscape of Dover Road entering the village and the landscape from South Foreland Lighthouse on South Downs (this view is currently on the TV Advert for Skipton Building Society- screenshot attached below). <p>Unsound</p> <ul style="list-style-type: none"> Site was excluded from submission in 2012 under site code SAD28. <ul style="list-style-type: none"> analysis of site in 2012 has not changed 10 years later. Site in an area of AONB. If developed will impact on wildlife in the area including the adjacent National Trust land and Heritage Coast. It will also impact the surrounding biodiversity of the area. The Wildlife Trust plan to release the rare bird the Chough in the surrounding area. Access to site would be via the Droveaway, which is narrow, unlit and for most part does not have footpaths. Increased traffic and construction vehicles would pose a danger to residents and the public eg. children walking to school, elderly to access public transport, horse riders and cyclists. Construction traffic causes obstruction and possible danger to life with no other access to the Droveaway (see photo below - taken 15.11.2022) Major disruption caused to residents when just 2 large houses were built at , no 36 and 38. These and several other properties have not sold in this area, proving there is not a need for further housing within this area (Rightmove screenshot dated today attached below)
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant	Site STM010 should be removed from the Local Plan at Regulation 19

and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Local Residents should be represented and I live nearly adjacent to Site
Include files	rightmove- The Droeway.png Skipton Advert.png Droeway Obstruction.png
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP521
Rep Status	Processed
Consultee ID	1331743
Consultee Full Name	Mr David Dunford
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Page 188. SAP40 - St Margarets-at-Cliffe Small Housing Sites. Section 4.254, Site STM010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>It is my understanding Site STM 010 was not included in Reg 18 Version of the Local Plan which meant that there was a lack of opportunity for local residents (such as myself), the Parish Council, National Trust, Natural England and other interested parties to be involved in the required consultation and therefore contravenes the requirements of the Statement of Community Involvement.</p> <p>On the initial 'Call For Sites' STM010 was aligned with a separate small paddock to the South East (bordering Salisbury Road) STM011. Although I have no documentary evidence to support it, I and most of my neighbours in Salisbury Road were given understand that Dover District's response to an application by the owner of plot STM010 was that it would only consider an application which included both STM 010 and STM 011. Most of the residents are friends of the owners of site STM 011 and were assured by them that they did not want their land included in any proposed development and had informed Dover District Council of this. Thus we were very surprised to discover that site STM010 had been included in the Regulation 19 version of the Local Plan. Subsequent enquires revealed that the owner of STM010 had made his submission for the site's inclusion under Regulation 18 shortly before its deadline date.</p> <p>As I was not afforded the opportunity to voice my comments during the Regulation 18 public consultation period I would like to make them now.</p> <ol style="list-style-type: none"> 1 The proposed site is part of the Kent Downs ANOB. It is possibly the highest point in St. Margaret's- at-Cliffe and has panoramic 360 degree views to France, Deal, Pegwell Bay, Ramsgate, Dover Patrol Monument and St. Margaret's Lighthouse. <p>It also abuts National Trust and Heritage Coast Land.</p> <ol style="list-style-type: none"> 1 Any development on this site would contravene National Planning Policy Framework (paragraphs 174 to 178). 1 Due to the height of the land, which is more than 5meters above the ground level of the existing properties is Salisbury Road any development would not only overlook, effect the privacy and sunlight to these houses but would dominate the whole of the local landscape. <p>4.The only practical access to the site is via The Droveaway, which because it houses the Doctor's Surgery and a very popular Cafe/bar is currently very congested. Any additional traffic would only add to this congestion.</p> <p>5.This site STM010 was previously assessed in 2012 for inclusion in the 2015 version of the Local Plan (SAD28) and subsequently not included. Given that nothing materially has change since then, what are the new reasons for including it now.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Remove site STM010 from the Regulation 19 version of the Local Plan.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	

Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP547
Rep Status	Processed
Consultee ID	1331723
Consultee Full Name	Mrs Patricia Tordoir
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Page 188. SAP40 - St Margarets-at-Cliffe Small Housing Sites. Section 4.254, Site STM010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>First, I would like to ask why site STM010 has been included in the Local Development Plan. Information recently received indicates that following a meaningful qualitative assessment for STM010, previously referred to as SAD28, the site was removed from consideration in 2012. At this time however, following a meaningless quantitative assessment it was included in the local plan.</p> <p>Secondly, as a Resident and Member of the Salisbury Road Association Committee, I would like to agree with the points raised on my behalf: Site STM010 was not included in the Regulation 18 version of the Local Plan and was therefore not available for representation to be made during the public consultation period for this version of the plan. As such, residents were unable to review and comment on the proposal for site STM010 to be included in the Regulation 19 version of the Local Plan. Given this, I believe that the process for public engagement for the Local Plan is not in general accordance with the Statement of Community Involvement and in fact contravenes it and would therefore question if it is legally compliant.</p> <p>Given the lack of public consultation and agreements with the likes of Natural England, the National Trust and the Kent Downs AONB and the public for Site STM010, I would also claim a lack of Soundness for this aspect of the plan. As such, I believe that this part of the plan does not demonstrate that it is Positively prepared, Justified, Effective and Consistent with National Policy and has therefore not followed due process.</p> <p>Based on the above, it is my opinion that site STM010 should be removed from the Regulation 19 version of the DDC Local Plan.</p> <p>I have been advised to include comments that should have been made during the Regulation 18 public consultation if the STM010 site had been included in that version:</p> <ol style="list-style-type: none"> 1 Salisbury Road is a Private Road the upkeep and maintenance of which is undertaken by the Salisbury Road Association SMB, managed by an elected committee. Annual payments are collected from all residents to finance any works required and to pay for Public Liability insurance. The Salisbury Road Association has been in existence for over 50 years.

It is the view of the Salisbury Road Association that the landowner of site SM010, Mr David Powell, would have no legal right to create an access road and/or junction with Salisbury Road. Neither Mr Powell nor the farmer currently renting the field have ever accessed the field via Salisbury Road and there is currently no access in existence. In addition, neither Mr Powell nor the farmer have ever contributed to the upkeep or maintenance of Salisbury Road.

- 1 The proposed development access road and junction as shown on page 19 of the landowners proposal is also not reasonable, feasible or achievable. The junction with Salisbury Road would be immediately opposite the drive and/or frontage of the existing properties, wherever it was placed on this section of the road. In addition, Salisbury Road is only 4.7m wide at its widest point and this, together with the fact that the residents park their cars on the road outside of their properties, results in the road being single track and would essentially make turning in and out of such a junction highly hazardous and likely impossible.
- 2 Given the above, the Salisbury Road Association would not grant right of access or agree to the proposed access/junction between Salisbury Road and the proposed site. In addition, it would also not allow access to the site for any construction plant if the site were ever to be developed.
- 3 It is my view that the impact of the proposed development and the resultant increased traffic flow has not been fully evaluated and that it would certainly significantly worsen what is already a system that barely copes with the current traffic flow, especially at the narrow and congested junctions between Salisbury Road and the Drove way and the Drove way and Sea Street.
- 4 Analysis of the Title deeds of the proposed STM010 site reveals that it is in fact land locked, with its boundaries completely inside of the hedgerow and tree line along its borders with both Salisbury Road and the Drove way. As such, the landowner has no obvious access to the site that is in his ownership and therefore renders the site as undeliverable and unachievable.
- 5 The ground level of the proposed site is in excess of 5 metres higher than the ground level of the properties opposite the proposed site on Salisbury Road. As such, the houses adjacent to Salisbury Road in the proposed development will be 11-12 M higher and dominate the existing properties. This will significantly impact the access to sunlight due to the inevitable shading by these new properties. In addition, the proposed properties will have direct line of site into the front aspects of the existing properties, which include bedrooms, bathrooms, living rooms and kitchens. It is my view that this development proposal would therefore significantly adversely impact the residential amenities of these properties.
- 6 Further to the above point I would also like to highlight the Landscape Sensitivity Assessment of proposed development sites FINAL REPORT January 2021, page 139 where under the Mitigation heading it is stated that –‘Any development should also be one story to minimise visual impact.’ Thus, confirming that the height of this site is a significant issue.
- 7 The proposed site, whilst currently used agriculturally is part of the Kent Downs AONB and constitutes a buffer zone between the residential aspects of Salisbury Road and the Drove way and the North Downs SLA, the Heritage Coast, National Trust land, the Site of Special Scientific Interest (SSSI) and the Biodiversity Opportunity Area. In fact, the site is only 300 meters from the Dover to Kingsdown cliffs Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) which protects cliff top grassland and scrubland habitat which is also a key natural and landscape feature of the AONB and heritage coast. Any development on this site would remove that buffer and significantly impact these extremely important and sensitive conservation areas.
- 8 The AONB and heritage coast boundaries were drawn to explicitly include the area of STM010 to protect this land from development. A housing development would be a clear separation from the intended purpose of the AONB designation for this area.
- 9 I also believe that the proposed development in an AONB is in complete conflict with National Planning Policy Framework (paragraphs 174 to 178).

In particular paragraph 174 states that Planning policies and decisions should contribute to and enhance the natural and local environment by;

- protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils.
- recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services.
- maintaining the character of the undeveloped coast, while improving public access to it where appropriate.
- minimising impacts on and providing net gains for biodiversity.

Paragraph 175 states that plans should allocate land with the least environmental or amenity value.

Para 176 states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues.

In my view the allocation of site STM010 in the Local Plan is contrary to all of the above and could therefore be deemed as not being legally compliant and is further evidence that the site should be removed.

- 1 The Local Plan Policy NE2 clearly states that; ‘Major development proposals within the AONB will only be permitted in exceptional circumstances and where it is demonstrated they are in the public interest’. In addition, NE2 also states that any development in the AONB should achieve the following:

	<ul style="list-style-type: none"> • Be sensitively located and designed to avoid or minimise adverse impacts on the AONB and its setting. • The location, form, scale, materials and design should conserve and where appropriate enhance or restore the special character of the landscape. • The development should enhance the special qualities, distinctive character and tranquillity of the AONB and the Heritage Coasts • The development has regard to the AONB Management Plan and any associated guidance. <p>It is my view that the proposed STM010 development site does not meet any of the above criteria.</p> <ol style="list-style-type: none"> 1 In addition, any development of this site would impact on the long and medium view of the extremely important Dover Patrol Memorial from many aspects of the surrounding area. 2 DDC will be aware of the number of Saxon burial sites that have been identified both on and adjacent to Salisbury Road. It is widely accepted that the proposed development site, given that it constitutes the highest point in the locale, will contain a significant concentration of Saxon burial sites and is therefore of high archaeological significance and value. <p>In conclusion, I believe that, for all of the reasons discussed above, Site STM010 should be removed from the DDC Local Plan.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	As stated above, the Plan is in no way legally compliant or sound and cannot be modified to make it so.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP640
Rep Status	Processed
Consultee ID	1331787
Consultee Full Name	Mr SMBCA SMBCA
Consultee Company / Organisation	St Margarets Bay Conservation Association
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP40 STM010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>St Margarets at Cliffe Small Housing Sites. Site STM010.</p> <ul style="list-style-type: none"> Provision of new residential developments of 10 or more units will be required to contribute to the provision of new or enhanced local community facilities or services to meet the needs of the development. I would posit this is required in addition to the demands which the development is making on existing services (eg roads, drainage). The additional drain on existing services will include to education provision - eg the existing nursery in St Margarets Village requires complete new provision.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	I think this site (STM010) needs to be removed from the plan and reconsulted upon
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP623
Rep Status	Processed
Consultee ID	1331790
Consultee Full Name	Julie Davies
Consultee Company / Organisation	CPRE Kent
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP40 STM010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Land located between Salisbury Road and The Droveaway, St Margarets-at-Cliffe Object to allocation of land within the AONB.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP974
Rep Status	Processed
Consultee ID	1331795
Consultee Full Name	Mrs Talina Wells
Consultee Company / Organisation	

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 39 and 38
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Item 11.9 - The Kent Downs AONB I refer to the comment '...land which is visible from the AONB and from which the AONB can be seen.' Would the dark skies be compromised re the concentrated development planned STMO10 - land between Salisbury Road and The Droveaway. Or indeed other planned developments abutting or within the AONB.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Item 11.9 - The Kent Downs AONB I refer to the comment '...land which is visible from the AONB and from which the AONB can be seen.' Would the dark skies be compromised re the concentrated development planned STMO10 - land between Salisbury Road and The Droveaway. Or indeed other planned developments abutting or within the AONB.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP864
Rep Status	Processed
Consultee ID	1331930
Consultee Full Name	Ms Vivienne Pay

Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	The allocation for housing of site STM010 in St Margaret's at Cliffe by policy SAP40
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>In my view, site STM010 in St. Margaret's at Cliffe is unsuitable for housing development for the reasons set out below. I believe that its allocation for such development in Policy SAP40 of the Regulation 19 Submission Document Local Plan makes the Plan unsound to that extent, as built development on this site would be in conflict with national and local planning policy, and with the policies of the Kent Downs AONB Management Plan.</p> <p>I am aware that the St. Margaret's at Cliffe Parish Council has objected in its response to the Local Plan to the allocation of this site for housing, on the grounds principally of the harm which would be caused to the AONB and which could not be satisfactorily mitigated. I am also a named supporter of the response which has been submitted by Mr. Gerald Irvine in relation to this site on behalf of over 100 local residents. Without repeating in detail the arguments set out in these responses, I would like to confirm that I strongly support them. Contrary to paragraph 176 of the National Planning Policy Framework and policy SP4 of the draft Local Plan, the development for housing of this site would not conserve or enhance the beautiful surrounding landscape of the AONB, and would in fact cause considerable damage to that landscape setting, due to the inevitable visual intrusion which would result from any building on this prominent and elevated site. This site topography makes it virtually impossible for there to be any meaningful mitigation of the harmful impact of development.</p> <p>I should like to add a further consideration which I believe should be taken into account, which is the inconsistent treatment of this site in the various assessments and judgments made in connection with the preparation of the Local Plan. This is demonstrated in the two instances below.</p> <p>Firstly, this site is in a much more prominent position, and much closer to the highly sensitive coastal parts of the AONB in this area, than other sites in the village which have been considered for allocation and rejected, for example site STM002. A planning application was made in 2020 for the erection of four detached dwellings on land included in the latter site (application number 20/00541), which was refused by Dover District Council for the following reasons:</p> <p>"The proposed development would result in an unjustified intrusion of built development into an undeveloped countryside location, which would harm the prevailing rural character at this point and result in significant and demonstrable harm to the character and appearance of the AONB and the setting of St Margaret's within it's rural context. The proposal would therefore conflict with policies DM15 and DM16 of Dover District Local Plan that seeks to protect the character of the countryside and paragraphs 170 and 172 of the NPPF as well as policies SD1, SD2, SD3 and SD9 of the Kent Downs AONB Management Plan." (see attachment 1)</p> <p>These reasons for refusal would apply with equal, if not stronger, force to any proposed housing development on STM010. In my view, they should therefore also rule out the allocation of STM010 for housing in the Local Plan, due to conflict with the cited policies.</p> <p>Secondly, the suitability of the land comprising STM010 for housing land was previously considered by DDC in 2012, when preparing the current Local Plan (adopted in 2015). The site assessment form for the site, then coded as SAD28, is attached as attachment 2. The assessment makes the following points:</p> <ul style="list-style-type: none"> • The site is higher than properties on the western side, on the Droveaway • The site is on the crest of a hill and, despite screening, would be visible for a long distance

- Redevelopment of a house adjacent to this but lower, on the Droveaway, had to undergo numerous changes before it was considered acceptable
- Any development on the site would have a **highly detrimental impact** on the designated landscape of the AONB (my emphasis)
- The arable land may be amenable to reversion to chalk grassland with appropriate management
- The site could provide foraging and flightlines for bats
- The area around the site provides a wide range of recreational walking opportunities, together with the biodiversity associated with chalk grassland and the associated hedges and scrub
- The site is within the "restore and conserve" area of the Green Infrastructure network
- Development would harm the existing Green Infrastructure and the opportunities for enhancement
- The approach roads to the site (the Droveaway and Salisbury Road) are both single track and lack footways from the site up to their junction, and the Droveaway already serves a large number of dwellings
- Pedestrian access to services, including the local bus stop, is therefore poor, and reliance on cars is likely to be high as a consequence
- The site is located on the edge of the Bay area, and the majority of services and facilities in the village would be over a ten-minute walk

The concluding analysis states:

"The site is located in the AONB in a highly visible location at the top of a hill on a plateau. Any development would have a detrimental impact on this designation. Access to the site is unsuitable on unadopted roads."

The site was therefore not considered for inclusion in the Submission Document, and was not allocated for housing in the 2015 Local Plan.

Since this assessment was prepared in 2012, there has been no change in any of the factors considered that would mean that this site was any more suitable for development now than it was at that time. (The only exception being that the northern section of the Droveaway adjacent to the site is now adopted, but it was not widened, and there is still no footway.) Indeed, in the light of the worsening of the climate and biodiversity crises since 2012, the weight that should be given to material considerations such as the protection of the environment, Green Infrastructure and biodiversity; sustainability; and the need to reduce carbon emissions has increased, and this has been reflected in many aspects of current national and local planning policy.

The inconsistency displayed in the difference of approach between the earlier assessment and that carried out for the current Local Plan process, which has resulted in the proposed allocation of this site for housing, is very marked. In my view, all the considerations which led to the site's rejection in 2012 remain of great force, and this inconsistency should be resolved in favour of the earlier and much sounder judgment. The 2012 rejection was justified and correct, and there is no valid reason for a different judgment to be made now.

The only benefit of this proposal would be to add 10 houses (according to the submission made by the promoter) to the stock of those to be built in Dover District over the period of the Local Plan. There is no demonstrable need in the village for further housing of this type, which would inevitably be high-cost due to the perceived prestigious location. There are currently several unsold houses in the likely price bracket on the market in the village, and that market is slowing. The main housing need in the village is for affordable housing, and none is proposed on this site. The other proposals for the allocation of housing land in the Local Plan, almost all of which are in more sustainable and acceptable locations than this proposal, would if approved allow DDC to exceed comfortably its five-year housing target. (See Table 3.2 of the draft Plan, which estimates a 6.16-year supply with a 10% buffer). In any event, it seems that mandatory housing targets may even have been abolished by the government by the time that this Plan comes to be approved.

Any benefit of allowing built development on this site would therefore be substantially outweighed by the harm caused to the surrounding countryside and especially to the AONB and the Heritage Coast, the detriment to the residents of the village and the potential damage arising from the precedent of allowing development which is in conflict with so many important national and local planning policies. For the reasons set out above, I would ask that this site be deleted from Policy SAP40 of the Regulation 19 Submission Document, and not allocated for housing in the Local Plan.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will

The deletion of site STM010 from policy SAP40

make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	There has been no proper public consultation in relation to this site, as it was not included in the Regulation 18 consultation process and was added to the Regulation 19 submission document as a new site. Participation in the oral part of the examination will assist in redressing this lack of consultation.
Include files	STM002 - 20_00541-DECISION_NOTICE-2150645.pdf SAD28 SHLAA assessment.pdf (5)
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP1009
Rep Status	Processed
Consultee ID	1331898
Consultee Full Name	Lorna Biggs
Consultee Company / Organisation	
Agent Full Name	Lorna Biggs
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP40 St Margarets at Cliffe small housing sites. Site STM010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I would like to see evidence that procedures were correctly followed by DDC at Regulation 18 stage of the Local Plan Process as it is my understanding that a public consultation did not take place
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s)	Remove STM010 from Regulation 19 version of the Local Plan.

you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP1426
Rep Status	Processed
Consultee ID	1271139
Consultee Full Name	Katy Wiseman
Consultee Company / Organisation	National Trust
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP40
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The National Trust is the owner and custodian of Langdon Cliffs and Foxhill Down which forms part of the Dover to Kingsdown Cliffs Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI). Qualifying features include vegetated sea cliffs of vegetated sea cliffs of the Atlantic and Baltic Coasts, and Semi-natural dry grasslands and scrubland facies on calcareous substrates.</p> <p>As identified at paragraph 3.256 of the draft Local Plan, the White Cliffs of Dover are one the country's most iconic landscapes, attracting visitors from across the country and from overseas. The National Trust has seen year on year increases in visitor numbers to the Dover to Kingsdown Cliffs SAC site and we are increasingly concerned about the designated areas being damaged through trampling and path widths spreading by the increased use of visitors to the site. The Trust is working hard to ensure that the integrity of the site is maintained and along with partner</p>

	<p>organisations is committed to an extensive and ongoing programme of visitor management and mitigation measures. As well as this, the National Trust is currently seeking planning permission to secure new parking outside of the designation at Wanstone with the aim of alleviating pressure on the qualifying natural habitats and to reduce footfall through the SAC.</p> <p>Proposed site allocation SAP40 is located approximately 300m west of the Dover to Kingsdown Cliffs SAC with direct access to the South Foreland Coastal Path and the SAC via a historic permissive path through National Trust land that adjoins the proposed site allocation to the north. Although protection should be afforded through proposed Policy SP13 Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets, the Trust wants certainty that the integrity of the Dover to Kingsdown Cliffs SAC qualifying features will be maintained and enhanced and that appropriate avoidance and mitigation measures will be in place.</p> <p>Recommend criterion added to policy wording which states, 'Due to the scale of development and close proximity to the Dover to Kingsdown Cliffs SAC and site of SSSI, a project level HRA is required. The HRA should consider the potential impact pathway of significantly increased recreational pressure and the relevant avoidance or mitigation measures required in line with Strategic Policy SP13'.</p> <p>Whilst the impact of development on the Dover to Kingsdown Cliffs SAC is the Trust's primary concern we also object to the principle of development at this location. The proposed site allocation is located within the Kent Downs AONB and although not identified within policy wording, or the supporting evidence base 'Landscape Sensitivity Assessment, Douglas Horman' (2021), the site is located within the Heritage Coast as identified on the adopted Dover Policies Map, and Magic Maps (Defra). As identified at paragraph 3.264, Heritage Coasts are defined by Natural England based on their notable natural beauty, flora and fauna, and their heritage features. There are only two areas defined as Heritage Coast within Kent, both of which are within the Dover District. This site falls within the South Foreland Heritage Coast which stretches a total of 8km covering an area 4km2 . The supporting Sustainability Appraisal Regulation 19 (September 2022) identifies the site to have the 'potential to moderately affect the District's landscapes, townscapes or seascapes'. However, given the omission it is of the opinion that not full consideration had been given to the sites status as defined Heritage Coast. The site has an elevated position within the landscape and any development in this location would be visually intrusive when viewed from the north back towards the village and it is considered that development here will have an adverse impact on the undeveloped coast. This does not align with proposed Policy NE2 – Landscape Character and the Kent Downs AONB, criterion (j) which seeks to enhance the special qualities, distinctive character and tranquillity of the AONB and Heritage Coasts, and national policy (paragraph 178) which places importance on the special character of the area and the importance of its conservation.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Recommend criterion added to policy wording which states, 'Due to the scale of development and close proximity to the Dover to Kingsdown Cliffs SAC and site of SSSI, a project level HRA is required. The HRA should consider the potential impact pathway of significantly increased recreational pressure and the relevant avoidance or mitigation measures required in line with Strategic Policy SP13'.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP40 - St Margaret's-at-Cliffe Small Housing Sites</p>
<p>Rep ID</p>	<p>SDLP1320</p>
<p>Rep Status</p>	<p>Processed</p>

Consultee ID	1331537
Consultee Full Name	Mr William Ratchford
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 40. St. Margaret's-at-Cliffe. STM010. Land located between Salisbury Road and The Droveaway, St Margarets-at-Cliffe. Page 171
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Site STM010 Policy SAP40 Reg 19 Local Plan (2022)</p> <p>This is additional to the group submission made by residents in The Droveaway, St Margaret's Bay to which I am a signatory.</p> <p>This is the first practical opportunity for me to comment on the draft local plan for this site due to STM010 being removed from allocation in SAP40 Reg 18 by Dover DC before being re-allocated in Reg 19. I live within 30 meters of the site.</p> <p>The DDC 2012 assessment form, which informed the adopted Land Allocation Local Plan 2015, said no to the inclusion of land site SAD28 (the same site as SMT010 in Policy SAP40 of the draft Local Plan to 2040). I largely concur with its findings and quote some of them below along with my comments.</p> <p>(The quotations are from the above mentioned assessment form, obtained by a Freedom Of Information Request, and released for public viewing by DDC Freedom Of Information Office)</p> <p>From the section entitled "Landscape Impact":</p> <p>"The site lies within the AONB and close to the Heritage Coast. It abuts National Trust land to the NE. The site is on a crest of a hill and, despite the screening, would be visible from a long distance (Redevelopment of a house adjacent to this, but lower, on The Droveaway had to undergo numerous changes before it was considered acceptable) Any development on the site would, therefore, have a highly detrimental impact on the designated landscape."</p>

Comment: Actually the site lies not only in an AONB, but also within the Heritage Coast and a BOA, and several hundred yards from an SSSI and an SAC. The development of 78 and 80 The Droveaway, immediately adjoining STM010, included the removal of vast amounts of chalk to allow the two chalet bungalows to sit low enough so that their rooflines did not impinge on the AONB landscape (I was a daily eyewitness to that). It must also be noted that DDC's Regulation 18 draft, as well as documents related to the Local Plan 2015, referred to STM010 as being adjacent to rather than in the AONB—a significant error on DDC's part and one which could be construed as influencing its decisions regarding STM010's eligibility for housing.

From the section entitled: "Biodiversity":

"The site is identified as chalk grassland to the NE(STM09), which is a priority habitat under the Natural Environment and Rural Communities Act 2006 and is a material consideration under PPS 9. That section of the site is not amenable to development. Apart from a small area of scrub to the SW, the rest of the site is arable with some hedging along boundaries. The arable is chalk-based and maybe amenable to reversion to chalk grassland with appropriate management.

The site could provide foraging and flight lines for bats. EIA Screen: Essential due to sensitive location Appropriate Assessment: The site is within 300m of the Dover to Kingsdown Cliff SAC and screening would be necessary. There would also be a requirement to contribute to the Thanet Coast Mitigation strategy."

Comment: I concur with the conclusions of the above quotation.

From the section entitled: "Green Infrastructure":

"The site is bounded by footpath ER26 along the SW, the vehicular cul-de-sacs of the Droveaway to the NW, Salisbury Road to the SE and by National Trust land to the NE, providing a wide range of recreational walking, together with the biodiversity associated with chalk grassland and its associated hedges and scrub. The ambience of the area is demonstrated by the numbers of visitors to the coastal areas and the levels of usage of paths, both public and permissive. The site is within the 'restore and conserve' area of the GI network, reflecting the real opportunities for GI. Development would harm the existing GI and the opportunities for enhancement."

Comment: I concur with the conclusions of the above quotation.

From the section entitled "Proximity to Road Network"

"The two roads that lead to the site appear to be unadopted and not well maintained. There is no access onto the site. The site is located in the area between Salisbury Road and The Droveaway. Salisbury Road is a single track unadopted road and there are no footways along its length. The Droveaway is also a single track road but is adopted. However, the road already serves a large number of dwellings and there are no footways beyond the junction with Salisbury Road. Pedestrian access to services including the local bus stop is therefore poor and reliance on the car is likely to be high as a consequence."

Comment: The Droveaway is adopted. Cars are parked all along the Droveaway allowing single lane access and nothing more. I concur with the above quotation otherwise.

From the section entitled "Analysis":

"The site is located in the AONB in a highly visible location at the top of a hill on a plateau. Any development would have a detrimental impact on this designation. Access to the site is unsuitable on unadopted roads.

	<p>Comment: The Drove way is adopted but very unsuitable. Otherwise I concur with the above quotation.</p> <p>From the section entitled: :“Consider for inclusion in the Submission Document?”</p> <p>(Answer) “No”</p> <p>Comment: I have lived at the end of The Drove way for thirteen years. The land in question is a thirty seconds walk from my house. The above mentioned council document faithfully reflects the present situation except that now there are even more parked cars on The Drove way and its size and condition have not changed. That DDC’s present Planning Office have allocated STM010 as a building plot, thus radically negating their own past assessment, is understandably shocking.</p> <p>I can only think that they have failed to consult their own archives —e.g. how could they otherwise have mistakenly identified the land as ‘adjoining’ the AONB? I also fear that they failed to visit and visibly assess the land, its setting and its accessibility. If they have failed to, it is crucial that they do visit in order to understand the error of their recent judgment. The DDC Planning Office must be made to understand that the construction of at least ten ‘executive’ houses on the highest point of our local AONB, no matter what attempts are made to screen, disguise, or ‘landscape’, can in no way be construed as a beauty enhancement or a road improvement. It would be unmistakably an insult to the designation AONB and the Heritage Coast, a dangerous precedent for future assaults on our protected environments, and a further deterioration of existing road difficulties.</p> <p>I find the inclusion of Site SMT010 in policy SAP40 of the DDC Local Plan to be, as a decision, unsound, not justified, inconsistent with National Policy, and not legally compliant, and therefore I object strongly to its inclusion in the proposed Local Plan.</p> <p>Thank you for the opportunity to submit my opinion.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The removal of STM010 as an allocation from policy SAP40 of the DDC Local Plan for the reasons given above</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP40 - St Margaret's-at-Cliffe Small Housing Sites</p>
<p>Rep ID</p>	<p>SDLP1280</p>

Rep Status	Processed
Consultee ID	1331584
Consultee Full Name	Robert Blowers
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP40
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I write as an ex-resident of St Margaret Bay with experience of living there for some 46 years, both in the Droveaway and nearby Granville Road. One of the reasons for our move to Walmer was the congested road situation between the Bay area and the road out of the village, particularly exacerbated at school dropping-off and picking-up times, making it almost impossible to get to and from. The latter problem needs to be addressed now by the provision of an offroad parking lane from the top of Bay Hill to the School entrance, on either side of the road, and improved sightlines around the bend in the middle. A further factor is the increase in size of the average motor car with the school pick-up vehicles being very largely of the 'Chelsea Tractor' variety.</p> <p>The building of many more houses in the Bay area, such as the above proposals, without a corresponding upgrading of the access road situation would be most irresponsible. Similarly, I have seen over the years the huge increase in the number of parked cars in The Droveaway itself making it difficult to negotiate with one-way traffic necessary at many points.</p> <p>I do hope these, and all the other points raised by the residents, will receive due consideration before any decisions on the house building proposals are decided.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP1341
Rep Status	Processed
Consultee ID	1330189
Consultee Full Name	Douglas Johnston
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 40 STM010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>STM10 has been added to the Local Plan, after the close of Reg 18, following an HELAA (Housing and Economic Land Availability Assessment) review. Whilst it is disappointing not to have been able to comment, I will now take the opportunity to make my views known.</p> <p>I have read the outline reasons using the various SA Objectives; however, I would beg you to consider some points in more detail.</p> <p>I am upset you do not seem to place much emphasis on the AONB boundaries. I am led to believe there are many migratory birds which pass over our cliffs – buildings and additional lights will certainly have an adverse effect on their wellbeing – I would hope you ensure proper consultation with the National Trust, Natural England, and RSPB before finalising this review.</p> <p>Regarding the location of the site. I appreciate this should have been visited by council staff as part of the HELAA review, however I believe they have not understood the full effect of this proposal on the community.</p> <p>This land is situated above the Droveway and Salisbury Road where previous applications have been rejected due to height restrictions. Surely this development would be higher than surrounding houses and be a complete contradiction to previous decisions.</p> <p>The site measures 20,358m2 (approx. per google earth). If we assume there will be 10 houses, this equates to 2035m2 per plot. (I appreciate there will be some roads and service areas included, therefore a small adjustment may be needed!)</p> <p>It is very difficult to understand why 10 bungalow style houses would be an economic development for this site. Obviously, there is no requirement to provide affordable housing however I fail to understand the need for such expensive style homes in this area. In addition Salisbury Road is a private road and there can be no access from that side .The only access is therefore via The Droveway.</p>

	<p>The site is situated at the end of what is a very narrow road with houses on both sides and only a small section serviced by a pavement. Most of the road has no pavements and, obviously, when cars are parked on the side, it becomes a single carriage road.</p> <p>The regular traffic is currently cars and delivery vans, often with congestion issues when passing the parked vehicles. On the occasions when heavy vehicles must use the road, they invariably mount the pavements or run up the grass verges.</p> <p>If this development were to go ahead there would be circa 2/3 years of large construction vehicles making their way to/from the site. Post construction the increase in cars /delivery vans using The Droveaway and Sea Street (past the St Margarets primary school) would be unconscionable. Mothers and children and older people especially will be at risk. (I can assure you, from experience, the drivers do NOT take extra care!). There is no way of mitigating this risk.</p> <p>This is a residential road leading to a farmyard and has not had the benefit of regular maintenance. Without doubt the continual heavy traffic will cause undue wear and tear – will there be a budget set aside to restore the inevitable damage.</p> <p>Access to the Droveaway is through St Margaret's village and up to Bayhill via Sea Street. This involves navigating a very narrow passage between some old cottages on one side and the entrance to the village primary school on the other side.</p> <p>I ask a proper traffic usage survey is instigated to assess the impact the increased traffic will have on The Droveaway and Sea Street – especially at the start and end of the school day- before authorisation is given.</p> <p>Your review also considers the infrastructure at the location.</p> <p>Water and sewage pipes have not been upgraded or replaced in over 30 years and it is unlikely they will cope with the additional demand.</p> <p>The review also states there is an NHS surgery. This is a small building (in The Droveaway – parking issues!) and has to service the whole of St Margarets. It currently is struggling to cope. By adding four additional building developments, I believe it will be overwhelmed – perhaps this should be checked before just noting a surgery within 800m. The above-mentioned school suffers from the same problems, I would recommend their capacity is checked before accepting the application.</p> <p>In respect of local transport, the latest bus timetable has been issued which identifies only 5 buses per day to Dover and Deal – the last one to St Margarets leaves Deal at 2.30.</p> <p>In respect of your transport criteria, especially re climate change, I would suggest this is not a suitable timetable.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>I believe if the prpoer consultation had been invoked with regulation 18, this project would not have been allowed. It is my belief Nelson Park St Margarets is a more appropriate area which would accomodate 10 dwellings - including affordable houses. STM010 should be deleted.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP40 - St Margaret's-at-Cliffe Small Housing Sites</p>
<p>Rep ID</p>	<p>SDLP1282</p>

Rep Status	Processed
Consultee ID	1331856
Consultee Full Name	Mr Russell Abrahams
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP40
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SAP 40 Figure 4.12. Map of Allocations in St Margarets -at -Cliffe SAP 40 STM010 land located between Salisbury Road and The Drove way St Margarets -at- Cliffe I am a resident of Salisbury Road. The access from and to Salisbury Road via the Drove way currently is both difficult and dangerous as there is poor visibility, a very narrow road access and cars parking in the Drove way (as very few houses have off street parking) especially opposite the entrance to Salisbury Rd make this perilous. Additional traffic along the Drove way resulting from any residential development would create a bottleneck and a hazard.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP1524
Rep Status	Processed
Consultee ID	1331894
Consultee Full Name	Mr Peter Wash
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP40
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>I would like to object against the above mentioned Planning submission - as follows:- Firstly the proposed site is within an area of outstanding natural beauty - being so close to the famous White Cliffs of Dover. Secondly, and following:- Access to the site would be a problem, as it can only be accessed by The Droveaway - as there are properties, and farmers field with livestock in on the other side. The Droveaway reduces in width as you approach that particular end which does not lend itself for increased throughput - especially with the larger type of vehicles required for the build. There are many other arguments as set out in the group objection sent in by various residents of not just The Droveaway residents, but many more people in St Margarets Bay and St Margarets-at-Cliffe. I noted that the promoters of the site referred to its proposed development as " infill " ?? On what grounds? - as this certainly is not an appropriate description - it is situated on the edge of a built up area of St Margarets - and between the Northern ends of the Droveaway and Salisbury Road. Finally, the current local plan. adopted by the DDC in Jan 2015 provides for the protection of sites in St Margarets at cliffe, and includes St Margarets Bay, that fall within the AONB section 2.18 of the DDC land allocations local plan - emphasises that AONB have the highest status of protection and the plan states that there are very limited development opportunities in St Margarets Bay that would NOT HARM the setting of the AONB. For this reason, I understand that no sites with the AONB of St Margarets Bay were allocated for housing in the current plan.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Not Applicable
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
<p>Rep ID</p>	SDLP1356
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1333128
<p>Consultee Full Name</p>	David Powell

Consultee Company / Organisation	
Agent Full Name	Klaire Lander
Agent Company / Organisation	Lander Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP40
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Lander Planning sent a PDF document which has been split across the relevant sections of the Plan. See Original Attachment on SDLP1346)</p> <p>The identification of the land between Salisbury Road and The Drove way at St Margaret's at Cliffe as a housing allocation is supported. The site is available and deliverable and is sustainably located. Housing in this local centre is important to creating sustainable development in these areas. The policy is therefore 'effective' and 'justified' and therefore supported.</p> <p>In terms of the likely phasing of delivery of the site, ecology and other surveys are underway, with the hope that a planning application will be submitted in 2023. A pre-application has taken place with the Council, with it identifying the key issues that any planning application would need to address. The pre-application indicated support for the principle of a development on this site.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP1873
Rep Status	Processed

Consultee ID	1330322
Consultee Full Name	Margaret Scott
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP40 STM010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>It is disappointing to learn this application was not given the scrutiny it deserves because decisions were made at the last minute the donkey's field in Salisbury Road is privately owned and not part of this development.</p> <p>DDC has previously declined to use this site preferring others in the village. The Drove way is effectively a cul-de-sac with five roads feeding off it. Can this junction take more traffic from 72 houses on the field in question, this was the figure was quoted in the past. It is not financially viable to build just ten houses. Are any of them going to be affordable houses? With building land costs, of course not!</p> <p>This development will destroy the scenic value of the White Cliffs of Dover when seen from the sea (Green space dark skies project). It will destroy the view of the war memorial from the village. The field is adjacent and complimentary to the AONB with footpaths running along each end, and across the field. I have used the footpaths for over twenty years. Surely it is outside the village envelope and has planning protection on both counts!</p> <p>What of the bank of trees along the Drove way, and the copse of trees along Salisbury Road? Will they disappear along with the wildlife they support?</p> <p>The Drove way has little pavements along its length it is just over one lane in width beyond the Post Box. I understand access will only be via the existing field entrance. Large farm vehicles already struggle to make their way along The Drove way. The road surface in the Drove way is in a poor state of repair.</p> <p>Lastly what about the impact of the gales along the coast? This site is raised about 2-3m above the level of the road. it is exposed to high winds n all sides, especially from South Westerly gales. The solid wooden stable in the donkey's field blew over. My bungalow has experienced structural damage despite being protected from the worst of the gales. The garage roof blew off, and the car was written off. I replace blown double glazing annually. Cladding broke free. Gales are made more intense by the funnel shaped land mass either side of the channel. Living through gales is a terrifying experience.</p> <p>Be warned this raised site is not suitable for even single storey development</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance	

with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP1965
Rep Status	Processed
Consultee ID	1334296
Consultee Full Name	Mr Julian Thorn
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP40 STM010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I am Julian Thorn, and I wish to strongly object to the inclusion of the AONB field STM010, at St Margarets Bay, opposite my property, (DDC Redacted) The Droveaway, St Margarets Bat, in the Local Plan, Regulation 18, and now Regulation 19. STM010 is owned by David Powell and in one corner of it, a smaller field STM011 owned by an elderly Droveaway resident who has no intention of selling it and is opposed to the development of STM010. Previously these two fields had only particularly ever been considered with any proposals jointly, so something of a departure, why?

STM010 is an AONB field, and European status SPA adjacent to National Trust land, South Foreland Heritage Coastal Path area, Dover Patrol Memorial, Leathercote Point, which includes an SSSI, biodiversity area, and important for migrating birds. It forms a vital buffer zone between these and the village of St Margarets Bay, as the views over the field are a continuation of the landscape. It stands on the crest of the area, at 86 metres high, and seen from all around, has 3 public footpaths across it, which are much used by locals and walkers.

Originally it was 'discounted' from being included in the Local Plan, Reg 18, then the day before closure. 16 March 2021, it was suddenly included. With closure on 17 March 2021 there was no chance of consultation for The Drove way residents to have their say. Indeed, St Margarets Parish Council on learnt of it later!! A worrying lack of transparency, was correct procedure followed, indeed even legal?? Very sadly passed now to Regulation 19.

No prior consultation with interested parties, namely NT, Natural England, CPRE and Kent AONB, why not? Looking at the criteria required to consider development on AONB land, particularly NPPF rules 115 and 116, these seems to have been flagrantly disregarded, namely the detrimental effect on landscape quality and heritage. We are only custodians of such precious sites as this and have a duty to care for and hand them on to future generations. Both the Drove way and Salisbury Road and 'dropped down', built on one side only, opposite and away from this field, which is about 5 metres above them, with a deep hedge/tree line, excepting the field 'entrance' opposite me. The visual impact of 10-metre-high houses on top (15 metres in total) would be a horrendous scar on the landscape crest of this field and seen for miles around. Ironically enough, about 8-10 years ago, 2 chalet bungalows, 80 and 78 The Drove way were built abutting STM010. To get planning permission, he builders had to take away 100s of tons of soil and chalk to 'drop down' the properties to preserve the views over the field, and avoid roof lines spoiling the view, different rules applied then it would seem. This is also a Saxon burial site, important to preserve.

The entrance to the field has only ever been used by tractors, no cars, is directly opposite my property, and would be the entrance to the proposed development. Originally it was only a turning point, and it seems the farmer probably pushed through the hedge. Going right back, the field entrance was via Brockhill Farm (CT15 6DF) prior to NT ownership. Also, STM010 is shown on plans as having its boundary 'inside' the field plot, effectively landlocked ?legal access?, interesting legal question. The last quarter of the Drove way is a narrow track and ends at Brickhill Farm; the Council tarmacked it for the first time in the 1990's, just screeding it, no actual foundations. The road outside my house is just over 4 metres wide. If myself or visitors park on the road, farm vehicles and cars can only pass by virtue of the field opening opposite. Looking at the plans in the Landers development report the farmer commissioned, it very wrongly shows The Drove way at this end as a normal two-lane width road, it most certainly is NOT!! For vehicles to enter the proposed site they would have to enter via the proposed site's exit side for the road if anyone was parked outside my house. Dangerous and illegal.

The Drove way has no pavements for the bulk of its length, and where it is accessed off Sea Street at the beginning. The Drove way is effectively single file for the first quarter of a mile with parked cars always, a doctor's surgery compounds this, and ambulances must be able to access. Lorries often have to go on the pavement to pass, only bit with pavement, a nightmare it's a real problem and dangerous. Also, Sea Street is a horror story with the school and village centre traffic most the daytime, not helped by the bus service being reduced to only 1 bus every 2 hours no!

Because STM010 is about 5 metres higher than my house, at night, cars would illuminate my bedrooms coming and going opposite me, adding to the general increase in light pollution this development would bring. So much an AONB!

I hope you can understand why I am so upset and angry because DDC's inclusion of STM010 in Local Plan Ref 18, and now 19. When I look at how cavalierly STM010's AONB status has been disregarded I am horrified. Landscape, scenic beauty, conservation and enhancement, public amenity interest all seem to have counted for nothing.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Abandon the inclusion of STM010 in local plan

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	For the Droveaway. Salisbury Road residents to be directly represented.
Include files	
Local Plan Consultation Point	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
Rep ID	SDLP2033
Rep Status	Processed
Consultee ID	1334472
Consultee Full Name	Rebecca Woods
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	STM010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>I write in relation to the proposals made under the above reference and wish to register my strong objections.</p> <p>Given the surrounding infrastructure, these proposed developments are totally inappropriate. The local primary school is already over subscribed, with some local children having to travel some distance to other schools.</p> <p>The GP Surgery offers a fairly limited service and is full to capacity in any event. The bus service is now extremely limited, following the recent changes to the timetable, making it almost impossible for children to get to school.</p> <p>The traffic on our narrow and winding village roads and lanes has already increased dramatically over recent years. Upper Road to Dover is narrow and winding, fairly dangerous in wet weather and treacherous in ice and snow. The main road through the centre of the village, Sea Street, is very narrow with no adequate footpath, and we already have frequent traffic jams in the centre of the village, outside the Post Office, particularly when a brewery lorry is delivering to The Smugglers, a post van is parked outside the Post Office or a bus is going in or out of the village. A massive increase in the population of the village would cause huge problems in relation to the amount of traffic and parking, not to mention the safety element, as each new household would have at least one car, most having two or more, particularly as there is next to no bus service here anymore.</p> <p>We do not want to lose what peace and quiet we are currently able to enjoy in our lovely, rural village, by overpopulating the area and creating a huge housing estate.</p> <p>I would urge you to please reconsider and choose an alternative location.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	SAP40 - St Margaret's-at-Cliffe Small Housing Sites
<p>Rep ID</p>	SDLP1830
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1331604
<p>Consultee Full Name</p>	Elizabeth Bostock

Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	STM010
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I wish to express my strongest objections to this proposed development of 10 dwellings which – if allowed – I feel would only be the thin end of the wedge and many more applications would follow.</p> <p>Historically I know of 2 applications to build on this site – one for 5 dwellings and the other for just one – both applications were refused.</p> <p>The Droeway which is the only reasonable access to Salisbury Road and other roads is very busy already carrying too much traffic unsuited for a narrow road with very limited pavements for pedestrians. I live right opposite the doctor's surgery and Droeway Gardens and every day see situations where pedestrians' lives are already at risk due to the volume, speed and type of traffic passing. Cars are inevitably parked on one side of the road for people using the doctor's surgery, parents and children cross the road here to access the footpath to the local nursery and primary schools.</p> <p>Our bus service is now very limited so many people drive children to school, people drive to work, and others drive for personal reasons. New housing will obviously increase the private traffic.</p> <p>Oversized commercial vehicles – delivery, farm, construction and even DDC refuse – often have to travel along the narrow pavement this end of the Droeway – obviously very dangerous. Apart from my concern about the increase in traffic both during construction and afterwards, I also worry about the loss of green spaces, loss of habitat for birds and other wildlife and the inevitable light pollution. At the moment we are lucky enough to still be able see the stars.</p> <p>I am in my 90's so this proposed development would not affect me personally for long but the future residents.....?</p> <p>Please do not allow this to happen.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Local Plan Consultation Point	Wingham
Rep ID	SDLP828
Rep Status	Processed
Consultee ID	1330664
Consultee Full Name	TG Designer Homes c/o Agent (Hobbs Parker)
Consultee Company / Organisation	
Agent Full Name	Elizabeth Welch
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Wingham
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The Plan is considered unsound for failure to allocate the land at Gobery Hill, Wingham. The site has not been correctly assessed in so far as a smaller scheme of up to 10 units can be accommodated on site without causing any harm.</p> <p>4.255 Land off Gobery Hill, Wingham</p> <p>The Council assessed the site as part of its assessment of sites in connection with the Regulation 18 version of the emerging Local Plan (site reference WIN013). The site was rejected as part of this process for a number of reasons, including heritage and landscape.</p> <p>The site which the Council assessed is 0.97 ha in size, with an indicative capacity of 29 units. To ensure that the points raised by the Council have been addressed Stantec and Mark Hanton Studio (Landscape Architecture and Urban Design) have been engaged. Predominately utilising the existing access a landscape-led low density scheme can be accommodated on site.</p> <p>From the analysis a sensitively located scheme of approximately 10 units is considered suitable for the site (compared to a figure of 29 which was assessed by the Council).</p> <p>As part of any proposed development there is an opportunity to open up the riverside, both to existing and new residents, to enhance the River setting and create new wetland habitat. Other ideas to be explored include the creation of a small bird hide/ecological centre.</p> <p>In reducing the potential capacity of the site to 10 units we can demonstrate that the views of the Church will not be impacted, and that the countryside setting will be retained as part of the development.</p> <p>A pre-application request has been submitted to the Council under reference PE/22/00130, in November 2022 with a separate pre-app approach direct to KCC Highways.</p>

	<p>Proposed vehicular access</p> <p>It is anticipated that the site will, in effect, be accessed from two locations. One location will be through the use of a shared driveway at the west end of the site frontage. The other access would be using the existing vehicular access at the east end of the site frontage.</p> <p>The west shared driveway access has been considered with respect to visibility splays of 2.4m x 43m to the west, and 2.4m x 160m to the east, from a new driveway access that would serve around three units. These splays are based upon the Manual for Streets requirement for a 30mph speed limit (to the west) and Design Manual for Roads and Bridges (DMRB) requirement for a 50mph speed limit (to the east). The existing east access will serve the balance of the proposed development. Visibility splays have been considered at 2.4m x 90m to the west and 2.4 x 160m to the east from the existing site access. These distances are based upon DMRB guidance based on a 50mph speed limit from the east and the 30mph limit from the west.</p> <p>The visibility splays considered would be expected to fall within the scope of existing highway boundary or site frontage. On this basis it is considered that suitable vehicular access could be provided to serve the proposed development.</p> <p>Deliverability</p> <p>The site is immediately available being pursued by a local developer, TG Designer Homes, who have a number of active sites under construction in the local area. Following obtaining pre-application advice the intention is that the required supporting evidence to accompany a full planning application will be drawn together. The site itself has no ownership or infrastructure constraints or extraordinary development costs, the site is considered by the developer to be a viable proposition. There are no known barriers to development of the site and an application is likely to be submitted in 2023.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The Plan should allocate the land at Gobery Hill, Wingham for a small sensitive scheme of approximately 10 units</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>To demonstrate that the site is suitable for development and is immediately available</p>
<p>Include files</p>	<p>Land off Gobery Hill, Wingham - Final.pdf</p>
<p>Local Plan Consultation Point</p>	<p>Wingham</p>
<p>Rep ID</p>	<p>SDLP1520</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1333294</p>
<p>Consultee Full Name</p>	<p>Guy Van Petegem</p>

Consultee Company / Organisation	
Agent Full Name	Grace Martin
Agent Company / Organisation	Hume Planning Consultancy Ltd
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Omission Site In Wingham - WIN006
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Representation submitted by Hume Planning. Full Representation attached to SDLP1520. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1520.)</p> <p>Dover Local Plan Regulation 19 Consultation: Gobery Hill, Wingham We write to you on behalf of our client, Mr Guy Van Petegem in relation to the Dover District Council Regulation 19 consultation on its Local Plan.</p> <p>Our client owns the site at Gobery Hill (HEELA site WIN006). The extent of the site is shown below. This site is not included as an allocation within the Pre-Submission version of the Local Plan. We are writing to object to its omission. For the reasons set out below we consider it is a suitable and available site to help deliver housing to Wingham, a local centre within the district.</p> <p>The Site This 1.3 ha site is located on the northern side of Gobery Hill adjacent to the settlement confines, which runs along the back gardens on the eastern side of Preston Hill. The site extends for approximately 150 metres in a northeast direction rising from Gobery Hill. The main section of the site is approximately 70 metres wide, with a further triangular section of land adjacent to Gobery Hill in addition to this, which will be retained as a setting to the existing dwellinghouse.</p> <p>The site is currently accessed from a field gate onto Gobery Hill, adjacent to the rear of Chegworth Cottages and Beech Tree Cottages. These are situated on Preston Hill, but also have rear parking onto Gobery Hill. Immediately northeast of the site is the residential dwelling Bircham House.</p> <p>The site is currently undeveloped land. It is not located in flood zones 2 or 3, nor is it in an area at risk of surface water drainage.</p> <p>Planning History Planning permission was dismissed at appeal in May 2022 for the redevelopment of this site for 15 dwellings. However, this was refused on highway grounds and on a technical footpath connection and safety issue which we consider can be addressed and overcome in conjunction see below (an assumption that KCC supported when withdrawing its original objection shortly before the Informal Hearing).</p> <p>It is pertinent to note that during the course of discussions on this site at pre-application and application stage, officers at the Council considered the principle of residential development in this location was acceptable. The only issue dealt with through the appeal was highway safety (appeal ref. APP/X2220/W/20/32642360), and in particular, the provision of a safe and suitable pedestrian crossing over Preston Hill. Ahead of the appeal hearing, KCC highways dropped its objection to the scheme and the council agreed it would work with the applicant to find a suitable mitigation scheme. We are confident this can be found and accordingly this site would be suitable for development removing the single technical reason to this residential site not coming forward.</p> <p>Suitability of the Site This site is located immediately adjacent to the Settlement confines for Wingham, a defined Local Centre. It is appropriate that growth is directed towards Wingham given it has a good range of services for a settlement of this size. This is evident from its high placement in the settlement</p>

hierarchy. The site is also very well connected to the centre of Wingham which provides the services and local facilities, all of which can be appropriately accessed via an improved footpath linkage as outlined above.
The site is located in flood zone 1, which is sequentially preferable location for development.

We note that this site has been considered as part of the HEELA (site WIN006), and within this it is concluded that the site is “potentially suitable”. Low density development here would be appropriate, which follows the existing grain, and would represent a logical extension to existing built form. Within the HEELA it is acknowledged, as set out above, that improvements would be required at the junction of Gobery Hill and Preston Hill to provide pedestrian crossing facilities, allowing connection between site and bus stops/services/amenities in village. Accordingly, we consider the site is suitable for development and should be allocated.

Availability

We confirm on behalf of our client that this site is available for development over the short to medium term of the plan period.

SP3: Housing Growth

(DDC Note - Section DUPLICATED against SP3)

We welcome DDC’s commitment to meeting its housing need, with Strategic Policy SP3 committing to providing at least 10,998 net additional homes over the Plan period. Within the Policy, reference is made to the Council’s overall spatial strategy i.e. the majority of growth will be focused towards the principal town, Dover, and the nearby further expansion of Whitfield. It is appropriate that medium/smaller sized settlements in the district, i.e. local centres such as Wingham, receive some growth to sustain their role in the settlement hierarchy over the plan period, serving the needs of its own residents and those within surrounding villages and hamlets and also to provide a good choice of sites. Wingham contains a range of local services including a primary school, a local food store, a pub and Post Office facilities. The allocation of around 100 dwellings across various sites is therefore considered appropriate for this settlement when considering its role in the settlement hierarchy. A large proportion of growth is being directed towards further expansion of Whitfield (over 2,000) where delivery rates in the past have not matched the local plan housing trajectory. Large strategic sites delivery rates can easily slow down during the plan period and under-deliver. Whilst there is a buffer within the Plan, it is considered appropriate not to use this as a limit and allocate other suitable sites in sustainable locations where available.

Wingham is a sustainable location for growth and delivering a choice and this allocation is attractive to smaller housebuilder. The expansion of the settlement in other directions is constrained by flood risk, access, landscape and heritage considerations which are constraints which do not affect this site (if the assumption that KCC will support the detailed pedestrian crossing design which was its position at the recent Informal Hearing). It was established through the work undertaken as part of the recent planning application and support of LPA Officers that the Gobery Hill site is considered suitable for residential development. It is also available and can be delivered within the short to medium term, and in our view this site should be allocated within the Plan.

Summary

Hume Planning Consultancy welcomes the opportunity to comment on this stage of the Council’s Pre-Submission Local Plan and would like to reserve the right to attend the Examination in Public in due course to discuss potential development sites in Wingham.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Martin Hume Planning (Gobery Hill) 1515 Att1_Redacted.pdf
Martin Hume Planning (Gobery Hill) 1515 Att2_Redacted.pdf

SAP41 - Footpath Field, Wingham (WIN0014)

Local Plan Consultation Point	SAP41 - Footpath Field, Wingham (WIN0014)
Rep ID	SDLP833
Rep Status	Processed
Consultee ID	1331285
Consultee Full Name	Mr David Maher
Consultee Company / Organisation	Dandara South East Ltd
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy SA41 - Footpath Field, Staple Road, Wingham (WIN014)
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Not applicable.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>SA41 – Footpath Field, Staple Road, Wingham (WIN014)</p> <p><i>The site, Footpath Field, Staple Road, Wingham as shown on the policies map is allocated for an indicative capacity of 75 dwellings.</i></p> <p>This policy provision is considered by Dandara to be “sound”.</p> <p>Development proposals for the site shall include the following:</p> <p>a) Development should be sensitively designed to respect the character of the built area to the west of the site and to allow transition to the rural landscape;</p> <p>Dandara does not object to this criterion and considers it to be “sound”.</p> <p>b) A sensitive landscaping scheme and appropriate landscape buffer determined by a Landscape Visual Impact Assessment is required to mitigate the impact of development on the wider countryside. The existing trees/hedgerows along the southern and eastern edge of the site are to be maintained and enhanced;</p> <p>Dandara does not object to this criterion and considers it to be “sound”.</p>

c) Consideration will need to be made regarding the quality and condition of trees and hedgerows within the site. Detailed proposals should aim to protect those of importance and incorporate them in the overall design of the development and to provide opportunities for biodiversity habitat creation and enhancement;

Dandara does not object to this criterion and considers it to be “sound”.

d) Primary vehicular, pedestrian and cycle access to the site shall be provided via either Staple Road or Miller Close and should include traffic calming features on Staple Road;

Dandara does not object to this criterion, yet it considers that an “if required” clause should be inserted with regard to the proposed traffic calming features. The necessity for traffic calming features has not yet been fully established. This work will be undertaken through the Transport Statement in preparation of the planning application for the site. Accordingly it is recommended this criterion is re-worded as follows:

*Primary vehicular, pedestrian and cycle access to the site shall be provided via either Staple Road or Miller Close and, **if required** should include traffic calming features on Staple Road;*

e) Widening of Staple Road will be required along the site frontage with a footway provided along the frontage connecting to the existing network at Miller Close;

Dandara does not (yet) consider this criterion to be “sound”. As per criterion d above, the necessity, or otherwise for road widening and footway provision along Staple Road will be established through survey work and the Transport Assessment (to be prepared in advance of the planning application). Equally, Dandara notes the presence of both a foul sewer drain and a change in site levels along the site frontage onto Staple Road (northern edge of Staple Road).

The above aspects will need to be considered through further site and survey work in advance of the planning application for the site. Accordingly to enable the criterion to be “sound” it is recommended that an “if required” clause is introduced to the policy wording as follows:

***If required**, widening of Staple Road will be **required provided** along the site frontage with a footway provided along the frontage connecting to the existing network at Miller Close;*

f) The design and layout of the site should retain and enhance the PROW;

Dandara does not object to this requirement, yet it notes that the proposed alignment of the PROW at the site will need to be the subject of further review and consideration including with Kent County Council. This work will be undertaken prior to the submission of the planning application and will have regard to the design and layout considerations for the site indicated under criterion a.

g) In accordance with Policy SP13, a wintering bird survey must be undertaken in advance of a planning application on the site. If the bird survey identifies that the development will exceed the threshold of significance, mitigation will be required. A suitable scheme of mitigation will need to be submitted with the planning application for the site;

Dandara does not object to this criterion and considers it to be “sound”.

h) The site is over 1ha in size and a Flood Risk Assessment is required which should include an appraisal of the impact of climate change;

Dandara does not object to this criterion and considers it to be “sound”.

i) Development must include appropriate air quality mitigation measures as set out in the Air Quality study;

This criterion is not considered to be “sound” at the present time. It refers to an Air Quality Study, which is not yet apparent from the emerging Local Plan evidence base. It is therefore recommended that the criterion is re-worded as follows:

Development ~~must~~ include appropriate air quality mitigation measures ~~as set out~~ to be identified in the Air Quality study;

j) Layout is designed to ensure future access to existing wastewater infrastructure for maintenance and upsizing;

Dandara does not object to this criterion and considers it to be “sound”.

k) A Transport Assessment is required in accordance with Policy TI2 to identify off-site highway improvements and sustainable transport measures that are necessary to serve the development. The Transport Assessment must evidence that there is no severe impact on the highway network and identify appropriate mitigation;

Dandara does not object to this criterion, yet it makes a presumption that off-site highway improvements and sustainable transport measures will be necessary to serve the development. Whilst this may be the case, this work will emerge through the Transport Assessment for the site. Accordingly, it is recommended that works are referred to as “potential” works as follows:

	<p>A Transport Assessment is required in accordance with Policy TI2 to identify potential off-site highway improvements and sustainable transport measures that are necessary to serve the development. The Transport Assessment must evidence that there is no severe impact on the highway network and identify appropriate mitigation;</p> <p>l) Open space requirements in accordance with Policy PM3 shall be provided. However, due to the location of nearby existing open space infrastructure, off-site contributions to upgrade or enhance nearby facilities may be sought rather than on-site provision; and</p> <p>Dandara does not object to this criterion and considers it to be “sound”.</p> <p>m) Development must include appropriate odour mitigation measures to mitigate any impact from the nearby Dambridge Waste Water Treatment Works.</p> <p>Dandara does not object to this criterion and considers it to be “sound”.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Dandara is seeking to bring forward development proposals for the site broadly in line with Policy SA41. As above, Dandara is seeking proposed modifications to some of the wording for the site policy. This wording may have implications for the development proposals for the site. Accordingly, Dandara would seek to attend and participate at the examination in order to make its case for the above modifications to be inscribed into the Local Plan.
Include files	
Local Plan Consultation Point	SAP41 - Footpath Field, Wingham (WIN0014)
Rep ID	SDLP793
Rep Status	Processed
Consultee ID	1331870
Consultee Full Name	Mr Gary Thomas
Consultee Company / Organisation	Wingham Heritage Ltd
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy SA41 – Footpath Field, Staple Road, Wingham (WIN014)
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is ‘unsound’, on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	not applicable

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>SAP41 criteria d: The wording to this part of the policy should be more flexible in relation to traffic calming measures. Any measures, if required, will be a development management issue. Criteria d should read: "Primary vehicular, pedestrian and cycle access to the site shall be provided via either Staple Road or Miller Close and, if required, should include traffic calming features on Staple Road"</p> <p>SAP41 criteria e: The wording to this part of the policy should be more flexible in relation to the widening of Staple Road and the provision of a footpath. Any measures, if required, will be a development management issue. Criteria e should read: "If required, widening of Staple Road will be provided along the site frontage with a footway provided along the frontage connecting to the existing network at Miller Close"</p> <p>SAP41 criteria i: It is premature to make reference to the Air Quality Study in advance of its publication which should be reflected in the policy wording. Criteria i should read: "Development may include appropriate air quality mitigation measures to be identified in the Air Quality study"</p> <p>SAP41 criteria k: The wording to this part of the policy should be more flexible since it assumes that the Transport Assessment will identify the need for off-site highway improvements. Any measures, if required, will be a development management issue. Criteria k should read: A Transport Assessment is required in accordance with Policy T12 to identify potential off-site highway improvements and sustainable transport measures that are necessary to serve the development. The Transport Assessment must evidence that there is no severe impact on the highway network and identify appropriate mitigation"</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>To fully debate and explain the need for the important changes proposed to the policy to help aid its delivery.</p>
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP41 - Footpath Field, Wingham (WIN0014)</p>
<p>Rep ID</p>	<p>SDLP1647</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1252038</p>
<p>Consultee Full Name</p>	<p>Kerry Coltham</p>
<p>Consultee Company / Organisation</p>	<p>Wingham Parish Council</p>
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP41
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>a) As in the Council's previous response to the Reg.18 Submission (Ref: 21-06 DDC Local Plan 17.3.21), Councillors are in general agreement with the suitability assessment undertaken previously which identified sites potentially suitable for residential development and those that were not. The assessments resulted in identification of the above three sites for potential development in Wingham, subject to Planning Permission. Councillors continue to have no objections to the allocated sites, subject to appropriate design, scale and planning permission.</p> <p>b) Impact of SAP41 & SAP42 Councillors have no objection to the allocation of site SAP41 but were very surprised to see the Reg 19 indicative capacity increased by 50% from 50 to 75 dwellings. Councillors question how this increase came about and why it is required as they do not believe the site can sustain this level of development. Character Impact on Wingham River & farmland: The Dover District Landscape Character Assessment 2020, which contains guidance and strategy when considering any type of change to the landscape character, refers to two Landscape 'segments' [LCA A3 (Little Stour and Wingham River) & LCA D3 (Staple farmlands)] which outline the key characteristics, key sensitivities and values of the area, and the Landscape strategy. Regarding 'Development management' of Footpath field/SAP41 the strategy guidance is:-</p> <ul style="list-style-type: none"> • Conserve the strong vernacular of historic buildings and their rural setting; • Conserve and respect the character and pattern of the historic built form and their association with traditional farming practices by resisting further agricultural intensification; • Conserve the open landscape and avoid the introduction of large scale or incongruous elements; • Encourage the use of traditional and in keeping materials, such as flint, redbrick and render; • Resist proposals for highway upgrading to retain the rural character of the narrow lanes and associated verges. <p>The Council seeks reassurance that the principles of this DDC document are adhered to and that the commercial drivers of the developers play no part whatsoever in the decision-making process for development in our village. Traffic/drainage: Both SAP41 and SAP42 will have a significant impact on traffic in the immediate vicinity both during development and once completed. The 'Seath's Corner' junction where Staple Road meets the B2046 Adisham Road is notorious for damaged buildings and infrastructure from large vehicles using this junction and thus an informal one-way system is in place for existing businesses with local and visiting foreign LGVs to help ease this issue. This must be taken into consideration, especially at the development stage. Surface water drainage at site SAP41 is of concern to Councillors post development, especially if 75 dwellings are built.</p> <p>c) Affordable Housing Wingham's requirement for socially affordable housing is well documented. The land at Footpath Field (SAP41) was due to be used for the second phase of the Miller Close development for 16no rural exception affordable units but was not given planning consent at the time. The existing Miller Close development of 26 properties supplied a much-needed housing resource for Wingham residents. The Local Housing Needs Survey (HNS) carried out by Action with Communities in Rural Kent (ACRK) on the Parish Council's behalf in February 2021 identified a need for 10 affordable homes; 2 of which are for older households plus a requirement for 3 open market properties suitable for older households who want to downsize/move to more suitable housing for their needs. This information, and the breakdown on the types of property required was supplied to DDC Planning Officers and discussed in May 2021 where the Council were assured 15 affordable properties would be included in the development at WIN014 (SAP41) and the HNS would inform the type of property built. The Council urge DDC Planners to ensure this local housing need is allocated as required by their existing policies and that a Local Lettings Plan for rural settings is put in place. Councillors also request that any development is phased to ensure local housing needs.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness	generally supportive of the allocated sites for the parish, though not the number of dwellings allocated to SAP41, and request that development includes suitable affordable housing to meet the local need

matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	Coltham Wingham PC 0951 Att1_Redacted.pdf
Local Plan Consultation Point	SAP41 - Footpath Field, Wingham (WIN0014)
Rep ID	SDLP999
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP41
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The County Council requests that the policy includes reference to better pedestrian connectivity.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness	The County Council requests that the policy includes reference to better pedestrian connectivity.

matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

SAP42 - Wingham Small Housing Sites

Local Plan Consultation Point	SAP42 - Wingham Small Housing Sites
Rep ID	SDLP68
Rep Status	Processed
Consultee ID	1330307
Consultee Full Name	Messrs Upton
Consultee Company / Organisation	J.Scott, Finn's
Agent Full Name	Jane Scott
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP42 - land adjacent to Staple Road (WIN003)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The Policy is not making the best use of land by maximising the level of development appropriate for the land.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The site was identified in the HELAA as being suitable for 20 dwellings with the reason given that a 'lower density development would be a logical continuation of built form'. Since the site submission, the road speed has been reduced to 30mph, recognising the change in character as passing into the settlement. Additionally, a larger site is proposed for allocation on the northern side of the road. These allocations will naturally extend the built form and edge of the settlement further east and with existing residential developments still further along Staple Road to the east, there seems no good planning reason to reduce the density on this site. Therefore, we request the policy wording for WIN003 under Policy SAP42 be increased from 20 to 25 dwellings.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	The proposed allocation of site WIN003 under Policy SAP42, land adjacent to Staple Road, Wingham is supported. The land is available and in a single ownership to enable easy access to be provided from Staple Road. It is deliverable in the first 5 years of the Plan.

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	<p>Being a site smaller than 1 hectare in size, its allocation is supported by paragraph 68 of the National Planning Policy Framework which recognises the important contribution small sites can make to meeting the housing requirements of an area and requires Local Planning Authorities to accommodate at least 10% of their housing requirement on sites less than 1 hectare in size. This site allocation supports these objectives.</p> <p>In terms of housing numbers, the site was submitted for 24 residential units based on 30 dwellings per hectare. It is considered this is an acceptable density for this site given it will become part of the settlement confines itself and the land opposite is also proposed to be allocated for residential development. Therefore in the interest of making the best use of the land, it is suggested that the allocation number should be raised to 24 dwellings.</p> <p>The site benefits from being within walking distance of the local school and shops and is considered a sustainable extension to housing provision in Wingham. The land to the south, east and west is already developed and these developments provide an existing screen to this site. Residential land adjoins on both eastern and western boundaries and further residential development is proposed for allocation opposite this site on the northern side of Staple Road. This site is considered appropriate for residential development without resulting in any landscape harm and it is therefore suggested the allocation number should be raised accordingly.</p> <p>Since the submission of the site to the Plan, the speed limit on Staple Road has been reduced to 30 mph, in further recognition of its more developed setting. The allocation of this site offers an opportunity to obtain some localised highway improvements, with the addition of a pedestrian crossing link to the existing footway on the northern side of Staple Road and some minor road widening at the site entrance to ensure uninterrupted passage for buses, all which can be carried out on land either within the Applicants or Kent Highways ownership, confirming that all necessary works can be provided.</p>
Include files	
Local Plan Consultation Point	SAP42 - Wingham Small Housing Sites
Rep ID	SDLP214
Rep Status	Processed
Consultee ID	1261082
Consultee Full Name	Mr Richard Stevens
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	WIN004
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	I confirm that, subject to the New Local Plan being adopted and detailed planning, WIN004 development will proceed with a billed programme of 18 months to deliver 8 no properties. The developer is to be Structural Services with the appointed architects Red House Design and appointed environmental consultants ASL Environmental as detailed below.

<p>possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>Developer: Structural Services (DDC Redacted) Architects: Red House Design (DDC Redacted) Environmental Consultants: ASL Environmental (DDC Redacted)</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Not Applicable</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP42 - Wingham Small Housing Sites</p>
<p>Rep ID</p>	<p>SDLP393</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1330307</p>
<p>Consultee Full Name</p>	<p>Messrs Upton</p>
<p>Consultee Company / Organisation</p>	<p>J.Scott, Finn's</p>
<p>Agent Full Name</p>	<p>Jane Scott</p>
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP42 - land adjacent to Staple Road (WIN003)</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Effective</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Yes</p>

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The proposed allocation of site WIN003 under Policy SAP42, land adjacent to Staple Road, Wingham is supported. The land is available and in a single family ownership to enable easy access to be provided from Staple Road. It is deliverable in the first 5 years of the Plan.</p> <p>Whilst the Council envisage the site to be built out between 2031 and 2034, the estimated trajectory for this site should be brought forward to build out between 2024-2026, with 10 units being completed in each year 2025 and 2026.</p> <p>Being a site smaller than 1 hectare in size, its allocation is supported by paragraph 68 of the National Planning Policy Framework which recognises the important contribution small sites can make to meeting the housing requirements of an area and requires Local Planning Authorities to accommodate at least 10% of their housing requirement on sites less than 1 hectare in size. This site allocation supports these objectives.</p> <p>In terms of housing numbers, it is still considered that the identification of this land within the HELAA for 24 units, based on 30 dwellings per hectare, is an acceptable density for this site given it will become part of the settlement confines itself and the land opposite is also proposed to be allocated for residential development. Therefore in the interest of making the best use of the land, it is suggested that the allocation number should be raised to 24 dwellings.</p> <p>The site benefits from being within walking distance of the local school and shops and is considered a sustainable extension to housing provision in Wingham. The land to the south, east and west is already developed and these developments provide an existing screen to this site. Residential land adjoins on both eastern and western boundaries and further residential development is proposed for allocation opposite this site on the northern side of Staple Road. This site is considered appropriate for residential development without resulting in any landscape harm and it is therefore suggested the allocation number should be raised accordingly.</p> <p>Since the submission of the site to the Plan, the speed limit on Staple Road has been reduced to 30 mph, in further recognition of its more developed setting. The allocation of this site offers an opportunity to obtain some localised highway improvements, with initial highway discussions requesting the addition of a pedestrian crossing link to the existing footway on the northern side of Staple Road and some minor road widening at the site entrance to ensure uninterrupted passage for buses, all which can be carried out on land either within the Applicants or Kent Highways ownership, confirming that all necessary works can be provided.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	To support the ongoing allocation of this site
Include files	
Local Plan Consultation Point	SAP42 - Wingham Small Housing Sites
Rep ID	SDLP503
Rep Status	Processed

Consultee ID	1331544
Consultee Full Name	Mrs. Shelley Morris
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	WIN003
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Wingham is a complex settlement that includes ancient historic buildings, many of which are listed, and more modern housing. The roads are constantly busy and congested by heavy traffic. Staple Road carries heavy vehicles to and from the large Grain Store which often causes a bottleneck at Seath Corner leading onto the High Street or along the B2046 towards Alyesham and the A2. The recent additional speed reductions to 20mph have hardly mitigated against this.</p> <p>Access onto the Staple Road from the proposed development would further exacerbate the congestion especially during deliveries to the construction site when the adjacent site, WIN014, is also likely to be under construction. Due to the depth of the road below the hedgerow flooding often ensues.</p> <p>For all these reasons I question the soundness of this proposal to develop 20 houses. The settlement is already under great pressure from the large number of developments in this rural farming area. Fields should be used for agricultural purposes if we are to feed the nation.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP42 - Wingham Small Housing Sites
Rep ID	SDLP1648
Rep Status	Processed
Consultee ID	1252038
Consultee Full Name	Kerry Coltham
Consultee Company / Organisation	Wingham Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP42
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Councillors continue to have no objections to the allocated sites, subject to appropriate design, scale and planning permission. SAP42 will have a significant impact on traffic in the immediate vicinity both during development and once completed. The 'Seath's Corner' junction where Staple Road meets the B2046 Adisham Road is notorious for damaged buildings and infrastructure from large vehicles using this junction and thus an informal one-way system is in place for existing businesses with local and visiting foreign LGVs to help ease this issue. This must be taken into consideration, especially at the development stage. Request that development includes suitable affordable housing to meet the local need. Councillors also seek assurance that adequate provision is made to prevent severe traffic impact in Wingham and that policies in relation to traffic assessments and travel plans will be clarified.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Larger Villages: Alkham, Capel-le-Ferne, East Langdon, Lydden, Preston and Worth,

Local Plan Consultation Point	Larger Villages: Alkham, Capel-le-Ferne, East Langdon, Lydden, Preston and Worth,
Rep ID	SDLP350
Rep Status	Processed
Consultee ID	1252512
Consultee Full Name	Mr David J Woodward
Consultee Company / Organisation	
Agent Full Name	Patricia Martin
Agent Company / Organisation	Field Martin Consultants Ltd
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	LAN005 - LOCAL PLAN SITE ALLOCATIONS
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>My application to include land lying to the south east of Eastside Farm East Langdon CT15 5JF for housing development has not proceeded beyond the Reg 18 stage, without justifiable cause or reason.</p> <p>This site should be considered a previously developed or brownfield site as it includes an industrial building plus adjacent garden / paddock. Recent planning history has allowed residential buildings within the curtilage of the Grade II Listed Eastside farmhouse so heritage cannot genuinely be a relevant factor in excluding it.</p> <p>The increased requirement for housing at a Government level and the need for 300,000 new homes per annum are also material changes to National policy since your Reg 19 version of the LP was drafted.</p> <p>My outline planning application No 21/01744 (with all matters reserved) was refused on 31 July 2022 for reasons that are not legally sustainable as my attached response dated 26 September 2022 demonstrates.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	<p>DDC is legally required under the Town and Country Planning (Brownfield Land Register) Regulations to maintain a register of previously developed sites which are available and potentially suitable for housing.</p> <p>This site should have been included on this register. Had it been included then it ought to have been automatically identified as a suitable site for housing development.</p> <p>My recent planning application No 21/01744 for outline consent for up to 10 houses with all matters reserved was rejected, on grounds that are not legally justifiable as my attached response to DDC Planning dated 26 September 2022 makes clear. Those reasons are equally applicable to this Reg 19 challenge.</p>

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	SDLP0350 Woodward Att1 Redacted.pdf
Local Plan Consultation Point	Larger Villages: Alkham, Capel-le-Ferne, East Langdon, Lydden, Preston and Worth,
Rep ID	SDLP439
Rep Status	Processed
Consultee ID	1331645
Consultee Full Name	Mr Kevin Kevin Lynch
Consultee Company / Organisation	Worth Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	4.261
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Numerous residents of Worth have made numerous representations about the lack of infrastructure, services, education and health to support WOR 006 and WOR009. We do not believe that these representations have been adequately resolved. In addition the rural bus service servicing these potential developments has been withdrawn and therefore both these developments will cause an increase in the use of private vehicles this breaching the NPPF. Furthermore the emerging findings of the Census (Dover District) indicate that the population in the District is declining. Therefore it follows that the need for developments in Worth (if not elsewhere) is not needed - breaching government policy of the right houses in the right places. Both these proposed site allocations need to be removed from this draft Local Plan. And finally, again on vehicular movements, KCC(Highways) has stated on a nearby planning application that parts of the A258 (the road used by Worth residents) including a key roundabout is overcapacity - again breaching the NPPF (paragraph 109?)
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant	Remove WOR006 and WOR009 from the draft Local Plan.

and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Simply because residents will be better able to discuss with the Inspector the detailed local issues surrounding this representation.
Include files	
Local Plan Consultation Point	Larger Villages: Alkham, Capel-le-Ferne, East Langdon, Lydden, Preston and Worth,
Rep ID	SDLP518
Rep Status	Processed
Consultee ID	1331555
Consultee Full Name	Mr. Trevor Johns
Consultee Company / Organisation	Alkham Valley Society
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	4.264
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The only stated reason for Alkham to be suitable for enhanced development is that it has good bus service. However that service is scheduled to be halved in the next month. In addition the bus stops are inaccessible by most of the village due to lack of footpaths and safe pedestrian crossings.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Redirect through traffic to the planned major routes, slow and reduce local traffic to ensure pedestrian / bus user safety, and provide suitable crossing points and shelters. Preserve the existing hourly level of service.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Larger Villages: Alkham, Capel-le-Ferne, East Langdon, Lydden, Preston and Worth,
Rep ID	SDLP1008
Rep Status	Processed
Consultee ID	1331879
Consultee Full Name	Northbourne Estate c/o Agent
Consultee Company / Organisation	
Agent Full Name	Rory Baker
Agent Company / Organisation	Frazer Halls Associates
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy SP3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible.	Please refer to the accompanying representations. Text below (copied from attached statement) added by DDC. See attachment for full representation. WOR004 Land at Jubilee Road

<p>possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>Deliverability of the Site</p> <p><i>Despite the Site being discounted from the draft Local Plan, we consider the Site to be suitable, available and achievable for allocation in the draft Local Plan for residential development, particular to provide high quality rural housing delivered in the early years of the plan period.</i></p> <p><i>Although the Site was considered unsuitable in the 2022 HELAA due to its impact on landscape and the setting of the village, these are concerns that can be remedied through detailed design and a careful and considered approach to layout and landscaping. The Site comprises a nominally sized segment of the overall agricultural field and countryside beyond and would be tightly positioned close to existing development along Jubilee Road. The Site is capable of delivering linear ribbon development, symmetrical to the housing opposite and which would represent a sustainable pattern of development. Through the delivery of a comprehensive and sympathetic landscaping scheme, the visual impact on the wider countryside would be limited, ensuring proposed house types, materiality and overall scale is consistent with neighbouring housing in the village, harmonious to the established village character and vernacular. Achieving this would ensure the village setting is unharmed as a result of development coming forward on the Site.</i></p> <p><i>The landowner is actively promoting the Site for residential and there remain no legal constraints in implementing and delivering the development within the first five years of the Local Plan. If allocated, the LPA can be confident that the Site will form a robust part of the Council's five year housing land supply. We urge the Council to allocate more smaller sites capable of delivering local housing to rural communities in sustainable locations, with Land at Jubilee Road considered deliverable and capable of ensuring the supply of local housing in the early years of the plan period. The allocation of the Site will help to remedy the issues with the draft spatial strategy helping to make the Plan sound.</i></p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Please refer to the accompanying representations.</p> <p>Text below (copied from attached statement) added by DDC. See attachment for full representation.</p> <p>Land at Jubilee Road is considered suitable, available, and achievable for development</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>To ensure that that the spatial strategy and distribution of growth is amended to rebalance the portionality of housing growth across the district, requiring additional smaller rural sites that are deliverable.</p>
<p>Include files</p>	<p>SDLP1008 Northbourne Estate - Att 2.pdf SDLP1008 Northbourne Estate - Att 1.pdf</p>
<p>Local Plan Consultation Point</p>	<p>Larger Villages: Alkham, Capel-le-Ferne, East Langdon, Lydden, Preston and Worth,</p>
<p>Rep ID</p>	<p>SDLP1007</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331879</p>
<p>Consultee Full Name</p>	<p>Northbourne Estate c/o Agent</p>
<p>Consultee Company / Organisation</p>	<p></p>
<p>Agent Full Name</p>	<p>Rory Baker</p>

Agent Company / Organisation	Frazer Halls Associates
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy SP3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Please refer to the accompanying representations.</p> <p>Text below (copied from attached statement) added by DDC. See attachment for full representation.</p> <p><i>We also have concerns with the site selection process, and the resulting impact on the soundness of the spatial strategy and draft Local Plan as a whole.</i></p> <p><i>We note that The Former Packhouse was assessed through the 2022 SHELAA under reference NOR002. The Site was considered to be achievable, available and potentially suitable, with the following comments:</i></p> <ul style="list-style-type: none"> <i>- Brownfield site. Impact on the landscape and adjacent heritage asset would need to be mitigated through good screening, sensitive design, low densities and landscaping</i> <i>- Site adjacent to a Conservation Area and partly within the Grade II* Northbourne Court Registered Park. Site is also within an AAP and adjacent to an undesignated heritage asset. A Heritage Assessment will therefore be required as will consultation with Historic England and the Gardens Trust.</i> <i>- Trip generation from 60 dwellings is likely to be significantly above that which could be generated by the permitted use(s) on this brownfield site, and is therefore unacceptable due to limited visibility at access and width of The Drove. A smaller scheme may however be acceptable in highways terms</i> <i>- Concern regarding impact of this site on narrow sections of the routes between the site and the A256 /A258. Concern regarding the cumulative impact on the wider highway network from potential allocation sites in the locality.</i> <i>- No footways serving the site.</i> <i>- A Transport Assessment will be required to satisfy that highway concerns can be overcome - Risk of surface water flooding</i> <p><i>As part of the 2022 SHELAA it also underwent a highways assessment. The concluding comments were as follows: "Trip generation from 80 dwellings is likely to be significantly above that which could be generated by the permitted use(s) on this brownfield site and is therefore unacceptable due to limited visibility at access and width of The Drove. Further assessment is required"</i></p> <p><i>Combining the two sets of comments, we can draw the conclusion that the Site is considered suitable subject to achieving a satisfactory access strategy which will likely be derived from a reduction in development quantum.</i></p> <p><i>The Site was then subject to assessment as part of the Council's Sustainability Appraisal (SA) (2022). The Site was discounted from the site selection process on the following grounds:</i></p> <p><i>"Northbourne is a large village where development would be acceptable in principle in or adjoining the settlement To allocate all the sites identified as suitable or potentially suitable in the HELAA in Northbourne would be in conflict with the settlement hierarchy and would not lead to sustainable development. Given this it was considered that NOR005 was best related to the settlement, is already supported by existing infrastructure and would deliver the most benefit to the existing community. NOR001, NOR002 and NOR003 were therefore discounted."</i></p> <p><i>The Site was therefore not allocated in the Regulation 18 Draft Local Plan in favour of NOR005 (Betteshanger Colliery). NOR005 was however removed from the Regulation 19 Submission Local Plan because it now benefits from planning permission for 210 homes.</i></p>

	<p><i>We therefore question the robustness of the SA in discounting The Former Packhouse in favour of a site that now benefits from planning permission and has been removed from the draft Local Plan as a result. Failing to allocate additional sites in Northbourne so that housing is delivered across the plan period, once again, heavily relying on extant permissions risks delivering unsustainable growth to rural communities. The Former Packhouse also better relates to Northbourne village, is more centrally located in proximity to the village hall and other local facilities and is also a brownfield site which should be actively promoted for residential development through the emerging Local Plan. As such, the draft Local Plan should look to allocate smaller sites already considered suitable and sustainable through the SHELAA in Northbourne, such as The Former Packhouse. This would also ensure that should the consent for 210 dwellings face any problems in implementation and build out (problems frequently referenced throughout this letter), a modest provision of housing on The Former Packhouse can help serve the immediate needs of the local community and can be delivered more quickly in the early years of the plan period</i></p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Please refer to the accompanying representations.</p> <p><i>Text below (copied from attached statement) added by DDC. See attachment for full representation.</i></p> <p>The Former Packhouse is considered suitable, available, and achievable for development as confirmed in both the SHELAA and the SA 2022</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>To ensure that that the spatial strategy and distribution of growth is amended to rebalance the portionality of housing growth across the district, requiring additional smaller rural sites that are deliverable.</p>
<p>Include files</p>	<p>SDLP1007 Northbourne Estate - Att 1.pdf SDLP1007 Northbourne Estate - Att 2.pdf (1)</p>
<p>Local Plan Consultation Point</p>	<p>Larger Villages: Alkham, Capel-le-Ferne, East Langdon, Lydden, Preston and Worth,</p>
<p>Rep ID</p>	<p>SDLP2034</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1274452</p>
<p>Consultee Full Name</p>	<p>Mr Peter Marriott</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>Hare and Hounds, Northbourne</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>

<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified Effective Consistent with National Policy</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Not Applicable</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Not Applicable</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>DDC Note: See SDLP133 We found out yesterday that the draft District Local Plan is available & so checked to see if our site was included for deliberation. We cannot find any reference to it or the other site we put forward - the car park at the Hare & Hounds Northbourne. Could you please provide an indication where these may be as you office did confirm that they had been included in the targeted call for sites last year (see attached). Regarding TC4S072 in appendix 2a the pub is rejected as being 'isolated in the countryside' yet it is in a village on the high st & there were houses there previously</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>SDLP2035 Marriott - Att 1.pdf SDLP2035 Marriott - Att 2.pdf</p>

Local Plan Consultation Point	Alkham
Rep ID	SDLP515
Rep Status	Processed
Consultee ID	1331555
Consultee Full Name	Mr. Trevor Johns
Consultee Company / Organisation	Alkham Valley Society
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	4.266
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	IT is regnised the need for additional housing but it must come with appropriate design and supporting infrastructure, to ensure safety and preserve the character of an historic AONB village. The junction of this develoment area is already an accident hot spot as the road's exit is freequently blind due to visibility splays and high speed of traffic.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Parking provision on the curtalige of the site needs to be adaaquate for the planned number of dewellings as the road is already extremely congested by existing resident vehicles. Slow and reduce passing traffic and review design of road junction with Alkham valley road to improve both vehicular and pedestrian safety. The current sewage provision in the area is overloaded often requiring tanker support. Poluted surface water endangers the aquifer and local residents so this needs to be addressed as part of the residential planning process.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Alkham
Rep ID	SDLP1680
Rep Status	Processed
Consultee ID	1333375
Consultee Full Name	Ms D C King
Consultee Company / Organisation	
Agent Full Name	Gurdev Moore
Agent Company / Organisation	Rubix Estates
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Omission Site in Alkham
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>REPRESENTATIONS TO DOVER DISTRICT COUNCIL LOCAL PLAN (REGULATION 19) LAND ON THE SOUTH EAST SIDE OF ALKHAM VALLEY ROAD, ALKHAM Rubix Estates Ltd. (hereafter, the Agent) and the landowners are working together on the promotion of the above Site for sustainable residential development. Enclosed is our representation to the Regulation 19 Submission Draft of the Dover District Local Plan 2040. The site is promoted for an estimated total of 25 dwellings, including 18 market houses and 7 affordable homes. This would, based on the site being 2.16ha, represent a dwelling per hectare (DPH) of 11 DPH, a sympathetic amount for Alkham. This Site will be designed to ensure all on-site open space and biodiversity improvements will accessible for the new and existing community. Furthermore, the Site proposed for this representation is adjacent to the settlement of Alkham and consists currently of pasture land. We will be presenting and promoting an exemplar sustainable scheme that garners local for a high quality development that boasts both attractive design. A vital part of our strategy is early engagement with the community, ward councillors and other key stakeholders. We understand how local communities can feel threatened by housing development forced upon them and we will work hard to actively and meaningfully engage with the community to make them part of the process. The Promoter and Landowners generally support the Submission Draft of the Dover District Local Plan 2040 and in particular allocation for 10 dwellings. Included to our response following our review of the Draft of the Dover District Local Plan 2040 is a formal representation to provide assurances to Dover District Council that this land is available, suitable and deliverable for sustainable residential development if further housing allocations are needed. In addition to the Strategic Housing Allocations and Non-Strategic Housing Allocations identified in the Plan, there is a small site allocation for housing in Alkham (SAP43 - Land at Short Lane, Alkham (ALK003). We support this allocation and make this Site available for further growth in the village. We welcome the opportunity to assist or provide comment on the preparation of the Plan which will help shape future development in Alkham and we look forward to the opportunity to participate at later hearing sessions where appropriate. SUMMARY Overall, our representations conclude that the Plan is legally compliant, and provides a sound evidencebased approach to planning in the District over the plan period. It finds further that Dover District Council has sufficiently met the Duty to Cooperate. We look forward to onwards participation in the Examination of the Plan in 2023, and towards the progression of our promotion of this land for sustainable residential development.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	

Include files

Moore Rubix Estates 1626 (Alkham) Att1_Redacted.pdf
Moore Rubix Estates 1626 (Alkham) Att2.pdf

SAP43 - Land at Short Lane, Alkham (ALK003)

Local Plan Consultation Point	SAP43 - Land at Short Lane, Alkham (ALK003)
Rep ID	SDLP40
Rep Status	Processed
Consultee ID	1273055
Consultee Full Name	Mrs Tina Matcham
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	4.266
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I do not agree with the proposed development of this site. I live in the immediate area and am fully aware of previous applications for development in this area, all of which have been refused by both the local Authority as well as the Planning Inspectorate.</p> <p>The main reason for the many objections to development in this part of the countryside are as follows -</p> <p>The site is out of the confines of the village boundaries</p> <p>It would be detrimental to an Area of Outstanding Natural Beauty - and there is strong evidence of protected wildlife habitats</p> <p>The services and infra-structure in this area are inadequate now, especially with notable problems with sewage and waste water disposal.</p> <p>The site is in a high flood risk zone</p> <p>The village has no relevant amenities, save a Church and public house. The present bus service is minimal, increasing the need for more vehicles, especially with the recent cuts to bus services in the District. An increase in traffic in this small but busy road, is not acceptable</p> <p>Development of the site would adversely affect people living nearby, who currently enjoy the vista and beauty of the countryside.</p> <p>Development of this site would set a precedent for further development of the countryside</p>

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	I think the Local Plan would be more compliant if more emphasis was made to protect our naturally beautiful countryside and consideration given to redevelop brown field sites and re-addressing empty and neglected properties in the District, with the view of creating more affordable housing.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	SDLP0040_email.msg.pdf SDLP0040_Matcham_Att1.pdf
Local Plan Consultation Point	SAP43 - Land at Short Lane, Alkham (ALK003)
Rep ID	SDLP269
Rep Status	Processed
Consultee ID	1331383
Consultee Full Name	Mrs Katie Miller
Consultee Company / Organisation	Kent Downs AONB Unit
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 43
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	As recognised in the policy, the site lies within the Kent Downs AONB. The site is relatively well contained within the wider landscape and relates well to the existing settlement, where the settlement pattern includes development in depth south of the Alkham Valley Road. The proposed requirements included in site specific requirements to help manage impacts on the AONB are supported.

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP43 - Land at Short Lane, Alkham (ALK003)
Rep ID	SDLP552
Rep Status	Processed
Consultee ID	1268168
Consultee Full Name	Messrs Barnes
Consultee Company / Organisation	c/o Agent
Agent Full Name	Elizabeth Welch
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP43 - Land at Short Lane, Alkham (ALK003)
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails	Additional information is requested by DDC regarding availability and deliverability of the site - accordingly the following supporting material is detailed below

to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SAP43 - Land at Short Lane, Alkham (ALK003)- The site remains to be immediately available being owned by a developer - Heritage Developments (Ludlow) Ltd. Fairfield, and work is being progressed initially with collating the required supporting evidence to accompany a full planning application. The site itself has no ownership or infrastructure constraints or extraordinary development costs, the site is considered by the developer to be a viable proposition. There are no known barriers to development of the site and an application is likely to be submitted in 2023.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	No changes required
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP43 - Land at Short Lane, Alkham (ALK003)
Rep ID	SDLP1001
Rep Status	Processed
Consultee ID	1331844
Consultee Full Name	Miss Irene Bowie
Consultee Company / Organisation	Alkham Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	4.267 SAP43 - Land at Short Lane, Alkham (ALK003)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable

<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Not Applicable</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>Alkham Parish Council challenges the classification as a “Larger Village” as defined in the Local Plan. “Each of these villages has a good range of services and facilities which serve their own residents and those of nearby hamlets. Capel-le-Ferne, Lydden, Preston, Worth and East Langdon have primary schools and Capel-le-Ferne, Lydden, Worth, Alkham are served by frequent regular bus routes. Retail facilities are not as available however as at the Local Centres, with only Preston and Capel-le-Ferne having a village shop, and only East Langdon having Post Office facilities”</p> <p>Alkham does not have a frequent or regular bus service, there are no shops, no school, no GP surgery therefore we do not have a good range of facilities which serve our own residents and those of nearby hamlets. The parish council requests that Alkham is reclassified as a smaller village.</p> <p>The parish council again to raises concerns with Dover District Council’s wanton disregard for the protection of the AONB. We note with interest that none of the other Non Strategic Housing Allocation sites are within the AONB. We consider it a fundamental duty of DDC to protect the AONB , not to encourage and actively promote its erosion.</p> <p>The parish council are astonished to see this site included in the local plan when in January 2017 outline planning permissions for six homes on this site was refused by DDC. The grounds given were:</p> <p><i>TAKE NOTICE that Dover District Council, the Local Planning Authority, HAS REFUSED Outline Planning Permission for the proposal in accordance with the application and accompanying plans received on 21/10/2016</i></p> <p><i>The reasoning underlying such refusal is as follows:-</i></p> <p><i>1 The proposed development would result in an obtrusive urban form of development in the open countryside, beyond the settlement confines, which would detract from the unspoiled rural character of the area and the setting of the village of Alkham and the character and appearance of the Area of Outstanding Natural Beauty within which the site lies. In particular, the proposal would be contrary to Dover District Core Strategy Policies DM1, DM15 and DM16, paragraphs 109 and 115 of the National Planning Policy Framework and Policies SD1, SD2 and SD03 of the Kent Downs Area of Outstanding Natural Beauty Management Plan</i></p> <p><i>2014-2019</i></p> <p><i>In accordance with paragraphs 186 and 187 of the NPPF, Dover District Council (DDC) takes a positive and proactive approach to development proposals focused on solutions.</i></p> <p><i>DDC works with applicants/agents in a positive and proactive manner by: Offering a pre-application advice service; where possible, suggesting solutions to secure a successful outcome; and, as appropriate, updating applicants/agents of any issues that may arise in the processing of their application. In this instance:</i></p> <p><i>1 The application does not accord with the development plan and no material considerations are apparent to outweigh these matters.</i></p> <p>Alkham parish council asserts that the AONB remains unchanged and that this ‘development’ of 10 houses would result in an obtrusive urban form of development in the open countryside, beyond the settlement confines, which would detract from the unspoiled rural character of the area and the setting of the village of Alkham and the character and appearance of the Area of Outstanding Natural beauty within which the site lies. In particular, the proposal would be contrary to Dover District Core Strategy Policies DM1, DM15 and DM16, paragraphs 109 and 115 of the National Planning Policy Framework and Policies SD1, SD2 and SD03 of the Kent Downs Area of Outstanding Natural Beauty Management Plan 2014-2019</p> <p>A subsequent appeal to the Planning Inspectorate was unsuccessful.</p> <p>Appeal Decision</p> <p><i>Site visit made on 21 November 2017</i></p> <p>by Grahame Gould BA MPhil MRTPI</p> <p>an Inspector appointed by the Secretary of State for Communities and Local Government</p> <p>Decision date: 11th December 2017</p> <p>Appeal Ref: APP/X2220/W/17/3180321 Land at Short Lane, Alkham CT15 7BZ</p> <p><i>The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.</i></p>

- *The appeal is made by Mr S Barnes against the decision of Dover District Council.*
- *The application Ref DOV/16/01216, dated 20 October 2016, was refused by notice dated 25 January 2017.*
- *The development proposed is the erection of up to 6 dwellings with garaging.*

1 *The appeal is*

- 1 *The application was made in outline form and sought permission for up to six dwellings, with matters relating to access, appearance, landscaping, layout and scale all being reserved for future consideration.*
- 1 *The main issue is the effect of the development on the character and appearance of the Kent Downs Area of Outstanding Natural Beauty (the AONB).*
- 1 *The dwellings would occupy part of a field, currently used as grazing land, which slopes gently from north to south. To the west, on the opposite side of Short Lane, there is housing, while to the east and south there are gently rolling open fields. Immediately to the north of the site there are four pairs of semi-detached houses, 1 to 8 Short Lane (Nos 1 to 8) granted planning permission in 1993. A little to the south of the site there is a public right of way (PROW) extending eastwards from Short Alkham is a small village mainly characterised by housing, with very few local services and facilities being available within it.*
- 2 *Given that the site is situated in the AONB there is a general duty to have regard to the purpose of conserving and enhancing the AONB's natural beauty¹.*

Alkham parish council asserts that none of the above reasons for refusal have changed. Further that Policy DM16 of the Core Strategy states that development that would harm the character of the landscape will only be permitted if: it accords with a development plan allocation and incorporates any necessary avoidance or mitigation measures; or it can be sited to avoid or reduce the harm and/or its design would incorporate measures to mitigate the impact to an acceptable level. The parish council asserts that this development does not incorporate any necessary avoidance of mitigation measures and its siting will harm the nature of the AONB.

We would refer you to point 10 of the Inspectors response:

- 1 *While the site's roadside boundary is marked by an established hedgerow it would only provide limited screening for the development, not least because an opening or openings would be needed for access purposes. I recognise that there would be scope to undertake soft landscaping along the eastern boundary and immediately to the south of the site. However, it would take a considerable period of time before any new planting would provide any meaningful mitigation for the development when it was viewed from Short Lane or the PROW.*

Alkham parish council asserts that the observations of the Inspector are still valid and there will not be suitable screening of this development.

The parish council concurs and supports the inspectors decisions point 12:

- 1 *I consider that the development would neither conserve nor enhance the AONB's natural beauty and I therefore conclude that it would be harmful to the character and appearance of the AONB. There would therefore unacceptable conflict with Policies DM1, DM15 and DM16 of the Core Strategy and paragraphs 109 and 115 of the Framework. In relation to Policy DM15 I consider that the development would not come within any of this policy's stated exceptions. I also consider that the Kent Downs Area of Outstanding Natural Beauty Management Plan 2014 to 2019 does not provide support for this development.*

Alkham parish council fully supports all reason given by the Inspector in his refusal of the appeal for six houses on the site in November 2017.

We are therefore astounded that Dover District Council has completely ignored not only the Planning Inspectorates Decision (November 2017) but its own refusal (December 2017)for six properties and now suggests that ten houses on the same site would be acceptable.

Further DDC have identified that the site is liable to flood and that a flood risk assessment is required. The constraints of the existing infrastructure with regards sewage and flooding is insufficient for a development of this size.

The parish council would urge Dover District Council to reconsider this site and act in a manner that is both consistent and to protect the AONB.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	This development will have a significant impact on the residents of Alkham and is damaging to the AONB. The Parish Council would wish to make the voice of our residents known to the Inspector. The Parish Council is passionate in its resolve to maintain the character of the AONB.
Include files	
Local Plan Consultation Point	SAP43 - Land at Short Lane, Alkham (ALK003)
Rep ID	SDLP1292
Rep Status	Processed
Consultee ID	1331555
Consultee Full Name	Mr. Trevor Johns
Consultee Company / Organisation	Alkham Valley Society
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	4.266
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	IT is regnised the need for additional housing but it must come with appropriate design and supporting infrastructure, to ensure safety and preserve the character of an historic AONB village. The junction of this develoment area is already an accident hot spot as the road's exit is freequently blind due to visability splays and high speed of traffic.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness	Parking provision on the curtalige of the site needs to be adaquate for the planned number of dewellings as the road is already extremely congested by existing resident vehicles. Slow and reduce passing traffic and review design of road junction with Alkham valley road to improve both vehicular and pedestrian safety.

matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The current sewage provision in the area is overloaded often requiring tanker support. Poluted surface water endangers the aquifer and local residents so this needs to be addressed as part of the residential planning process.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP43 - Land at Short Lane, Alkham (ALK003)
Rep ID	SDLP1691
Rep Status	Processed
Consultee ID	1333375
Consultee Full Name	Ms D C King
Consultee Company / Organisation	
Agent Full Name	Gurdev Moore
Agent Company / Organisation	Rubix Estates
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	ALK003
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails	(DDC Note - Full representation and attachment on SDLP1680) The Promoter and Landowners generally support the Submission Draft of the Dover District Local Plan 2040 and in particular allocation for 10 dwellings. Included to our response following our review of the Draft of the Dover District Local Plan 2040 is a formal representation to provide assurances to Dover District Council that this land is available, suitable and deliverable for sustainable residential development if further housing allocations are needed. In addition to the Strategic Housing Allocations and Non-Strategic Housing Allocations identified in the

to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Plan, there is a small site allocation for housing in Alkham (SAP43 - Land at Short Lane, Alkham (ALK003). We support this allocation and make this Site available for further growth in the village.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP43 - Land at Short Lane, Alkham (ALK003)
Rep ID	SDLP1777
Rep Status	Processed
Consultee ID	1331526
Consultee Full Name	Mrs Mairi Jones
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP43
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>DDC Note: Please see detailed representation (attached at 1770) which has been divided against numerous consultation points. The representation has images within the test. The text below is an extract from the detailed representation 'by an Alkham resident'.</p> <p>5 Housing Growth</p> <p>5.1 The Green Integration Plan and the local housing plan originally identified considerable growth for Dover District with land initially to be allocated for 14,000 new homes with a target to complete 10,100 homes by 2026. This target now appears to have been reduced and the new plan identifies the broad areas where the growth of the additional homes will be located; notably sites within the Dover urban area, Whitfield, Deal, Sholden and Sandwich.</p> <p>5.2 The Dover District Council Plan justifies its housing allocation growth on the grounds of identified need in line with NPPF and the Department of Levelling Up Housing and Communities criteria and as such has identified a number of choices for housing based on supply, demand, windfall sites etc. As a result a number of small development sites have been identified throughout the District including one in Alkham as well as a plan for a major Urban expansion site at Whitfield.</p> <p>5.3 The District Plan identifies a requirement for an additional 42 traveller pitches throughout the district and identifies two such pitches in Alkham and three others elsewhere.</p> <p>Comment 5</p> <p>a) I welcome the fact that the Plan wishes to increase the types of housing built, encouraging designs to maximise climate benefits and I take no issue with the site for ten houses identified within Alkham and would welcome the development of more affordable housing to encourage more families into the village.</p> <p>b) Alkham has many traveller residents who partake in village life I but would query where the other 37 sites will be accommodated as windfall proposals sites have not been identified. Information on this would be welcome .</p> <p>c) However I must raise severe concerns re the planned development at Whitfield</p> <ul style="list-style-type: none"> • The DDC highlights the requirement for 6350 homes at Whitfield stating that this will be supported by education, primary health and social care , utility services retail and leisure provision as well as the development of the Whitecliff Business Park area at Whitfield which will not only have retail but also light industrial and haulage uses. • The Plan talks at length on the landscaping and it highlights transport networks and in particular references the upgrades required for the Whitfield and the Duke of York Roundabouts It also says that consideration must be given to the local transport links , the Alkham road , the A256 and Whitfield Hill • This matter was raised in 2014 when the Transport Plan for 2015 -2030 was adopted and no action was taken. • Since that time traffic along the Alkham Valley has hugely increased. Representations have been made to the local MP, KCC and a Highway improvement plan submitted all to no avail. • The current plan makes a flawed assumption that householders and businesses will access routes to London via the A20/M20 or A2/M2 whereas in reality they use the Alkham Valley Road , a DECLASSIFIED Road to access the M20. This matter is the subject of more detailed comment later in the report under transport <p>D) As housing increases traffic will continue to expand and radical options to consider the Valley a green space in the middle of urban development with road only open for business residents leisure use and emergency vehicles offering a range of bridleways, walks, cycle routes should be explored. This type of scheme has been successfully carried out in other areas such as the Goyt Valley Derbyshire and can lead to vibrant rural community improved air quality and improved traffic management</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Please see appended report</p>

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I can speak to any of the points raised in the attached document
Include files	

Local Plan Consultation Point	Capel-le-Ferne
Rep ID	SDLP469
Rep Status	Processed
Consultee ID	1259309
Consultee Full Name	Mr Peter Jull
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CAP13 & SAP44
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Submitted sites at this end of Capel should have been considered together to produce a more cohesive planning solution.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	CAP13 site specific requirements should include a requirement for development to be set back sufficiently to allow road widening in line with that agreed by the adjoining site CAP009 during a planning application as well as providing a footway. There is sufficient highways land beside the existing surfaced carriageway along Cauldham Lane to allow it to be widened to allow two cars to pass in addition to a full width pavement on one side. CAP015 was rejected at the HELAA stage for landscape reasons that could have been equally applied to CAP13 or vice versa. If this had been considered together with SAP44 access to the larger site could be provided along Cauldham Lane which can be widened rather than Capel Street which cannot.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	To answer questions not anticipated by the written submission and point at maps where explanation in words is more difficult.

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Capel-le-Ferne
Rep ID	SDLP2032
Rep Status	Processed
Consultee ID	1331136
Consultee Full Name	Tina Wilson
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CAP006, CAP009, CAP011, CAP013
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Re above plots that are looking at having dwellings on them, can I be one of the voices that says: NO Wildlife, flora and fauna will be ruined. People's lives ruined by this quiet village becoming busier and even more noise pollution and racing around the village in cars and bikes and flouting driving rules. Flooding will be more of a risk. Water shortages will be more of an issue and slower services in telephone lines, broadband and electricity and gas. Once again this probably won't be considered and backhanders will be going on to build these. And the long term future and sustainability not thought about.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	

<p>if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	

SAP44 - Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006)

Local Plan Consultation Point	SAP44 - Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006)
Rep ID	SDLP77
Rep Status	Processed
Consultee ID	1330507
Consultee Full Name	Mr Christopher Malins
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CAP 006
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The road Capel is a very dangerous road with more traffic it will make the junction worse with traffic going both way accidents will happen. Also the dwellings there a to many we're they are proposed to be built it will destroy an Area of natural beauty. There's a dip in the land and privacy for people living in Capel street will be impaired also loss of light the noise factor. And parking will be impossible to park outside your own home. there are also listed buildings in the area
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Less dwellings there a far to many the numbers should be lower. And built so that the Beauty of the area will not be spoilt.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP44 - Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006)
Rep ID	SDLP82
Rep Status	Processed
Consultee ID	1265502
Consultee Full Name	MR Paul Curtis
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP44 - Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Local plan - Land west of Capel Street - CAP006</p> <p>The proposed new road will be running along our boundary hedge just a few meters from our back door, producing noise, pollution and extreme loss of privacy. Houses backing onto our rear garden will also present a severe loss of privacy. As the site slopes down, the highest points are above our roof line and would create another loss of privacy.</p> <p>Buildings backing onto our rear garden would be overshadowing and produce a loss of light and privacy.</p> <p>Capel Street and Cauldham Lane are both narrow and unsuitable for any increase in traffic of several hundred cars, vans, emergency vehicles, delivery trucks of all sizes. Emergency vehicles could find it impossible to access through the proposed narrow gap after the demolition of number 11 Capel Street.</p> <p>Traffic passing within a few meters of our back door, driveway and front & rear garden creating dangerous, unacceptable, and possibly illegal levels of pollution and noise nuisance.</p> <p>Previous planning applications have been rejected for development of this area, ALL those reasons still apply. Part of this same field, north of Green Lane footpath, is designated as an 'area of outstanding natural beauty' the question is - why is the area south of the footpath, the land in question, different? What makes it different?</p> <p>Capel-le-Ferne's present infrastructure is totally inadequate for any further development of this kind. In a time when populations are expanding and more sustainable food needs to be produced, covering good agricultural land with buildings is bordering on criminal. As we go into a recession, if built how many will remain unsold/unoccupied given the interest rates, inflation and mortgage rationing leaving a development unfinished or homes left empty or derelict. Some of the property's in Capel's most recent development of comparable size (40) on the New Dover Road stood unsold and empty for years.</p>

	In my submission to the Council in July 2021 I touched on some of these points and made perfectly clear that we strongly and unreservedly object to any development in this area west of Capel Street for all of the reasons above.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	SDLP0082 Curtis Att1_Redacted.pdf
Local Plan Consultation Point	SAP44 - Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006)
Rep ID	SDLP78
Rep Status	Processed
Consultee ID	1259482
Consultee Full Name	Mr Lee Bracegirdle
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP44 - Land to the East of Great Cauldham Farm, Capel-le-Ferne CAP006
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>I cannot comment on the legality of the local plan as I am not qualified. I object to the proposal on the following grounds;</p> <ol style="list-style-type: none"> 1. The use of prime arable land for development is inappropriate. 2 . The proposal will increase traffic conjection on Capel Street leading to an overflow into Cauldham Lane and exacerbate conjection at the junction with Capel Street and the B2011. How will the emergency exit at Great Cauldham Farm be policed? 3.Past proposals have reduced dwelling numbers downwards due to acknowledge inadequacy of utilities to support said proposals. SAP44 item h) implies that current proposed dwelling numbers would be increased in the future, how does this fit with acknowledged lack of utilities, particularly water pressure.
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Cannot comment as I'm not qualified</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP44 - Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006)</p>
<p>Rep ID</p>	<p>SDLP467</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1259309</p>
<p>Consultee Full Name</p>	<p>Mr Peter Jull</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to?Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>CAP13 & SAP44</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Submitted sites at this end of Capel should have been considered together to produce a more cohesive planning solution.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	CAP13 site specific requirements should include a requirement for development to be set back sufficiently to allow road widening in line with that agreed by the adjoining site CAP009 during a planning application as well as providing a footway. There is sufficient highways land beside the existing surfaced carriageway along Cauldham Lane to allow it to be widened to allow two cars to pass in addition to a full width pavement on one side. CAP015 was rejected at the HELAA stage for landscape reasons that could have been equally applied to CAP13 or vice versa. If this had been considered together with SAP44 access to the larger site could be provided along Cauldham Lane which can be widened rather than Capel Street which cannot.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	To answer questions not anticipated by the written submission and point at maps where explanation in words is more difficult.
Include files	
Local Plan Consultation Point	SAP44 - Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006)
Rep ID	SDLP177
Rep Status	Processed
Consultee ID	1331069
Consultee Full Name	mrs Lynne Hancock Dufton Stokes
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP44 Land East of Great Cauldham Farm Capel le Ferne

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	This large development would cause numerous problems in Capel Street and Cauldham Lane as the access is quite restrictive, adding to the already traffic problem. Cauldam Lane is very narrow and virtually a single track road. Lack of amenities with in the village and the surrounding area ie doctors, schools. This is farming land as should be kept as such. This development has already been refused before. Drainage in the village needs to be improved and this will only add to the problem.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP44 - Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006)
Rep ID	SDLP217
Rep Status	Processed
Consultee ID	1330745
Consultee Full Name	mrs Marie-Helene brown
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP44 land to the east of Great Cauldham Farm
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	We object to the above plan for the following reasons: the site is on arable land used every year to grow valuable crops, creating a T junction five houses down from the busy New Dover road; Cauldham Lane and Capel Street junction is unsafe as it will cause traffic to build up at the top of Capel Street, this is a large increase in the number of dwellings in the village and we do not have the infrastructure to support this.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Please build on Brown Field land with proper access
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP44 - Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006)
Rep ID	SDLP316
Rep Status	Processed
Consultee ID	1330745
Consultee Full Name	mrs Marie-Helene brown
Consultee Company / Organisation	
Agent Full Name	

Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CAP 006
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Other important factors:</p> <ul style="list-style-type: none"> - Capel Street is, as we all know, a very busy narrow road sustaining normal traffic + school traffic + an increasing number of large lorries and delivery vans. Choosing this road to gain access to and exit the proposed development would be an untenable idea. - Based on what I believe was suggested in the past: To access the new proposed estate, traffic would turn off at a proposed one way new road off Capel Street (adjacent to No.9). House No. 11 would be pulled down to create this road as it is now part of the development site. Traffic would come out again at another one way road a little further up Capel Street. This would make traffic conditions considerably worse all around. - *DDC REDACTED* this allegedly proposed new entry road (green area on the map) would make it difficult to enter/exit the drive. It would also be adjacent to our 3 bedrooms and the whole length of our garden (155ft /47m). This would unavoidably make our environment unpleasant, adding unwanted movement, noise and pollution at the front and on the side of the house. - The amazing open view at the back should also be preserved from an environmental point of view (so critical nowadays). The new proposed development would destroy this and unavoidably increase factors detrimental to the environment. It would also increase the population density of our "village", directly affecting the school intake number.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP44 - Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006)

Rep ID	SDLP239
Rep Status	Processed
Consultee ID	1331327
Consultee Full Name	Mr Stephen Letchford
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Not applicable
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The housing development needs to be scaled down. Capel Street does not have safe foot paths in parts of the road and from a pedestrian point of view is dangerous, and the volume of extra traffic the development will create is not acceptable. A footpath needs to be created and if necessary the hedge removed and replanted. Consideration also needs to be given to allowing at least two car parking places for each property within the development and designated visitors parking.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

Local Plan Consultation Point	SAP44 - Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006)
Rep ID	SDLP270
Rep Status	Processed
Consultee ID	1331383
Consultee Full Name	Mrs Katie Miller
Consultee Company / Organisation	Kent Downs AONB Unit
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP44
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Although a relatively large site, close to the AONB boundary , it is well contained within the landscape by existing development on its south and eastern sides and vegetation along the western boundary. The proposed requirements included in criterion a and b to help manage impacts on the AONB are supported.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	

Include files	
Local Plan Consultation Point	SAP44 - Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006)
Rep ID	SDLP576
Rep Status	Processed
Consultee ID	1252039
Consultee Full Name	Mrs MAUREEN LEPPARD
Consultee Company / Organisation	Capel-le-Ferne Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP44 - Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<ul style="list-style-type: none"> • 3 of the 4 sites allocated in the plan CAP006, CAP009(Decided) and CAP013 have very poor infrastructure • Capel Le Ferne is defined as a large village in the Plan, yet the allocation housing sites by settlement as identified within the Strategic Policies (table 3.3) allocates 95 dwellings, some 279% increase to Capel Le Ferne compared with the average of the other 5 villages in the district which has an average of 34 as can be seen in table 1 (Attachment). • In relation to Local Centres which has a separate definition, DDC strategy for the rural area, it is proposing to grow the adjacent villages of Eythorne & Elvington by 355 to create a new Local Centre. Excluding this Local Centre, Capel le Ferne's allocation of 95 is some 113% compared to the average of the 5 Local Centres identified in the Plan. The average in the district is 84 and Capel is a village not a Local Centre as can be seen on table 2 (Attachment). • When looking at the 4 sites proposed the increase would amount to circa 20% increase compared to that North of New Dover Road as identified table 3 and 4 (Attachment). <p>Sustainability In the Sustainability Appraisal, SA 10 state: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the district's historic environment SA 11 states: To conserve and enhance the special qualities, accessibility, local character and distinctive character and distinctiveness of the district's settlements, coastline and countryside. Capel is a unique settlement within Dover District, located over 500ft above sea level with the Heritage Coast to the South and AONB to the North, East and West of the settlement Sites CAP006, CAP011 and CAP013 will all have a significant negative impact on both SA 10 and SA 11. Capel Le Ferne Parish Council and our Parishioners have raised the above concerns and are extremely worried about the proposed local plan and the impact this would leave on our village.</p> <p>CAP006 Land to the east of Great Cauldham Farm, Capel-le-Ferne CT18 7LZ Number of units: - 70</p>

In the Local Plan Capel has been designated as a Large Village. However, Capel Parish Council are extremely concerned that Dover District Council still appear to be treating Capel as a Local Centre with an indicative number of dwellings set at 85 plus 15 (originally 10) for Longships, where planning permission has already been granted. The figure of 100 dwellings appears disproportionate when compared with the number of dwellings proposed in other Large Villages and Local Centres in this Local Plan and will have a major impact on the AONB that borders these sites.

The Parish Council considers that CAP006 has high-level constraints because of its prominent position and do not support this site for development as it does not sit well with Policy NE2.

The site is outside the settlement of Capel-Le-Ferne, the impact of any development here would be detrimental to the setting of the AONB which borders the site to the Northwest and the wildlife-rich habitat of the area. Development on this scale is also considered inappropriate in this location given the size of the existing settlement.

The access points proposed are from Capel Street and Cauldham Lane, both providing completely inadequate highway infrastructure, for example Cauldham Lane is single track with no passing places and Capel Steet, although two-way, has a very restrictive traffic flow due to parked vehicles on one side of the road making it in essence a single lane. This is because many houses towards the New Dover Road end of Capel Street are built on higher ground with no off-street parking.

KCC have concerns over whether a secondary emergency access onto Cauldham Lane is achievable.

The Cauldham Lane access point is of significant concern as it is a single-track lane. The lane is often blocked by delivery vehicles and is regularly used by heavy vehicles accessing the local farm and the industrial units further down the lane.

Consideration must be given to the increased volume of traffic resulting from this and other sites put forward in the new Local Plan (CAP 009 (Decided) & CAP013), together with a further 34 houses likely to be built in the near future at the lower end of Capel Street (CAP010 from the 2015 Local Plan). These sites could amount to 134 new dwellings that would need to access Capel Street. Currently there are approximately 170 dwellings fronting Capel Street. Therefore, the new and current Local Plans are likely to generate a substantial increase in traffic using Capel Street, which is totally unacceptable as the street cannot accommodate this increase due to the inadequate highways infrastructure as mentioned above.

This additional traffic would impact heavily on the New Dover Road/ Capel Street/Cauldham Lane's junction. This is already a dangerous junction and would be completely inadequate for the increase volume of traffic being proposed. DDC have previously raised concerns about this difficult junction. Historically there have been a number of road traffic collisions exacerbated by the blind entrance / exit to the B2011 often in foggy times. The poor visibility often experienced in Capel is due to its geological situation which is in excess of 500ft above sea level.

Capel Street is the main access route to the local Primary school so will add even further pressure at certain times of the day. The Parish Council are of the opinion that no further development should take place in this part of Capel because of the unconventional layout of the Capel Street/Cauldham Lane/New Dover Road junction, which would be impracticable to change along with parked cars and passing points in Capel Street as stated above.

Although Capel-le-Ferne is designated as a **Large Village**, it has little in the way of facilities and services. There is no post office, no health care facilities, no doctor, no dentist and no pubs within the village boundaries. **It only has one shop, a primary school and a through bus service to Dover, Folkestone and beyond.** This site does not conform with your Strategic Policy 3 – Housing growth, specifically identifies new development at accessible and sustainable locations which can utilise existing infrastructure, facilities and services, and to ensure development contributes to the sustainability of local communities and services, supporting regeneration and wherever possible make the best use of brownfield land. We see little evidence of this.

Many residents of Capel use Health Service facilities in Folkestone which are not directly accessible by bus, therefore, in order to access these services, residents tend to drive to Folkestone which is clearly at odds with **SP1.Planning for Climate Change. Item f**, which mentions reducing the need to travel.

It is also worth mentioning that because of Capel's geological position, it is unlikely that residents would walk or cycle to use facilities in the nearest towns.

This plot is a high class agricultural green field site that has been cropped for many years. The Parish Council object to the loss of valuable arable land and believe that the development of this site would be contrary the National Planning Policy Framework.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s)

you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	Table 1 and 2 - Settlements.png (1) Table 3 and 4 - Site Maps.png (1)
Local Plan Consultation Point	SAP44 - Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006)
Rep ID	SDLP575
Rep Status	Processed
Consultee ID	1260890
Consultee Full Name	Mr Owen Wilson
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP44
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	We believe the revised Local Plan is not sound for the following reasons: It has not been justified and is not effective as the reasonable, sustainable alternatives for additional housing previously suggested in larger development centres such as North Aylesham, Elvington and Ethorne and Farthingloe and included within the original plan have now been removed and the proposed allowance for housing has been increased in Capel-le-Ferne and may not be deliverable. The original draft Local Plan has been changed so that 900 fewer houses are proposed overall and yet the number of houses proposed in Capel-le-Ferne has increased

to 95. This is on top of recent planning permission for 34 houses off Capel Street, 15 dwellings at Longships on Cauldham Lane and 40 new dwellings in a recently completed development at Grasslands. It would appear that Dover District Council are spreading development with numerous small sites which is uneconomic and unsustainable rather than concentrating in larger developments where existing services, facilities and infrastructure are already available. We find it difficult to understand why Dover District Council persist with this policy in relation to Capel-le-Ferne when it clearly is not in keeping with the council's stated objectives.

SP2 - Planning for Healthy and Inclusive Communities and

SP3 – Housing growth

SP2 states that *'The Council will support the creation of healthy, inclusive and safe communities in the District by ensuring that new development is well served by services and facilities (for example education, health care, community, cultural facilities, play, youth, recreation, sports, faith and emergency facilities) and that a mix of uses are provided in new development that support daily life.'*

SP3 states that what they are trying to achieve is *'To focus new development at accessible and sustainable locations which can utilise existing infrastructure, facilities and services, and to ensure development contributes to the sustainability of local communities and services, supporting regeneration and wherever possible make the best use of brownfield land'.*

We do not believe that the proposals for Capel-le-Ferne meet any of the objectives in the above Strategic Policies as follows:

- The proposed development is on arable land, currently in use and not brownfield land.
- The development of the village is clearly not sustainable – Capel-le-Ferne has little or no facilities and services – only one small shop, no post office, no health care facilities, no doctor, no dentist, no pubs within the village confines and only a primary school. Therefore, in order to access services, residents need to drive to either Folkestone or Dover which is clearly at odds with SP1 – Planning for Climate Change.
- The location of the proposed development in SAP 44 will connect to existing overloaded roads using Capel Street as its primary access point.
- The addition of 40 dwellings recently completed at Grasslands has not led to any benefit to the community in terms of new services or facilities.
- Trying to 'grow the villages' by increasing the number of houses, but not having any plans to help develop services and facilities is unsustainable and uneconomic and will only lead to more unnecessary travel.
- There is only a single bus service and no train service at all.
- The strategic policy SP6 – Economic Growth identifies areas distant from Capel-le-Ferne for economic development. Capel-le-Ferne has little opportunity for employment generation so cannot be seen to contribute to SP6.
- The agreed number of number of houses for the site was originally set at 100, this was then reduced to 50 to allow a single point of access to the site. It has now been increased to 70 and is deemed achievable. We would question this and believe any scheme is likely to be undeliverable. It would appear that the increase in the number of houses is being driven by economic needs to cover developer contributions which are likely to be substantial rather than by any need by Dover District Council to provide more housing. The development at Longships under SAP45, which has been granted planning permission, exceeds the allocated housing number by 5 dwellings on the basis that sticking to the SAP45 allocation of 10 houses would be uneconomic. The development of SAP44 is likely to encounter similar cost problems and is unlikely to be achievable in the proposed timetable (2021-2026) due to strong local opposition when it comes to the planning application stage

CONSULTATION WITH STATUTORY CONSULTEES (Reg 22)

We believe that Dover Council **has not fully consulted with statutory consultees** to ensure that the existing facilities where present are sufficient or that plans are in place for future development of infrastructure.

SP11 – Infrastructure and Developer Contributions states: *Supporting infrastructure should be provided in advance of, or alongside, the development, unless there is sufficient existing capacity. The appropriate phasing for the provision of infrastructure will be determined on a case-by-case basis with reference to the most up to date Infrastructure Delivery Plan (IDP) and the priority classification along with other relevant evidence, and in consultation with the relevant providers.*

It is noted that the site at Aylesham North (AYL004) has been removed for transport reasons – essentially Kent County Council objected on transport grounds – yet given 500 homes in a sustainable location (two rail stations, large settlement), that would seem to be logical focus for development and the Council has failed its Duty to Cooperate with Kent County Council by failing to ensure the relevant transport assessments are undertaken / potential mitigation identified and agreed, rather than simply removing the large site from the plan and yet still maintaining and increasing allocations on the edge of villages (such as Capel-le-Ferne) that they hope are small enough to slip under the radar at Examination.

	<p>The existing infrastructure in Capel-Le-Ferne is already struggling to cope with the existing level of housing. Water supply is weak throughout the village, power outages are common, and drainage has insufficient capacity and frequently blocks. The addition of 90 houses along with the 49 already given planning permission will make this worse. Access to the site is proposed via Capel Street, an already congested road (little off street parking, busy cut through, primary school).</p> <p>Looking through the supporting Infrastructure Delivery Plan (IDP), no mention is made of any suggested improvements to facilities/services or for any proposed improvements to be carried out by Kent Highways, Southern Water (drainage) or Affinity Water (water supply) in Capel-le-Ferne. Incremental development such as extensions to villages are more difficult to plan for with respect to infrastructure as they are too fragmented and should therefore be avoided.</p> <p>Transport modelling has been carried out for developments in other areas, but nothing has been done for Capel-le-Ferne where there will be over 100 new houses accessing Capel Street, a narrow congested road. This was highlighted as a significant problem during the long drawn out process of granting planning permission for 34 dwellings off Capel Street. The revised Local Plan is proposing to add a further 70 houses along with 20 dwellings on Cauldham Lane. All the traffic from these developments will exit onto the New Dover Road at the junction of Capel Street/Cauldham Lane –a poorly designed junction which has been identified in numerous surveys as a real problem for development in the area. The Local Plan does not include any transport modelling for this area.</p> <p>Kent County Council have reservations about access to the site SAP44 indicating that it is not ideal. Given the current frequent traffic congestion in the area, this is not surprising. Particular concern was raised regarding emergency vehicle access, hence the requirement for a secondary access to SAP44 and further consultation with the emergency services. However, it should be noted that this secondary access is via a single track lane. Clearly insufficient consultation has been carried out at this stage.</p> <p>Although Dover District Council have consulted with Capel-le-Ferne Parish Council as required, it would appear that they have not engaged fully with the parish council as the objections raised by the council to overdevelopment of the village have been ignored both in this local plan and in planning permissions granted in the past. If the purpose of consultation is to incorporate the views of the local population, Dover District Council have clearly failed in this regard.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>We believe that the best way to make the plan more sound would be to remove SAP44 from the areas where housing can be considered and to provide more housing in a more sustainable location, where there is easy access to facilities, services, transport and infrastructure (or where the size of the proposed development would warrant significant investment in new infrastructure).</p> <p>The Planning Inspector may wish to consider that the non-compliance with the duty to co-operate with other bodies is sufficient to reject the plan outright. However, as a compromise, if SAP44 were removed from the plan, then the requirement to fully co-operate with utility providers in respect of Capel-le-Ferne would no longer be an issue and the plan could go forward to the next stage.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>I feel it is necessary as it would appear to me that the council is not following it's own strategic policies and ignoring the genuine objections made by the local Parish Council and residents of Capel-le-Ferne.</p>
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP44 - Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006)</p>
<p>Rep ID</p>	<p>SDLP987</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1267168</p>
<p>Consultee Full Name</p>	<p>Mr</p>

	David Whittington
Consultee Company / Organisation	Folkestone and Hythe District Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP44 & SP45 Capel-le-Ferne sites
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The District Council raises no objections to the Local Plan but seek continued dialog between the two Council's, KCC and the health authority on the impact of any future development in Capel-le-Ferne on the provision of schools and health care in Folkestone & Hythe District.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	None.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP44 - Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006)
Rep ID	SDLP814
Rep Status	Processed
Consultee ID	1331777

Consultee Full Name	Mr James Blomfield
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Sustainability Appraisal Reg 19 Chapter 6 - Draft Local Plan SA p74-165 / Chapter 3 Sustainability Context p15-29 / Whole Plan Viability Study Chapter 8 Local Plan Policy Requirements / Housing + Economic Land Availability Assessment HELAA - Main Report TC45 - Assessment of Sites p11
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p><u>Dover Local Plan – Section 19 Consultation</u></p> <p>SAP 44</p> <p>SOUNDNESS</p> <p>The revised Local Plan is not sound for the following reasons:</p> <p>It has not been justified and is not effective. It has not been positively prepared to meet 'objectively assessed' needs and for this reason is not consistent with National Policy.</p> <p>Why have the reasonable, sustainable alternatives for additional housing previously suggested in larger development centres such as North Aylesham, Elvington and Ethorne and Farthingloe and included within the original plan have now been removed? At the same time the proposed allowance for housing has been increased in Capel-le-Ferne and will not be deliverable.</p> <p>The original draft Local Plan has been changed so that 900 fewer houses are proposed overall and yet the number of houses proposed in Capel-le-Ferne has increased to 95.</p> <p>This is on top of recent planning permission for 34 houses off Capel Street, 15 dwellings at Longships on Cauldham Lane and 40 new dwellings in a recently completed development at Grasslands.</p> <p>Why is Dover District Council spreading development across numerous small sites which is uneconomic and unsustainable rather than concentrating in larger developments where existing services, facilities and infrastructure are already available?</p> <p>Why Dover District Council persist with this policy in relation to Capel-le-Ferne when it clearly is not in keeping with the council's stated objectives?</p> <p>SP2 - Planning for Healthy and Inclusive Communities and</p> <p>SP3 – Housing growth</p> <p>SP2 - Planning for Healthy and Inclusive Communities and</p> <p>SP3 – Housing growth</p> <p>SP2 states that <i>'The Council will support the creation of healthy, inclusive and safe communities in the District by ensuring that new development is well served by services and facilities (for example education, health care, community, cultural facilities, play, youth, recreation, sports, faith and emergency facilities) and that a mix of uses are provided in new development that support daily life.'</i></p>

SP3 states that what they are trying to achieve is 'To focus new development at accessible and sustainable locations which can utilise existing infrastructure, facilities and services, and to ensure development contributes to the sustainability of local communities and services, supporting regeneration and wherever possible make the best use of brownfield land'.

But the proposals for Capel-le-Ferne do not meet any of the objectives in the above Strategic Policies as follows:

- 1 The location of the proposed development in SAP 44 will connect to existing overloaded roads using Capel Street as its primary access point.
- 2 The proposed development is on arable land, currently in use and not brownfield land.
- 3 The development of the village is clearly not sustainable – Capel-le-Ferne has little or no facilities and services – only one small shop, no post office, no health care facilities, no doctor, no dentist, no pubs within the village confines and only a primary school. Therefore, in order to access services, residents need to drive to either Folkestone or Dover which is clearly at odds with SP1 – Planning for Climate Change.
- 4 The addition of 40 dwellings recently completed at Grasslands has not led to any benefit to the community in terms of new services or facilities.
- 5 Trying to 'grow the villages' by increasing the number of houses, but not having any plans to help develop services and facilities is unsustainable, uneconomic and unethical. It will only lead to more unnecessary travel.
- 6 There is only a single bus service and no train service at all.
- 7 The strategic policy SP6 – Economic Growth identifies areas distant from Capel-le-Ferne for economic development. Capel-le-Ferne has little opportunity for employment generation so cannot be seen to contribute to SP6.
- 8 The agreed number of number of houses for the site was originally set at 100, then reduced to 50 to allow a single point of access to the site. It has now been increased to 70 and is deemed achievable. This is not realistic and undeliverable. It would appear that the increase in the number of houses is being driven by economic needs to cover developer contributions which are likely to be substantial rather than by any need by Dover District Council to provide more housing. The development at Longships under SAP45, which has been granted planning permission, exceeds the allocated housing number by 5 dwellings on the basis that sticking to the SAP45 allocation of 10 houses would be uneconomic. The development of SAP44 is likely to encounter similar cost problems and is unlikely to be achievable in the proposed timetable (2021-2026)

Consultation With Statutory Consultees (Reg 22)

Dover Council **has not fully consulted with statutory consultees** to ensure that the existing facilities where present are sufficient or that plans are in place for future development of infrastructure.

SP11 – Infrastructure and Developer Contributions states: *Supporting infrastructure should be provided in advance of, or alongside, the development, unless there is sufficient existing capacity. The appropriate phasing for the provision of infrastructure will be determined on a case-by-case basis with reference to the most up to date Infrastructure Delivery Plan (IDP) and the priority classification along with other relevant evidence, and in consultation with the relevant providers.*

It is noted that the site at Aylesham North (AYL004) has been removed for transport reasons – essentially Kent County Council objected on transport grounds. However, given 500 homes in a sustainable location (two rail stations, large settlement), that would seem to be the obvious logical focus for development and the Council has failed its Duty to Cooperate with Kent County Council by failing to ensure the relevant transport assessments are undertaken and potential mitigation identified and agreed; rather than simply removing the large site from the plan and increasing allocations on the edge of villages (such as Capel-le-Ferne) that they hope are small enough to slip under the radar at Examination. This is not ethical.

The existing infrastructure in Capel-Le-Ferne is already struggling to cope with the existing level of housing. Water supply is weak throughout the village, power outages are common, and drainage has insufficient capacity and frequently blocks.

The addition of 90 houses along with the 49 already given planning permission will make this worse. Access to the site is proposed via Capel Street, an already congested road (little off street parking, busy cut through, primary school).

Note also the checkered history of road traffic accidents and injuries caused at the congested at the junction of Capel Street/Cauldham Lane from New Dover Road.

Looking through the supporting Infrastructure Delivery Plan (IDP), no mention is made of any suggested improvements to facilities/services or for any proposed improvements to be carried out by Kent Highways, Southern Water (drainage) or Affinity Water (water supply) in Capel-le-Ferne.

Incremental development such as extensions to villages are more difficult to plan for with respect to infrastructure as they are too fragmented and should therefore be avoided.

	<p>Transport modelling has been carried out for developments in other areas, but nothing has been done for Capel-le-Ferne where there will be over 100 new houses accessing Capel Street, a narrow congested road. This was highlighted as a significant problem during the long drawn out process of granting planning permission for 34 dwellings off Capel Street. The revised Local Plan is proposing to add a further 70 houses along with 20 dwellings on Cauldham Lane. All the traffic from these developments will exit onto the New Dover Road at the junction of Capel Street/Cauldham Lane –a poorly designed junction which has been identified in numerous surveys as a real problem for development in the area. The Local Plan does not include any transport modelling for this area.</p> <p>Kent County Council have reservations about access to the site SAP44 indicating that it is not ideal. Given the current frequent traffic congestion in the area, this is not surprising. Particular concern was raised regarding emergency vehicle access, hence the requirement for a secondary access to SAP44 and further consultation with the emergency services. However, it should be noted that this secondary access is via a single track lane. Clearly insufficient consultation has been carried out at this stage.</p> <p>Although Dover District Council have consulted with Capel-le-Ferne Parish Council as required, they have not engaged fully with the parish council as the objections raised by the council to overdevelopment of the village have been ignored both in this local plan and in planning permissions granted in the past. If the purpose of consultation is to incorporate the views of the local population, Dover District Council have clearly failed in this regard.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Changes I would make:</p> <p>Take SAP 44 out of the plan completely as it is not following the policies that the council say they are trying to Achieve and not following their own policies.</p> <p>Choose one of the alternative sites for additional housing in larger development centres such as North Aylesham, Elvington and Ethorne and Farthingloe and included within the original plan. In particular, Aylesham North (AYL004) is far more appropriate, given 500 homes in a sustainable location (two rail stations, large settlement), that would seem to be the obvious logical focus for development</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>I would like to participate as I represented the Village Council in recent Planning Committee meetings.</p>
<p>Include files</p>	<p>Crashmap.png Cauldham Lane CT18 7HG.jpeg SDLP0814 Blomfield - Att 3.png.jpeg (1)</p>
<p>Local Plan Consultation Point</p>	<p>SAP44 - Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006)</p>
<p>Rep ID</p>	<p>SDLP679</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331815</p>
<p>Consultee Full Name</p>	<p>Mrs Angela Parkes</p>

Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP44
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I beleive the plan is unsound due to the fact that there are no services to accomadate further dwelligns. The only service the village has is an over subscribed bus service that would not be sufficient for taking any further children to the towns for secondary schools. The local infrastructure is not sufficient to support this number of houses and cannot be made so due to existing properties. There are already flooding and water pressure issues in the area that should buiding go ahead will only become worse. I am also concerend that there will be significan timpact to the AONB
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Remove SAP44 from the plan
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP44 - Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006)

Rep ID	SDLP1000
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP44
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The County Council requests that the policy includes reference to Bridleways ER253 252 and the required improvements to support connectivity.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The County Council requests that the policy includes reference to Bridleways ER253 252 and the required improvements to support connectivity.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP44 - Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006)

Rep ID	SDLP1857
Rep Status	Processed
Consultee ID	1259482
Consultee Full Name	Mr Lee Bracegirdle
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP44
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I object most strongly to the proposals in the latest local plan for proposals CAP006 and CAP013.</p> <p>Despite the local resident majority view objecting in respect of CAP009 it is noted that the Council at the stroke of a pen has disregarded these views and agreed to this development. Any further development in the areas proposed will despoil the rural nature of Capel Le Ferne and in particular Cauldham Lane, at least CAP011 is close to a major thoroughfare and will not require a rural lane to become a main road.</p> <p>Both CAP006 and CAP013 and in conjunction with CAP009 2ill require the widening of Cauldham Lane in an attempt to ease the inevitable increase in traffic flow. All these proposals in conjunction with the traffic now accessing great Cauldham farm industrial complex, are likely to increase the number of additional vehicle movements by 180 with the inevitable bottle neck of vehicles trying to access the B2011 from both Capel Street and Cauldham Lane.</p> <p>It is curious to note that the persistent applications for CAP006 site have been; over time reduced to 70 dwellings (previous latest proposal was for 50 dwellings) on the basis that local utilities are unlikely to be to support a greater number. This is particularly applicable to water supply. The water pressure in Cauldham Lane has always been low and is particularly low in summer months. With the above proviso that utilities would be unable to support a larger development in CAP006 it is now suggested that CAP009 and CAP013 (15 dwellings) are supportable – where is the logic for this?</p> <p>I am further concerned that the proposal for CAP006 is likely to be considered as an interim solution bearing in mind the comment in SAP44 item (h) that refers to future upsizing. This suggests the site s likely to be considered for more development in the future. Does this mean that there are plans to improve local infrastructure in regard to water supply, reliable electricity supply along with drainage referred to in item h above?</p> <p>In conclusion I find it unacceptable that these proposals should be considered where local rural lanes should be developed in to major thoroughfares when there are sites close to the B2011 that have been mysteriously redesignated as not suitable but would be far more easily accessed.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s)	

you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP44 - Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006)
Rep ID	SDLP1137
Rep Status	Processed
Consultee ID	1331825
Consultee Full Name	Mrs Janet Milliken
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP45
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	CAP013 This land is on a dangerous corner and at the end of a narrow lane which already has a number of large lorries and farm vehicles using it numerous times on a daily basis. CAP009 should never have been granted permission for the same reason. These 2 plus CAP006 will be accessed by an already busy dangerous junction of B2011/Capel Street/Cauldham Lane.

	<p>I was recently waiting in a queue of 5 vehicles coming from Folkestone and 2 lorries on the opposite side of the road, waiting for a large lorry to exit Cauldham Lane.</p> <p>A few months ago I was attempting to exit Cauldham Close and had to wait for a lorry to perform a 6 point turn to enable 4 cars to come from the direction of Longships to the top of Capel Street</p> <p>The government has expressed a wish for the country to become self sufficient in food. Why would any sane council give permission for CAP006 which is prime agricultural land.</p> <p>Please consider carefully the safety of villagers, particularly the elderly who struggle already with the traffic in the area and please remember that Capel Street is the access for the village school, village hall and the Baptist chapel.</p> <p>Capel residents already have problems accessing doctors, additional residents will exacerbate the problem</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>As I have already indicated, these developments will expose villagers to danger and reduce the country's ability to be self sufficient in food</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>Hopefully, the elected Parish councillors will be able to pass on the comments of the villagers</p>
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP44 - Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006)</p>
<p>Rep ID</p>	<p>SDLP1260</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1333023</p>
<p>Consultee Full Name</p>	<p>Ann Bonomy</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP44</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	CAP006 Object most strongly. Too many houses - the access to Capel Street, just not suitable, not wide enough, not enough vision. Capel Street is chaos frequently now. Would public services be up to such a vast increase on demand? I think not. We would lose our identity as a village, surely as residents we have that right to stay as a village.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP44 - Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006)
Rep ID	SDLP1214
Rep Status	Processed
Consultee ID	1332957
Consultee Full Name	Mrs S Bailey
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CAP006 Great Cauldham Farm, CT18 7LZ
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	1. With no major changes or improvements to Capel-le-Ferne highways (Roads or Pavements) for numerous years, any increase in extra vehicle traffic or additional road use will have a detrimental effect on Fire, Police and Ambulance Services response times. Fire Services state their vehicles require a 4 metre gap to operate. (Issue relates to Parking, Highway Safety, Traffic, Noise and Disability Parking/Access) 2. Before building any housing on farm land, building on old disused buildings and exindustrial sites be a priority. (Issue relates to Government Policy) 3. With no major changes or improvements to Capel-le-Ferne and surrounding infrastructure, such as Primary and Secondary schools, Doctors Surgeries, Hospitals etc, any increase in population (to Capel-le-Ferne) will have a detrimental effect on services that are either very strained or at breaking point. (Issue relates to Government policy Parking, Highway Safety, Traffic, Noise, Disability Parking/Access and proposals in the Development Plan)
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP44 - Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006)

Rep ID	SDLP1981
Rep Status	Processed
Consultee ID	1265512
Consultee Full Name	Mr Roger Hobart
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CAP006
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I believe the proposals concerning this particular location are unsound for the following reasons: -</p> <ol style="list-style-type: none"> 1 The location is very close to an Area of Outstanding Natural Beauty and the scale of the development envisaged is out of keeping with this designation. 1 This is productive agricultural land, and its loss would seem to be contrary to the current Government policy to ensure 'food security' and also its stated policy to emphasise the use of Brownfield sites for housing development. 1 There is every likelihood that the development proposed would cause significant traffic disruption and threaten pedestrian safety. The current proposals envisage a main exit from the site onto Capel Street with a backup/emergency exit onto Cauldham Lane. As regards Capel Street – this street is the site of severe congestion at peak times (notably school drop off and pick up plus the usual commuter periods). I am surprised that any traffic survey undertaken did not identify this feature and would therefore question the timing of said survey! A development on the scale envisaged would inevitably generate a significant increase of traffic flows, particularly as most future householders will inevitably work outside the village. The most obvious result would be log-jam in Capel Street. The secondary exit onto Cauldham Lane is supposedly not for regular traffic usage but how on earth would this be adequately monitored and controlled to ensure it was not abused. The aforementioned potential problems in Capel Street would obviously incline motorists to seek alternative routes. Cauldham Lane is a typical narrow country lane, bordered by hedgerows and lacking any pavements, and any increase in traffic usage would have a seriously negative impact. The lane provides the only access for HGVs and articulated lorries regularly servicing the nearby farm and adjacent industrial units and such vehicles would have great difficulty in maneuvering/reversing if confronted by oncoming traffic. Any disruption would adversely impact local business. In addition, there are concerns for the safety of pedestrians and horse riders – the lane is used by pedestrians (some disabled) dog walkers and horse riders. It should be remembered that there are no pavements and there is a blind bend which also happens to be the entrance to a bridal path. In conclusion there is significant scope for both traffic disruption and the potential for heightened risk to pedestrians.

	1 There is highly likely to be an adverse impact on local utilities, especially water supply/pressure. I believe the local water company have already flagged potential supply problems if the development proceeds on the scale envisaged. There is already a recognized problem with inadequate water pressure locally and this problem can only worsen.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	This development proposed should ideally be rejected in its entirety, or at least substantially scaled back
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP44 - Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006)
Rep ID	SDLP1263
Rep Status	Processed
Consultee ID	1333025
Consultee Full Name	Douglas Bonomy
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP44
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	CAP006 Object most strongly. Too many houses - the access to Capel Street, just not suitable, not wide enough, not enough vision. Capel Street is chaos frequently now. Would public services be up to such a vast increase on demand? I think not. We would lose our identity as a village, surely as residents we have that right to stay as a village.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP44 - Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006)
Rep ID	SDLP1837
Rep Status	Processed
Consultee ID	1274134
Consultee Full Name	D Belsey
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP44
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective

	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I object to any considered development on plots CP006, CAP011 and CAP 013. This would result in a massive increase in traffic. Capel Le Ferne roads are not the easiest to negotiate at present and this would increase the problems i.e., what effect would it have on emergency services. The infrastructure of the village is not capable of supporting new developments. Things like water pressure have been a problem with the current population of the village, increase the population, increase the problem.</p> <p>What of design and appearance, when Grasslands obtained planning permission, I like many of the villagers were under the impression that houses would be built in keeping with the appearance of the village, what was built a modern housing estate that would fit in very well on Folkestone Beach what we have is a blot on the landscape.</p> <p>Any development is going to cause loss of trees, hedgerows and natural habitat, for wildlife. We are being reminded every day that we need to act quickly to help nature conservation before it's too late.</p> <p>We live in a time of unrest and turmoil and a planet that has an ever-increasing population. We are told that food production is becoming more strained and the need for countries to become as productive as possible in growing as much food stuff as they can. I therefore feel that to even consider development on CAP006 would be completely inappropriate, as this is agricultural land.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP44 - Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006)
Rep ID	SDLP1250
Rep Status	Processed
Consultee ID	1332980
Consultee Full Name	Carole Belsey
Consultee Company / Organisation	

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CAP006
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Due to the war in Ukraine there should be a stop to the building on farm land for the next 2-5 years due to the shortage of grain, this field has been used for crops for many years and believe this is how it should stay, before building on any farm land the council should investigate any old disused and ex industrial sites first. Any additional road use will have a detrimental effect on fire, police and ambulance services response time, with fire engines requiring a 4 metre road with space to operate, existing local roads are not adequate. Capel street and Cauldham lane are not wide enough for increased traffic.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP44 - Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006)
Rep ID	SDLP1833
Rep Status	Processed

Consultee ID	1331439
Consultee Full Name	Bradley Dickenson
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP44
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I have been a resident in Capel Street (DDC Redacted) for 23 years, I have raised my concerns many times as this seems to be a regular application over the period of time I have lived here. It's so sad that the farmer who owns the field behind me (proposed 70 dwellings) has stooped to a new low on offering and successfully succeeding on purchasing a bungalow (that can be demolished) to enable an entry road from Capel street as this in the past has been an issue. This area is noted on the plan. All this points out to me is this man has no concern for the local community and is only driven by financial gain. The residents of Capel like myself live in Capel due to the peace and outstanding countryside which surrounds us which obviously attracts all sorts of wild animals/ insects/ wild flowers. All of this I'm sure is part of the attraction for young couples/ families and Senior citizens to live in a SMALL village and helps to promote the community we now have. Concerns are felt as we feel Capel is at its limits now and especially our primary school. All this says to me if these dwellings are passed it will open the door for future dwellings and mass expansion in infrastructure to be able to make this viable. I'm sure you can sense but just to confirm I am absolutely against all the projects proposed and it will take away everything Capel Le Ferne stands for.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP44 - Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006)
Rep ID	SDLP1920
Rep Status	Processed
Consultee ID	1266857
Consultee Full Name	Mr John Scannell
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP45 CAP006
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I believe the proposals for this site development are unsound for the following reasons</p> <ol style="list-style-type: none"> 1 This is not a Brownfield site – but prime agricultural land 2 Inappropriate as close to AONB 3 Development scale is out of keeping with our village 4 An increase of traffic will cause major problems and will be exasperated after CAP010 site is completed on Capel Street <p>Exit and entrance on Capel Street will cause traffic jams as there are already traffic flow problems</p> <p>The junction of Capel Street and B2011 is already frequently congested</p> <p>Capel Street is at most times single file traffic because of the narrowness of the road and residence parking</p> <ol style="list-style-type: none"> 1 Our school is already at capacity 2 There would be unexceptionable increase in noise and light pollution 3 Concerns of our water supply that already has pressure problems 4 The proposed Cauldham Lane entrance is not appropriate be it an Emergency Entrance/Exit – how will this be policed <p>The site leads onto a single-track lane already busy with farm tractors. Deliveries to the units at the farm. Local traffic and traffic that use the lane as a short cut from the valley.</p> <p>As an emergency entrance/exit is not fit for purpose, being too narrow (that is the Lane) and is close to a blind corner</p>

	<p>The public will be at risk further as there are no pavements</p> <p>It is impossible to pass the farm tractors on this lane as when walking as a pedestrian there is no room the tractors are as wide as the lane. Further traffic will cause major congestion.</p> <ol style="list-style-type: none"> 1 This development will have a negative impact on wildlife – animals and birds and bats including the endangered skylark that is regularly heard at this site. 2 We have concerns that residence properties will be devalued. <p>Regarding all of the above, has sufficient consultation with appropriate departments been carried out?</p> <p>Our Parish Council appears not to have been listed to – they represent our village, why have they been ignored with the concerns they have raised?</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>A plan should be in place should this development go forward – for improvements to facilities/services and improvements (that will have to be made) by Kent Highways – and the water supply needs to be addressed</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>To express my concern of the consequences should this development proceed.</p>
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP44 - Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006)</p>
<p>Rep ID</p>	<p>SDLP1928</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1271717</p>
<p>Consultee Full Name</p>	<p>Quinn Estates</p>
<p>Consultee Company / Organisation</p>	<p>Quinn Estates Ltd</p>
<p>Agent Full Name</p>	<p>Sarah Willson</p>
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP44</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>

<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified Effective</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Not Applicable</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Not Applicable</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>Iceni Projects Limited ('Iceni') is writing on behalf of Quinn Estates Ltd ('Quinn Estates') to submit representations to the Dover District Local Plan Regulation 19 Consultation in respect of land to the east of Great Cauldham Farm, Capel-le-Ferne ('the Site').</p> <p>These representations should be considered alongside the following supporting documents appended to this letter:</p> <ul style="list-style-type: none"> • Appendix 1 - Indicative Site Layout Plan; • Appendix 2 - Landscape Briefing Note; • Appendix 3 – Transport Note; and • Appendix 4 – Cultural Heritage and Archaeology Note. <p>Quinn Estates supports the allocation of the Site within the new Local Plan for 70 dwellings in order to support the Council's target of 11,924 homes over the Local Plan period to 2040. Nevertheless, as set out in further detail below, the Site can sustainably accommodate additional housing to deliver further dwellings in the Plan period, as demonstrated by the documents appended to this letter.</p> <p>The vision for the Draft Local Plan reflects the growing importance of new challenges facing local communities in regard to climate and ecological emergency, and greater emphasis on the protection and enhancement of retail, leisure, cultural and commercial development across the district area, and promoting the health and social wellbeing of communities. The corresponding objectives strive for a more prosperous economy, as well as vibrant new communities. Nevertheless, Quinn Estates considers that the approach to assessing settlements, and the resultant amount of housing allocated to settlements, is based on an ineffective method of understanding the sustainability of villages. Quinn Estates considers that the Plan would be strengthened by increasing the amount of housing allocated to settlements which can suitably accommodate such growth.</p> <p><u>a. Relevant Background</u></p> <p>Quinn Estates Quinn Estates is the south east's foremost mixed-use developer with numerous development interests within Dover District, Kent and the wider South East area. The company has delivered both successful community extension schemes and stand-alone development sites both within rural and urban locations within the District. Quinn Estates' track record of housing delivery should be a material consideration that should inform key planning decisions, including which sites to allocate for development. Furthermore, Quinn has demonstrated through its' actions that it can formulate and deliver development solutions of high community value, always working hard to identify through community engagement how the company's developments can support and strengthen communities by delivering community infrastructure needed. They have a track record of delivery in Dover, with over 200 new homes and 45,000 sq.ft of commercial space delivered.</p> <p>Site and Surroundings The Site adjoins the existing settlement of Capel le Ferne, though it is centrally located within the settlement given the proposed Site lies between Capel Street and Cauldham Lane. The Site is approximately 4ha and currently comprises farmland. It is located outside the settlement boundary as defined by the Core Strategy 2010.</p> <p>The Site is well connected to the local footway network with a footway running alongside Capel Street. The path is approximately 2.0m in width and provides links to the north and to the south as well as excellent connectivity to the centre of the village, including a network of interconnected public rights of way and bridleways.</p> <p>The Kent Downs Area of Outstanding Natural Beauty (AONB) borders the Site to the west and the Capel le Ferne settlement boundary bounds the site to the east. Notably, the landholding comprises the only land adjoining the settlement that lies outside of the AONB, which makes the land the best suited and the most sequentially preferable development option for the settlement. The Site is not located within a Conservation Area and there are no heritage assets or Scheduled Ancient Monuments within the site boundary. The whole of the Site is located within Flood Zone 1.</p>

To the north-west, the Site is bound by agricultural fields whilst the north-east corner is bound by residential properties. To the south and east of the site are further existing residential dwellings fronting onto Cauldham Lane and Capel Street. Existing dwellings also border the western boundary of the Site on the southern section and farmland on the northern section. The existing settlement is characterised by one and two storey dwellings. The rear gardens of the existing dwellings directly adjoin the Site. The gardens are generally substantial in size and therefore setback from Site.

The Site is well located in proximity to services, facilities, amenities and public transport making it a sustainable location for residential development. Capel le Ferne Primary School and Village Hall are located approximately 200m north-east of the Site (less than 5-minute walk), a convenience store is located less than 200m from the Site to south-east and so the most important components of a sustainable settlement are already in situ. In addition, the Site is served via nearby bus stops located on New Dover Road, approximately 200m to the south of the Site. The bus service runs every 15 minutes between Dover, Folkestone, New Romney, Rye and Littlestone-on-Sea and as such, there is a frequent and reliable public transport option to access a variety of high order settlements. This connectivity is an important and sometimes overlooked factor in determining the sustainability credentials of settlements such as Capel.

Capel le Ferne is defined in the adopted Dover District 2010 Core Strategy as a Local Centre providing a range of shops and services for the local communities and surroundings. There are also a variety of nearby employment areas including Folkestone and Dover that provide work opportunities for residents of Capel le Ferne and surrounding areas. Dover is the principal town in the District and therefore hosts a range of employment opportunities including those relating to the international port and retail related employment, whilst Folkestone is a sub-regional town in the Folkestone & Hythe Local Plan which provides “(inter-) national transport links, and a good choice of employment, retail, cultural/leisure and public services for the whole of the district, adjoining districts and visitors.”.

b. Response to Draft Dover District Local Plan

The draft Dover District Local Plan Regulation 19 Consultation seeks comments on the legal compliance, soundness, and compliance with the duty to cooperate of the Submission Version of the plan. This section responds to the draft Local Plan and assesses its soundness in relation to the housing growth strategy (Policy SP3) and proposed allocation at Great Cauldham Farm (Policy SAP44).

Quinn Estates welcomes the inclusion of the Site within the Draft Local Plan for residential development. However, Quinn Estates consider that the Settlement Hierarchy, particularly for Capel-le-Ferne, is based on an assessment methodology which fails to appropriately assess the sustainability of the village. Accordingly, the village could accommodate additional growth and the Table 4.12 should be amended to propose a minimum of 70 dwellings on the site. The current approach to the development strategy raises several issues which can be addressed through the allocation of additional housing growth to Capel le Ferne, including the Site subject to this representation.

Housing Need and Supply

Table 3.1 of the draft Local Plan outlines an overall supply of 11,924 dwellings across the plan period. This equates to an 8% buffer over the minimum housing requirement derived from the standard method. This is proposed to be met through a combination of committed schemes, site allocations and windfall sites. This is not considered to be sufficient due to the over reliance on one strategic site - the Whitfield Urban Expansion.

Quinn Estates has no objection to large-scale housing development at strategic sites playing an important role in meeting housing need. However, what looks good on paper needs to deliver in practice. However, in a District like Dover where there is a need for the benefits of growth to translate across the District, the spatial strategy should be seeking to unlock growth and inward investment at other settlements, such as Capel le Ferne, and this is a significant weakness of the Plan in its current form. Paragraph 35 of the NPPF outlines how plans are effective where they are found to be deliverable over the plan period. The disproportionately high dependence on Whitfield Strategic Allocation (SAP1) results in a plan which raises considerably uncertainty as to this key soundness test.

Strategic scale sites typically have long lead-in times and often require infrastructure to be delivered up-front. As a result, they may not begin to deliver housing until the later in the Plan period. Smaller scale sites, such as the subject Site at Great Cauldham Lane, which is rightly allocated to ensure the plan is positively prepared in line with the requirements of the NPPF is supported. In this regard, Paragraph 60 of the NPPF highlights that “to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed”. The allocation of the site at Great Cauldham Lane is supported by Quinn Estates, it can come forward early in the period, it is capable of delivering a mix of housing types and tenures and therefore makes an important contribution to local housing needs in the near future.

Quinn therefore encourages Dover District Council (DDC) to make every effort to meet, and if possible, exceed this target to ensure the Government’s objective to significantly boost the supply of housing can be met. As part of this a wide range of sites of different sizes and locations should be allocated to ensure choice and flexibility in the supply, in accordance with paragraph 67 of the NPPF. Sites such as Great

Cauldham Farm should therefore be utilised to their full extent to reduce this over reliance on the Whitfield Urban Expansion to deliver housing across the plan period.

Settlement Hierarchy

Quinn Estates considers that the approach taken to the delivery of housing in Dover as set out within Table 3.3 of the Regulation 19 Submission Version of the Draft Local Plan is not a result of sound plan-making. It is considered that the Settlement Hierarchy inappropriately assesses settlements using a bizarre matrix system which does not reflect how residents use services, and the resultant ability for a settlement to support additional residential development and deliver benefits to existing residents.

The Council's evidence base for the Local Plan comprises a range of technical reports and topic papers including a Rural Settlement Hierarchy Study (2022). Quinn Estates are disappointed to note that the previous comments made at Regulation 18 stage have not been taken into account, and that Capel le

Ferne remains downgraded to a 'Larger Village' rather than as a 'Local Centre' as the 2010 Dover Core Strategy currently acknowledges. Within the 2010 Dover Core Strategy Capel le Ferne was identified as a Local Centre and therefore a secondary focus for development in the rural area; suitable for a scale of development that would reinforce its role as a provider of services to its home and adjacent communities.

The Rural Settlement Hierarchy Study is an important document, as it has clearly directly led to the spatial approach presented in the Plan. However, the methodology to assess the sustainability of settlements is flawed and consequently this undermines the soundness of the whole spatial strategy. A simple matrix exercise has been used to count the number of facilities within the settlement, yet limited consideration is given to the level or value of service these facilities provide or any objective and balanced measure of sustainability of settlement based on critical elements such as their characteristics or spatial relationship in relation to other settlements and connections to them. It is disappointing to note that this matrix exercise has been used again for the Regulation 19 draft of the Local Plan.

A quantified points system has been used in which each service is awarded a certain number of points based on the amount and range of facilities provided within the settlement. It is clear there are some significant shortcomings in using this inventory method to assess the sustainability of a settlement and thus determining its position within the settlement hierarchy. For example, each shop unit is worth one point whilst a primary school or train station is only worth three points in total. The result of this is a settlement could score points if it contains shops that do not provide an everyday service to the settlement, for example a car dealership or a furniture store. It is clear that these uses will make a limited contribution to sustainability, they have a limited day to day function, they make a negligible contribution to day-to-day sustainable travel patterns and indeed, if anything, they could serve to weaken the potential to achieve more sustainable travel patterns if such uses are sited at remote settlements. As such, the methodology inflates the sustainability credentials of some settlements, whilst failing to identify the high sustainability credentials of others. When considering the sustainability of the site, the Council should consider a settlement's respective connectivity to other settlements and the way that settlements inter-relate to support and foster sustainable development. This more nuanced qualitative approach was taken through the previous Local Plan Review, but appears to have been discarded in the current Plan review for no discernible reason. As such, the method used to review settlements calls into question the soundness of the Local Plan as it would not be considered appropriately justified under Paragraph 35B of the NPPF.

In the case of Capel le Ferne, the settlement is supported by its own services, as detailed the Housing and Economic Land Availability Assessment submission for the subject site in 2022, and the Sustainability Appraisal Appendix F 2022.

These services include regular bus services to Dover and Folkestone, general public store, public house, café, village hall, two churches, weekly farmers market and a primary school. This range of services meets the everyday needs of existing and future residents of Capel le Ferne and a new residential population would ensure that the vitality and viability and the range of local service provision is enhanced. Focusing growth at the settlement offers the potential to achieve highly sustainable development through a combination of the existing facilities at the settlement to meet a day-to-day convenience function, and the settlement's superb connectivity and proximity to the main town of Dover and the Sub-Regional town of Folkestone to provide sustainable access to a host of major employment opportunities. No other rural settlement boasts such connectivity to the two primary towns in this part of the County, yet this factor has been entirely overlooked.

Quinn Estates currently have land under option adjacent to the existing primary school for expansion. A larger allocation could provide the opportunity to include additional services, such as GP surgery, which is identified as lacking in the village. Nevertheless, this can only be delivered in tandem with additional housing allocation to support it.

The downgrading of Capel le Ferne from a Local Centre to a Larger Village is unsound and appears to have resulted in the development allocation at Great Cauldham Lane being reduced in size, to the detriment of the settlement and the District. Within the existing Dover Local Plan Capel le Ferne was identified as a Local Centre to 'reinforce its role as provider of services to its home and adjacent communities'. Therefore, the settlement was presumed to support the retention of existing services

and attract new services within the area. The proposed downgrading of the settlement implies this objective has been met, although there is no evidence to support this. Capel Le Ferne should therefore continue to be identified as a Local Centre to continue to support this objective, with allocations such as that at Land east of Great Cauldham Lane being able to come forward to support this.

Given the range and suitability of the services available to residents in Capel le Ferne, along with its strong connections to employment centres via public transport, the settlement should be re-designated as a Local Centre. Moreover, the allocation of Land east of Great Cauldham Farm amended to a minimum of 70 dwellings to make full use of the site, strengthen the sustainability of the village and enable Quinn Estates to explore the delivery of additional services which would further enhance the settlement for existing and future residents.

Site Allocation Policy SAP44 – Land to the east of Great Cauldham Farm (CAP006)

Quinn Estates supports the allocation of the land to the east of Great Cauldham Farm within the draft Policy SAP44 for residential development. The site is available, suitable and achievable, as confirmed by the Housing and Economic Land Availability Assessment 2022. There are no obvious barriers to delivery, including that there are no constraints on the site such as ecology, trees, flooding and heritage, and the site is not dependent on the delivery of infrastructure before coming forward.

Quinn Estates consider that the land to the east of Great Cauldham Lane can comfortably accommodate additional housing. The appended Indicative Site Layout Plan details the ability of the site to accommodate up to 100 homes whilst retaining existing trees and hedgerows and providing sufficient screening along the western boundary of the Site, in accordance with the above assessment under the HELAA.

The Landscape Briefing Note submitted confirms that the site is more closely associated with the settlement edge than the open countryside to the north-west. It is considered that views are highly localised, and the visual envelope of the site is limited to a small area to the north. The site is not considered to be reflective of the special qualities or characteristics of the AONB, nor would the proposal bear any significant or detrimental impact on its setting. Furthermore, its redevelopment provides an opportunity to reinstate hedgerow planting that was lost due to intensive agricultural use and therefore a more sensitive transition to the AONB can be achieved.

Finally, it is considered to be a logical approach to extend the allocation further to the north, due to a localised dip in the land here meaning this part of the site is far less prominent and can ensure that a robust landscape buffer can be provided. Additional dwellings in this location are therefore suitable in landscape and visual terms, and the amendment of the allocation to 'minimum 70' can be supported. It is also significant to note that the site is the only site at the settlement outside of the AONB which can deliver housing, therefore, it is imperative that the Council makes best use of the site by expanding the allocation, or at the least revising the policy wording to a minimum of 70 dwellings.

A Cultural Heritage and Archaeological Scoping Report has been prepared in relation to the site and is appended to these representations. This Report confirms that there are no heritage assets on or near the site that would be directly affected by development. It is however considered that there may be archaeological remains, however it is not clear due to the limited archaeology works undertaken in the area. As such it is proposed that as part of any planning permission, a programme of archaeological evaluation would be agreed to confirm whether any remains exist, and any mitigation required.

This provision would enable greater benefits for the wider local community to be delivered, including:

- Contributing further to the local housing need;
- More affordable housing provision;
- Provision for community facilities;
- Increased amount of open space;
- Financially enables the delivery of the additional school land and potential GP surgery; and
- Opportunities to meet local self/custom build need

c. Conclusion

Quinn Estates wishes to support Dover in bringing forward a successful, effective and sound Local Plan that can serve the District across the Plan period. The allocation of the Site within the draft local plan is welcomed by Quinn and they are committed to delivering a successful housing scheme. However, Quinn seeks a minor amendment to the wording of the policy to support additional housing numbers on site, of which it has been demonstrated that the Site is suitable to do so.

It is considered that Capel le Ferne should be reconsidered as a Local Centre due to a number of factors including the facilities and services it currently provides, its proximity to Dover and Folkestone and its sustainable transport links to these settlements and the

	<p>potential for future development to support existing and new facilities in the village. The matrix exercise used to determine the settlement hierarchy has taken a very narrow view on settlement sustainability and its position in the hierarchy must be reviewed. In this regard, it is recommended that the Council exercise planning judgement to ensure that the settlement hierarchy for the District reflects the potential to achieve and deliver a sustainable growth strategy.</p> <p>The benefits of increasing the size of the allocation have been detailed as providing a more significant contribution to the housing needs for the local area, provision for a community facility and enhanced provision of open space. Given the range of benefits a larger allocation would be able to provide, Quinn Estates request the wording of the allocation in Table 4.12 to be amended to a minimum of 70 dwellings to enable these significant benefits to be utilised by new and existing residents.</p> <p>We trust that the above amendment is acceptable to the Council and that these representations will be taken into account in consideration of the current consultation. We also confirm that Quinn Estates would welcome the opportunity to be involved in the forthcoming Examination-in-Public and contribute to the debate to ensure that the best strategy for the District is found.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The site is promoted for 100 dwellings and requests the policy wording is amended to minimum 70 dwellings on the present site boundary, or expanding the site to the north to include 100 dwellings</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>SDLP1928 Willson Att1 Original rep.pdf SDLP1928 Willson Att2 Landscape briefing note.pdf SDLP1928 Willson Att3 Transport Assessment.pdf SDLP1928 Willson Att4 Cultural Heritage and Archaeological Scoping report.pdf SDLP1928 Willson Att5 Site Layout Plan.pdf</p>
<p>Local Plan Consultation Point</p>	<p>SAP44 - Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006)</p>
<p>Rep ID</p>	<p>SDLP1829</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1333688</p>
<p>Consultee Full Name</p>	<p>Ms S Bradshaw</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP44
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The proposed works would destroy the insects, shrubbery, habitats and other creatures which rare wildlife rely on. We've photographed redwing, turtle doves, song thrush, pied flycatcher, field fare, lesser spotted woodpecker, mistle thrush, house sparrow, tree sparrow, starling, squirrel, rabbit, domestic/household family – cats, dogs, foxes – many of these are on the red and amber list – see RSPB.org.uk/birds and wildlife guides. There are also summer migrants. Many native animals forage in the field. Other issues are: noise – disruption to the peace, health from both building and from any new buildings. This is a windy area – building debris would blow into the gardens, windows, prevent hanging out washing/airing the house, cause breathing and health difficulties. Especially stress from the dirt, noise and disruption. Vibration could disturb the structure of buildings/houses, drainage, structures. Our cats are elderly and used to going in the garden – we'd have to keep them in to keep them safe – would be expensive to buy litter and time consuming – stressful. New buildings would block light, no privacy, living here for decades in peace – the noise of new people/cars etc. would exasperate us and cannot manage it. Lighting would disrupt sleep, disrupt life and create more environmental concerns.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	There are two other plans in place – ne has been granted for a block of flats, the other is nearby and if hedges are kept/minimal pruning, these will provide many new residences. Iir makes sense to assess what issues incur during these works, assuming the new plan will be accepted. New residences require resources. There's only one shop, it needs a doctors, there's a shortage and none in the village, additional properties and the works pose security risks.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP44 - Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006)
Rep ID	SDLP1905
Rep Status	Processed
Consultee ID	1333857

Consultee Full Name	Mrs J Jarvis
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP44
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I detail below my objections to the above development as follows:</p> <ul style="list-style-type: none"> With no major changes or improvements to Capel-Le-Ferne Highways (roads or pavements) for numerous years, any increase in extra vehicle traffic or addition road use will have a detrimental effect on fire, police and ambulance services response times. Fire services state their vehicles require a 4-metre gap to operate (Issue relates to parking, highway safety, traffic, noise and disability parking/access) Before building any housing on farm land, building on old disused buildings and ex-industrial sites should be a priority (Issue relates to government policy) With no major changes or improvements to Capel-Le-Ferne and surrounding infrastructure, such as primary and secondary schools, doctors' surgeries, hospitals, etc any increase in population (to Capel-Le-Ferne) will have a detrimental effect on services that are either very strained or at breaking point. (Issue relates to government policy, parking, highway safety, traffic, noise, disability parking/access and proposals in the development plan)
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP44 - Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006)
Rep ID	SDLP1937
Rep Status	Processed
Consultee ID	1333906
Consultee Full Name	Mr and Mrs Pacey
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CAP006
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	We wish to object to CAP006 / CAP009 / CP013 We are very concerned about the extra traffic these sites will cause, we live in a lane, we are both disabled and concerned about parking and access to our property if the road is widened. Also, the amount of traffic that is going to be using Capel Street is scary, it is dangerous enough crossing at the junction of Cauldham Lane / Capel Street now as I walk my dog and we are slow. Why don't the build where access can be directly off the main road, e.g. opposite Grasslands or opposite the war memorial. This is our village we don't really want a town
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP44 - Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006)
Rep ID	SDLP1956
Rep Status	Processed
Consultee ID	1331442
Consultee Full Name	Jenny Bennett
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP44
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	CAP006 <ol style="list-style-type: none"> 1 Location currently productive in terms of crops vital for food security as per government policy. The site borders designated area of outstanding natural beauty with its associated ecological and wildlife habitats including 'red' status species such as skylarks (ground nesting) protected by Wildlife and Countryside Act 1981. 2 Low water pressure already a feature of life in Capel-Le-Ferne – more houses will impact this 3 Traffic problems already exist in Capel Street and will be worse. Congestion already an issue at school times with potential to increase Cauldham Lane traffic and its existing rat run feature and thus danger to existing residents and pedestrians that already requires action as presumably acknowledged in any traffic survey
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness	This development proposal should not proceed.

matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP44 - Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006)
Rep ID	SDLP1908
Rep Status	Processed
Consultee ID	1333860
Consultee Full Name	Mr J Jarvis
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP44
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I detail below my objections to the above development as follows: <ul style="list-style-type: none"> Brexit has shown us that the cost of food has increased greatly and that farm and in the UK should be set aside for growing (Issue relates to Government Policy)

	<ul style="list-style-type: none"> • Before building any property on farm land, building on old disused building and ex-industrial sites should be a priority (Issue relates to government policy) • With the fire services requiring a four metre (4m) gap in the road for their fire engines to pass safely, neither Capel Street, Cauldham Lane or surrounding roads are currently wide enough for the services to operate effectively particularly when cars are parked. (Issue relates to parking, highway safety, traffic, noise and disability parking/access)
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP44 - Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006)
Rep ID	SDLP1912
Rep Status	Processed
Consultee ID	1333863
Consultee Full Name	Peter and Linda Lever
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP44
2 - Do you consider this part of the Plan sound?	No

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We believe the proposals concerning this location are unsound for the following reasons:</p> <ol style="list-style-type: none"> 1. The location is currently home to Badgers, foxes, skylarks and numerous other wildlife whose existence would be threatened by building this development. This is an area of outstanding natural beauty. The location is currently very productive in the production of numerous crops vital for food security as per Government policy. This land is not a brown field site as cited in NPPF paragraph 145, this would be contrary to Government policy we would be very concerned if this land was considered. 2. The school is full to capacity we have no doctors surgery and services to provide for the increased community. 3. The local residents would be subject to noise and light pollution and we would be concerned how this would impact on mental wellbeing if this proceeds as the residents will have an impact of their lives that they will have no control over foisted on them through no fault of their own also suffer from property devaluations. 4. The village of Capel-le-Ferne suffers from low water pressure, which has been added to by the development already completed in Capel, to add even more houses will be even more detrimental to the poor supply of water. 5. The proposed development will create traffic problems accessing/ exiting the site. Capel street is already congested at peak times for school drop off/ pick up and commuter traffic. Two car households would equate to 140 plus extra cars, this would simply not be viable, traffic would try and exit on to Cauldham Lane which is already a rat run at certain times and frequently blocked by farm traffic being that it is a single lane with no passing spaces. We would assume that this would have been evident in any traffic survey. We currently queue to exit Cauldham Lane onto Capel Street, additional traffic will cause significant backlog to an already dangerous junction. 6. Finally the phrase 'not in my back yard' applies to us 3 fold, as there is development proposed at the back at the front and down the lane, which will destroy this beautiful area.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	This development should not proceed
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP44 - Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006)
Rep ID	SDLP1952

Rep Status	Processed
Consultee ID	1334251
Consultee Full Name	Mrs E bradshaw
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP44
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Major concerns of loss of agricultural land, given the uncertainty of last few years. Environmental damage, loss of habitat/feeding grounds for rare and local wildlife. I have photographed those on the RSPB red and amber lists: song thrush, house and tree sparrows, lesser spotted woodpecker, stopet, mistle thrush, starling, squirrel, turtle dove, foxes, rabbits, many butterflies, lapwing, pied flycatcher, field fare and lots of insects, beetles and more. Buildings would generate more light, heat, waste, electricity, telephone and other cables and pipework – all disrupt wildlife and disturb existing residences peace, would affect sleep, light, noise, smell would create stress, exasperate health. Drain light from gardens/windows increase our utility costs. More tarmac/concrete in an area known to be damp/frequent costal storms and mist would stop the natural drainage. There are limited resources in Capel Le Ferne, these have reduced, there's no doctor, only one shop, no direct bus to Canterbury. No shop open in the evening/Sunday after 12pm – insufficient resources puts stress on overstretched doctors, dentists etc. in Folkstone – the nearest. There are other places to build.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	New houses have already been built in Capel Le Ferne. A block of flats is due to be built and many other road/structural changes – there's been no consultation of local residents or considerations as to how we'll be affected by that. Another proposition is in place for houses off Cauldham Lane – let that go ahead but spare us living with all the stress of multiple works/building on our doorsteps and back gardens. Its too much. This is supposed to be a peaceful area in the countryside. It's an area that's often damp/foggy/stormy, most rain gets swallowed up by the trees, shrubs, soil, wildlife, adding more concrete and tarmac would cause flooding problems, as well as risks from flying debris from proposed new properties. We've been affected by earthquakes here too and the ground and buildings still move. Poses a security risk, invades privacy.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP44 - Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006)
Rep ID	SDLP1984
Rep Status	Processed
Consultee ID	1334322
Consultee Full Name	P Bailey
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP44
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I detail below my objections to the above development, CAP006, as follows.</p> <p>Before the building of any housing on farmland, building on old disused buildings and ex-industrial sites should be a priority. Issue relates to Government policy)</p> <ol style="list-style-type: none"> 1 Due to the war in Ukraine, there should be a stop to the building on farmland for a minimum five years (5yrs) due to the shortage of grain. This will enable the UK to identify solutions to producing its own crops and grain growing, reducing reliance on imported crops and grain in the shortage to medium term (issue relates to Government policy) 2 With the fire service requiring a four metre (4m) gap in the road for their fire engines to pass safely, neither Capel Street, Cauldham Lane or Surrounding Roads are currently wide enough or complaint, particularly when cars are parked. (Issue relates to parking, highway safety, traffic, noise and disability parking/access) 3 With no major changes or improvements to Capel-Le-Ferne and surrounding infrastructure, such as primary and secondary school intake capacity umbers, doctors' surgeries, hospitals etc, any increase in population (to Capel-Le-Ferne) will have a detrimental effect on public services that are either very strained or at breaking point. (Issue relates to Government Policy, parking, highway safety, traffic, noise, disability parking/access and proposals in the development plan) 4 With no major changes or improvements to Capel-Le-Ferne Highways (roads or pavements) for numerous years, any increase in extra vehicle traffic or additional road use will have a detrimental effect on fire, police, ambulance response times. (Issue relates to parking, highway safety, traffic, noise and disability parking/access)

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP44 - Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006)
Rep ID	SDLP1835
Rep Status	Processed
Consultee ID	1333696
Consultee Full Name	Ms Rachael Lever
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP44
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	I believe proposals for CAP006 are unsound for these reasons: <ul style="list-style-type: none"> • Capel Street is, in reality a single carriageway, due to cars of existing residents that park on one side of the roads, for the entirety of the road. The additional congestion this proposal would cause if it went ahead is unsustainable and dangerous, particularly so for the young school children that use Capel Street on a daily basis

<p>possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<ul style="list-style-type: none"> • There are insufficient amenities within the village • There are insufficient school places which are already competitive, at a detriment to the existing residents • Increase in noise and light pollution • Existing residents will financially be at a significant detriment as additional housing in the back gardens of the existing houses of Cauldham Lane and Capel Street will lose value • The wellbeing and mental health of the existing residents of Capel Street and Cauldham Lane will be impacted as a result of the destroyed views caused by the buildings, the views being a key reason for the existing residents to purchase their homes • There is a food shortage crisis looming; changing the use of this land from agricultural to residential contributes to the crisis • The proposals are not in line with the rest of the village, nor the accreditation of the area being close to and Area of Outstanding Natural Beauty' • The proposed building would be harmful to the vast array of wildlife that has inhabited the area for many years • The proposals would have a serious impact and significant consequences for Cauldham Lane (identified as an access route). The reasons for this are • There is no pathway, which poses a significant safety risk for pedestrians and horse riders due to significant additional traffic using the lane caused by these proposals • The country lane is simply unable to support the traffic these proposals would cause • There is a national speed limit zone with a sharp, blind bend; additional traffic increases the risk of serious accidents comprising public safety • The lane is a narrow country lane, often blocked by delivery drivers and farm traffic
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>This part of the plan should be rejected¹</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP44 - Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006)</p>
<p>Rep ID</p>	<p>SDLP1859</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1333825</p>
<p>Consultee Full Name</p>	<p>W Leeming</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	

Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP44
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I am writing to ask you please to turn down the proposed development of plot CAP006 of 70 dwellings whose main access after the demolition of a property will be an already fairly narrow stretch of an already busy Capel street. Please think of the residents who live on the street and think of the impact of at least 100-140 vehicles accessing the street especially at peak times etc work and school. It would be a nightmare. The construction of these houses would also cause major disruption and chaos for all of us who live on the street. It is not a main road so should not be treated as one. If more houses are needed surely the best place to build them would be next to the proposed brownfield site CAP011 which has no other development round it and has immediate access to the main road. this would cause minimal disruption for residents and builders alike and I feel sure this site would be acceptable. I have no problem with the 5 dwellings CAP013 on Cauldham Lane next to the agreed development CAP009 longships as this is a minimal build for this small lane. Please think hard about the effect a large development would make on us as we are still a village in an Area of Outstanding Natural Beauty and we want to stay this way. Please don't allow any development that will impact Capel Street as it was never designed to take large volumes of traffic and as where I live I have no pavement on my side of the road it could also make Capel Street more dangerous. We have a 20 mile an hour rule but sadly this is frequently ignored.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

SAP45 - Capel-le-Ferne Small Housing Sites

Local Plan Consultation Point	SAP45 - Capel-le-Ferne Small Housing Sites
Rep ID	SDLP31
Rep Status	Processed
Consultee ID	1259309
Consultee Full Name	Mr Peter Jull
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CAP13 & SAP44
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Submitted sites at this end of Capel should have been considered together to produce a more cohesive planning solution.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	CAP13 site specific requirements should include a requirement for development to be set back sufficiently to allow road widening in line with that agreed by the adjoining site CAP009 during a planning application as well as providing a footway. There is sufficient highways land beside the existing surfaced carriageway along Cauldham Lane to allow it to be widened to allow two cars to pass in addition to a full width pavement on one side. CAP015 was rejected at the HELAA stage for landscape reasons that could have been equally applied to CAP13 or vice versa. If this had been considered together with SAP44 access to the larger site could be provided along Cauldham Lane which can be widened rather than Capel Street which cannot.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	To answer questions not anticipated by the written submission and point at maps where explanation in words is more difficult.

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP45 - Capel-le-Ferne Small Housing Sites
Rep ID	SDLP79
Rep Status	Processed
Consultee ID	1259482
Consultee Full Name	Mr Lee Bracegirdle
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP45 - Capel-le-Ferne small housing sites
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I cannot comment on the legality of the plan as I am not qualified. I object to the plan for the following reasons; 1. A pedestrian connection along Cauldham Lane implies widening of the lane which will encourage increased traffic use of this quiet rural lane which is already a "rat run" from B2011 to the Alkham Valley and is busy with traffic to Great Cauldham farm and the industrial complex on the farm. 2. The proposed site is inappropriate given its close proximity to the Kent Downs and AONB. 3. This proposal will further increase pressure on local utilities in particular water pressure (exacerbated by the approval of CAP009) which in Cauldham Lane is already problematic particularly in the summer months.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	Do not approve this proposal

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP45 - Capel-le-Ferne Small Housing Sites
Rep ID	SDLP83
Rep Status	Processed
Consultee ID	1265502
Consultee Full Name	MR Paul Curtis
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP45
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC Local plan - Land west of Capel Street - CAP006 The proposed new road will be running along our boundary hedge just a few meters from our back door, producing noise, pollution and extreme loss of privacy. Houses backing onto our rear garden will also present a severe loss of privacy. As the site slopes down, the highest points are above our roof line and would create another loss of privacy. Buildings backing onto our rear garden would be overshadowing and produce a loss of light and privacy. Capel Street and Cauldham Lane are both narrow and unsuitable for any increase in traffic of several hundred cars, vans, emergency vehicles, delivery trucks of all sizes. Emergency vehicles could find it impossible to access through the proposed narrow gap after the demolition of number 11 Capel Street. Traffic passing within a few meters of our back door, driveway and front & rear garden creating dangerous, unacceptable, and possibly illegal levels of pollution and noise

	<p>nuisance.</p> <p>Previous planning applications have been rejected for development of this area, ALL those reasons still apply. Part of this same field, north of Green Lane footpath, is designated as an 'area of outstanding natural beauty' the question is - why is the area south of the footpath, the land in question, different? What makes it different?</p> <p>Capel-le-Ferne's present infrastructure is totally inadequate for any further development of this kind.</p> <p>In a time when populations are expanding and more sustainable food needs to be produced, covering good agricultural land with buildings is bordering on criminal.</p> <p>As we go into a recession, if built how many will remain unsold/unoccupied given the interest rates, inflation and mortgage rationing leaving a development unfinished or homes left empty or derelict. Some of the property's in Capel's most recent development of comparable size (40) on the New Dover Road stood unsold and empty for years.</p> <p>In my submission to the Council in July 2021 I touched on some of these points and made perfectly clear that we strongly and unreservedly object to any development in this area west of Capel Street for all of the reasons above.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP45 - Capel-le-Ferne Small Housing Sites
Rep ID	SDLP448
Rep Status	Processed
Consultee ID	1252039
Consultee Full Name	Mrs MAUREEN LEPPARD
Consultee Company / Organisation	Capel-le-Ferne Parish Council
Agent Full Name	
Agent Company / Organisation	

<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP45 - Capel-le-Ferne Small Housing Sites</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Justified</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Not Applicable</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Not Applicable</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<ul style="list-style-type: none"> • 3 of the 4 sites allocated in the plan CAP006, CAP009(Decided) and CAP013 have very poor infrastructure • Capel Le Ferne is defined as a large village in the Plan, yet the allocation housing sites by settlement as identified within the Strategic Policies (table 3.3) allocates 95 dwellings, some 279% increase to Capel Le Ferne compared with the average of the other 5 villages in the district which has an average of 34 as can be seen in table 1 (Attachment). • In relation to Local Centres which has a separate definition, DDC strategy for the rural area, it is proposing to grow the adjacent villages of Eythorne & Elvington by 355 to create a new Local Centre. Excluding this Local Centre, Capel le Ferne's allocation of 95 is some 113% compared to the average of the 5 Local Centres identified in the Plan. The average in the district is 84 and Capel is a village not a Local Centre as can be seen on table 2 (Attachment). • When looking at the 4 sites proposed the increase would amount to circa 20% increase compared to that North of New Dover Road as identified table 3 and 4 (Attachment). <p>Sustainability In the Sustainability Appraisal, SA 10 state: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the district's historic environment SA 11 states: To conserve and enhance the special qualities, accessibility, local character and distinctive character and distinctiveness of the district's settlements, coastline and countryside. Capel is a unique settlement within Dover District, located over 500ft above sea level with the Heritage Coast to the South and AONB to the North, East and West of the settlement Sites CAP006, CAP011 and CAP013 will all have a significant negative impact on both SA 10 and SA 11. Capel Le Ferne Parish Council and our Parishioners have raised the above concerns and are extremely worried about the proposed local plan and the impact this would leave on our village.</p> <p>CAP011 Land known as the former Archway Filling Station, New Dover Road, Capel-le-Ferne CT18 7JD Number of units: - 10 This site sits within the AONB and was previously a petrol filling station, buried tanks and site contamination may still exist. There is existing access on the site so there are no access concerns. However, the Parish Council would like to remind DDC that the site was previously rejected as it was divorced from the main settlement and would have a detrimental impact on the surrounding AONB. Whilst development may be acceptable on 'Previously Developed Land', a considerable portion of the site would need to be used to provide a generous landscape buffer from the AONB to the North and West of the site. However, if this site were to be taken forward, the Parish Council believe that if a generous landscape buffer is put in place between development and the AONB, they would support sympathetic ribbon development on this site.</p> <p>CAP013 Land at Cauldham Lane, Capel-le-Ferne CT18 7HG Number of units: - 5 This site is on the edge of Capel, outside of the definite settlement boundary and detached from the village. The site is in a prominent position on high ground overlooking the adjacent AONB and bridle path. It would need significant screening to mitigate its impact on the AONB and Bridleway. Any development on this site would have a major negative impact when viewed looking north-east from the bridle path and beyond.</p>

	<p>The only access to this site is via Cauldham Lane, the lane is single-track and is regularly blocked by delivery vehicles. It is also used by heavy vehicles accessing the local farm and the industrial units further down the lane.</p> <p>Cauldham Lane is also used by many of our parishioners including dog walkers, ramblers, school children, elderly residents, families and horse riders accessing the bridle path. Any increase in traffic would have wider health, safety & social impact to this part of the village.</p> <p>This site will also impact on the dangerous Cauldham Lane/Capel Street/New Dover Road junction.</p> <p>The Parish Council believe that such development is inappropriate in this area and the site does not sit well with Policy NE2 or the National Planning Policy Framework, therefore, is not supported by the Parish Council. For the reasons given above, Capel Parish Council request this site is excluded from the Local Plan.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	Table 1 and 2 - Settlements.png Table 3 and 4 - Site Maps.png
Local Plan Consultation Point	SAP45 - Capel-le-Ferne Small Housing Sites
Rep ID	SDLP302
Rep Status	Processed
Consultee ID	1331383
Consultee Full Name	Mrs Katie Miller
Consultee Company / Organisation	Kent Downs AONB Unit
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP45 CAP009, CAP 011 and CAP013
2 - Do you consider this part of the Plan sound?	No

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>SAP45 Capel-le Ferne CAP 009 Longships: The site lies in the setting of the AONB. The proposed requirements included in site specific requirements to help manage impacts on the AONB are supported.</p> <p>SAP45 Capel-le Ferne CAP 011 Archway Filling Station: The site lies wholly within the Kent Downs AONB and we have concerns that the site lies separated and unrelated to existing built form at Capel-le-Ferne and that the allocation would result in new development in the countryside, that would fail to be complementary to local settlement pattern in the AONB, in conflict with the AONB Management Plan principle SD9. The open undeveloped nature of the site together with its boundary hedgerows means that it contributes positively to the rural character of the area and constitutes part of the rural setting to Capel-le-Ferne, which given the recent development at George's Close on the opposite side of New Dover Road, it is considered all the more important to retain. While we note that the site was previously occupied by a Petrol Filling Station, aerial imagery indicates that this only occupied the very front part of the site and was removed at least 20 years ago. The site has reverted to nature and the remains of permanent structures/infrastructure have blended into the landscape and as such, we do not consider that the site constitutes Previously Developed Land, as per the Glossary in Annex 2 of the NPPF. As such, it is considered that development here would be unsound as it would fail to conserve or enhance the landscape and scenic beauty of the AONB and is therefore in conflict with paragraph 176 of the NPPF. However, we do not consider the site to represent Major Development for the purposes of paragraph 177 of the NPPF.</p> <p>SAP 45 Capel-le Ferne CAP 013 Land at Cauldham Lane: This site immediately abuts the Kent Downs AONB on its north-western boundary and lies on high ground that is highly visible in long distance views from the AONB. The proposed requirements included in site specific requirements to help manage impacts on the AONB are supported.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Omission of SAP45 Capel-le Ferne CAP 011 Archway Filling Station as an allocation.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	To ensure impacts of the proposed allocation CAP 011 on the AONB are fully considered.
Include files	
Local Plan Consultation Point	SAP45 - Capel-le-Ferne Small Housing Sites
Rep ID	SDLP271

Rep Status	Processed
Consultee ID	1331383
Consultee Full Name	Mrs Katie Miller
Consultee Company / Organisation	Kent Downs AONB Unit
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP45 CAP009, CAP 011 and CAP013
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>SAP45 Capel-le Ferne CAP 009 Longships: The site lies in the setting of the AONB. The proposed requirements included in site specific requirements to help manage impacts on the AONB are supported.</p> <p>SAP45 Capel-le Ferne CAP 011 Archway Filling Station: The site lies wholly within the Kent Downs AONB and we have concerns that the site lies separated and unrelated to existing built form at Capel-le-Ferne and that the allocation would result in new development in the countryside, that would fail to be complementary to local settlement pattern in the AONB, in conflict with the AONB Management Plan principle SD9. The open undeveloped nature of the site together with its boundary hedgerows means that it contributes positively to the rural character of the area and constitutes part of the rural setting to Capel-le-Ferne, which given the recent development at George's Close on the opposite side of New Dover Road, it is considered all the more important to retain. While we note that the site was previously occupied by a Petrol Filling Station, aerial imagery indicates that this only occupied the very front part of the site and was removed at least 20 years ago. The site has reverted to nature and the remains of permanent structures/infrastructure have blended into the landscape and as such, we do not consider that the site constitutes Previously Developed Land, as per the Glossary in Annex 2 of the NPPF. As such, it is considered that development here would be unsound as it would fail to conserve or enhance the landscape and scenic beauty of the AONB and is therefore in conflict with paragraph 176 of the NPPF. However, we do not consider the site to represent Major Development for the purposes of paragraph 177 of the NPPF.</p> <p>SAP 45 Capel-le Ferne CAP 013 Land at Cauldham Lane: This site immediately abuts the Kent Downs AONB on its north-western boundary and lies on high ground that is highly visible in long distance views from the AONB. The proposed requirements included in site specific requirements to help manage impacts on the AONB are supported.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	Omission of SAP45 Capel-le Ferne CAP 011 Archway Filling Station as an allocation.

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	To ensure impacts of the proposed allocation CAP 011 on the AONB are fully considered.
Include files	
Local Plan Consultation Point	SAP45 - Capel-le-Ferne Small Housing Sites
Rep ID	SDLP296
Rep Status	Processed
Consultee ID	1331383
Consultee Full Name	Mrs Katie Miller
Consultee Company / Organisation	Kent Downs AONB Unit
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP45 CAP009, CAP 011 and CAP013
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>SAP45 Capel-le Ferne CAP 009 Longships: The site lies in the setting of the AONB. The proposed requirements included in site specific requirements to help manage impacts on the AONB are supported.</p> <p>SAP45 Capel-le Ferne CAP 011 Archway Filling Station: The site lies wholly within the Kent Downs AONB and we have concerns that the site lies separated and unrelated to existing built form at Capel-le-Ferne and that the allocation would result in new development in the countryside, that would fail to be complementary to local settlement pattern in the AONB, in conflict with the AONB Management Plan principle SD9. The open undeveloped nature of the site together with its boundary hedgerows means that it contributes positively to the rural character of the area and constitutes part of the rural setting to Capel-le-Ferne, which given the recent development at George's Close on the opposite side of New Dover Road, it is considered all the more important to retain. While we note that the site was previously occupied by a Petrol Filling Station, aerial imagery indicates that this only occupied the very front part of the site and was removed at least 20 years ago. The site has</p>

	<p>reverted to nature and the remains of permanent structures/infrastructure have blended into the landscape and as such, we do not consider that the site constitutes Previously Developed Land, as per the Glossary in Annex 2 of the NPPF. As such, it is considered that development here would be unsound as it would fail to conserve or enhance the landscape and scenic beauty of the AONB and is therefore in conflict with paragraph 176 of the NPPF. However, we do not consider the site to represent Major Development for the purposes of paragraph 177 of the NPPF.</p> <p>SAP 45 Capel-le Ferne CAP 013 Land at Cauldham Lane:</p> <p>This site immediately abuts the Kent Downs AONB on its north-western boundary and lies on high ground that is highly visible in long distance views from the AONB. The proposed requirements included in site specific requirements to help manage impacts on the AONB are supported.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Omission of SAP45 Capel-le Ferne CAP 011 Archway Filling Station as an allocation.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>To ensure impacts of the proposed allocation CAP 011 on the AONB are fully considered.</p>
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP45 - Capel-le-Ferne Small Housing Sites</p>
<p>Rep ID</p>	<p>SDLP861</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1252039</p>
<p>Consultee Full Name</p>	<p>Mrs MAUREEN LEPPARD</p>
<p>Consultee Company / Organisation</p>	<p>Capel-le-Ferne Parish Council</p>
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>CAP009 Longships, Cauldham Lane, Capel-le-Ferne CT18 7HG Number of units: - 10</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Justified</p>

4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We consider the plan to be unsound and cannot be justified based upon the following: -</p> <ul style="list-style-type: none"> • 3 of the 4 sites allocated in the plan CAP006, CAP009 and CAP013 have very poor infrastructure • Capel Le Ferne is defined as a large village in the Plan, yet the allocation housing sites by settlement as identified within the Strategic Policies (table 3.3) allocates 95 dwellings, some 279% increase to Capel Le Ferne compared with the average of the other 5 villages in the district which has an average of 34 as can be seen in table 1. • In relation to Local Centres which has a separate definition, DDC strategy for the rural area, it is proposing to grow the adjacent villages of Eythorne & Elvington by 355 to create a new Local Centre. Excluding this Local Centre, Capel le Ferne's allocation of 95 is some 113% compared to the average of the 5 Local Centres identified in the Plan. The average in the district is 84 and Capel is a village not a Local Centre as can be seen on table 2. • When looking at the 4 sites proposed the increase would amount to circa 20% increase compared to that North of New Dover Road as identified below. <p>Sustainability</p> <p>In the Sustainability Appraisal, SA 10 state: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment</p> <p>SA 11 states: To conserve and enhance the special qualities, accessibility, local character and distinctive character and distinctiveness of the District's settlements, coastline and countryside.</p> <p>Capel is a unique settlement within Dover District, located over 500ft above sea level with the Heritage Coast to the South and AONB to the North, East and West of the settlement</p> <p>Sites CAP006, CAP009, CAP011 and CAP013 will all have a significant negative impact on both SA 10 and SA 11.</p> <p>Capel Le Ferne Parish Council and our Parishioners have raised the above concerns and are extremely worried about the proposed local plan and the impact this would leave on our village.</p> <p>CAP009 Longships, Cauldham Lane, Capel-le-Ferne CT18 7HG</p> <p>Number of units: - 10</p> <p>The Parish Council agree with DDC that this is a self-contained previously developed site. The owner of this site has currently applied for planning permission for a block of 15 self-contained double apartments with social areas, 5 units above that indicated in the Local Plan. This is not supported by the Parish Council</p> <p>In principle, the Parish Council agree with the concept of a mix of single and double retirement units within the Parish to service the need of those Parishioners wishing to downsize. This was identified in The Capel Community Plan following a detailed survey undertaken within the village in 2019 and shared with Dover District Council.</p> <p>However, Cauldham Lane does present a barrier to any development in the area because it is a single-track narrow lane with no passing places or pedestrian linkage to the existing footway network or the public transport system. The lane is frequently blocked by delivery vehicles and is regularly used by heavy vehicles accessing the local farm and the industrial units further down the lane. Therefore, the increased traffic likely to be generated from this site by residents, deliveries, contractors, staff, etc. would become intolerable for existing local residents.</p> <p>This site would also impact on the dangerous Cauldham Lane/Capel Street/New Dover Road junction.</p> <p>Many residents of Capel use Health Service facilities in Folkestone which are not directly accessible by bus, therefore, in order to access these services, residents tend to drive to Folkestone which is clearly at odds with SP1.Planning for Climate Change. Item f, which mentions reducing the need to travel.</p> <p>It is also worth mentioning that because of Capel's geological position, it is unlikely that residents would walk or cycle to use facilities in the nearest towns. Therefore it is reasonable to assume that many residents of any apartments built on this site would use private vehicles to access health and other facilities.</p> <p>The redevelopment of this site may also result in the loss of mature trees, which would exacerbate the harsh visual impact of any redevelopment. As the site is in a prominent position on high ground, it would need significant screening to mitigate its impact on the adjacent AONB.</p>

	<p>As stated previously, whilst the Parish Council recognise the need for retirement apartments in the village, the Council does have concerns about development on this scale in this location for the reasons identified above.</p> <p>Therefore, the Parish Council believe that such development is inappropriate in this area and the site does not sit well with Policies NE2, SA10 and SA11 or the National Planning Policy Framework, therefore, is not supported by the Parish Council.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<ul style="list-style-type: none"> • Not Applicable
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Not Applicable
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<ul style="list-style-type: none"> • Not Applicable
<p>Include files</p>	<p>Table 1 and 2 - Settlements.png (2) Table 3 and 4 - Site Maps.png (2)</p>
<p>Local Plan Consultation Point</p>	SAP45 - Capel-le-Ferne Small Housing Sites
<p>Rep ID</p>	SDLP784
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1267168
<p>Consultee Full Name</p>	Mr David Whittington
<p>Consultee Company / Organisation</p>	Folkestone and Hythe District Council
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	SP44 & SP45 Capel-le-Ferne sites
<p>2 - Do you consider this part of the Plan sound?</p>	Yes
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	Yes

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The District Council raises no objections to the Local Plan but seek continued dialog between the two Council's, KCC and the health authority on the impact of any future development in Capel-le-Ferne on the provision of schools and health care in Folkestone & Hythe District.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	None.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP45 - Capel-le-Ferne Small Housing Sites
Rep ID	SDLP701
Rep Status	Processed
Consultee ID	1331728
Consultee Full Name	Oonagh Kerrigan on behalf of Guardian Parks Ltd
Consultee Company / Organisation	DHA on behalf of Guardian Parks Ltd
Agent Full Name	Oonagh Kerrigan
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP45 CAP011 - Land known as the former Archway Filling Station, New Dover Road, Capel-le-Ferne
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	

4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p><u>Introduction</u></p> <p>This representation has been prepared by DHA Planning on behalf of Guardian Parks Ltd in response to the Dover District Council 'DDC' Local Plan (Regulation 19) consultation which runs until 9th December 2022.</p> <p>We understand that Dover District Council is in the process of preparing a new Local Plan to set out a strategy for development for the period to 2040 and that the Council are presently seeking comments on the pre-submission Plan prior to its submission for examination in early 2023. Our client controls 'Land known as the former Archway Filling Station, New Dover Road, Capel-le-Ferne' (hereafter referred to as 'the former Archway Filling Station' or 'the site') and is promoting the residential allocation of the site as part of the new Dover District Local Plan preparation process. The site is allocated for residential development in the Regulation 19 Pre-submission Plan for the provision of 10 dwellings under policy reference SAP45 (CAP011).</p> <p>The purpose of the representation is to support the allocation of 'the former Archway Filling Station' for a greater quantum of development. In this regard, we remain wholly supportive of the allocation of the site and agree that it represents a logical and sustainable location to direct growth consistent with the growth strategy of the Plan as a whole, however we submit that more effective use of our client's site can be made. Accordingly, we say that the former Archway Filling Station can further assist the Council in meeting the growing need for new homes in the district and help to ensure the Council can have greater confidence in meeting its market and affordable housing targets in full.</p> <p>It is submitted that the SAP45 (CAP011) policy wording should be amended to reflect the capability of the site to accommodate an estimated 18 dwellings, deliverable early in the Plan period.</p> <p>Based on the current national and local planning context, we consider the site to be a highly suitable edge-of-settlement location to allocate land for housing to help meet the need for new homes in the district and its effective use should be appropriately maximised in accordance with national policy objectives.</p> <p><u>Site Specific Assessment</u></p> <p>As set out in the preceding sections, Guardian Parks Ltd control 'the former Archway Filling Station' at Capel-le-Ferne and are continuing to promote the residential allocation of the site. The site is allocated for residential development in the Regulation 19 Pre-submission Plan for the provision of an estimated 10 dwellings under policy reference SAP45 (CAP011). Notwithstanding our client's support of the draft allocation within the Regulation 19 Plan, we suggest that the policy text be re-visited prior to submission, to allow a higher dwelling per hectare and ensure the site is developed to its full potential. It is submitted that the SAP45 (CAP011) policy wording be amended to more accurately reflect the capability of the site to accommodate approximately 18 dwellings which will be deliverable early in the plan period. The site is available immediately and discussions have been ongoing with a number of interested parties who would look to deliver this site, including housebuilders. It is therefore anticipated the site could be delivered within the next five years, with commencement taking place within 2-3 years after allocation (or sooner should planning permission be secured quickly).</p> <p><u>Site and Surroundings</u></p> <p>The site is located to the eastern edge of Capel-Le-Ferne, to the northern side of New Dover Road. A former petrol station, the site constitutes previously developed land. Parts of the former structure, forecourt as well as below ground tanks remain on site. Approximately 0.65 ha in size, dense boundary planting and hedgerow establishes the site's boundary, with a line of mature trees to the north. Existing access to the site is from New Dover Road to the south-western corner.</p> <p>Enclosed by established planting, the site is relatively level, and bounded by a collection of housing to the east, and agricultural land to the north and western boundaries. Beyond the agricultural land to the west forms the wider built-up settlement of Cape-le-Ferne. To the south, the site is bound by New Dover Road with Capel Court Park caravan park and the newly developed George Close beyond.</p> <p>Within the wider settlement of Capel-le-Ferne services and facilities available include pub-restaurants, a convenience store, village hall and Primary School.</p> <p>The nearest bus stop located 100m east of the site serves the 102 bus route with regular services between Dover and Rye/Littlestone-on-Sea. This provides a direct route into Folkestone which provides a variety of facilities and services including train station, hospital, supermarkets, primary and secondary schools, eating establishments and sports facilities.</p> <p>The site does lie within the Kent Downs AONB, and a small part of the site is identified on the policies map as lying within an area at risk of surface water flooding. This is however not considered to prevent development, and can be appropriately assessed through a Flood Risk</p>

Assessment and Drainage Strategy as part of future applications. The site does not have any history of flooding. Furthermore, the site does not lie within Flood Zones 2 or 3. The site is not subject to any other constraints.

Development Capacity

For the purposes of this representation, the former Archway Filling Plot is submitted with capacity for approximately 18 dwellings which would be delivered as part of a high-quality, well-landscaped residential scheme that could be delivered in the early part of the plan period.

Draft Policy Allocation Capel-le-Ferne Small Housing Sites (SAP45) – CAP011 Land known as the former Archway Filling Station, New Dover Road, Capel-le-Ferne

As introduced in the preceding sections, our client's site is allocated for residential development within the Dover Pre-submission (Regulation 19) Local Plan. For ease of reference, the draft policy wording is as follows:

SAP45 – Capel-le-Ferne Small Housing Sites

Planning permission will be granted for proposals that:

- a) Accord with the policies in the Local Plan; and
- b) Address the site-specific issues and requirements for the site set out below.

CAP011 – Land known as the former Archway Filling Station, New Dover Road, Capel-le-Ferne

Estimated dwelling number: 10

Site-specific issues:

- Existing trees and hedgerows along the boundary of the site should be retained and enhanced.
- The site is in the AONB and any scheme coming forward on this site should be designed to be appropriate to the sites sensitive location within the Kent Downs AONB in respect of scale, form, materials and colour palette.
- Existing trees and hedgerows along the boundary of the site should be retained and enhanced and an appropriate landscape buffer is required along the northern and western boundaries of the site to mitigate the impact of development on the AONB
- Archaeological Assessment is required.
- The site is within Groundwater Source Protection Zone 3.
- Contamination Assessment is required

To be clear, our client remains wholly supportive of the allocation of the site. The allocation represents a logical and sustainable location to direct growth consistent with the growth strategy of the Plan as a whole, however we submit that more effective use of our client's site can be made.

The sensitive landscape nature of the site is acknowledged given its location within the Kent Downs AONB. However, as set out within the Housing Sites Landscape Assessment which forms part of the Evidence Base, the established boundary planting to the north and western edges of the site have the potential to mitigate any impact and could be retained and enhanced as part of a future development. The site comprises brownfield land and therefore a betterment could be secured on this site through a sensitive, landscape led design.

It is therefore proposed that any impact on the surrounding landscape character can be mitigated easily, and that the impact of 10 houses from the surrounding views would not be dissimilar to the impact of 18 units. Furthermore, a scheme of 18 units would be able to provide a good level of landscape which would assist to mitigate any potential impact. The Council previously considered 18 units to be an appropriate number on this site as part of previous iterations of the draft plan, and that this number of homes could be accommodated on site, whilst limiting impact on the surrounding landscape character.

Furthermore, emerging policy PM1 requires an average of 30-50 net dwellings per hectare (dph). Should the proposed policy wording be updated to allocate an estimated 18no. dwellings this would be more closely aligned with the requirement of policy PM1, with an average of 27dph for the site. Whilst this is still slightly below the policy, this is reflective of the edge of settlement location and allows for the appropriate landscape mitigation. The current estimated density of 10 dwellings results in an average 15dph would be well below policy requirements and not make efficient use of this previously developed land.

An allocation of estimated 18 dwellings would make the most efficient use of the site, which constitutes previously developed land and has the capability to be brought forward in the early part of the Plan period. Accordingly, the former Archway Filling Station can assist the Council in meeting the growing need for new homes in the district and help to ensure the Council can have greater confidence in meeting its market and affordable housing targets in full.

It is therefore submitted that the SAP45 (CAP011) policy wording be amended to reflect the capability of the site to accommodate approximately 18 dwellings, deliverable early in the plan period.

Deliverability

There is no recent planning history for the site of a residential nature or a history of unimplemented permissions. There are not considered to be any impediments to the site being brought forward for development within the first five years of the plan period. Combined with the other allocations in Capel-le-Ferne and wider allocations in the district, this would ensure a steady delivery of housing in Dover district across the majority of the Plan period.

For the reasons set out in this representation, the site is considered suitable for the residential development of approximately 18 dwellings. The site comprises previously developed land and lies in the settlement of Capel-le-Ferne, adjacent to existing residential development and would form a natural and logical development within the settlement.

Finally, in respect of suitability there are no physical limitations or problems which cannot be overcome such as access, infrastructure or flood risk.

On behalf of the landowner, we submit that there are no known financial restrictions that would impact upon the viability of a future housing scheme or that would prohibit development coming forward within the early stages of the Plan period. To the contrary, we consider there to be an opportunity to deliver a high-quality, sustainably located residential development scheme consistent with the Council's proposed growth strategy.

The site is in single ownership and there are no complicated legal agreements or covenants that would prohibit the ability to bring forward the site early in the Plan period. The site is therefore considered available and achievable for the purposes of the tests of deliverability.

Conclusion

Summary

This representation has been prepared by DHA Planning on behalf of Guardian Parks Ltd in response to the Dover District Council Local Plan (Regulation 19) consultation which runs until 9th December 2022.

Our client controls 'Land known as the former Archway Filling Station, New Dover Road, Capel-le-Ferne' and is promoting the residential allocation of the site as part of the new Dover District Council Local Plan preparation process. The site is an allocation for residential development in the Regulation 19 Pre-submission Plan for the provision of an estimated 10 dwellings under policy reference SAP45 (CAP011).

We consider that the land promoted at the former Archway Filling Station should remain included as a future housing allocation within the Dover District emerging Local Plan. The allocation is considered wholly consistent with the objectives of the Plan and forms part of a sound growth strategy for the district to 2040.

Without prejudice to our client's position, we would urge the Council to re-visit the allocation policy text and allow a higher dwelling per hectare guide to ensure the site is developed to its full potential. It is submitted that the SAP45 (CAP011) policy wording should be amended to more accurately reflect the capability of the site to accommodate approximately 18 dwellings.

In addition to being a highly sustainable and logical edge-of-settlement allocation, the site is deliverable in a single land ownership with no viability issues, legal or third-party constraints present.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

For the reasons set out in this representation, the site is considered suitable for the residential development of approximately 18 dwellings. The site comprises previously developed land and lies in the settlement of Capel-le-Ferne, adjacent to existing residential development and would form a natural and logical development within the settlement.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note

Please refer to the attached consultation response submitted on behalf of Guardian Parks Ltd.

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	Archway Filling Station Reg 19 Representation_Final.pdf
Local Plan Consultation Point	SAP45 - Capel-le-Ferne Small Housing Sites
Rep ID	SDLP794
Rep Status	Processed
Consultee ID	1331099
Consultee Full Name	Rosie Cavalier
Consultee Company / Organisation	Esquire Developments
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP45
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>INTRODUCTION</p> <ul style="list-style-type: none"> • These representations have been prepared by Esquire Developments Ltd, a multi-award-winning SME developer based in Longfield, Kent. • Esquire Development has a number of land interests in Dover, including Land at Cauldham Road, Capel-Le-Ferne. The site is identified as an emerging allocation under reference SAP45 Capel-le-Ferne Small Housing Sites. • We support the allocation of the site for residential development but query the identified capacity (5 dwellings) and the justification for a reduction in capacity from the Regulation 18 stage (15 dwellings). • We consider the Council should reassess the site's capacity, or acknowledge that the number is not 'fixed' with the final capacity of the site to be determined through the course of a planning application. • As a local SME Housebuilder, the development of this site brings forward the opportunity to help diversify the housing market and offer a wide choice of housing from different developers.

1.0 RESPONSE TO THE REGULATION 19 PLAN

Land at Cauldham Lane, Capel-Le-Ferne

- Land at Cauldham Lane, Capel-Le-Ferne has been allocated for development for an estimated 5 dwellings as part of SAP45 Capel-le-Ferne Small Housing Sites. This site is also referenced as CAP013 and is allocated under policy SAP45 along with Longships, Cauldham Lane (CAP009) and Land known as the former Archway Filling Station, New Dover Road (CAP011) for a total of 25 units. 70 dwellings have also been allocated under policy SAP44 within Capel-le-Ferne.
- Figure 4.15 (shown at **Appendix 01**) shows a Map of site allocations in Capel-le-Ferne including all of those mentioned above. As a point of clarity, we would suggest that each individual allocation is afforded separate references on the map - so that each site is easily identifiable within the policy.
- Capel-le-Ferne is identified as one of the six settlements recognised as a 'Larger Village'. It is noted within this that these villages have a good range of services and facilities which serve their own residents and those of nearby hamlets. It is noted that Capel-le-Ferne has a primary school, is served by frequent regular bus routes and has a village shop.
- We support the plan that identifies Capel-le-Ferne for housing and consider it an appropriate settlement for development. It is noted that development is needed in Capel-le-Ferne to help sustain and strengthen the role of these larger villages and that development will be of a scale that is consistent with the settlements accessibility, infrastructure provision, level of services available, suitability of sites and environmental sensitivity.

Site Capacity

- The Site was identified in the Regulation 18 Consultation Local Plan for a total of 15 dwellings with an anticipated medium delivery timescale which was set as 2025-2029.
- However, the current Regulation 19 Consultation has reduced the site's capacity to only 5No. dwellings – a 65% reduction in capacity between the Regulation 18 to Regulation 19 Local Plan.
- The only reference to the site's reduction is at paragraph 7.49 of the Local Plan Regulation 19 Cabinet Report where it is stated that the reason for this reduction was 'to mitigate impact upon AONB'. However, within the Local Plan evidence base, there is no further evidence or explanation as to why this number was reduced or how this reduction would mitigate the impact upon the AONB.
- The site, at approximately 0.75ha can accommodate at least 15 dwellings as originally allocated while still respecting the proximity to the AONB. The plan shown at **Appendix 02** shows how a development of at least 15 dwellings could be delivered on the site whilst offering sufficient landscape buffers to the site. 15 dwellings represents a density of approximately 20 dwellings per hectare,. Reflecting a more efficient use of site than 5 dwellings (which would only be 6.6 dwelling per ha).
- Initial informal views have been sought from the AONB Unit in order to agree LVIA methodology, study area and view points along with a request for feedback on the draft layout (as shown in **Appendix 02**). This sets out that the draft layout responds to the existing context by:

	<ul style="list-style-type: none"> • Off-setting development from the AONB by new open space and retained vegetation along the western edge of the Site; • Implementing a new vegetated buffer along the southern boundary of the Site via new hedge and tree planting; • Reducing the overall density of development towards the western edge of the Site, so that there is the potential for increased gardens and new planting; • Incorporating the existing sloping landform across the Site via locating SUDS in the northern (lower lying) part of the Site; • Retaining the existing hedgerow along the northern edge of the Site, with the exception of access and visibility splays; and • Aligning the proposed western extent of development with that adjacent to Cauldham Lane to the north of the Site. <ul style="list-style-type: none"> • A full response has yet to be received from the AONB Unit, however initial feedback sets out that there is no objection in principle to a sensitively designed development and although allocated for an indicative number of 5 units in the emerging Local Plan- an increase may be acceptable in terms of AONB impacts. • We therefore consider that the total number of dwellings expected to be generated from the site is reassessed, and returned to the Regulation 18 capacity of atleast 15 dwellings, or that reference is made within the supporting text/policy that the numbers are indicative and subject to assessment at the planning application stage. <p>Please see attached set of representations including appendices</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>See above and attached</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>Capel Esquire Reps to Dover Reg 19 Nov 22 with appendices.pdf</p>
<p>Local Plan Consultation Point</p>	<p>SAP45 - Capel-le-Ferne Small Housing Sites</p>
<p>Rep ID</p>	<p>SDLP696</p>
<p>Rep Status</p>	<p>Processed</p>

Consultee ID	1331825
Consultee Full Name	Mrs Janet Milliken
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP45
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>CAP013</p> <p>This land is on a dangerous corner and at the end of a narrow lane which already has a number of large lorries and farm vehicles using it numerous times on a daily basis. CAP009 should never have been granted permission for the same reason.</p> <p>These 2 plus CAP006 will be accessed by an already busy dangerous junction of B2011/Capel Street/Cauldham Lane.</p> <p>I was recently waiting in a queue of 5 vehicles coming from Folkestone and 2 lorries on the opposite side of the road, waiting for a large lorry to exit Cauldham Lane.</p> <p>A few months ago I was attempting to exit Cauldham Close and had to wait for a lorry to perform a 6 point turn to enable 4 cars to come from the direction of Longships to the top of Capel Street</p> <p>The government has expressed a wish for the country to become self sufficient in food. Why would any sane council give permission for CAP006 which is prime agricultural land.</p> <p>Please consider carefully the safety of villagers, particularly the elderly who struggle already with the traffic in the area and please remember that Capel Street is the access for the village school, village hall and the Baptist chapel.</p> <p>Capel residents already have problems accessing doctors, additional residents will exacerbate the problem</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	As I have already indicated, these developments will expose villagers to danger and reduce the country's ability to be self sufficient in food
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Hopefully, the elected Parish councillors will be able to pass on the comments of the villagers
Include files	
Local Plan Consultation Point	SAP45 - Capel-le-Ferne Small Housing Sites
Rep ID	SDLP1134
Rep Status	Processed
Consultee ID	1331825
Consultee Full Name	Mrs Janet Milliken
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP45
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>CAP013</p> <p>This land is on a dangerous corner and at the end of a narrow lane which already has a number of large lorries and farm vehicles using it numerous times on a daily basis. CAP009 should never have been granted permission for the same reason.</p> <p>These 2 plus CAP006 will be accessed by an already busy dangerous junction of B2011/Capel Street/Cauldham Lane.</p> <p>I was recently waiting in a queue of 5 vehicles coming from Folkestone and 2 lorries on the opposite side of the road, waiting for a large lorry to exit Cauldham Lane.</p> <p>A few months ago I was attempting to exit Cauldham Close and had to wait for a lorry to perform a 6 point turn to enable 4 cars to come from the direction of Longships to the top of Capel Street</p> <p>The government has expressed a wish for the country to become self sufficient in food. Why would any sane council give permission for CAP006 which is prime agricultural land.</p> <p>Please consider carefully the safety of villagers, particularly the elderly who struggle already with the traffic in the area and please remember that Capel Street is the access for the village school, village hall and the Baptist chapel.</p> <p>Capel residents already have problems accessing doctors, additional residents will exacerbate the problem</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s)	As I have already indicated, these developments will expose villagers to danger and reduce the country's ability to be self sufficient in food

you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Hopefully, the elected Parish councillors will be able to pass on the comments of the villagers
Include files	
Local Plan Consultation Point	SAP45 - Capel-le-Ferne Small Housing Sites
Rep ID	SDLP1251
Rep Status	Processed
Consultee ID	1332980
Consultee Full Name	Carole Belsey
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CAP013
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>CAP013 As permission has already been granted to longships to have 15 flats built on it I think the addition of another 5 properties is just too much, we have the governments and wildlife trusts asking us to look after nature and asking farmers to plant more hedgerows yet it seems that certain people find it perfectly acceptable to destroy as much as they can, Cauldham lane is as it says a lane, not a road nor a street and considering it is a village it should remain that way. Micheal Gove has stated that villagers should be happy with the amount of building work going on in their village, well at present all these threats of more and more properties it is causing a lot of stress to a lot of people. Any building of houses (if really needed) should be looked at more closely, looking at areas that can have direct access from main roads instead of small streets/lanes and roads.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP45 - Capel-le-Ferne Small Housing Sites</p>
<p>Rep ID</p>	<p>SDLP1921</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1266857</p>
<p>Consultee Full Name</p>	<p>Mr John Scannell</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP45 CAP 011</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>Yes</p>

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	[DDC Note: Support, no comments submitted]
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	[DDC Note: Support, no comments submitted]
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP45 - Capel-le-Ferne Small Housing Sites
Rep ID	SDLP1259
Rep Status	Processed
Consultee ID	1333023
Consultee Full Name	Ann Bonomy
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP45
2 - Do you consider this part of the Plan sound?	Yes

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	CAP013 Seems okay to follow on from CAP009 to complete to the end of the road. No Objection.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP45 - Capel-le-Ferne Small Housing Sites
Rep ID	SDLP1257
Rep Status	Processed
Consultee ID	1333023
Consultee Full Name	Ann Bonomy
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP45
2 - Do you consider this part of the Plan sound?	Yes

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	CAP011 Waste piece of ground. Why not- it has good access to Main Road. No objection.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP45 - Capel-le-Ferne Small Housing Sites
Rep ID	SDLP1261
Rep Status	Processed
Consultee ID	1333025
Consultee Full Name	Douglas Bonomy
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP45
2 - Do you consider this part of the Plan sound?	Yes

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	CAP011 Waste piece of ground. Why not- it has good access to Main Road. No objection.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP45 - Capel-le-Ferne Small Housing Sites
Rep ID	SDLP1262
Rep Status	Processed
Consultee ID	1333025
Consultee Full Name	Douglas Bonomy
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP45
2 - Do you consider this part of the Plan sound?	Yes

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	CAP013 Seems okay to follow on from CAP009 to complete to the end of the road. No Objection.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP45 - Capel-le-Ferne Small Housing Sites
Rep ID	SDLP2021
Rep Status	Processed
Consultee ID	1331439
Consultee Full Name	Bradley Dickenson
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP45
2 - Do you consider this part of the Plan sound?	No

<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified Effective Consistent with National Policy</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Not Applicable</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Not Applicable</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>I have been a resident in Capel Street (DDC Redacted) for 23 years, I have raised my concerns many times as this seems to be a regular application over the period of time I have lived here. It's so sad that the farmer who owns the field behind me (proposed 70 dwellings) has stooped to a new low on offering and successfully succeeding on purchasing a bungalow (that can be demolished) to enable an entry road from Capel street as this in the past has been an issue. This area is noted on the plan. All this points out to me is this man has no concern for the local community and is only driven by financial gain. The residents of Capel like myself live in Capel due to the peace and outstanding countryside which surrounds us which obviously attracts all sorts of wild animals/ insects/ wild flowers. All of this I'm sure is part of the attraction for young couples/ families and Senior citizens to live in a SMALL village and helps to promote the community we now have. Concerns are felt as we feel Capel is at its limits now and especially our primary school. All this says to me if these dwellings are passed it will open the door for future dwellings and mass expansion in infrastructure to be able to make this viable. I'm sure you can sense but just to confirm I am absolutely against all the projects proposed and it will take away everything Capel Le Ferne stands for.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP45 - Capel-le-Ferne Small Housing Sites</p>
<p>Rep ID</p>	<p>SDLP1982</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1265512</p>
<p>Consultee Full Name</p>	<p>Mr Roger Hobart</p>

Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP45 - CAP013
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I believe the proposals concerning the above designated location are unsound for the following reasons: -</p> <ol style="list-style-type: none"> 1 The area immediately abuts an Area of Outstanding Natural Beauty and this is exacerbated by the act that the location would represent the highest point in the village – as such it would reinforce the adverse visual impact 2 There would be a seriously negative impact on traffic/pedestrian safety, and it would, furthermore, cause unwarranted and severe disruption. Traffic volume along Cauldham Lane would inevitably increase, both during the construction phase and thereafter. This is a narrow country lane, bordered in parts by hedgerows, and lacking pavements – it is barely wide enough for one vehicle in parts. It should be noted that the lane is the only access route for the HGVs and articulated lorries servicing the local farm and the adjacent industrial units – these large vehicles fill the lane and have greater difficulty in maneuvering/reversing. This regular flow would be significantly disrupted for local businesses. As regards pedestrian safety the lack of pavements allied to increase traffic flows would significantly heighten the dangers posed to pedestrian safety/dog walkers and horse riders who use the lane – some of whom are disabled. Finally, the site is adjacent to a blind bend and bridal path would serve to increase the safety risks previously highlighted. 3 This is not a brownfield site and as such its development would run contrary to recently stated Government policy which seeks to emphasise the usage of brownfield sites wherever possible. 4 There would be an adverse impact on local utilities – particularly water supplies and pressure. We already have a recognized problem with water pressure locally and any such development would only serve to worsen the problem – particularly as the site is the highest point in the village!
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The development proposal should not proceed
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP45 - Capel-le-Ferne Small Housing Sites
Rep ID	SDLP1917
Rep Status	Processed
Consultee ID	1333879
Consultee Full Name	Mrs Louise Lewis
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP45
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	CAP013 I believe the proposals concerning this particular location are unsound for the following reasons: <ul style="list-style-type: none"> • Cauldham Lane is a single carriageway, with a speed limit of 60mph at the entrance to this plot. The Lane does not have a pavement and is used frequently by pedestrians and horse riders. Adding to the traffic will cause a danger, especially considering there are numerous other potential planning sites nearby which will also add significantly to the traffic • The land is raised and is higher than the properties on the opposite side of the lane. The existing properties are therefore likely to have their privacy invaded. The construction of new houses will also interrupt the view from existing properties • There will be a negative impact on the local wildlife • The number of houses is not in keeping with the rest of the lane which is quiet and peaceful
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance	This part of the plan should be rejected

with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP45 - Capel-le-Ferne Small Housing Sites
Rep ID	SDLP1983
Rep Status	Processed
Consultee ID	1265512
Consultee Full Name	Mr Roger Hobart
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP45 - CAP009
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I believe the current proposals for this site are unsound for the following reason: - 1 The development envisages a number of individual dwellings which in turn will generate considerable traffic activity from the site into a narrow lane. The lane is the only access for HGV's and articulated lorries servicing the nearby farm and adjacent industrial units and even if marginally widened in parts the lane would not permit two way traffic. These large vehicles find it very difficult to reverse or maneuver. The lane itself is used by pedestrians, dog walkers and horse riders and there is every possibility that safety would be compromised. Such a situation would also arise during the construction phase which may well result in considerable/unacceptable disruption to local occupants and businesses.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The current proposals should be rethought – perhaps scaled back and more thought given to entrance/exit issues
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP45 - Capel-le-Ferne Small Housing Sites
Rep ID	SDLP1919
Rep Status	Processed
Consultee ID	1266857
Consultee Full Name	Mr John Scannell
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP45 CAP013
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	This development, should it proceed will cause – <ul style="list-style-type: none"> • Lack of privacy as on higher ground, overlooking dwellings opposite • Have an impact on abutting area of AONB

<p>possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<ul style="list-style-type: none"> Highway safety noise and traffic. These need to be considered as there are no pavements, the lane is a single lane road – this already presents problems at peak times as it gets congested <p>There are no traffic two way places on this lane where traffic could pass one another – a concern that the carcasses of buried animals could cause an environmental issue. That our water pressure would be further effected.</p> <p>Bare in mind the tractors from the local farm are as wide as out lane – the tracks of which cut into the banks either side – cutting into our verges along the lane.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>This is not a Brownfield site Regarding para 145 of the NPPF Local planning authority should regard the construction of new dwellings as 'inappropriate in the green belt areas' My main objection is the fact Cauldham Lane is a 'LANE' single vehicle access along 90% of its length – further traffic will be unacceptable.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>This is not a Brownfield site Regarding para 145 of the NPPF Local planning authority should regard the construction of new dwellings as 'inappropriate in the green belt areas' My main objection is the fact Cauldham Lane is a 'LANE' single vehicle access along 90% of its length – further traffic will be unacceptable.</p>
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP45 - Capel-le-Ferne Small Housing Sites</p>
<p>Rep ID</p>	<p>SDLP1838</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1274134</p>
<p>Consultee Full Name</p>	<p>D Belsey</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP45</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified Effective</p>

	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I object to any considered development on plots CP006, CAP011 and CAP 013. This would result in a massive increase in traffic. Capel Le Ferne roads are not the easiest to negotiate at present and this would increase the problems i.e., what effect would it have on emergency services. The infrastructure of the village is not capable of supporting new developments. Things like water pressure have been a problem with the current population of the village, increase the population, increase the problem.</p> <p>What of design and appearance, when Grasslands obtained planning permission, I like many of the villagers were under the impression that houses would be built in keeping with the appearance of the village, what was built a modern housing estate that would fit in very well on Folkestone Beach what we have is a blot on the landscape.</p> <p>Any development is going to cause loss of trees, hedgerows and natural habitat, for wildlife. We are being reminded every day that we need to act quickly to help nature conservation before it's too late.</p> <p>We live in a time of unrest and turmoil and a planet that has an ever-increasing population. We are told that food production is becoming more strained and the need for countries to become as productive as possible in growing as much food stuff as they can. I therefore feel that to even consider development on CAP006 would be completely inappropriate, as this is agricultural land.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP45 - Capel-le-Ferne Small Housing Sites
Rep ID	SDLP2022
Rep Status	Processed
Consultee ID	1331439
Consultee Full Name	Bradley Dickenson
Consultee Company / Organisation	

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP45
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I have been a resident in Capel Street (DDC Redacted) for 23 years, I have raised my concerns many times as this seems to be a regular application over the period of time I have lived here. It's so sad that the farmer who owns the field behind me (proposed 70 dwellings) has stooped to a new low on offering and successfully succeeding on purchasing a bungalow (that can be demolished) to enable an entry road from Capel street as this in the past has been an issue. This area is noted on the plan. All this points out to me is this man has no concern for the local community and is only driven by financial gain. The residents of Capel like myself live in Capel due to the peace and outstanding countryside which surrounds us which obviously attracts all sorts of wild animals/ insects/ wild flowers. All of this I'm sure is part of the attraction for young couples/ families and Senior citizens to live in a SMALL village and helps to promote the community we now have. Concerns are felt as we feel Capel is at its limits now and especially our primary school. All this says to me if these dwellings are passed it will open the door for future dwellings and mass expansion in infrastructure to be able to make this viable. I'm sure you can sense but just to confirm I am absolutely against all the projects proposed and it will take away everything Capel Le Ferne stands for.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP45 - Capel-le-Ferne Small Housing Sites

Rep ID	SDLP1958
Rep Status	Processed
Consultee ID	1331442
Consultee Full Name	Jenny Bennett
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP45
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>CAP013</p> <p>Although not a resident of Cauldham Lane – personal family circumstances lead me to spend considerable time there. I believe the proposed development is unsound for the following reasons</p> <ol style="list-style-type: none"> 1 The site borders designated area of outstanding natural beauty with its associated ecological and wildlife habitats including 'red' status species such as skylarks (ground nesting) protected by Wildlife and Countryside Act 1981. 2 The site itself is highest marked point in Capel with all its associated history of the Battle of Britain memorial. Any development will cause adverse visual impact 3 The residents of Cauldham Lane purchased their properties in the quiet and peace of a rural location which will be destroyed – thus impacting on mental health and wellbeing of current residents whose lives will be permanently affected by this proposal. 4 Onne cannot underestimate the dangerous situation that already exists in Cauldham Lane in respect of traffic. It is a narrow single lane without pavements that primarily services residents and the farm so a great deal of heavy traffic is already present. There are blind spots and no pull in places. It has a great deal of pedestrian traffic with dog walkers and also horses using the land for bridle path access. The route is used as a high-speed rat run in the mornings with little regard to the 20-mile speed limit in place to protect residents and pedestrians . the additional traffic that would come with this proposal would bring disruption and there would be sever detriment to the lives of residents who sometimes already take their life in their hands by pulling out of their drives into the lane as speed is ignored by the rat runners and this is worse if accidents elsewhere cause more drivers to use the route. One cannot underestimate the impact on mental wellbeing if this proceeds as the residents will have and aspect of their lives that they have no control over foisted on them through no fault of their own. 5 Issues already exist with the water pressure this will be magnified
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness	This development proposal should not proceed.

matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP45 - Capel-le-Ferne Small Housing Sites
Rep ID	SDLP1834
Rep Status	Processed
Consultee ID	1333696
Consultee Full Name	Ms Rachael Lever
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP45 (CAP013)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	CAP013 <ul style="list-style-type: none"> The site borders designated area of outstanding natural beauty with its associated ecological and wildlife habitats including 'red' status species such as skylarks (ground nesting) protected by Wildlife and Countryside Act 1981 The site is a brown field site and is not suitable for development as per government policy, being the highest marked point in Capel there would be an adverse visual impact on local residents as well as light and noise pollution

	<ul style="list-style-type: none"> • The residents of Cauldham Lane purchased their properties in the quiet and peace of a rural location which will be destroyed, impacting on the mental health and well being of current residents whose lives will be permanently affected by this proposal as well as devaluation to their properties • Cauldham Lane is a narrow single land without pavements that primarily services residents and the farm, so a great deal of heavy farm traffic is already present. During harvest time, the lane is frequently blocked by farm vehicles and there is a jam at the entrance on to Capel Street causing further congestion • There are blind spots and no pull in places. It has a great deal of pedestrian traffic with dog walkers and also horses using the lane for bridle path access. The blind bend on the brow of the hill at the end of Cauldham Lane is already dangerous without pavements • Issues already exist with the water pressure this will be magnified
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	This part of the plan should be rejected
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP45 - Capel-le-Ferne Small Housing Sites
Rep ID	SDLP1839
Rep Status	Processed
Consultee ID	1274134
Consultee Full Name	D Belsey
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP45
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified

	Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I object to any considered development on plots CP006, CAP011 and CAP 013. This would result in a massive increase in traffic. Capel Le Ferne roads are not the easiest to negotiate at present and this would increase the problems i.e., what effect would it have on emergency services. The infrastructure of the village is not capable of supporting new developments. Things like water pressure have been a problem with the current population of the village, increase the population, increase the problem.</p> <p>What of design and appearance, when Grasslands obtained planning permission, I like many of the villagers were under the impression that houses would be built in keeping with the appearance of the village, what was built a modern housing estate that would fit in very well on Folkestone Beach what we have is a blot on the landscape.</p> <p>Any development is going to cause loss of trees, hedgerows and natural habitat, for wildlife. We are being reminded every day that we need to act quickly to help nature conservation before it's too late.</p> <p>We live in a time of unrest and turmoil and a planet that has an ever-increasing population. We are told that food production is becoming more strained and the need for countries to become as productive as possible in growing as much food stuff as they can. I therefore feel that to even consider development on CAP006 would be completely inappropriate, as this is agricultural land.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP45 - Capel-le-Ferne Small Housing Sites
Rep ID	SDLP1910
Rep Status	Processed
Consultee ID	1333863
Consultee Full Name	Peter and Linda Lever

Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP45 (CAP013)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>CAP013</p> <p>We believe this site is unsound for any development for the following reasons:</p> <ol style="list-style-type: none"> 1 This area is on the edge of a designated area of outstanding natural beauty, being the highest marked point in Capel-Le-Ferne. To develop this site would cause an adverse visual impact. This site is directly opposite our property and our privacy would be compromised, with light and noise pollution. Our property would be devalued considerably. 2 There are significant problems with the water pressure and this site being the highest point will adversely impact this further. 3 We are concerned that there are horses buried on the site, which could cause an environmental issue should the site be developed. 4 Cauldham Lane is a narrow single lane without any pavements, dog walkers and horse riders use the lane to access the nearby bridle path, to increase the traffic using the lane would cause a detrimental effect for the users. The lane is frequently blocked by heavy farm traffic as there are no passing places, there is also a blind corner on the brow of the hill causing a further hazard
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	This development should be rejected
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP45 - Capel-le-Ferne Small Housing Sites
Rep ID	SDLP2018

Rep Status	Processed
Consultee ID	1334459
Consultee Full Name	Natalie Mack
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP45
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I received the grapevine newsletter and feel sad about proposed building of 10 dwellings on brownfield site . I am most unhappy that this beautiful field where I take my children for walks etc , as do many other people within the village, is now going to have ten houses built there . It is such a beautiful field. There are so many abandoned houses around Kent , why is the money not being used to renovate other properties instead? Why build brand new houses , destroying the beautiful nature around us ? The village is perfect the way it is surrounded by these beautiful views and beautiful walks and open space. That is what makes capel le ferne this lovely village to live in. It is so sad that someone sees a field and instantly wants to build on it . The farmers work hard there growing their crops . That is their livelihood. That the farmers pass down from generation to generation. If we build on every field , then farming will soon cease to exist in the future. That is a really scary thought.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP45 - Capel-le-Ferne Small Housing Sites
Rep ID	SDLP2019
Rep Status	Processed
Consultee ID	1331439
Consultee Full Name	Bradley Dickenson
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP45
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I have been a resident in Capel Street (DDC Redacted) for 23 years, I have raised my concerns many times as this seems to be a regular application over the period of time I have lived here. It's so sad that the farmer who owns the field behind me (proposed 70 dwellings) has stooped to a new low on offering and successfully succeeding on purchasing a bungalow (that can be demolished) to enable an entry road from Capel street as this in the past has been an issue. This area is noted on the plan. All this points out to me is this man has no concern for the local community and is only driven by financial gain. The residents of Capel like myself live in Capel due to the peace and outstanding countryside which surrounds us which obviously attracts all sorts of wild animals/ insects/ wild flowers. All of this I'm sure is part of the attraction for young couples/ families and Senior citizens to live in a SMALL village and helps to promote the community we now have. Concerns are felt as we feel Capel is at its limits now and especially our primary school. All this says to me if these dwellings are passed it will open the door for future dwellings and mass expansion in infrastructure to be able to make this viable. I'm sure you can sense but just to confirm I am absolutely against all the projects proposed and it will take away everything Capel Le Ferne stands for.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP45 - Capel-le-Ferne Small Housing Sites
Rep ID	SDLP1939
Rep Status	Processed
Consultee ID	1333906
Consultee Full Name	Mr and Mrs Pacey
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CAP009 / CAP013
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	We wish to object to CAP006 / CAP009 / CP013 We are very concerned about the extra traffic these sites will cause, we live in a lane, we are both disabled and concerned about parking and access to our property if the road is widened. Also, the amount of traffic that is going to be using Capel Street is scary, it is dangerous enough crossing at the junction of Cauldham Lane / Capel Street now as I walk my dog and we are slow. Why don't the build where access can be directly off the main road, e.g. opposite Grasslands or opposite the war memorial. This is our village we don't really want a town
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s)	

you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Local Plan Consultation Point	East Langdon
Rep ID	SDLP1194
Rep Status	Processed
Consultee ID	1331099
Consultee Full Name	Rosie Cavalier
Consultee Company / Organisation	Esquire Developments
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3 SP4 SAP40
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>1.0 INTRODUCTION</p> <ul style="list-style-type: none"> • These representations have been prepared by Esquire Developments Ltd, a multi-award-winning SME developer based in Longfield, Kent. • Esquire Development has a number of land interests in Dover, including <ol style="list-style-type: none"> 1 New Townsends Farm, St Margaret's (Appendix 01); 2 Appleton Farm, East Langdon (Appendix 02) and 3 Ringwould Nurseries, Ringwould (Appendix 03) • New Townsend Farm is identified as an emerging allocation identified as SAP40 (STM006) in the Regulation 19 Local Plan. Appleton Farm and Ring would Nurseries are not identified as emerging allocations but put forward as suitable alternative sites. • As a local SME Housebuilder, the development of these sites brings forward the opportunity to help diversify the housing market and offer a wide choice of housing from different developers.

2.0 RESPONSE TO THE REGULATION 19 PLAN

A. New Townsend Farm, St Margaret's-at-Cliffe

- St Margaret's-at-Cliffe is recognised in the Regulation 19 Local Plan as a Local Centre along with Eythorne and Elvington, Eastry, Kingsdown, Shepherdswell, Wingham and Ash. These Local Centres are noted to be the largest of the district's rural settlements. The Local Centres are characterised by the range of services and facilities that they offer, serving the needs of their own residents and those of adjoining small villages and hamlets. We support the recognition within the plan that in order to help sustain and strengthen the role of these local centres, additional housing is considered appropriate. A total of 96 dwellings are allocated within the Regulation 19 Local Plan in St Margaret's-at-Cliffe.
- New Townsend Farm has been identified as an allocated site for 10 dwellings under SAP40 which allocates all small sites in St Margaret's-at-Cliffe. We support the identification of the site for development, and we consider this site to be deliverable in the lifetime of the plan.
- SAP40 includes two sites within St Margaret's-at-Cliffe Land at New Townsend Farm (referred to as STM006) and Land located between Salisbury Road and The Drove Way (referred to as STM010). These are shown on the map at Figure 4.12 and are both referred to as SAP40. As a point of transparency, it would be beneficial to separately identify these allocations on the accompanying Plan in order to prevent any confusion.
- We consider that this area has the potential to deliver more dwellings than the allocated number of 10 dwellings as part of a more comprehensive form of development which would, overall, deliver a much enhanced scheme of approximately 20 dwellings alongside significant areas of open spaces offering net biodiversity gain and maintaining views and perceived areas of separation.
- The proposed development would be in keeping with the surrounding pattern of development, reflecting an extension of built form in an eastward direction away from Station Road/High Street in a linear character (see Nelson Park Road, Hardy Road, St Vincent Road and Kingsdown Road for example in **Appendix 04**)
- **Appendix 01** demonstrates how this could come forward and facilitates the ability to deliver this allocation which has a covenant constraint that whilst is not a showstopper, would benefit from an increased capacity of dwellings.
- St Margaret's-at-Cliffe is recognised within SP4 Residential Windfall Development as an area where residential development or infilling will be permitted within or immediately adjoining the settlement boundaries. We consider that the wording of this policy is too restrictive (see SME Network Representations for full position) where it seeks to limit development unless within or immediately adjoining the settlement boundaries. We consider that the wording of this policy should be amended to reflect a more flexible approach. We would suggest that wording used by Ashford Borough Council in Policy HOU5 from the Ashford Local Plan 2030 adopted February 2019. A copy of this policy wording is provided at **Appendix 05**.

B. Appleton Farm, East Langdon

- East Langdon is recognised in the Regulation 19 Plan as a Larger Village and allocates Land adjacent Langdon Court Bungalow for 40 dwellings (LAN003). We consider that this site has a number of legal constraints that cannot be overcome and is therefore undeliverable. We suggest an alternative site should be proposed for allocation in Appleton Farm, East Langdon.
- East Langdon is categorised as a Larger Village within the Plan and distinguishes between the two distinct parts, the southern part and the northern part.
- East Langdon is recognised within SP4 Residential Windfall Development as an area where residential development or infilling will be permitted within or immediately adjoining the settlement boundaries.
- Paragraph 79 of the NPPF sets out that in order to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. It puts emphasis on the opportunities to grow where this will support local services. The key section of this paragraph is that where there are groups of smaller settlements, development in one village may support services in a village nearby. This is the case for East Langdon and Martin Mills, whereby services are interdependent on each other (by way of example the primary school is located in East Langdon, but the Railway Station is located in Martin Mills).
- We consider the allocated site in East Langdon, Land adjacent Langdon Court Bungalow (LAN003) to be undeliverable in the lifetime of the plan due to a number of restrictive covenants upon the land. The land is subject to restrictions which prevent the erection of any dwellinghouse or other buildings without consent from other parties. This is noted as a land charge and a copy can be found at Appendix 06. Our reading of the title indicates the following issues:
 - No sale is permitted until 30 September 2045 without consent of The Church Commissioners for England
 - Transfer dated 22 April 1970 contains Restrictive Covenants on over 5 parcels within the land to benefit and protect the part of the Langdon Court Farm House and farmlands adjoining the proposed land jointly and severally covenant with the personal representatives that they and their successors in title will not at any time erect or suffer to be erected any dwellinghouse or other buildings whatsoever upon the designated land without the written consent of the Personal Representatives.
- These restrictions are sufficient for a developer to not be able to purchase and develop the site.
- Accordingly, alternative sites should be found in East Langdon that are available, suitable and deliverable. Appleton Farm is such a site.
- Appleton Farm represents a parcel of land that is in total approximately 18.5 hectares. It extends from Holland Hill to the north to White Hill to the South. Whilst this is an extensive area, the site has the potential to deliver a modest scale of development of circa 30-35 dwellings on approximately 3.5ha that would offer a suitable alternative to the identified site – See Appendix 02.
- The proposal represent a reasonable alternative to the identified site and in a location that is recognised as being sustainable. Indeed, East Langdon and Martin Mills offer one of the few locations in the District outside of the main urban areas offering a railway connection and therefore a greater scale of development could be considered.

C. Ringwould Nurseries, Ringwould

- Ringwould is identified as a Smaller Village and Hamlet within the Plan. It is noted that although there is a limited range of services and facilities available, it is served by a regular bus service and there is a Church within Ringwould. It has close connections to the services and facilities in Kingsdown. Ringwould is located on the A258, the main road connecting Dover and Deal. We support the recognition that in order to help sustain and strengthen the role of smaller villages and hamlets, additional housing is considered appropriate. There is one emerging allocation within Ringwould for 10 units (Land at Ringwould, Alpines, Dover Road).
- Ringwould is identified in Policy SP4 Residential Windfall Development as a settlement appropriate for minor residential development or infilling of a scale that is commensurate with that of the existing settlement.
- The Nursery site is located to the west of Ringwould, with a long frontage to the A258. It comprises approximately 9.2ha and is considered suitable to deliver a wide mix of uses, including residential, retail, care and affordable homes and/or potentially education. Appendix 03 demonstrates how a care/retirement facility could be delivered.
- The mix of uses would help improve the services and facilities available to the existing community of Ringwould, as well as serve a wider catchment. The proposals would inherently improve the sustainability credentials of Ringwould as well as delving a mix of uses which are most in need, including care, affordable homes and potentially education.
- Consideration should be given by the Council as to the opportunity the site presents - including working with the Council's own Housing department to deliver locally required housing needs in partnership with the Council itself.

Please see attached full representations including appedices

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see above and attached representations in full

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Esquire Reps to Dover Reg 19 Nov 22 inc appendices.pdf

SAP46 - Land adjacent Langdon Court Bungalow, East Langdon (LAN003)

Local Plan Consultation Point	SAP46 - Land adjacent Langdon Court Bungalow, East Langdon (LAN003)
Rep ID	SDLP32
Rep Status	Processed
Consultee ID	1259309
Consultee Full Name	Mr Peter Jull
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP46
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	No footpath connection to the village hall proposed.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	At i. policy wording should include a requirement for pedestrian access to East Langon Parish Hall.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP46 - Land adjacent Langdon Court Bungalow, East Langdon (LAN003)
Rep ID	SDLP801
Rep Status	Processed
Consultee ID	1259612
Consultee Full Name	Mr Chris Shaw
Consultee Company / Organisation	Langdon Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Local Site Allocations SAP 46 - Land adjacent Langdon Court Bungalow (LAN003), East Langdon
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Category: Soundness: Justified See previous comments related to the availability of services and facilities in East Langdon. 40 homes would increase the size of the village by 58% and it is unclear about how this will be sustainable as per Policy SP2 (Planning for Healthy and Inclusive Communities) which includes the following text: "Ensuring that new development is well served by services and facilities (for example education, health care, community, cultural facilities, play, youth, recreation, sports, faith and emergency facilities) and that a mix of uses are provided in new development that support daily life") and clause a of SP4.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	a: Development should be focused in the southern part of the site fronting onto The Street. The northern and north-western part of the site should remain undeveloped and be retained as a landscape buffer: Category: Soundness: Effective Unclear if the settlement confines are to be amended to include the new site. If so, the landscape buffer would be at odds with Policy SP4 (Residential Windfall), which would permit windfall within or immediately adjoining the settlement boundaries, as shown on the Policies Map with the intention of reducing instances of isolated dwellings. Suggested amendment: Development should be restricted to the southern part of the site fronting onto The Street. The northern and north-western part of the site should remain undeveloped and be retained as a landscape buffer, to prevent development no further north than the existing line set by the existing woodland; b: Development should be low density and sensitively designed to respect the character of the area and to allow transition to the rural landscape: Category: Soundness: Effective Concern about the viability of delivering type type/mix/affordability of homes required to meet local need versus low density housing.

Suggested amendment: The design, numbers and style of housing need to be commensurate with the existing houses, density and connectivity with the village. Development should be low density throughout and sensitively designed to respect the prevailing historic character of the wider area and to allow transition to the rural landscape to the north and east.

c: A generous landscape buffer and structural planting, determined by a Landscape Visual Impact Assessment is required to mitigate the impact of development on the wider countryside:

Category: Soundness: Effective

It is unclear as to how 'generous' is being defined here. Also would be helpful to include detail as to the type of buffer – i.e. it should be a natural buffer comprising native species.

Suggested amendment: A generous landscape buffer and structural planting along all site boundaries, determined by a Landscape Visual Impact Assessment is required to mitigate the impact of development on the wider countryside.

d: The existing trees/hedgerows in the site and around the boundary of the site are to be maintained and enhanced where necessary to provide screening to mitigate the impact of development on the countryside:

and

e: Consideration will be to be made regarding the quality and condition of trees and hedgerows within the site. Detailed proposals should aim to protect those of importance and incorporate them in the overall design of the development and to provide opportunities for biodiversity habitat creation and enhancement:

Category: Soundness: Effective

Clauses appear to be somewhat contradictory.

How will trees/hedges be considered in terms of 'importance'? What is the definition being used (e.g. Woodland Trust veteran/ mature trees etc.). Cross-reference to Policy CC8, which required 2 x new trees to be planted per dwelling.

Suggested amendment: The existing trees/hedgerows in the site and around the boundary of the site are to be maintained and enhanced where necessary to provide screening to mitigate the impact of development on the rural countryside, particularly the existing woodland area to the immediate west of the site, which is of high ecological value. Where unavoidable boundary planting loss is necessary to achieve site access and footpath connectivity, a new tree-planted boundary shall be re-provided within the site between the development and the existing highway.

Consideration will be to be made regarding the quality and condition of trees and hedgerows within the site. Detailed proposals should aim to protect those of importance and incorporate them in the overall design of the development and to provide opportunities for biodiversity habitat creation, protection, enhancement and improving wider ecological connectivity.

f: Primary vehicular, pedestrian and cycle access to the site shall be provided from East Langdon Road, with the existing road to be widened at access point:

Category: Soundness: Effective

Improve clarity of wording to make more locally specific and effective.

Suggested amendment: Primary vehicular, pedestrian and cycle access to the site shall be provided from The Street/East Langdon Road, with the existing road to be widened at access point before new properties are sold.

g: Include a review of 20mph speed limit extent including appropriate gateway feature on The Street:

Category: Soundness: Effective

Essential to ensure safe connectivity with the existing village. Presumably this will be the responsibility of the Highways Authority (i.e. KCC). How will this be delivered?

h: Investigate, and where possible deliver, the need for improvements to the local rural road network:

Category: Soundness: Effective

This is noted in the IDP. Is this in relation to the site boundary or wider works across the parish?

No mention of rural bus services? Link to SP12 (the Council will support proposals for the rural demand-responsive bus service and other improvements to local bus service provision) – given that rural transport is limited in the village.

Policy T11: states: Development should, in so far as its size, characteristic and location: (A) Be designed so that opportunities for sustainable transport modes are maximised and provide for; (b) a variety of forms of transport as alternatives to travel by private motorised vehicle.

Clause H of the Langdon Policy appears to water these (and the other T11) clauses down.

Widening roads? How? A clause that would be impossible to deliver. But try to make safer?

	<p>Needs to be more locally specific: Suggested amendment: Investigate, and where possible deliver, the need for improvements to the local rural road network, in particular along Waldershare Lane to the west, Lucerne Lane to the north, and the junction of Station Approach onto the A258 to the east.</p> <p>i: Provide pedestrian and cycle connections to Landon Playing Field and Langdon Primary School, in addition to connections and enhancements to the PROW ER44/45/47:</p> <p>Category: Soundness: Effective And connecting these to the wider footpath/cycle network? The popular White Cliffs Skylark Cycle Trail passes through Langdon parish. Links to the shop and the railway station? Many of the local facilities that the residents might wish to access are located in neighbouring small villages (e.g. pubs, the railway station). Therefore new developments should be required to connect to the wider network that enables this access. Suggested amendment: Provide pedestrian and cycle connections along The Street between the Parish/Village Hall, Landon Playing Field and Langdon Primary School, in addition to connections and enhancements to the PROW ER44/45/47, and improved footpath/cycle connectivity to Martin Mill railway station.</p> <p>k: A site-specific Flood Risk Assessment is required to address the issue of surface water flooding and consider the impacts of climate change over the lifetime of the development:</p> <p>Category: Soundness: Effective The site falls wholly within Groundwater Protection Zone 2, hence reference to NE5 needs to be made.</p> <p>o: Open space requirements in accordance with Policy PM3, shall be provided. Due to the location in adjacent to existing open space and equipped play infrastructure in Langdon Playing Field, this scheme should seek to provide extensions and/or enhancements to those facilities:</p> <p>Category: Soundness: Effective This is also included in the IDP. There may be other infrastructure required as opposed to or in addition to that mentioned. The Parish Council is in the process of producing a neighbourhood plan and would not wish the LP to restrict any findings from the community that could be used to inform this provision. Suggested amendment: provision of community infrastructure, based on local need following engagement with the local community. This would also assist in contributing to the achievement of policies SP2 and SP4.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP46 - Land adjacent Langdon Court Bungalow, East Langdon (LAN003)</p>
<p>Rep ID</p>	<p>SDLP977</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1259612</p>
<p>Consultee Full Name</p>	<p>Mr Chris Shaw</p>

Consultee Company / Organisation	Langdon Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP4 - Residential Windfall Development, Paragraph 1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Langdon Parish remains concerned about the categorisation of East Langdon as a 'Large Village'– see comments below this table. It is unclear as to whether the settlement confines are to be amended to incorporate the proposed site allocation at East Langdon (Policy SAP46 - Land adjacent Langdon Court Bungalow, The Street, East Langdon (LAN003)). The Parish Council would like to see clarity on this, as extending the boundary would potentially open up additional countryside to windfall development. As an aside, the Policies map describes these as the 'settlement confines' as opposed to the 'settlement boundaries'
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	12Settlement hierarchy- East Langdon as a 'larger village': The Parish Council remains concerned about the categorisation of East Langdon as a 'larger village' The criteria for this category states that larger villages have a good range of services and facilities, which serve their own residents and those of nearby hamlets. East Langdon village has no retail facilities. There is a Post Office operated from the village hall two mornings per week. One bus serves the village 5 times a day, although there is no evening service. The main facility is the primary school, however it is unclear as to the viability of the school. The KCC Schools Plan states that there is likely to be a surplus of spaces in the coming years: "District commentary: We forecast a significant surplus of Year R and Year R-6 places over the Plan period. This surplus is the result of the falling birth rate, with some planning groups having around one quarter increase of Year R surplus in the coming years. As schools are primarily funded on the number of pupils on roll, low Year R numbers will impact on future budgets with some schools choosing to reduce their published admissions numbers." "Dover East Planning Group: Surplus places are forecast throughout the Plan period. However, in the longer term places will be required to support the planned development of Connaught Barracks. Ideally this will be via the expansion of Guston Church of England Primary School. We are continuing to work with interested parties to secure the additional land that will be required to enable the expansion to happen." The supporting text for the policy says that to help sustain and strengthen the role of these larger villages, additional housing over the lifetime of this Plan is considered appropriate. Criteria (a) of the policy itself states that any development is to be of "a scale that is appropriate to the size of the settlement and the range of services and community facilities that serve it, taking account of the cumulative impact of any allocated sites and committed development". This is further emphasised in Policy SP2 (Planning for Healthy and Inclusive Communities) which includes the following text: "Ensuring that new development is well served by services and facilities (for example education, health care, community, cultural facilities, play, youth, recreation, sports, faith and emergency facilities) and that a mix of uses are provided in new development that support daily life."

	<p>East Langdon currently comprises some 87 dwelling, 69 being concentrated central to the village in the vicinity of The Street, a narrow through-route to other hamlets of the parish. The proposed land allocation SAP46 at East Langdon is for 40 dwellings adjacent to the current north-eastern settlement boundary on BMV quality agricultural land.</p> <p>This location would be accessed via the network of narrow country lanes which lead from the A258 – A256 – A2 district highways into East Langdon Road and The Street. Although SAP46 has been identified as the most suitable allocation site in East Langdon, increasing the village core from 69 to 109 dwellings (58%) would have a profound impact on the local infrastructure, road network and access to services.</p> <p>It is considered that there is a discrepancy between the allocation of 40 additional dwellings to the village (with no requirement for mixed development to include space for other services/ retail/ economic use etc.) in the context of Policy SP2 and clause (a) of Policy SP4 particularly in the context of lack of certainty over the school, which is the primary service in the village, and the rural nature of the road network. The Parish Council consider that either the categorisation of East Langdon as a larger village should be reconsidered, or the number of dwellings in the proposed site allocation should be reconsidered to ensure that it is sustainable in the context of the lack of local services.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Langdon Parish Council wishes the opportunity to explain the specific issues with East Langdon being categorised as a "Large Village" and the consequential issues it raises if a development was proposed which would increase the dwellings by nearly 60% on the infrastructure, road safety and infrastructure services.
Include files	
Local Plan Consultation Point	SAP46 - Land adjacent Langdon Court Bungalow, East Langdon (LAN003)
Rep ID	SDLP506
Rep Status	Processed
Consultee ID	1331724
Consultee Full Name	Mr Michael Arkinstall-Doyle
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP46 - Land adjacent Langdon Court Bungalow, East Langdon (LAN003)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>I consider the SAP 46 of the Local Plan to be unsound on the grounds of its positive preparation. To be positively prepared, the Plan should achieve sustainable development part of which includes an environmental objective.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>This environmental objective is not met due to the partially contradictory nature of points D and E. Point D states "The existing trees/hedgerows in the site [...] are to be maintained and enhanced where necessary to provide screening to mitigate the impact of development" while E states "Consideration will be to be made regarding the quality and condition of trees and hedgerows within the site [...] aim to protect those of importance".</p> <p>It is therefore unclear whether any potential developers have a responsibility to maintain and enhance the wooded area in the southern corner of the site or only if this only applies if they deem it of sufficient importance or screening.</p> <p>The regulation should be re-written in a more prescriptive manner to ensure the protection and, if at all possible, expansion of this wooded area to safeguard the current level of biodiversity.</p> <p>Furthermore, point C should be more prescriptive about the "generous landscape buffer". This should include linking the buffer, to be focussed in the northern end of the site, with the wooded area at the southern end of the site. The regulation should ensure that a wildlife corridor is maintained between the landscape buffer and wooded area.</p> <p>Overall, the plan should seek to combine points C, D and E to ensure a generous boundary to the north and north-west with this linked, or curved round, to the wooded area in the south.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP46 - Land adjacent Langdon Court Bungalow, East Langdon (LAN003)</p>
<p>Rep ID</p>	<p>SDLP1020</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331999</p>
<p>Consultee Full Name</p>	<p>Claire Pamberi</p>
<p>Consultee Company / Organisation</p>	<p>Kent County Council</p>
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP46</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>Yes</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	

4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The County Council welcomes the inclusion of ER45/56/57 improvements within this policy.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP46 - Land adjacent Langdon Court Bungalow, East Langdon (LAN003)
Rep ID	SDLP1201
Rep Status	Processed
Consultee ID	1331099
Consultee Full Name	Rosie Cavalier
Consultee Company / Organisation	Esquire Developments
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3 SP4 SAP40
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective

4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p data-bbox="786 236 1010 260">1.0 INTRODUCTION</p> <ul data-bbox="786 300 2123 762" style="list-style-type: none"> <li data-bbox="786 300 2123 355">• These representations have been prepared by Esquire Developments Ltd, a multi-award-winning SME developer based in Longfield, Kent. <li data-bbox="786 395 2123 419">• Esquire Development has a number of land interests in Dover, including <ul data-bbox="786 467 1361 547" style="list-style-type: none"> <li data-bbox="786 467 1361 491">1 New Townsends Farm, St Margaret's (Appendix 01); <li data-bbox="786 491 1361 515">2 Appleton Farm, East Langdon (Appendix 02) and <li data-bbox="786 515 1361 547">3 Ringwould Nurseries, Ringwould (Appendix 03) <li data-bbox="786 587 2123 643">• New Townsend Farm is identified as an emerging allocation identified as SAP40 (STM006) in the Regulation 19 Local Plan. Appleton Farm and Ring would Nurseries are not identified as emerging allocations but put forward as suitable alternative sites. <li data-bbox="786 715 2123 762">• As a local SME Housebuilder, the development of these sites brings forward the opportunity to help diversify the housing market and offer a wide choice of housing from different developers. <p data-bbox="786 954 1283 978">2.0 RESPONSE TO THE REGULATION 19 PLAN</p> <p data-bbox="786 1098 1290 1121">A. New Townsend Farm, St Margaret's-at-Cliffe</p> <ul data-bbox="786 1193 2123 1465" style="list-style-type: none"> <li data-bbox="786 1193 2123 1345">• St Margaret's-at-Cliffe is recognised in the Regulation 19 Local Plan as a Local Centre along with Eythorne and Elvington, Eastry, Kingsdown, Shepherdswell, Wingham and Ash. These Local Centres are noted to be the largest of the district's rural settlements. The Local Centres are characterised by the range of services and facilities that they offer, serving the needs of their own residents and those of adjoining small villages and hamlets. We support the recognition within the plan that in order to help sustain and strengthen the role of these local centres, additional housing is considered appropriate. A total of 96 dwellings are allocated within the Regulation 19 Local Plan in St Margaret's-at-Cliffe. <li data-bbox="786 1393 2123 1465">• New Townsend Farm has been identified as an allocated site for 10 dwellings under SAP40 which allocates all small sites in St Margaret's-at-Cliffe. We support the identification of the site for development, and we consider this site to be deliverable in the lifetime of the plan.

- SAP40 includes two sites within St Margaret's-at-Cliffe Land at New Townsend Farm (referred to as STM006) and Land located between Salisbury Road and The Drove Way (referred to as STM010). These are shown on the map at Figure 4.12 and are both referred to as SAP40. As a point of transparency, it would be beneficial to separately identify these allocations on the accompanying Plan in order to prevent any confusion.
- We consider that this area has the potential to deliver more dwellings than the allocated number of 10 dwellings as part of a more comprehensive form of development which would, overall, deliver a much enhanced scheme of approximately 20 dwellings alongside significant areas of open spaces offering net biodiversity gain and maintaining views and perceived areas of separation.
- The proposed development would be in keeping with the surrounding pattern of development, reflecting an extension of built form in an eastward direction away from Station Road/High Street in a linear character (see Nelson Park Road, Hardy Road, St Vincent Road and Kingsdown Road for example in **Appendix 04**)
- **Appendix 01** demonstrates how this could come forward and facilitates the ability to deliver this allocation which has a covenant constraint that whilst is not a showstopper, would benefit from an increased capacity of dwellings.
- St Margaret's-at-Cliffe is recognised within SP4 Residential Windfall Development as an area where residential development or infilling will be permitted within or immediately adjoining the settlement boundaries. We consider that the wording of this policy is too restrictive (see SME Network Representations for full position) where it seeks to limit development unless within or immediately adjoining the settlement boundaries. We consider that the wording of this policy should be amended to reflect a more flexible approach. We would suggest that wording used by Ashford Borough Council in Policy HOU5 from the Ashford Local Plan 2030 adopted February 2019. A copy of this policy wording is provided at **Appendix 05**.

B. Appleton Farm, East Langdon

- **East Langdon is recognised in the Regulation 19 Plan as a Larger Village and allocates Land adjacent Langdon Court Bungalow for 40 dwellings (LAN003). We consider that this site has a number of legal constraints that cannot be overcome and is therefore undeliverable. We suggest an alternative site should be proposed for allocation in Appleton Farm, East Langdon.**
- **East Langdon is categorised as a Larger Village within the Plan and distinguishes between the two distinct parts, the southern part and the northern part.**
- **East Langdon is recognised within SP4 Residential Windfall Development as an area where residential development or infilling will be permitted within or immediately adjoining the settlement boundaries.**
- **Paragraph 79 of the NPPF sets out that in order to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. It puts emphasis on the opportunities to grow where this will support local services. The key section of this paragraph is that where there are groups of smaller settlements, development in one village may support services in a village nearby. This is the case for East Langdon and Martin Mills, whereby services are interdependent on each other (by way of example the primary school is located in East Langdon, but the Railway Station is located in Martin Mills).**

- We consider the allocated site in East Langdon, Land adjacent Langdon Court Bungalow (LAN003) to be undeliverable in the lifetime of the plan due to a number of restrictive covenants upon the land. The land is subject to restrictions which prevent the erection of any dwellinghouse or other buildings without consent from other parties. This is noted as a land charge and a copy can be found at Appendix 06. Our reading of the title indicates the following issues:
 - No sale is permitted until 30 September 2045 without consent of The Church Commissioners for England
 - Transfer dated 22 April 1970 contains Restrictive Covenants on over 5 parcels within the land to benefit and protect the part of the Langdon Court Farm House and farmlands adjoining the proposed land jointly and severally covenant with the personal representatives that they and their successors in title will not at any time erect or suffer to be erected any dwellinghouse or other buildings whatsoever upon the designated land without the written consent of the Personal Representatives.
- These restrictions are sufficient for a developer to not be able to purchase and develop the site.
- Accordingly, alternative sites should be found in East Langdon that are available, suitable and deliverable. Appleton Farm is such a site.
- Appleton Farm represents a parcel of land that is in total approximately 18.5 hectares. It extends from Holland Hill to the north to White Hill to the South. Whilst this is an extensive area, the site has the potential to deliver a modest scale of development of circa 30-35 dwellings on approximately 3.5ha that would offer a suitable alternative to the identified site – See Appendix 02.
- The proposal represent a reasonable alternative to the identified site and in a location that is recognised as being sustainable. Indeed, East Langdon and Martin Mills offer one of the few locations in the District outside of the main urban areas offering a railway connection and therefore a greater scale of development could be considered.

C. Ringwould Nurseries, Ringwould

- Ringwould is identified as a Smaller Village and Hamlet within the Plan. It is noted that although there is a limited range of services and facilities available, it is served by a regular bus service and there is a Church within Ringwould. It has close connections to the services and facilities in Kingsdown. Ringwould is located on the A258, the main road connecting Dover and Deal. We support the recognition that in order to help sustain and strengthen the role of smaller villages and hamlets, additional housing is considered appropriate. There is one emerging allocation within Ringwould for 10 units (Land at Ringwould, Alpines, Dover Road).
- Ringwould is identified in Policy SP4 Residential Windfall Development as a settlement appropriate for minor residential development or infilling of a scale that is commensurate with that of the existing settlement.
- The Nursery site is located to the west of Ringwould, with a long frontage to the A258. It comprises approximately 9.2ha and is considered suitable to deliver a wide mix of uses, including residential, retail, care and affordable homes and/or potentially education. Appendix 03 demonstrates how a care/retirement facility could be delivered.

	<ul style="list-style-type: none"> • The mix of uses would help improve the services and facilities available to the existing community of Ringwould, as well as serve a wider catchment. The proposals would inherently improve the sustainability credentials of Ringwould as well as delving a mix of uses which are most in need, including care, affordable homes and potentially education. • Consideration should be given by the Council as to the opportunity the site presents - including working with the Council's own Housing department to deliver locally required housing needs in partnership with the Council itself. <p>Please see attached full representations including appedices</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Please see above and attached representations in full
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	Esquire Reps to Dover Reg 19 Nov 22 inc appendices.pdf
Local Plan Consultation Point	SAP46 - Land adjacent Langdon Court Bungalow, East Langdon (LAN003)
Rep ID	SDLP1226
Rep Status	Processed
Consultee ID	1332924
Consultee Full Name	Amy Aldridge
Consultee Company / Organisation	Gladman Developments Ltd
Agent Full Name	Amy Aldridge
Agent Company / Organisation	Gladman Developments Ltd
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP46
2 - Do you consider this part of the Plan sound?	Yes

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Gladman is promoting land adjacent Langdon Court Bungalow, The Street, East Langdon (LAN003) for residential development. The site is approximately 4.6 hectares in size currently in agricultural use and is situated to the north of The Street, on the northern edge of the village of East Langdon, Kent. Accompanying this representation is a Design Journal prepared by TaylorHare Architects which describes the emerging development proposals and provides a design rationale for the scheme. There has been detailed analysis undertaken in order to establish a considered set of design principles, upon which a site layout has been derived. (DDC Note - Text Extracted from Document sent from Gladman Developments Ltd. Full attachment can be found under the introduction comment reference SDLP1192)
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Gladman would advise that the wording of Policy SAP46 is altered from "Development proposals for the site shall include the following:" to "Development proposals for the site shall be supported when in broad accordance with the following:" to ensure that any necessary deviations following the outcome of detailed technical works can be supported in order to allow the site to come forward in conformity with Policy SAP46.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Gladman are actively promoting Land off the Street, East Langdon and would therefore request a seat at the table to have detailed discussions regarding the suitability of the sites allocation.
Include files	
Local Plan Consultation Point	SAP46 - Land adjacent Langdon Court Bungalow, East Langdon (LAN003)
Rep ID	SDLP1216
Rep Status	Processed
Consultee ID	1332924
Consultee Full Name	Amy Aldridge
Consultee Company / Organisation	Gladman Developments Ltd
Agent Full Name	Amy Aldridge
Agent Company / Organisation	Gladman Developments Ltd

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP46 - Land adjacent Langdon Court Bungalow, The Street, East Langdon (LAN003)
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Gladman fully support the inclusion of land adjacent Langdon Court Bungalow, The Street, East Langdon as a site for residential development with an indicative capacity of 40 dwellings in East Langdon. Policy SAP46 sets out a number of criteria for any future development proposals to be in accordance with, Gladman are supportive of criterions a, b, c, d, e, j, k, l, m, n, o. While Gladman are supportive of these policy requirements, a degree of flexibility should be added to ensure that any future proposals are informed by detailed technical works and supported by the policy requirements. Regarding the criterions relating to highways matters f, g, h and i Gladman would advise the Council to ensure that these requirements are agreed with Kent County Highways for consistency. Gladman would advise that the wording of Policy SAP46 is altered from "Development proposals for the site shall include the following:" to "Development proposals for the site shall be supported when in broad accordance with the following:" to ensure that any necessary deviations following the outcome of detailed technical works can be supported in order to allow the site to come forward in conformity with Policy SAP46. This allocation is further supported by a full site submission, including a design journal in section 5.</p> <p>(DDC Note - Text Extracted from Document sent from Gladman Developments Ltd. Full attachment can be found under the introduction comment reference SDLP1192)</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Gladman are actively promoting Land off the Street, East Langdon and would therefore request a seat at the table to have detailed discussions regarding the suitability of the sites allocation.
Include files	

SAP47 - Land adjacent to Lydden Court Farm, Lydden (LYD003)

Local Plan Consultation Point	SAP47 - Land adjacent to Lydden Court Farm, Lydden (LYD003)
Rep ID	SDLP150
Rep Status	Processed
Consultee ID	1331013
Consultee Full Name	Mr Jonathan Mount
Consultee Company / Organisation	Lydden Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 47 Land adjacent to Lydden Court Farm
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Lydden ~Parish Council does not consider the proposed development on the land adjacent to Lydden Court Farm to be sound for the following reasons: 1. There will be a massive issue with the drainage of waste from the development 2. There will be huge issues with the disruption to local residents during the building of the development 3. There is no suitable access by road apparent in the plan 4. There is no village shop or amenities to support future residents 5. There is likely to be substantial flooding during the winter months and the subsequent freezing of the water will lead to dangerous conditions
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The development should not go ahead. It is unnecessary and there is already a new development that is taking place within the curtilage of the village with no suitable access or amenities, this proposed development is both unnecessary and unsuitable for the area.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP47 - Land adjacent to Lydden Court Farm, Lydden (LYD003)
Rep ID	SDLP272
Rep Status	Processed
Consultee ID	1331383
Consultee Full Name	Mrs Katie Miller
Consultee Company / Organisation	Kent Downs AONB Unit
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP47
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The site lies adjacent to the Kent Downs, with the AONB boundary formed by Canterbury Road. The site is considered relatively well contained within the wider landscape with limited intervisibility between the AONB and the site, from where development would be viewed in conjunction with existing development associated with the village. The proposed requirements included in criterion c to help manage impacts on the AONB are supported.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	T

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP47 - Land adjacent to Lydden Court Farm, Lydden (LYD003)
Rep ID	SDLP714
Rep Status	Processed
Consultee ID	1267697
Consultee Full Name	Mrs Anna Cook
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP47
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SAP47 -S Land adjacent to Lydden Court Farm (LYD003) a) & b) Building on this site, even if restricted to the southern most part of the site will not prevent the impact i.e. smells/noise from the working farm c) No consideration of the impact on properties already bordering the site have been taken into account particularly if development is to be on the southern most part of the site e) f) l) Primary vehicular will impact on our quality of life i.e. noise and air quality. Egress from the site in only a southerly direction will result in all vehicles passing our property in both directions and the new road into the site will mean having roadways on 3 sides of our property. There is no mention of existing traffic using Church Lane and if and how this will be impacted.

	<p>Pedestrians will have no pathway to the eastbound bus stop as Lydden Garage forecourt is not a public right of way. At times of heavy rainfall Church Lane from site to Canterbury Road can be under water, affecting cycle and pedestrian access and vehicles causing a wash that could affect our fencing. This has occurred historically and on several occasions over the past 2 years.</p> <p>g) This I believe is incorrect as a crossing would be required to access the westbound bus stop.</p> <p>j) Partly referenced above. Surface water from all directions courses towards Lydden Pond and then down the current track behind our property to the proposed development site. If property is built on this site it will cause additional surface water into this location at its lowest point.</p> <p>In addition and in light of the use of mobile phones and data in 21st century, Lydden, particularly the proposed development area, has very limited/no mobile/data service by any provider.</p> <p>The hedgerow on Church Lane and where the access road is to be built is full of wildlife, including rabbit warren and deserves some consideration so as not to cause mass destruction.</p> <p>Consideration during construction, if it goes ahead will cause considerable dust, mud, noise and disruption, including the increased number of large vehicles/machinery and workers vehicles.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>I would not recommend this site for development.</p> <p>As in g) above</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP47 - Land adjacent to Lydden Court Farm, Lydden (LYD003)</p>
<p>Rep ID</p>	<p>SDLP597</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331788</p>
<p>Consultee Full Name</p>	<p>Dr Ceri Davies</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP47
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The policy is unsound for two main reasons:</p> <ol style="list-style-type: none"> 1. It does not adequately address the impact of said development on the setting of the Grade II* listed Church which is located adjacent to the site. As per the National Planning policy Framework (section 200). "Any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification". Neither have been provided for this proposed development. In addition as per section 201 of said Framework, the development does not achieve substantial public benefits that out weigh the harm. 2. It does not adequately address the impact of said development on the Area of Outstanding Natural Beauty (AONB). As per the National Planning policy Framework (Section 176). "Great weight should be given to conserving and enhancing landscape and scenic beauty in AONB". This has not happened in this proposal. In particular the "conservation and enhancement of wildlife and cultural heritage" has not been adequately taken into account.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	SAP47 should be rejected as a possible future site for development
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP47 - Land adjacent to Lydden Court Farm, Lydden (LYD003)
Rep ID	SDLP596
Rep Status	Processed
Consultee ID	1331785
Consultee Full Name	Dr KA Davies

	Katherine Davies
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP47
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The policy is unsound for two main reasons:</p> <ol style="list-style-type: none"> 1. It does not adequately address the impact of said development on the setting of the Grade II* listed Church which is located adjacent to the site. As per the National Planning policy Framework (section 200). "Any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification". Neither have been provided for this proposed development. In addition as per section 201 of said Framework, the development does not achieve substantial public benefits that out weigh the harm. 2. It does not adequately address the impact of said development on the Area of Outstanding Natural Beauty (AONB). As per the National Planning policy Framework (Section 176). "Great weight should be given to conserving and enhancing landscape and scenic beauty in AONB". This has not happened in this proposal. In particular the "conservation and enhancement of wildlife and cultural heritage" has not been adequately taken into account.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	SAP47 should be rejected as a possible future site for development
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

Local Plan Consultation Point	SAP47 - Land adjacent to Lydden Court Farm, Lydden (LYD003)
Rep ID	SDLP1021
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP47
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The County Council requests that the policy includes reference to improvements required to ER116 and ER115.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The County Council requests that the policy includes reference to improvements required to ER116 and ER115.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

Local Plan Consultation Point	SAP47 - Land adjacent to Lydden Court Farm, Lydden (LYD003)
Rep ID	SDLP1735
Rep Status	Processed
Consultee ID	1271717
Consultee Full Name	Quinn Estates
Consultee Company / Organisation	Quinn Estates Ltd
Agent Full Name	Nicholas Pellegram
Agent Company / Organisation	Iceni projects
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP47
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes

6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

REPRESENTATIONS TO THE DOVER DISTRICT LOCAL PLAN REGULATION 19 CONSULTATION IN RESPECT OF LAND ADJACENT TO LYDDEN COURT FARM, CHURCH LANE, LYDDEN

Iceni Projects, on behalf of Quinn Estates, welcomes the opportunity to submit further representations to the Dover District Local Plan (Regulation 19 Consultation) in respect of land to the north of Lydden Court Farm, Church Lane, Lydden (referred to in the Plan as as Policy SAP47). Quinn Estates ('Quinn') is the south east's foremost mixed use developer with numerous development interests within Dover District, Kent and the wider South East area. The company has delivered both successful community extension schemes and stand-alone development sites both within rural and urban locations within the District. Quinn Estates' track record of housing delivery should be a material consideration that should inform key planning decisions, including which sites to allocate for development. The company has delivered more commercial space than any other developer in Kent creating over 5,000 jobs and millions of pounds of investment in the Kent economy and in the past year obtained planning permission for circa 3,000 new dwellings. Furthermore, Quinn has demonstrated through its actions that it can formulate and deliver development solutions of high community value, always working hard to identify through community engagement how the company's developments can support and strengthen communities by delivering community infrastructure needed.

Quinn supports the proposed allocation of Land adjacent to Lydden Court Farm, and considers that it is a sustainable, deliverable and achievable site that would enable the delivery of a high-quality residential development that could support the steady growth of Lydden and bring an opportunity to deliver public improvements. The site is well-located, in a desirable location with good sustainability credentials for a settlement of its size. With Quinn overseeing the delivery of the scheme, it is also considered that it could unlock new benefits for the town, including public open space provision, which the plan recognises Lydden to be in need of. As will be evidenced in the following sections, Quinn considers that the issues of visual impacts, highways, ecology, flooding and drainage can be managed and appropriately addressed.

a. The Site

The site is approximately 2ha of relatively flat land, comprising one large open grassland field and a smaller field forming part of the residential curtilage of a residential dwelling ('Glebelands') which adjoins Church Lane. The site adjoins the settlement boundary of Lydden to the south and east and is located on the western side of the village. The site is bound by development on three sides. Lydden Court Farm, including the Farmhouse, outbuildings and open fields which front onto Church Lane lie to the north. Residential properties fronting onto Canterbury are to the east. In the south, the site is bound by further residential properties fronting onto Canterbury Road, whilst to the west are open agricultural fields. The site boundary includes a smaller area of open land fronting onto Church Lane

than is included in the draft allocation boundary. The adjoining residential dwelling known as Glebelands and its associated outbuildings further to the north of this are not proposed to be included as part of the allocation.

A Public Right of Way (PRoW) runs along the eastern boundary of the site and across the back of Lydden Court Farm towards the Church of St Mary further north. The site is within a Groundwater Source Protection Area (Zone 2) and the Dover & Folkestone Cliffs & Downs Biodiversity Opportunity Area, but is not subject to any statutory ecological designations. The Kent Downs AONB is located to the south of the site beyond the residential dwellings fronting onto Canterbury Road. There are no heritage assets on or adjoining the site and the site is not located in a Conservation Area. The closest heritage asset is the Grade II listed Lydden Court Farmhouse and the Church of St Mary (Grade II*) beyond this to the north of the site, however it appears that views of these assets from the site are reduced due to the farm outbuildings located between the Farmhouse and site. The site is wholly located in Flood Zone 1.

b. Support for SAP47, Dover District Local Plan

Quinn Estates is in support of the allocation of Land at land to the north of Lydden Court Farm, Church Lane (Policy SAP47). The land is located within Lydden, a small but sustainable settlement located in

the south of Dover. The village benefits from a number of valuable services which are uncommon for a settlement of its size, including a GP, Primary School and Public House. There are also a number of industrial/commercial sites within close walking distance, providing residents with a local source of work. For residents that work in other sectors, there is a regular bus service which provides quick access to the coastal town of Dover. The site Sustainability Appraisal submitted as part of the Regulation 19 Evidence Base indicates that the site scores well in regard to Services and Facilities, Employment Opportunities, Sustainable Transport Options and opportunity for Climate Change Mitigation. By virtue of these credentials, Quinn Estate therefore also supports the promotion of the settlement from Village (in the adopted Core Strategy 2010) to 'Larger Village' in the Draft Local Plan. The principal constraints for development relate to drainage, flooding, and access, in addition to impacts on nearby heritage and ecology assets. Given these considerations, the previous allocation of the site for 65 dwellings, at the 'Preferred Options' phase (Regulation 18), was considered undeliverable. It was also considered that this quantum would conflict with the existing settlement character, which currently comprises detached and semi-detached dwellings set within medium and large plots. The Regulation 19 Submission version of the Plan allocates the site for 30 dwellings, which Quinn considers to be deliverable in account of the sites constraints and more in keeping with the prevailing character and urban form of the village. It is also noted that this site allocation falls outside of the Nutrient Neutrality Catchment Area, and therefore would be able to make a meaningful contribution to Dover District's short term housing supply. A number of measures to address the issues mentioned are set out within Policy SAP47 of the Draft Plan, which ensures that an acceptable and sustainable scheme is delivered. These measures are discussed in further detail below. Though the capacity of the allocation has been reduced, it is considered that the approach taken to the allocation of the site is a result of sound plan making and would enable the delivery of a sustainable development whilst still making a meaningful contribution to Dover District's rural housing needs. The site is suitable, available now and achievable in accordance with NPPF Paragraph 68, and could come forward quickly to bolster the Council's short term supply. There are no obvious barriers to delivery, and, as will be shown below, the requirements listed in draft Policy SAP47 are considered to be deliverable and appropriate measures to ensure that negative impacts are not generated. In addition to this, Quinn Estates recognise the needs of the village, and consider that through the delivery of the scheme, they could also make a meaningful contribution towards addressing identified public infrastructure needs to support the new and existing residents.

c. Site Allocation Conditions

For the Draft Allocation SAP47, a number of conditions are listed within this Policy to ensure that a sustainable and appropriate scheme is secured. At this stage, Quinn consider that the conditions posed on the site do not threaten the deliverability, suitability or achievability of the site and that the proposed Policy is sound and in conformity with the NPPF. The revised development quantum can be accommodated with limited impact on the local area, particularly in terms of transport and heritage, as set out in more detail below.

Public infrastructure provision

Parish Council have identified that the settlement is in need of new play facilities for children. In terms of Policy SAP47, a requirement has therefore been set out within matter (o) to investigate the provision of equipped play facilities, either on site or off site. Although Draft Policy PM3 would not require this level of provision for a scheme of this size, Quinn Estates agree that this is something that should be explored and, although it may not be possible to secure such provision on site, is prepared to work with the Parish Council and District Council to secure this provision. It is envisaged that this objective is more achievable given the reduction in dwellings for the regulation 19 submission.

Heritage

As noted, there are multiple heritage assets within proximity to the site, including Lydden Court Farmhouse (Grade II listed) and the Church of St Mary (Grade II* listed) both to the north of the site. Views of and from the assets are limited due to the existing outbuildings ancillary to the Farmhouse that are located between the assets and the site. In addition, there is strong tree and hedge planting to the rear of these outbuildings and along the field boundaries to the north and north-east which will

limit views further. The following conditions are proposed in the Draft Allocation:

(b) Development should be restricted to the southernmost part of the site with a significant buffer zone and density significantly decreased, in order to reduce potential harm to the setting of the farmstead and Grade II* church;

(k) A Heritage Assessment for the site must be carried out in accordance with Policy HE1 the results of which should inform the layout and design of the development which is necessary to avoid harm to any heritage assets identified through the assessment;

Quinn Estates raises no objection to the suggested conditions and consider that this would be deliverable with any future proposals on the site. The proposed reduction in dwelling numbers for the site will help ensure that the future development would significantly limit any impacts on surrounding heritage assets, whilst being able to secure an effective use of land and public benefits. Whilst the site currently benefits from existing landscaping features, it is envisaged that additional landscaping is proposed to screen views of the site from the north and a sensitive design is proposed which will ensure the proposed development is in keeping with the character of the area. Overall, in regard to heritage impacts, the allocation is considered to be sound and would be comply with the Heritage Objectives set out within the NPPF.

Landscape

As the site is within the Kent Downs AONB, the draft allocation also states in matter (c) that appropriate measures are taken to avoid or minimise impacts on the setting of the Kent Downs AONB through the completion of a Landscape Visual Impact Assessment to determine the provision of an appropriate landscape buffer which will mitigate the impact of development on the AONB and wider countryside. The site is bordered by existing development to the south and east, as well as partly to the west and north. Therefore, the site is considered to be enveloped by the existing settlement, which significantly limits the impacts of any future development upon wider views from the surrounding countryside. Quinn considers that this proposed condition, coupled with the recommendations set out to limit heritage assets, will rule out any risk of significant landscape impacts. It is envisaged that the dwellings will benefit from planting and trees, providing a suitable buffer between the proposed development and existing dwellings and in particular, the listed buildings to the north. Overall, it is considered that the reduced scheme will provide an opportunity to deliver a high quality landscape setting which is suitable for the settlement.

Transport and Access

The site is encompassed by Church Lane in the west and Canterbury Road in the east. Apart from the small section of land to the east, the site is separated from these roads by single rows of buildings. Previous works conducted for Regulation 18 Local Plan consultation confirm that the existing junction function well and that the provision of 30-35 dwellings would not result in a detrimental impact on the local highway network.

In respect to Allocation SAP47, the following conditions are suggested to address transport and access matters:

(e) Primary vehicular, pedestrian and cycle access to the site shall be provided from Church Lane. Site access is to be designed to physically prevent access/egress to/from Church Lane to the north;

(f) Alterations are required at the two Canterbury Road junctions to manage vehicle movements;

(g) An uncontrolled pedestrian crossing where PROW ER116 joins Canterbury Road, is required to provide access to eastbound bus stop; and

(n) A Transport Assessment is required to be carried out in accordance with Policy TI3;

Quinn considers the above proposed conditions represent a sound approach to ensuring that the future development would be safe and suitable in regard to transport and access for the site, however, it is suggested that the wording of matter (e) altered so that the objectives can be delivered through a more realistic approach:

(e) Primary vehicular, pedestrian and cycle access to the site shall be provided from Church Lane. Site access is to be designed to discourage access/egress to/from Church Lane to the north;

Additionally, whilst Quinn supports the requirement for the access to be provided to/from the south of Church Lane, it is considered that to allow flexibility for the scheme, the wording of matter 'f' of draft Policy SAP47 should be changed to the following:

(f) "A suitable layout at the Canterbury Road / Church Lane junction will be secured to manage vehicle movements."

In addition, Quinn supports the requirement for the development of the site to include a connection to the PRow to provide routes to the bus stops and primary school. The village benefits from regular buses 7 days a week to Canterbury and Dover, so this provision would ensure that the new residents would be able to safely access sustainable transport options within the village. It is considered that the improvements to the junctions at Canterbury Road and pedestrian crossings are deliverable, and their exact location and nature would be subject to detailed work as part of any future planning application. Overall, it is considered that the transport impact of the new development could be mitigated, and even result in a betterment on the existing situation, whilst also providing significant benefits in terms of sustainable modes of transport in accordance with NPPF paragraph 104.

Ecology

The site is greenfield land, comprising grassland fields, bordered by hedgerows and trees. Previous technical studies confirm that the site is located within a Biodiversity Opportunity Area but is not subject to any ecological designations. In terms of habitats, previous works have also confirmed the site is a potential habitat of nesting birds which would need to be investigated further. In light of these considerations, a number of conditions have been attached to draft allocation in regard to Ecology:

(d) Consideration will be to be made regarding the quality and condition of trees and hedgerows within the site. Detailed proposals should aim to protect those of importance and incorporate them in the overall design of the development and to provide opportunities for biodiversity habitat creation and enhancement and support integrity of the BOA;

(h) In accordance with Policy SP13, a wintering bird survey must be undertaken in advance of a planning application on the site. If the bird survey identifies that the development will exceed the threshold of significance, mitigation will be required. A suitable scheme of mitigation will need to be submitted with the planning application for the site;

(i) In accordance with Policy SP13, an Environment Assessment study will be required for any development to address any potential impact on the Lydden & Temple Ewell Downs SAC;

Quinn considers that the proposed mitigation measures suggested are appropriate for the scheme and would ensure that the development would not result in the loss of any important ecological features.

As noted, the site benefits from a range of ecological features that would be able to be retained with any future development, which would contribute towards the objectives of the Biodiversity Opportunity Area. The development could also be timed appropriately to ensure that the development of the site does not result in any negative or harmful impacts on wintering birds. In addition to retaining as much ecological features on site as possible, Quinn would also seek to achieve Biodiversity Net Gain on site, resulting in an overall betterment to what presently exists. This could be achieved through a number of methods, such as native tree planting, bat roosting and more diverse nesting habitats for birds. The development of the site is considered to be suitable in regard to Ecology matters and the measures imposed are a result of sound plan making and would accord with Paragraph 174 of the NPPF.

Flooding and Drainage

The site is located within Flood zone 1, however, has been identified to contain land with a 1 in 30 year risk of surface water flooding. Therefore, it was considered in the Regulation 18 phase that this should be addressed by a carefully informed layout designed to address the potential threat of surface water flooding. A key change made between the Regulation 18 and Regulation 19 versions of the Local Plan was to lower the overall quantum of the site from 65 to 30. It is considered that this is a significant step down in the number of homes that would be delivered, and would create scope to position the dwellings away from the areas at highest risk of flooding. The following conditions are proposed in SAP47:

(j) A site specific Flood Risk Assessment must be carried out in accordance with Policy CC5 to address the issue of surface water flooding. This should inform the Sequential Approach which

	<p>should be applied to the layout of the site by locating the most vulnerable elements in the lowest risk areas;</p> <p>(m) Layout is planned to ensure future access to existing wastewater infrastructure for maintenance and upsizing purposes</p> <p>Overall, Quinn Estates support the approach taken to the site in respect to the mitigation of flood impacts, and consider that through the implementation of the measures suggested, a safe and suitable scheme could be delivered on the site.</p> <p>d. Conclusion</p> <p>Quinn Estates wishes to support Dover in bringing forward a successful, effective and sound Local Plan that can serve the District across the Plan period. With respect to the proposed Housing Allocations, Quinn Estates consider that the allocation of Land Adjacent to Lydden Court Farm, Church Lane, Lydden is a good opportunity to provide for the Districts future rural housing needs, and consider that the proposed conditions would ensure that the scheme delivered is sustainable and compliant with National Planning Objectives. The site will create a number of local benefits:</p> <ul style="list-style-type: none"> • Promoting the appropriate expansion of rural communities in the most suitable and sustainable locations, whilst ensuring that the town's existing character, heritage assets and surrounding landscape are preserved; • Creating the opportunity to address locally identified public infrastructure needs; • Protecting existing habitats and ensuring Biodiversity Net Gain within an identified Biodiversity Opportunity Area; • Improving the quality of local transport networks to create to a safer environment for both motorists and pedestrians; and • Delivering a high quality scheme which would be seen as an asset to the town and community. <p>Quinn would welcome the opportunity to participate in the forthcoming Examination-in-Public into the Plan and contribute to the debate to ensure that the best strategy for the District is found.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	Quinn Estates is a prominent developer with multiple land interests in the district, and will play a vital role in realising the development objectives and vision of the plan.
<p>Include files</p>	<p>Pellegram Icenii (Quinn Church Lane) 1134 Att1_Redacted.pdf</p>

Local Plan Consultation Point	Preston
Rep ID	SDLP1460
Rep Status	Processed
Consultee ID	1333277
Consultee Full Name	Mr George Jenkins
Consultee Company / Organisation	
Agent Full Name	Grace Martin
Agent Company / Organisation	Hume Planning Consultancy Ltd
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Omission Site in Preston (TC4S099)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Representation submitted by Hume Planning. Full Representation attached to SDLP1460. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1460.)</p> <p>Re: Regulation 19 Consultation on the Draft Dover District Local Plan to 2040 Site: Land to the East of The Street, Preston Dear Ms Taylor, We write to you on behalf of our client, Mr George Jenkins, to Dover District Council's Regulation 19 Submission Local Plan consultation. Hume Planning Consultancy are providing a written representation to the emerging Plan's housing strategy, with reference to our client's interest in the above site, pursuant to its positive rating in the latest version of the Housing and Economic Land Availability Assessment (HELAA) which has been published by Dover DC. The location and extent of the site is identified on the enclosed site plan (outlined in red). The site is in single ownership, and this will also help to simplify accelerated delivery of the development opportunity. This acceleration of delivery will also be assisted by the size of the site which, as well as providing housing choice to meet the need identified in a desirable location, will be attractive to smaller housebuilders, which is supported by national guidance and local plan policy. These representations focus on the site and the reasons the land can be justified for development because of its locational advantages, the fact that it is unconstrained and thirdly</p>

its single ownership and ability to make a short-term impact in meeting the development requirements of the district. For these reasons, together with the Council's positive assessment of the land in the HELAA, it is asserted that the land should be allocated within the emerging Dover Local Plan.

Spatial Strategy

(DDC Note - below section DUPLICATED against SP3 and SP4)

Whilst we welcome DDC's commitment to meeting its housing need, with Strategic Policy SP3 seeking to provide at least 10,998 net additional homes over the Plan period, it is considered smaller size additional sites, if suitable and available, should be additionally included within the Plan (especially where high scoring in the HELAA such as this site).

This is because a large proportion of the plan's growth is again being directed towards Dover, with further units at Whitfield (over 2,000 dwellings), and also Aylesham. With large strategic sites delivery rates can easily slow down during the plan period and under-deliver. This has been evidenced by the track record of slow delivery rates at earlier phases of planned development at Whitfield upon which previous approved development plans were very heavily reliant; a factor that explains the very high contribution of windfall opportunities to housing land supply over the last 15 years. Whilst it is acknowledged that there is a planned buffer within the emerging Local Plan, it is considered appropriate not to use this as a limit, and allocate other suitable sites in sustainable locations such as Preston where available.

Whilst it is acknowledged that emerging SP4 'Residential Windfall Development' allows for residential development or infilling of a scale that is commensurate with that of the existing settlement will be permitted within or immediately adjoining the settlement boundaries of Preston, subject to all of the listed criteria being met, it is considered preferable, in order to allow more certainty for small housebuilders (for the site-specific reasons outlined below and the positive HEELA scoring compared with other land opportunities), that the site is individually allocated. We believe will provide more certainty and accelerate housing delivery.

HELAA Rating

(Below section DUPLICATED against Appendix A -Evidence base)

The site was submitted to the Council during the 'targeted' call for sites process in March 2021, which sought additional small & medium housing sites between 0.25 and 1 hectare in size, but had not been promoted prior to this.

The published HELAA assesses the site as follows (please refer to reference: TC4S099):

Estimated housing number: 19 dwellings

Potentially Suitable

Summary of Suitability Assessment:

- Site would form a logical extension to the settlement area
- Access is achievable
- Pedestrian safeguarding issues
- Site is contained with good screening
- Archaeological assessment required
- Heritage assessment required

Available

Achievable

Medium Delivery

Despite this positive HELAA rating, the site has not been carried forward as a housing allocation for Preston.

Site Background

The site presents an opportunity for residential development that would provide a contribution towards the housing objectives of the Council and meeting the future needs of the district in

a sustainable way.

Our client is the landowner of the above site which falls under single title ownership (Land Registry Title Number K666656), which would facilitate early delivery and it is unconstrained by policy or technical designations.

The site extends to 0.62 hectares and comprises a rectangular field which is used as a horse paddock and contains a small stabling building, which is accessed off the eastern side of The Street – the main road through the village of Preston. The site is located towards the southern end of the village, 300m from the centre, and adjoins the defined settlement boundary on two sides. In the adopted Core Strategy, Policy CP1 designates Preston as a village which is suitable for a scale of development that would reinforce its role as a provider of services to essentially its home community. Moreover, the emerging Local Plan categorises Preston as a 'Larger Village'. Preston has a number of services including a village shop, Preston Primary School, a The Half Moon & Seven Stars pub, Preston Garden Centre and bus stops (No 11 service to Westwood and Canterbury). On this basis, it common ground that Preston and the subject site are regarded as a sustainable location for development.

The perimeter of the site is lined with brambles, shrubs and dispersed trees which provides some visual enclosure, and the topography of the site is relatively flat. The site adjoins horse paddocks and stabling to the east and north related to Shotfield Equestrian Centre. To the south and west, the site adjoins the rear gardens of predominately two storey properties fronting The Street and Longmete Road. As a result of its location and being nestled within

existing development, it is considered that development at the site would form a logical extension to the village – which is also reflected in the HELAA assessment.

From a review of heritage and aerial mapping, the site appears to have formed part of a wider agricultural landholding in Preston before being used for woodland or orchard planting in the 1930's and 40's, during which time development extended towards the southern edge of the village. The site lies beyond the conservation area and is well separated from the nearby Grade II listed buildings Mossey's Farm Shop and Parsonage Farm which are located on the western side of The Street and are well screened from the site due to intervening vegetation and built form.

A summary of the site's characteristics is set out as follows:

- The site has an area of c.0.62 hectares and constitutes an underutilised parcel of land used as horse paddock
- The site adjoins the settlement boundary of Preston on two sides
- The site benefits from an existing access from The Street
- A Public Rights of Way (EE144A) adjoins the north-eastern corner of the site which provides links to The Forstal, Longmete Road, Preston Primary School and other services at the centre of the village
- The site falls outside of any landscape or ecological designations
- The site lies outside the conservation area and there are no heritage constraints affecting the development potential of the site
- The site is within Flood Zone 1, an area of low flood risk, and there is a small area in the south-eastern corner at risk of localised surface water flooding
- There is no planning history directly relevant to the site

Taking account of the HELAA assessment and these characteristics, it is estimated that the site could accommodate approximately 15-19 dwellings. If allocated, detailed layout proposals and technical work would ensure that suitable access is provided along with a quality designed housing development that would have a positive impact on the character of Preston and surrounding residential properties, through the use of landscape buffers and sensitive design.

Other Sites in Preston

(DDC Note: Below section DUPLICATE against SAP48)

The HELAA identifies a total of 19 sites within Preston, including this site (ref. TC45099) which is rated as being potentially suitable. Of the remaining 18 sites, the Council have rated 15 of them as being unsuitable for development for a range of reasons mostly relating to unacceptable landscape, heritage or transport impacts.

Three sites have been rated as being suitable (ref's PRE003, PRE016 and PRE017), which are adjoining land parcels and have been put forward as a combined single allocation for 65 dwellings in the emerging local plan (draft policy SAP48). This site is located at the northern edge of the village and adjoins the new residential development site at Red Pippin Lane. Given the size of the allocation and the separate land ownerships, we anticipate the delivery of the site could be delayed, therefore allocating an additional smaller and unconstrained site, such as this, at the opposing end of the village would accelerate the sustainable delivery of homes in Preston in the short-term.

Anticipated Timescales for Delivery

Spring/Summer 2023: Pre-Application Submission

Early 2024: Application Submission

Autumn 2024: Permission Received & Commencement of Development

Autumn 2025: Completion & Occupation of Development

There have been regular approaches from developers and housebuilders to acquire the site, and interest remains high given its attractive village location and its unconstrained nature.

In summary, there are no known impediments to the development of the site and the location represents a logical extension to the village of Preston which would deliver up to 19 dwellings.

There are no restrictive covenants or ransom strips as demonstrated by the Title Register. There are no technical constraints that would affect delivery. Pedestrian permeability considerations, as noted in the HELAA, can be addressed through the design process following the site allocation and it is noted that any future application would be accompanied by an archaeological assessment report. As such, for the purpose of supporting future housing delivery and the plan creating certainty to guide development for housebuilders and landowners and consistent with the LPA's proposed housing objectives over the plan period up to 2040, it is requested that this site, which is suitable, available and achievable, is allocated as a housing site.

Hume Planning Consultancy welcome the opportunity to comment on this stage of the Council's emerging Local Plan 2040 and would be happy to discuss the attributes of the site and its allocation in further detail, should it be of assistance.

(DDC Note: The below figures are available in the attachment in addition to site photographs.)

Figure 1: Aerial image of the appraisal site (outlined in red)

Figure 2: Extract from adopted Planning Policy Map (blue star: appraisal site, red line: settlement boundary, purple dashed line: scheduled monument) (Source: DDC Planning Policy Map)

Figure 3: Extract from historic map of Preston dated 1929-1952 (Source: KCC Heritage Maps)

Figure 4: Aerial image of Preston from 1946 (Source: KCC Heritage Maps)

Figure 5: Surrounding PROW Network (Source: KCC PROW Map)

Figure 6: Proposed allocation at Apple Tree Farm under draft policy SAP48 (Source: DDC Emerging Policy Map)

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

[Martin Hume Planning \(East of the Street\) 1513 Att2_Redacted.pdf](#)
[Martin Hume Planning \(East of the Street\) 1513 Att1.pdf](#)

SAP48 - Apple Tree Farm and north west of Apple Tree Farm, Preston (PRE003/PRE016/PRE017)

Local Plan Consultation Point	SAP48 - Apple Tree Farm and north west of Apple Tree Farm, Preston (PRE003/PRE016/PRE017)
Rep ID	SDLP238
Rep Status	Processed
Consultee ID	1259055
Consultee Full Name	Mr Mark Squillaci
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP48
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>These plots are currently owned by 3 different landowners and are now being brought together by one developer, along with the original landowner of 2 of the plots, to create another large development within a village setting that cannot support this further growth. Whilst I do agree the area requires some affordable housing there is not the need or the structure in place to support the level of housing that this now single development would provide. The local facilities are limited with only a pub, garden centre, a butchers and local shop along with a single primary school, which is already oversubscribed. Couple this with the poor road network, lack of safe pedestrian routes throughout the village and now non-existent bus route, expect for the use of school children twice per day, Preston Village cannot support this level of housing in a rural location.</p> <p>I see no mention of infrastructure improvements in this area included in this Local Plan so imagine it will again be left down to broken promises through the S106 process, should these sites be included in the Plan any infrastructure requirements, driven by local needs, should be completed prior to any development.</p> <p>PRE016 The statement "the western field of the site is predominately brownfield with light industrial units", is untrue, there are no "industrial units" on this site, there is only redundant commercial materials that have been dumped there, without a change of use to the land by the current owner. This site was offered to DDC during the development of "Preston Grange" to build some affordable houses, which were not included in the "Preston Grange" development, due to alleged financial constraints to relocate the transport yard driving the need to build "Preston Grange". The affordable housing will now be grouped together rather than spreading this within the previous development. It is noted that the proposal now by the developer is for around 35 Dwellings, to include both market and affordable housing, I believe this will lead to overcrowding in this plot, the market housing is not required and is only being proposed for "Economic gain" rather than the needs of locals. My understanding is that there is a need for around 19 Affordable houses to meet the local needs. As per Southern Waters submission to the Section 18 "there is limited capacity in the area for further development", in fact there have already been many instances of over capacity on the wastewater in this area, this development is only going to increase this risk. The site I note also</p>

	<p>borders a flood plain and is regularly flooded during heavy rain. The access to this site is currently through a Private Road which leads out onto a small country lane not suitable for increased traffic.</p> <p>PRE017</p> <p>This plot is Arable Grade 1 agricultural land and as such should be kept for future food needs of the local and wider communities. As is evident from recent troubles the UK relies on food imports to much whilst building unneeded housing on farming land, purely for economic gain of the few.</p> <p>This plot was also "gifted" to the Parish in compensation for the building of Preston Grange. However it is now apparent there were many strings attached that prohibited the Parish for using this land for any meaningful purpose, other than now selling the land back, to the same developer/owner in return for a promise of building an unneeded village hall, which incidentally was the same promise made during the building of Preston Grange and never delivered. Its interesting to note how this piece of land was added to the local plan, not by the current owners, almost as if it were part of an original plan to develop Preston Grange further.</p> <p>As per PRE016 there is insufficient capacity for this development on the already overloaded wastewater system and would further add to this risk, along with the increase run off caused by over developing this area and extra traffic again this development is unneeded for local requirements and therefore is just for economic gain.</p> <p>PRE003</p> <p>As this is a relatively small site I would suggest it would have sufficient space alone to meet the local affordable housing needs, also as it is already adjacent to a main road through the area would not have any significant impact on others for traffic flow. The fact that it is being used already for a few dwellings and a caravan park would mean the impact to the wastewater system would be lessened with the inclusion of a few houses.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Only PRE003 should be included into the Local Plan in order to meet the Affordable housig needs identified for locals, all other housing is not required and will only impact further on the local infrastructure that is already poor.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP48 - Apple Tree Farm and north west of Apple Tree Farm, Preston (PRE003/PRE016/PRE017)</p>
<p>Rep ID</p>	<p>SDLP1022</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331999</p>
<p>Consultee Full Name</p>	<p>Claire Pamberi</p>
<p>Consultee Company / Organisation</p>	<p>Kent County Council</p>
<p>Agent Full Name</p>	

Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP48
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The County Council requests that the policy includes reference to the improvements required to Footpath EE480.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The County Council requests that the policy includes reference to the improvements required to Footpath EE480.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP48 - Apple Tree Farm and north west of Apple Tree Farm, Preston (PRE003/PRE016/PRE017)
Rep ID	SDLP1249
Rep Status	Processed
Consultee ID	1252303
Consultee Full Name	Mr Nigel Brown
Consultee Company / Organisation	Red House Design

Agent Full Name	Mr Nigel Brown
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP48
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>RE: Development Allocation, Land at Apple Tree Farm, Stourmouth Road, Preston.</p> <p>Further to your enquiry I can confirm have discussed the site with my client and we can confirm the following: My clients site forms one part of three tranches of land, and forming the plot adjacent to Stourmouth Road, currently allocated for residential development within the proposed new local plan. We understand the councils preference is for these three parcels of land to be jointly developed where possible.</p> <p>My client has been in discussions with Preston and Elmstone Parish Council (owner of the largest tranche of associated land) and with their preferred developer and progress is being made with regard to achieving an agreement for development of the land. My client has, in addition to Red House Design, instructed solicitors, accountants and land agents to assist with the agreement of terms, which we expect to be concluded prior to adoption of the new local plan.</p> <p>We understand it is the intention of both the Parish Council and their preferred developer to be able to achieve development of this land within the 5 year (2023-2028) time period.</p> <p>Should for any reason the above not come to fruition it is my clients intention to submit a planning application for consideration and, pending approval, arrange sale of the land for development which we would again expect to be realised within the same 5 year period stated above</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

Local Plan Consultation Point	SAP48 - Apple Tree Farm and north west of Apple Tree Farm, Preston (PRE003/PRE016/PRE017)
Rep ID	SDLP1294
Rep Status	Processed
Consultee ID	1271717
Consultee Full Name	Quinn Estates
Consultee Company / Organisation	Quinn Estates Ltd
Agent Full Name	Lydia Frimley
Agent Company / Organisation	Iceni Projects
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP48 (Land to the North of Discovery Drive, Preston)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - This Representation has been made by Iceni Projects on Behalf of Quinn Estates in relation to a Specific Site. Sections relating to strategic / DM Policies will be duplicated to the relevant locations within the Plan.)</p> <p>REPRESENTATIONS TO THE DOVER DISTRICT LOCAL PLAN REGULATION 19 CONSULTATION IN RESPECT OF LAND NORTH OF DISCOVERY DRIVE, PRESTON, DOVER</p> <p>On behalf of our client, Quinn Estates Ltd, we hereby provide our representations in relation to the Proposed Submission Version (Regulation 19) of the Draft Dover Local Plan to 2040 in respect of land to the north of Discovery Drive, Preston, Dover (hereafter referred to as 'the Site'). A Site location plan showing the extent of the Site is contained at Appendix 1 of this representation.</p> <p>Quinn Estates supports the Site as a housing allocation within the new Local Plan to contribute towards meeting Dover District's housing needs over the Local Plan period to 2040. Quinn supports the amendment from the Reg 18 Plan that now links the sites together to create a cohesive development. However, Quinn would recommend that the Site is allocated for 75+ homes instead of the stated indicative capacity of 65 homes.</p> <p>a. The Site and Surrounding Area</p> <p>The site is formed by four parcels that are all linked together, with Quinn Estates being in control of three of the landholdings and Dover District Council in control of the fourth.</p> <p>The site is located north of the Preston settlement boundary and is formed of several parcels of relatively flat fields, which accommodate a mix of brownfield with light industrial units, arable land and a holiday caravan park. The site is bounded by a mixture of mature trees and hedgerows to the east and north that provide containment to the central and eastern fields. The western field has an area of open space which is exposed on its western boundary to the larger field beyond. Located to the south of the Site is a new residential development, consisting of two storey developments. The site is bound</p>

by open fields to the north and east and west.

The site does not contain any Public Right of Ways (PRoWs). Existing access to the site is from a private road via Grove Road to the south of the site. The closest train station is located at Sturry, approximately 10km to the south-west of the site, whilst Minster train station is located c.10km to the north-east of the site. Both stations run on the southeastern line, offering direct trains to London Victoria and Ramsgate. The closest bus stop is approximately 0.5km from the site on Stourmouth Road and includes direct services to Canterbury and Westwood.

The site is wholly within Flood Zone 1, however an area of Flood Zone 3 is c.150m to the west which forms the floodplain of the Little Stour. The site is not subject to any designations in the emerging Proposals Map, however to the north and west of the site is a River Terrace Deposits designation under Kent County Council's Minerals and Waste Local Plan (KCC). The site is not subject to any ecological designations. Furthermore, there are no heritage assets on or adjoining the site.

2

b. Supporting allocation of the site within the Draft Dover District Local Plan

Within the draft Local Plan, the Site is allocated under SAP48 for approximately 65 homes. Quinn Estates considers that the approach taken to the delivery of housing at Preston as set out within Regulation 19 Submission Version of the Draft Local Plan is generally sound. However, it is considered that the Site's indicative capacity should be increased to at least 75 homes, as through a holistic development of the landholding, this quantum and density of development is considered to be wholly suitable, deliverable and entirely consistent with the density and character of the site surroundings. The site represents an opportunity to deliver a significant proportion of affordable housing which could make a meaningful contribution to local housing needs and can be developed in the short term. In planning terms, it is desirable and sound to optimise the capacity of sites such as this to make the most of brownfield land and to reduce greenfield landtake.

Housing Need and Supply

Strategic Policy 3 (Housing Growth) states that Dover will make provision for at least 10,998 homes (611 dpa) in the District over the Plan period, up to 2040. This target will be met through a mix of committed schemes, site allocations and suitable windfall proposals, however not all these commitments will be delivered and arguably a higher quantum with a larger buffer should be planned for to negate those sites that will not be developed in the plan period.

Of all the new homes positively allocated in the Plan, 76.7% are on greenfield sites and just 23.3% are on brownfield sites. The low ratio of brownfield housing compared to greenfield reinforces the need to optimise the development of suitable brownfield sites such as the subject land. This is considered to be a valid consideration in relation to this representation's request for increased capacity on the site.

The focus of the NPPF is to achieve sustainable development (Paragraph 8) and the Council should seek to encourage housing growth in the most sustainable locations, especially when they can ensure the achievement of societal improvements, economic benefits and positive environmental outcomes. The Site is well located with various other residential developments nearby, providing the opportunity for further social and economic growth in a settlement that would benefit from housing. In this regard, the site is the only land allocation at Preston, which is designated as a larger village in the settlement hierarchy, where a commensurate level of growth should be delivered, in accordance with Strategic Policies SP3 and SP4.

The requirements of the draft Local Plan must be deliverable and achievable whilst meeting the local need in order for the plan to be effective for the district. It is considered that, in its current form, the plan strategy is over reliant on the Whitfield (SAP1) Strategic Allocation to provide the district's housing needs over the plan period and that optimising the capacity of allocated sites elsewhere within the District will help to reduce the District's reliance on Whitfield whilst assisting the Council in exceeding the minimum housing number.

Affordable Housing

Dover District has an increasingly growing population and changing demographic, making it a key priority of the Government to deliver more homes, including more affordable homes. To enforce this policy SP5 (affordable housing) of the draft Local Plan explains that for this site, at least 30% of the housing provided should be affordable housing.

A scheme that optimises the capacity of the site will also optimise the number of affordable homes that can be delivered at this site, helping to ensure that sufficient affordable housing is delivered at Preston. Raising the development capacity of the site to at least 75 home will increase the affordable housing delivery to a minimum of 23 affordable homes.

Draft allocation: SAP48 - Apple Tree Farm and north west of Apple Tree Farm, Stourmouth Road, Preston (PRE003 PRE016 and PRE017)
Under Policy SAP 48 in the draft Local Plan, the Site is allocated for an indicative housing capacity of 65 homes, that will be provided across four land parcels, all connected.

	<p>Quinn Estates support all the design and landscape criteria included in the policy. Quinn Estates are particularly supportive of criterion d), which details that primary vehicular, pedestrian and cycle access to the whole of the site shall be provided from Stourmouth Road, with access provided to each site boundary. This criterion is considered necessary, given the land is in multiple ownership and it reduces any perceived ambiguity regarding the need for a holistic development where the sum of the parts adds up to a high quality, unified development site.</p> <p>Supporting Paragraph 4.283 of the draft Local Plan explains that although the site is made up of separate parcels it should all be designed and implemented as one contiguous scheme, where possible. Quinn Estates aims to bring forward all four parcels themselves through a single development and this will ensure the cohesiveness of the development.</p> <p>Through unifying the land parcels together in a single Masterplan layout, Quinn Estates is confident it can effectively and suitably deliver a high quality development of a minimum of 75 homes across the Site.</p> <p>c. Conclusion</p> <p>On behalf of Quinn Estates, we thank you for the opportunity to input into the Dover District Local Plan Regulation 19 Consultation. Quinn Estates wishes to support Dover in adopting a sound Local Plan that can serve the District across the Plan period. In respect of the subject land, Quinn supports the amendment from the Reg 18 Plan that now links the sites together to create a cohesive development. In its current form, it is considered that the Site is suitable but can be made more effective by increasing the number of dwellings proposed to around 75. It is considered this will strengthen the soundness and sustainability of the Plan by optimising the capacity of the site, maximising affordable housing delivery and boosting the viability and vitality of shops, service and infrastructure at Preston.</p> <p>I trust that these comments are of assistance and that these representations will be taken into account in consideration. Quinn would welcome the opportunity to participate in the forthcoming Examination-in-Public into the Plan and contribute to the debate to ensure that the best strategy for the District is found.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	Quinn Estates is a developer with significant land interests in the District, who has an important role in delivering the Plan strategy
<p>Include files</p>	Frimley Icenii (Quinn Preston) 1256 Att2_Redacted.pdf
<p>Local Plan Consultation Point</p>	SAP48 - Apple Tree Farm and north west of Apple Tree Farm, Preston (PRE003/PRE016/PRE017)
<p>Rep ID</p>	SDLP1466
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1333277
<p>Consultee Full Name</p>	Mr George Jenkins
<p>Consultee Company / Organisation</p>	

Agent Full Name	Grace Martin
Agent Company / Organisation	Hume Planning Consultancy Ltd
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP48
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Representation submitted by Hume Planning. Full Representation attached to SDLP1460. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1460.) The HELAA identifies a total of 19 sites within Preston, including this site (ref. TC45099) which is rated as being potentially suitable. Of the remaining 18 sites, the Council have rated 15 of them as being unsuitable for development for a range of reasons mostly relating to unacceptable landscape, heritage or transport impacts. Three sites have been rated as being suitable (ref's PRE003, PRE016 and PRE017), which are adjoining land parcels and have been put forward as a combined single allocation for 65 dwellings in the emerging local plan (draft policy SAP48). This site is located at the northern edge of the village and adjoins the new residential development site at Red Pippin Lane. Given the size of the allocation and the separate land ownerships, we anticipate the delivery of the site could be delayed, therefore allocating an additional smaller and unconstrained site, such as this, at the opposing end of the village would accelerate the sustainable delivery of homes in Preston in the short-term.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP48 - Apple Tree Farm and north west of Apple Tree Farm, Preston (PRE003/PRE016/PRE017)
Rep ID	SDLP1747
Rep Status	Processed
Consultee ID	1273342
Consultee Full Name	Brian Short
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP48
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	We agree in general with the requirements listed under this area before planning permission, however all surveys or assessments must be thoroughly and independently verified. Each of the three areas should be considered on their own merits, PRE017 is very different to the other areas in that it is currently an active greenfield site. PRE016 was to be returned to country side on completion of the Preston Grange site by DWH (David Wilson Homes) as part of their planning permission, instead some deal was done to leave the hard standing, subsequently it became used as an unsightly scrapyard. 100's of tons of hardcore or building waste has now been dumped at the low-lying end of the land which could affect storm drainage or stability of the land. PRE017 is teeming with wildlife especially birdlife and the large mature hedge between PRE017 and PRE016 is a key factor in this respect. The November rain this year caused issues again, adversely affecting residents of the Grange at the West side of the development, Red Pippin Lane was like a river and Grove Road was also affected, the absorbency of PRE016 and PRE017 does a lot to mitigate this and prevent matters getting worse. We support the Flood Risk Assessment proposed but are concerned that the situation we observed last November could be overlooked. Issues with sewage capacity keep occurring and seem to affect many areas in this location. Surveys and action seem to promised with no sign of a significant improvements. Traffic through Preston is quite a problem, speeding and recklessness. The ridiculous number of housing developments in this part of Kent is having an impact on traffic generally and as more people arrive in North Kent, more discover the route through Preston as a means of getting south avoiding problems like congestion is Canterbury, this applies to delivery drivers as well. The road through Preston from Plucks Gutter to Wingham is not suitable now and certainly not for any increase. Preston Grange has over two cars per household and the need to travel for the basics is there, as with all rural towns, a further increase from even more residents is of concern. Preston has very little infrastructure. Recently the bus service through Preston has been reduced to an inadequate level which makes having your own transport a necessity. We are concerned at the number of greenfield sites being developed in this area of Kent and do not agree with those who try to claim there is a shortage especially as there are already other more advanced proposals in the pipeline.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP48 - Apple Tree Farm and north west of Apple Tree Farm, Preston (PRE003/PRE016/PRE017)
Rep ID	SDLP1827
Rep Status	Processed
Consultee ID	1267837
Consultee Full Name	Dr Martin Ferber
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP48
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>"Soundness and duty to co-operate": The plan regarding Preston and Elmstone Parish fails on grounds that it has not been "positively prepared nor effective", for the following reasons. The Local Plan Regulation 19 submission whilst showing a reduction in indicative housing for site policy numbers SAP 48 PRE003/PRE016/PRE017 from 122 to 65 homes, which is welcome (although I understand challenged by the PPC as 77), fails to take account of several important strategic implications. Namely, the NO DEVELOPMENT in the prior Local Plan, the need for a small number of affordable homes as identified in the Village Design Statement 2008, which through windfall has now delivered 112 new homes since 2011 with more in the pipeline. Of these 82 are associated with the Salvatori redevelopment and the remainder, barn conversions, infill or garden new builds. The proposals in the pipeline that have received planning but not yet completed and a recent likely submission for 10 new homes at the Preston Nursery (Torren) will mean that the housing projection since 2011 together with this Local Plan will increase the residential housing in Preston by some 200 homes (~70%). The village parish is on the outer edges of Dover District close to borders with Canterbury and Thanet. It is accessed by inadequate local country roads already under severe pressure from local, commuter delivery and commercial farm traffic (Preston Hill and the junction of The Street with Mill Lane being of particular concern). A recent planning approval for the rebuilding of a new Village Hall on Mill Lane close to the primary school and village shop, has not taken account of this unfolding housing growth. The "six-acre" site was given to the village as a Section 106 agreement with Salvatori / Quinn to act as a buffer to future development, specifically for village use but has become part of the call for local sites (PRE 117). It could be better as a site for a new village hall making a strategic contribution to the growing village. I urge DDC to reconsider its plans and carry out a careful "strategic rural use" study, taking account, amongst other input, of plans in Thanet and Canterbury that impinge on the highways and infrastructure of Preston parish, the growth plans and the protection of the environment, the place and the community and its integral whole. Such a study by experts with no vested interest would undoubtedly lead to a better outcome for sustainable growth of the community into 2040 and potentially beyond. Furthermore, a balanced study with clear objectives rather than a piecemeal approach, as has been the case to date, would engender greater community involvement and buy-in.</p> <p>END</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Not Applicable</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	

Local Plan Consultation Point	Worth
Rep ID	SDLP435
Rep Status	Processed
Consultee ID	1262342
Consultee Full Name	Ms Deverill Sally Deverill
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 49
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The Worth Neighbourhood Plan (not due for renewal until 2026) had already planned for new housing. The housing built in the village already exceeds the number on the plan, due to the developer pulling a fast one over DDC .
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Adhere to the Worth Neighbourhood Plan until 2026
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Worth
Rep ID	SDLP815
Rep Status	Processed
Consultee ID	1331882
Consultee Full Name	Dr. Nagy Rafla
Consultee Company / Organisation	
Agent Full Name	Nigel Crawford
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	3 Strategic Policies SP3 – Housing Growth and SP4 and Residential Windfall Development Site_Origin HELAA, HELAA Reference WOR005, Origin_Ref HELAA213, Page 21.
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The Dover Local Plan is unsound and illegal (see attached rep).</p> <p>The decision to drop this site from the local plan was unsound and was not legal, it was not given due diligence and consideration, in spite of many attempts by the applicant, to communicate with the Council, regarding the draft Local Plan, via, telephone calls, emails, and previous representations, without a response, except that it was valid. The postcode presented by the Council against the Land is that of another property further away (Upton house) on Deal Road.</p> <p>The site presented is in an excellent position for the village and the offering of a footpath and widening the road, it will be a great help for the village. The site has access to three bus stops, two at the entrance to Deal Road and one just opposite at The Street, Worth, and with a footpath, it will be easy access to the villagers to use public transportation rather than using a car.</p> <p>The site has access to electricity, water, telephone lines, and internet as well as the main drain running just across its edge with Mill Lane. The site is vacant since the applicant's ownership in 1996. The site is kept tidy by cutting the grass once a year and has no constraints. The site is not in a flood-risk area. The site is flat and not in an area of outstanding natural beauty. The site is privately owned and is available immediately if successful. There have been few interested in developing this site, including a large property company as well as few local builders, and hence could employ few locals if the council agrees.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant	To amend the Local Plan to include the site HELAA Reference WOR005

and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	The Consultee would like the opportunity to participate.
Include files	SDLP815 Crawford Rep form_Redacted.pdf Local Plan Representation - CT14 0BD.pdf (1) Representation for Site Reference WOR005.pdf (1)
Local Plan Consultation Point	Worth
Rep ID	SDLP1772
Rep Status	Processed
Consultee ID	1260530
Consultee Full Name	Nagy Rafla
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Worth
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	wish to make representation regarding DDC Local Plan and WOR005 My site was wrongly labeled under a wrong post code and rejected because of its relation to the centre of the village of Worth. It can't be legal or acceptable to do so! The correct post code is CT14 0BD and the site starts from 4-7 meters from the centre of the village "the Street".

<p>possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>The site is that wooden fence opposite the road sign "The Street" of Worth. I made objection early in the year and my comment was labeled valid and ignored! Also the council did not include this important part which link the site to the centre of the village, which will provide access to widen Mill lane, provide footpath and improve the entrance and visibility for the Mill lane traffic. I have been asking for 18 months to reduce the number of dwellings in the interest of the village and I believe 15-25 dwellings is more appropriate than 100. There are other less attractive sites which are acceptable to the council but further away from the centre of the village! That can't be acceptable. WOR005 is bordering Mill Lane through two large gates.</p> <p>The site has access to water, electricity, gas and main drain just along its side at Mill Lane. The site is flat without hinderance. It isn't a site of outstanding natural beauty and of no special interest. The site has been vacant for 27 years and used to cut grass once a year to keep it tidy. The site has access three bus stops from 7-15meters away providing access to Worth and local villages, Sandwich, Dover and Canterbury. We are offering the following for the council and the village: 1) a large family park 2) footpath over 200 meters and currently there is none 3) widening Mill lane as now it is only possible for one car to pass. 4) improving the entrance to Mill lane and improving visibility.</p> <p>The site is owned by me since 1996 (K591936 and K 209681)and if accepted it will be available immediately. There has been few developers interested in the site and if accepted, it will be available immediately.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	No
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	SDLP1772 Rafla Att1.pdf
<p>Local Plan Consultation Point</p>	Worth
<p>Rep ID</p>	SDLP1960
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1331449
<p>Consultee Full Name</p>	Mr Lance Austin
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Worth
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Ref: Land to the rear of The Street, Worth Site WOR001</p> <p>I am naturally disappointed to note that the above site has not been taken forward in the Draft Plan for development. You will recall that the reasons for the rejection incorrectly included and addressed the issues concerning development of the land to the rear. This was never requested. My letters of 9th and 17th February 2021 refer.</p> <p>It follows that to date no appropriate reasons have been given for that area initially requested for development considerations. Your council's allocation map of 2008 is attached for ease of reference.</p> <p>I would be grateful to receive these reasons please. They cannot be presumed by me.</p> <p>At present I do not have the opportunity to submit my concerns stipulated date of 9th December 2022</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	Austin 26.10.22 att1.pdf Mr Lance B Austin typed _Redacted.pdf

SAP49 - Worth Small Housing Sites

Local Plan Consultation Point	SAP49 - Worth Small Housing Sites
Rep ID	SDLP490
Rep Status	Processed
Consultee ID	1272769
Consultee Full Name	Carol Gray
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP49
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The proposed site is accessed through a single track paved area which is very small, I believe that this would be inadequate for construction vehicles and heavy machinery and would have a major impact on said traffic coming through the existing development. But more worrying is that I don't think the emergency services particularly a fire engine would easily get through the very narrow entrance to the proposed site, if at all. Also this would be very dangerous for pedestrians to walk as there is no path and as stated above it is a very small road.</p> <p>Our property is adjacent to this single track and would have a serious impact if the development was to go ahead.</p> <p>The Sunningdale site that exists at present has had a major impact on the village with water mains/flooding etc and this would only exacerbate the problem. Also this would add to traffic passing past a school and nursery and would have major disruption for the residents.</p> <p>Having also recently lost our bus service this would be a further blow to this wonderful rural village. I hope this ill thought out paddock plot will not be considered for suitable development.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	I don't see that tjis could be compliant and sound

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Happy to be invited to the hearings or be around for a site visit
Include files	
Local Plan Consultation Point	SAP49 - Worth Small Housing Sites
Rep ID	SDLP410
Rep Status	Processed
Consultee ID	1330324
Consultee Full Name	John Stevens, Susan Morgan, Lynne Stevens
Consultee Company / Organisation	J.Scott, Finn's
Agent Full Name	Jane Scott
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Paragraph 4.284 and Policy SAP49
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The proposed allocation should be widened to include land adjacent to the west identified under the WOR006 reference as an Amber site in the HELAA. Pre-application advice findings have identified the land is suitable, will have no landscape or neighbour impacts, benefits from suitable access and already found the site frontage suitable for allocation. Failure to include the whole site within the SAP49 allocation (WOR006) is not achieving the best use of this land which is required by National Policy.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant	Site WOR006 was submitted to the Local Plan Call for Sites and the frontage section is proposed for allocation both in the Regulation 18 and Regulation 19 Draft Plan documents and this proposed allocation is fully supported. The land is available and in a single ownership with control of a wide site frontage to enable easy access location to be provided. The Housing Trajectory proposes development in 2031 and 2032. This

and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

is a small site in single ownership and can be delivered within the first five years of the Plan with an estimation of build out of 10 units in each of 2026, 2027 and 2028.

However, a further strip of land adjacent to the east of the area proposed to be allocated has still not been included within the proposed allocation. This part of the site was identified as 'amber' in the Housing and Economic Land Availability Assessment (HELAA) stating frontage development was most suitable however most importantly the site was not labelled a 'red' site and found to be unsuitable for development.

It is strongly suggested that the entire site area submitted should be allocated to make the most efficient use of this site and ensure the Plan is justified and effective in meeting its housing provision targets.

A draft layout of the site as a whole, both green and amber areas, showing the development of 30 dwellings was submitted to the Council for pre-application advice. Pre-application advice received from Dover District Council recognised half of the site had been found suitable for development and is proposed to be allocated. It found that it 'proposed development within the site of a suitable scale and density, would have the potential to be read within the boundary of built context of existing development and the wider village' and whilst an LVIA is requested to accompany any application submission, complete with landscape buffer provision along the field side of the land, it importantly did not find the proposal would be unsuitable on landscape impact grounds.

Turning to design and the submitted layout for development across the green and amber areas, the pre-application advice stated 'It is considered that the proposed scheme presented at this stage responds to the existing character and pattern of existing development by virtue of the layout, form and scale proposed.'

Whilst the pre-application site layout proposed a density lower than 30dph, the advice was to increase density 'to at least 30dph to make efficient use of land'. Further, the advice stated, 'To conclude, it is considered that in terms of layout, scale, character and appearance, the development proposed through this pre-app would form a compatible and suitable expansion of the village.'

It was found that the site as a whole would not have an unacceptable impact on the residential amenity of neighbours. It also found that the scoping flood risk assessment submitted with the scheme confirmed flood risk was low.

Despite these positive comments, the Officer concluded that part of the land was not proposed for allocation and therefore could not be supported for development. It is considered that the failure to allocate the amber area of land at WOR006 which lies adjacent to the area proposed to be allocated, leaves the Council in a position where the Emerging Plan is not effective and not making the best use of available land.

The Flood Risk Assessment has confirmed that the whole area, green and amber is suitable for residential development. The land is very well connected with Worth being within 400m of the bus stop on Jubilee Road and with public footpaths EE243 and EE456 passing close to the south and east of the site. Kent Highways accepted that suitable visibility to a new site access would be achievable. With the combined allocation of the green and amber sites WOR006, the road could be widened not just at the site entrance, but along the site frontage to provide inset off street parking bays which would provide opportunity for the existing pavement parking opposite the site to be removed. This would provide a highway benefit.

Development along Jubilee Road is described as 'linear', however existing development to the south of the site is not linear in form and extends some distance eastwards back from the road. Therefore the development of both the green and amber areas of WOR006 would not be out of character and would enable sufficient land to provide a soft landscaped buffer edge along its eastern side.

The amber area of WOR006 is as equally well located to existing development and facilities in Worth as the land proposed for allocation and its development would not result in any additional landscape impact. Both the green and amber areas of the site are in a single ownership making the whole site available and deliverable within the first five years of the Plan. This will enable a modest provision of housing to meet local needs throughout the next Plan Period as it is requested that the area identified in amber to the east of the green area subject of the proposed allocation is included as part of a larger green allocation for both area of land identified as WOR006.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

To achieve allocation of the full site rather than only the site frontage to make best use of the available land.
The site is available as a whole in single ownership and can be delivered within the first 5 years of the Plan.

Include files

[22.044 Jubilee Road Worth Pre-Application Document Final 25.7.22.pdf](#)
[DDC Pre-App Report - 23.09.22.pdf](#)

	0543 LVA Section 1-7 ISSUE 1.pdf 3034_FRSA_Jubilee Road Worth_Feb 21.pdf SDLP0410 REDACTED - Att 3.pdf
Local Plan Consultation Point	SAP49 - Worth Small Housing Sites
Rep ID	SDLP492
Rep Status	Processed
Consultee ID	1331648
Consultee Full Name	Robert Stevenson
Consultee Company / Organisation	Canterbury Diocesan Enterprises Limited
Agent Full Name	Robert Stevenson
Agent Company / Organisation	Canterbury Diocesan Enterprises Limited
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy SAP49 Objection to WOR006 and Omission of WOR007
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Please link this brief submission to the objections to Policy SAP49 and Site WOR006 made on behalf of Canterbury Diocesan Enterprises Limited (Submission reference id:201977 and Comment reference SDLP446)</p> <p>The purpose of this submission is to define site WOR007 as a convenient alternative to the Local Plan Evidence Base. A Land Registry Plan is supplied with this submission.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Please see Submission reference id: 201977 and Comment reference SDLP446.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Please see Submission reference id: 201977 and Comment reference SDLP446.
Include files	Worth Glebe WOR007 Land Registry Plan Objections to Reg 19 Dover District Local Plan October 2022.pdf
Local Plan Consultation Point	SAP49 - Worth Small Housing Sites
Rep ID	SDLP446
Rep Status	Processed
Consultee ID	1331648
Consultee Full Name	Robert Stevenson
Consultee Company / Organisation	Canterbury Diocesan Enterprises Limited
Agent Full Name	Robert Stevenson
Agent Company / Organisation	Canterbury Diocesan Enterprises Limited
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy SAP49
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Objections to Site Allocation WOR006 East of Jubilee Road</p> <ol style="list-style-type: none"> 1 Development of this site would conflict with the National Planning Policy Framework as it would not be sustainable. The site is versatile, productive farmland in open countryside outside the limits of the settlement. 2 Development of this site would cause serious harm to the character and appearance of the village which is characterised by views from the centre out across the surrounding fields. 3 The proposal would be unsustainable ribbon development with a multiplicity of access points onto the principal highway. 4 The development would conflict with the National Planning Policy framework as the site is within Flood Zones 2 and 3 when suitable Zone 1 land closer to the centre of the settlement is available. 5 Development would compromise the adjoining nature reserves which are important nationally and internationally for birds and have seen massive investment in recent years through RSPB. 6 The site forms part of a large agricultural unit which is well suited to modern farming methods, so its loss would be harmful to agricultural interests.

<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Allocation WOR006 should be omitted from the Local Plan. It should be replaced by Site WOR007 which was found to be a suitable housing site by the Council's professional officers.</p> <p>The case for allocating WOR007 may be summarised briefly as follows:</p> <ol style="list-style-type: none"> 1 As the DDC officers concluded, the 1.02 hectares (2.5 acres) site would be a logical extension to the village. It has clear development potential for 15 – 20 houses. In many ways it is the leading contender to deliver new housing by consolidating some of the very loose structure of the built-up part of the village. 2 It is a flat, arable field with peripheral vegetation. It has a 16m wide frontage giving access directly from Jubilee Road. There is a bus stop adjoining the access point. 3 The roughly rectangular site is bounded to the north by the "New Churchyard". The listed medieval parish church of St Peter and St Paul lies a short distance to the north east. 4 To the south, the land is bounded by ribbon development along Jubilee Road. 5 The site has no obvious physical constraints. Much of Worth Parish is at high risk of flooding, however the Glebe lies within Zone 1 which has a negligible risk of inundation. 6 Vehicular access can be derived directly from Jubilee Road. Pedestrian access can be derived directly from Jubilee Road or through the churchyard to the north via the public right of way. <p>In the Officers' Assessment there were only two negative comments both of which were inaccurate as follows:</p> <p>Firstly, the site does not lie within Flood Zone 2/3. The EA map confirms it is in Zone 1 i.e. least liable to flooding.</p> <p>Secondly, the out-of-date Worth Neighbourhood Plan is misleading regarding the facts. The site is a small area of privately owned farmland.</p> <p>For the above reasons, Site WOR007 Should be included in the Local Plan as a non-strategic housing allocation.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>The WOR006 site allocation is transparently unsound. Indeed it is very surprising that the Local Plan should propose ribbon development, which is intrinsically unsustainable, thereby blocking long distance (several miles) public views across open countryside and harming the character of the village. It is important for the Inspector to appreciate in detail the unsound rationale for the WOR006 allocation so that the evidence can be tested in public. At the same time it is important for the Inspector to hear the case for the allocation of WOR007. This would also allow for the arguments previously adduced against such an allocation to be tested in public.</p>
<p>Include files</p>	<p>Worth Glebe Maps, plans and images Reg 19 Dover District Local Plan October 2022.docx</p>
<p>Local Plan Consultation Point</p>	<p>SAP49 - Worth Small Housing Sites</p>
<p>Rep ID</p>	<p>SDLP429</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331626</p>
<p>Consultee Full Name</p>	<p>Mr Marc Jolly</p>
<p>Consultee Company / Organisation</p>	<p></p>
<p>Agent Full Name</p>	<p></p>
<p>Agent Company / Organisation</p>	<p></p>

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP49
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	As the resident that lives directly adjacent to this proposed development addition I will be most affected. The road to this area is single track block pavier and as such is totally inadequate for construction traffic or continued access for 15+ properties. My enjoyment and access of my own property would be seriously impacted as I would not have clear and open access to my own driveway. The land in question was confirmed by the original developers to those who bought on Nursery Fields (the original development) as being used as Paddock for horses and no development would take place. Many people bought here with those assurances from Sunningdale House. The village suffers from terrible flooding part of which is due to over-development. The current water mains are wholly inadequate for the additional load. Development traffic would be through a fully finished and landscaped area at the detriment of the owners who have only recently been able to enjoy a fully completed development. This is a ridiculous inclusion with very little forethought for those that will be impacted the most by it.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	As per my note in item 6 this should be struck from the plan for the reasons aforementioned.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I feel the only way that the inspector can fully understand the enormous impact this would have on myself and the other local residents is if I articulate this directly.
Include files	
Local Plan Consultation Point	SAP49 - Worth Small Housing Sites
Rep ID	SDLP437
Rep Status	Processed
Consultee ID	1331639
Consultee Full Name	James Donaldson
Consultee Company / Organisation	

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 49 WOR009 east of former Bisley Nursery
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>This part of the DLP is contrary to the village strategic plan which runs until 2025, and does not comply with assurance provided to villagers that this land would be returned to paddock once the Sunningdale development on the west side of the former Nursery Fields site was completed.</p> <p>Assess to the proposed building site at SAP49 WOR009 is very limited and building work is likely to be highly disruptive, and destructive to adjacent roads and properties, regardless of any assurances a developer may provide.</p> <p>Sunningdale Developments exceeds the number of properties that should have been built on the Nursery Fields site by 4 and cannot be trusted to adhere to an agreed plan and, in any event, the proposed density of housing on this part of the village will dangerously exceed the village's sewage infrastructure, which is already over its intended capability.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The DLP should be modified to delete SAP49 WOR009 which is an unsound. The village sewage system would need to be upgraded in capacity before any proposed development is considered. Assess to the site would need to be carefully considered and approved only if it does not disrupt or cause damage to existing infrastructure. An assurance by the developer alone would be insufficient in this regard
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP49 - Worth Small Housing Sites
Rep ID	SDLP1252
Rep Status	Processed
Consultee ID	1261607
Consultee Full Name	Mr

	Malcolm Bernardes
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	WOR006 Jubilee Road
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>This site is unsuitable for inclusion in the Dover Local Plan because:</p> <p>1) This plan to initially build 10 houses on this site is not in accordance with the Worth Neighbourhood Plan (currently in force until 2026) relative to future housing development. The Worth Village Neighbourhood Plan is likely to be renewed and reinforced prior to 2026.</p> <p>INFRASTRUCTURE INADEQUACY:</p> <p>2) The foul sewage system of Worth has been a source of problems for years and the Bisley Nursery Fields (Planning number DOV15/00749) more than exhausted its capacity to take more house building without Southern Water undertaking major sewage infrastructure investment, which Southern Water has repeatedly refused to undertake.</p> <p>3) The surface water drainage of Jubilee Road where it feeds into Worth Village Pond will put Worth Primary School at greater risk of surface water flooding when the pond cannot cope with the increased volume of surface water and overflows. The school has already been evacuated in the past due to flooding problems arising from the pond.</p> <p>4) Jubilee Road is too narrow for two cars to pass in numerous long sections already, and the bus already struggles to get through, so much so that the initial review of this site by DDC in the Local Plan suggested banning parking in Jubilee Road, but this does not appear in the final draft. Banning parking would leave some households with no option but to concrete over their front gardens, adding to the surface water going into the village pond. Even if all parking were banned, two cars will struggle to pass one another without mounting the pavement, putting pedestrians at risk. 10 new houses would generate a significant increase in vehicle movements, arising from this site and potentially from 20 more houses at Site WOR009, and the bus service may not be prepared to continue along such a restricted width road with increased traffic volumes.</p> <p>AMENITY VALUE:</p> <p>5) The RSPB has developed the Lydden Valley wildlife park with new lakes and ponds. To develop houses on this site will deny residents and visitors their only real chance to look over the resulting visually improved countryside. It will also create an urban ribbon development street scene, out of character with a country village.</p>

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP49 - Worth Small Housing Sites
Rep ID	SDLP1023
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP49
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The County Council requests that improvement pedestrian links are provided to the Church and School in respect of Public Footpath ER250 Restricted Byway EE237A, Bridleway EE236, Footpath EE235A will required consideration through well managed Active Travel Plans to upgrade, improve and incorporate.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The County Council requests that improvement pedestrian links are provided to the Church and School in respect of Public Footpath ER250 Restricted Byway EE237A, Bridleway EE236, Footpath EE235A will required consideration through well managed Active Travel Plans to upgrade, improve and incorporate.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP49 - Worth Small Housing Sites
Rep ID	SDLP1253
Rep Status	Processed
Consultee ID	1261607
Consultee Full Name	Mr Malcolm Bernardes
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	WOR009 Nursery Fields/Bisley site off The Street
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>This site is unsuitable for inclusion in the Dover Local Plan because:</p> <p>1) This plan to build a further 20 houses on this site is not in accordance with the Worth Neighbourhood Plan (currently in force until 2026) relative to future housing development. The Worth Village Neighbourhood Plan is likely to be renewed and reinforced prior to 2026.</p> <p>The Worth Neighbourhood Plan originally supported the construction of 32 houses on the Bisley nursery site which was to include integral on-site green space in the form of two "paddocks". In the end 35 houses have been built and finished. The Dover Local Plan should not now allow building on the reserved green space of the "paddocks". In addition the housing proposal for this site WOR009 envisages a significantly higher density of building than the original Bisley development, by proposing to build a further 20 houses on just 0.86 of a hectare, being the overall surface area of the designated green space paddocks. This site has already been artificially raised by several feet using the soil spoil from digging out the foundations of the recently constructed houses on the Bisley site. The land is therefore unstable for construction.</p> <p>INFRASTRUCTURE INADEQUACY:</p> <p>2) The foul sewage system of Worth has been a source of problems for years and the Bisley Nursery Fields (Planning number DOV15/00749) more than exhausted its capacity to take more house building in Worth, without Southern Water undertaking major sewer infrastructure investment, which Southern Water has repeatedly refused to undertake.</p> <p>3) The surface water drainage from this site, which feeds directly into The Street's surface water drains, and from there, straight into Worth Village Pond, will exacerbate and put Worth Primary School at far greater risk of surface water flooding when the pond cannot cope and overflows. The Primary School has been evacuated in the past due to flooding, and another 20 houses will make flooding even more likely, especially when violent downpours become more frequent due to climate change.</p> <p>4) Exiting The Street and Jubilee Road onto the main Sandwich-Deal road has become very difficult and dangerous since the Nursery Fields site added traffic from its 35 new houses. Any more houses will require KCC or DDC to install a roundabout on the main road at the end of The Street to both avoid accidents and enable the buses to re-join the main road quickly and safely, so as to keep to its timetable. Extra vehicles leaving this site and heading towards Deal via Jubilee Road will further add to the difficulties of two cars trying to pass one another on Jubilee Road.</p> <p>5) Access: How is this site to be accessed for construction? The only current access is over PRIVATE ROADS owned and maintained by residents of the Bisley site, and access permission is unlikely to be forthcoming.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP49 - Worth Small Housing Sites
Rep ID	SDLP1378
Rep Status	Processed
Consultee ID	1331645
Consultee Full Name	Mr Kevin Kevin Lynch
Consultee Company / Organisation	Worth Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	4.261
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Numerous residents of Worth have made numerous representations about the lack of infrastructure, services, education and health to support WOR 006 and WOR009. We do not believe that these representations have been adequately resolved. In addition the rural bus service servicing these potential developments has been withdrawn and therefore both these developments will cause an increase in the use of private vehicles this breaching the NPPF. Furthermore the emerging findings of the Census (Dover District) indicate that the population in the District is declining. Therefore it follows that the need for developments in Worth (if not elsewhere) is not needed - breaching government policy of the right houses in the right places. Both these proposed site allocations need to be removed from this draft Local Plan. And finally, again on vehicular movements, KCC(Highways) has stated on a nearby planning application that parts of the A258 (the road used by Worth residents) including a key roundabout is overcapacity - again breaching the NPPF (paragraph 109?)
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	Remove WOR006 and WOR009 from the draft Local Plan.

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Simply because residents will be better able to discuss with the Inspector the detailed local issues surrounding this representation.
Include files	
Local Plan Consultation Point	SAP49 - Worth Small Housing Sites
Rep ID	SDLP1377
Rep Status	Processed
Consultee ID	1331638
Consultee Full Name	Mr Phillip Welburn
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP49
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	<p>SITE "WOR006" Jubilee Road:</p> <p>This site is unsuitable for inclusion in the Dover Local Plan because:</p> <ol style="list-style-type: none"> 1) This plan to initially build 10 houses on this site is not in accordance with the Worth Neighbourhood Plan (currently in force until 2026) relative to future housing development. The Worth Village Neighbourhood Plan is likely to be renewed and reinforced prior to 2026. INFRASTRUCTURE INADEQUACY: 2) The foul sewage system of Worth has been a source of problems for years and the Bisley Nursery Fields (Planning number DOV15/00749) more than exhausted its capacity to take more house building without Southern Water undertaking major sewage infrastructure investment, which Southern Water has repeatedly refused to undertake. 3) The surface water drainage of Jubilee Road where it feeds into Worth Village Pond will put Worth Primary School at greater risk of surface water flooding when the pond cannot cope with the increased volume of surface water and overflows. The school has already been evacuated in the past due to flooding problems arising from the pond.

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

4) Jubilee Road is too narrow for two cars to pass in numerous long sections already, and the bus already struggles to get through, so much so that the initial review of this site by DDC in the Local Plan suggested banning parking in Jubilee Road, but this does not appear in the final draft. Banning parking would leave some households with no option but to concrete over their front gardens, adding to the surface water going into the village pond. Even if all parking were banned, two cars will struggle to pass one another without mounting the pavement, putting pedestrians at risk. 10 new houses would generate a significant increase in vehicle movements, arising from this site and potentially from 20 more houses at Site WOR009, and the bus service may not be prepared to continue along such a restricted width road with increased traffic volumes.

AMENITY VALUE:

5) The RSPB has developed the Lydden Valley wildlife park with new lakes and ponds. To develop houses on this site will deny residents and visitors their only real chance to look over the resulting visually improved countryside. It will also create an urban ribbon development street scene, out of character with a country village.

SITE "WOR009" Nursery Fields/Bisley site off The Street. (Allied to planning number DOV15/00749)

This site is unsuitable for inclusion in the Dover Local Plan because:

1) This plan to build a further 20 houses on this site is not in accordance with the Worth Neighbourhood Plan (currently in force until 2026) relative to future housing development. The Worth Village Neighbourhood Plan is likely to be renewed and reinforced prior to 2026. The Worth Neighbourhood Plan originally supported the construction of 32 houses on the Bisley nursery site which was to include integral on-site green space in the form of two "paddocks". In the end 35 houses have been built and finished. The Dover Local Plan should not now allow building on the reserved green space of the "paddocks". In addition the housing proposal for this site WOR009 envisages a significantly higher density of building than the original Bisley development, by proposing to build a further 20 houses on just 0.86 of a hectare, being the overall surface area of the designated green space paddocks. This site has already been artificially raised by several feet using the soil spoil from digging out the foundations of the recently constructed houses on the Bisley site. The land is therefore unstable for construction.

INFRASTRUCTURE INADEQUACY:

2) The foul sewage system of Worth has been a source of problems for years and the Bisley Nursery Fields (Planning number DOV15/00749) more than exhausted its capacity to take more house building in Worth, without Southern Water undertaking major sewer infrastructure investment, which Southern Water has repeatedly refused to undertake.

3) The surface water drainage from this site, which feeds directly into The Street's surface water drains, and from there, straight into Worth Village Pond, will exacerbate and put Worth Primary School at far greater risk of surface water flooding when the pond cannot cope and overflows. The Primary School has been evacuated in the past due to flooding, and another 20 houses will make flooding even more likely, especially when violent downpours become more frequent due to climate change.

4) Exiting The Street and Jubilee Road onto the main Sandwich-Deal road has become very difficult and dangerous since the Nursery Fields site added traffic from its 35 new houses. Any more houses will require KCC or DDC to install a roundabout on the main road at the end of The Street to both avoid accidents and enable the buses to re-join the main road quickly and safely, so as to keep to its timetable.

Extra vehicles leaving this site and heading towards Deal via Jubilee Road will further add to the difficulties of two cars trying to pass one another on Jubilee Road.

5) Access: How is this site to be accessed for construction? The only current access is over PRIVATE ROADS owned and maintained by residents of the Bisley site, and access permission is unlikely to be forthcoming.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP49 - Worth Small Housing Sites
Rep ID	SDLP1606
Rep Status	Processed
Consultee ID	1333364
Consultee Full Name	Sunningdale House Ltd
Consultee Company / Organisation	
Agent Full Name	Grace Martin
Agent Company / Organisation	Hume Planning Consultancy Ltd
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP49
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Representation submitted by Hume Planning. Full Representation attached to SDLP1606. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1606.)</p> <p>Dover Local Plan Regulation 19 Consultation: Policy SAP 49 Land east of Bisley Nursery, Worth</p> <p>We write to you on behalf of our client, Sunningdale House Developments ('Sunningdale'), in relation to the Dover District Council Regulation 19 consultation on its Local Plan. Specifically, we write in support of the proposed allocation at Land east of Bisley Nursery at Worth under Policy SAP 49, which is proposed to deliver around 15 dwellings.</p> <p>Sunningdale owns the site which is proposed to be allocated. As officers will be aware, Sunningdale also owns the land to the west (former Bisley Nursery now referred to as "Nursery Fields") which has been developed for residential development; 36 units have been constructed pursuant to planning permissions LPA ref. 15/07749 and 16/01161. Accordingly, the proposed redevelopment of this allocated site would form a logical extension to the "Phase 1" Nursery Fields scheme. It is noted at the outset, the existing Nursery Fields development is supported through the Worth Neighbourhood Development Plan which allocates this site for</p>

the provision of around 30 residential dwellings; over half of the residents who contributed to the Plan supported this site for housing development. Whilst this doesn't provide for the proposed allocated as now promoted through the Local Plan, it shows the principle of development to the north of the village as previously being acceptable. If progressed, Sunningdale confirms its commitment to work with the existing community in Worth to develop a high-quality scheme and pre-application engagement with LPA officers at the site has already been progressed.

SP3: Housing Growth

We welcome DDC's commitment to meeting its housing need, with Strategic Policy SP3 committing to providing at least 10,998 net additional homes over the Plan period. Within the Policy, reference is made to the Council's overall spatial strategy i.e. the majority of growth will be focused towards the principal town, Dover, and the expansion/planned new settlement at Whitfield. It is appropriate that smaller settlements in the district, i.e. the larger and smaller villages, receive some growth to sustain their role in the settlement hierarchy over the plan period.

Policy SAP 49: Worth Small Housing Sites

Sunningdale confirms its support for this policy, and in particular the allocation of housing on land to the east of Bisley Nursery.

It is noted in the supporting text to the policy that Worth is a large village that serves the northern part of the district (paragraphs 4.261 and 4.263). It has a primary school, several pubs and is served by regular bus routes. The strategy for Worth is to provide additional housing over the lifetime of the Plan to sustain and strengthen the role of this village and the allocation of an additional c. 25 units is considered appropriate to the position of Worth in the Council's settlement hierarchy, and the level of services provided.

Sunningdale confirms this site is available for development and can be delivered early on in the Plan period. Accordingly, the Council's assumed trajectory for the site as set out in Appendix D appears reasonable (9 units delivered 2026/27 and the remaining 6 units delivered 2027/28). As noted above, Sunningdale has already delivered 36 units on land immediately to the west of the proposed allocation; the development is completed and fully occupied. Sunningdale, as a regional housebuilder has a track record of delivery in Dover district and will develop a high-quality scheme in this location and therefore the prospects of delivery of housing to meet local need and also contribute to meeting the district's overall housing requirement are very good.

The allocation assumes 15 units can be delivered on the site which is roughly consistent with the pre-application approach already made to DDC by Sunningdale for 14 dwellings.

It is intended that the new allocation would be served from the existing access which serves the Nursery Fields housing development (St Crispin Close); which can provide access directly into the land to the east, which Sunningdale control. This access is considered appropriate to accommodate at least an additional 15 units as envisaged in the Plan.

The site is not within flood zone 2 or 3, nor is it at risk of surface water flooding. Accordingly, in sequential terms, it is a preferential site in a sustainable location adjacent to the existing built-up settlement of Worth. It is noted that the southern part of the site immediately adjoins the Worth Conservation Area and heritage issues will need to be considered as part of the proposed scheme. Accordingly, our client accepts the reference to heritage issues within the policy.

It is therefore a suitable and available site and its proposed allocation provides for a deliverable policy within the Local Plan.

Policies Map

It is noted that the proposed site "land east of Bisley nursery" is located outside, but immediately adjacent along the western and southern boundary, to the proposed settlement confines of Worth. On the basis that the site is to be allocated for residential development, it would appear sensible to extend the settlement boundary to include the site.

Summary

With specific reference to the proposed allocation in Worth (SAP 49), we confirm the site is available for residential development, and is a suitable site for residential development. It is therefore an achievable and deliverable allocation.

Hume Planning Consultancy welcomes the opportunity to comment on this stage of the Council's Pre-Submission Local Plan and would like to reserve the right to attend the Examination in Public in due course.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

[Martin Hume Planning \(Sunningdale\) 1525 Att1_Redacted.pdf](#)

Smaller Villages and Hamlets: Chillenden, Coldred, Nonington, Ringwould, Staple and Woodnesborough

Local Plan Consultation Point	Smaller Villages and Hamlets: Chillenden, Coldred, Nonington, Ringwould, Staple and Woodnesborough
Rep ID	SDLP2035
Rep Status	Processed
Consultee ID	1274452
Consultee Full Name	Mr Peter Marriott
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Canton Downs Rd, East Studdal
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC note (see comment SDLP0132) Canton Downs Rd, East Studdal - Title No. K414599. We found out yesterday that the draft District Local Plan is available & so checked to see if our site was included for deliberation. We cannot find any reference to it or the other site we put forward - the car park at the Hare & Hounds Northbourne. Could you please provide an indication where these may be as you office did confirm that they had been included in the targeted call for sites last year (see attached). Regarding TC4S038, Canton under appendix 2d Highways assessment it been given a red and "It would appear that the required sightlines for an access onto the highway could not be achieved within land that the site promoter has control over" and " Access considered to be unachievable and/or highway impact cannot be mitigated." Not sure if they are looking at older plans but the access was changed & sightlines approved by Highways & we currently own the land accessing the road.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	

<p>if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p> SDLP2035 Marriott - Att 1.pdf SDLP2035 Marriott - Att 2.pdf SDLP2035 Marriott - Att 3.pdf SDLP2035 Marriott - Att 4.pdf </p>

Local Plan Consultation Point	Chillenden
Rep ID	SDLP423
Rep Status	Processed
Consultee ID	1331010
Consultee Full Name	Mr Kevin Holyer
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Appendix G SAP50 Land Adjacent to Short Street, Chillenden (GOO006)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DOVER DISTRICT COUNCIL LOCAL PLAN CONSULTATION: REGULATION 19 REPRESENTATION TO REVIEW SITE TC4S067 THE GLEBE PLOT, STATION ROAD (OFF SHORT STREET) CHILLENDEN, CT3 1PR AND INCLUDE IN THE LOCAL PLAN</p> <p>Representation</p> <p>I am making a representation against the Dover District Council (DDC) Local Plan, which is currently subject to Regulation 19 Local Plan Consultation. I believe it is unsound and that The Glebe Plot Station Road (off Short Street) Chillenden (TC4S067) has been wrongly omitted from the Local Plan. I believe the site TC4S067 has been omitted from the Local Plan when it should have been included as an allocation, this is because I believe the HELAA assessment carried out by DDC is incorrect. I would ask that during your examination process you consider my representation, confirm the failings of the HELAA assessment and add site TC4S067 to the Dover District Council Local Plan.</p> <p>I also want to confirm that should this be included under the Examination process that I would like to attend the examination process and, if it is felt necessary, to support this representation.</p> <p>Background to Representation</p> <p>The Glebe Plot, Station Road (off Short Street) Chillenden (TC4S067) submission was made to DDC, following its Call for Sites in 2021. The submission was sent to the DDC Local Plans team and receipt acknowledged on 15th March 2021.</p>

When the Regulation 19 Local Plan Consultation was released in October 2022, by DDC, the Glebe Plot (TC4S067) was referenced by inclusion on the list of eliminated sites. The reason for the elimination is set out in the Evidence Base as having been eliminated at the Stage 1 Assessment, which is the initial desktop study, the reason stated is that the site is "isolated in the Countryside". This meant that there was no further consideration of the site and its suitability, availability and achievability to bring forward much needed housing in a sustainable and sympathetic location for the local community.

My representation is that the Stage 1 assessment is wrong, and that The Glebe Plot (TC4S067) is clearly within the boundaries and confines of Chillenden Village and represents an opportunity for the development of an infill site for the village.

To support this view, in addition to the absolute fact that The Glebe Plot is within the village and is not "isolated in the Countryside" I present the evidence of DDCs own information. Four sites were submitted for consideration from Chillenden village. These are set out on the Settlement maps for Goodnestone and Chillenden sites which were included at Stage 1 Assessment. This map is shown below.

This shows clearly that The Glebe Plot (TC4S067) sits between two sites that were not eliminated at stage 1, if these plots were not eliminated for being "isolated in the countryside" it cannot be correct that The Glebe Plot was eliminated for that reason, and it should have been carried forward for further assessment.

This first stage assessment also considered the following criteria and sites could have been eliminated if they were:

- Too small
- Covered by National designations

and/or

- Contrary to policy.

None of these criteria were identified as the reason for the elimination of The Glebe Plot, and I can confirm that the plot could not be eliminated for these reasons because:

- The site area extends to 0.38 hectares (3,800 metres squared). As part of the targeted call for sites 2021, the evidence base states that Housing sites would be considered between 0.25 and 1 hectare in size and therefore, The Glebe Plot, TC4S067 meets these criteria.
- The Glebe Plot TC4S067 is not covered by any National designations.
- Following discussions and e mail correspondence with DDC Local Plans team in November 2022, I understand that the reason The Glebe Plot TC4S067 was rejected is that it was considered that the site was "Isolated in the countryside". This is the reason given and why the Glebe Plot, TC4S067 was included in the HELAA document Appendix 2a (Initial assessment housing sites eliminated on page 3. Please see the link below.

<https://www.doverdistrictlocalplan.co.uk/uploads/pdfs/appendix-2a-tc4s-initial-assessment-housing-sites-eliminated.pdf>

In preparing to make this representation, on 21st November 2022, I asked the DDC Local Plan team to confirm the definition they had used of "Isolated in the Countryside". On 1st December 2022, DDC Local Plans team responded stating that the term "Isolated in the countryside" is explained in Paragraph 3.73 of the Local Plan (Page 39) and is also set out within National Guidance - See NPPF National Planning Policy Framework - 5. Delivering a sufficient supply of homes - Guidance - GOV.UK (www.gov.uk) Paragraphs 78 onwards. I have also researched numerous legal cases around the interpretation of the term 'isolated' in the NPPF.

I have read the explanation on Strategic Policy 4 (SP4) on page 39 Paragraph 3.73. The Local Plan states "National Policy is clear that new isolated dwellings in the countryside, outside of settlement boundaries are only permissible in exceptional circumstances"

The Local plan identifies in SP4 2, Chillenden "as a settlement suitable for minor residential development or infilling of a scale that is commensurate with that of the existing settlement and that "residential development or infilling will be permitted within the settlement boundaries, as shown on the Policies Map of the settlements" and which includes the settlement of Chillenden subject to criteria a) to k) being met (reference SP4 page 39 of the Local Plan).

With the above in mind, I would request that the Planning Inspector reviews the conclusion reached by the Stage 1 assessment that the Glebe Plot TC4S067 is "Isolated in the Countryside" for the following reasons:

- As can be seen from the map, The Glebe Plot TC4067 site is quite clearly within the well-defined settlement confines and boundary of the settlement of Chillenden.
- The TC4S067 site meets NPPF and SP4 policy subject to criteria 2a)-k) being met.
- The Glebe Plot Site TC4S067 is just 50m from the GOO006 site, (Land adjacent to short street, Chillenden) which has been included in the Consultation Local plan Regulation 19 submission on page 211.

	<ul style="list-style-type: none"> • From further research, I understand that the definition of “isolated in the countryside” is a dwelling that is physically separate or remote from a settlement (Court of appeal judgement Lord Justice Lindblom). The Glebe Plot TC4S067 is neither physically separate nor remote from the settlement of Chillenden. <p>In summary, I believe it to be absolutely clear that The Glebe Plot site (TC4S067) should not have been eliminated from consideration for inclusion in the DDC HELAA at stage 1 desk top assessment, because it is not “isolated and in the countryside”. Further to this, I consider that the site would not have been excluded at the Site, Suitability, Availability and Achievability assessments as it meets the same standards as the site, GOO006, that has been included in the Local Plan on page 212, but with the added advantage of not being a site which is subject to flooding.</p> <p>In summary The Glebe Plot TC4S067 site is:</p> <ul style="list-style-type: none"> • Highly accessible to Chillenden Village, being centrally located. • Not affected by Flood Risk • Suitably accessed from an existing access point off Station Road with the ability to improve the access further. • Visually contained by surrounding topography and existing mature hedgerow and trees and will be seen against the backdrop of the existing neighbouring dwellings. • Not affected by any recognised landscape designations. • Adjacent to a sole Heritage asset, with significant screening between them and the ability to further mitigate the impacts. • Not subject to any ecological constraint. <p>We have engaged fully with Goodnestone Parish Council (GPC) regarding the proposal to include, The Glebe Plot site, as part of the HELAA process and we are sympathetic to the comments made in the GPC letter dated 11th March 2021 as part of their response to the District Plan consultation. Due to its unique location in the middle of the settlement of Chillenden, The Glebe Plot site will not impact adversely on the surrounding landscape. It does not suffer from surface water flooding. The site is well screened by mature trees, hedgerows and bushes and a preliminary study has been undertaken by a heritage expert, to ensure that any heritage concerns of the nearby Grade 2 listed building can be mitigated. Importantly, The Glebe Plot site benefits from its own access off Station Road with no other shared properties or driveways.</p> <p>In addition to the documents submitted on 15th March 2021 as part of the targeted call for sites 2021, I would request that the details of the site’s suitability, achievability and availability appended to this representation to be considered (Appendix 1).</p> <p>In conclusion, my representation is that the Glebe Plot was wrongly excluded at the first stage assessment, because it is not “isolated in the Countryside” as it is within the confines and boundary of the village of Chillenden, and it should have been considered suitable for inclusion in the Local Plan, as at least equal to the site that has been included (GOO006), if not better given the lack of impact of flooding, and should be added to Dover District Council Local Plan.</p> <p>Thank you for your attention to this and I look forward to receiving confirmation that you have accepted my formal representation and will consider the matters during your Examination process.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>In summary, I believe it to be absolutely clear that The Glebe Plot site (TC4S067) should not have been eliminated from consideration for inclusion in the DDC HELAA at stage 1 desk top assessment, because it is not “isolated and in the countryside”. Further to this, I consider that the site would not have been excluded at the Site, Suitability, Availability and Achievability assessments as it meets the same standards as the site, GOO006, that has been included in the Local Plan on page 212, but with the added advantage of not being a site which is subject to flooding.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>

<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>I believe the site TC4S067 has been omitted from the Local Plan when it should have been included as an allocation, this is because I believe the HELAA assessment carried out by DDC is incorrect. I would ask that during your examination process you consider my representation, confirm the failings of the HELAA assessment and add site TC4S067 to the Dover District Council Local Plan.</p> <p>I also want to confirm that should this be included under the Examination process that I would like to attend the examination process and, if it is felt necessary, to support this representation.</p>
<p>Include files</p>	<p> SDLP0423 Holyer Att3.pdf SDLP0423 Holyer Att4.pdf SDLP0423 Holyer Att5.pdf SDLP0423 Holyer Att6.pdf Picture1.png (1) The Glebe V3.docx (1) </p>

SAP50 - Land adjacent to Short Street, Chillenden (GOO006)

Local Plan Consultation Point	SAP50 - Land adjacent to Short Street, Chillenden (GOO006)
Rep ID	SDLP124
Rep Status	Processed
Consultee ID	1330945
Consultee Full Name	Miss Nicola Clear
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 50 - Land adjacent to short street Chillenden GOO0006
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I believe the proposal for development at SAP 50 is unsound due to flood risk that has not been properly evaluated. The site in question is lower than the surrounding roads and fields. Hence there is an increased risk of flooding to some properties due to the site being a run off for surface water from the road and surrounding fields. Station Road frequently floods and the surface water runs off into the development site. If the site was built on, the surface water would by necessity have no other run off, except into neighbouring properties off Short Street: (Yew Tree Barn, The Grange, West Barn, The Stables, The Bothy). Worryingly, the flood risk mitigations suggested within the Flood Risk Assessment were aimed solely at minimising risk to the proposed new development. There were no proposed mitigations to prevent flood risk to neighbouring properties. Also it should be noted that the only other point in the village at such a low elevation opposite the farm, there is a purpose built pond which acts as a soak away, proving the point about water volume accumulation. The pond itself has also been known to flood in the past due to the volume of water that runs down into the village from both the east and west during storms.</p> <p>There is also incorrect information stated as facts in the Local Plan Flood Risk Assessment document (pp127-128). The document states incorrectly that there has been no history of flooding in the area – there has been flooding in June 2022 affecting The Grange and flooding in June 2017 affecting West Barn and Yew Tree Barn, as well as numerous other occasions prior to this date.</p> <p>In addition any use of the current entrance will involve construction vehicles crossing over private land to access the site – this issue has not been addressed.</p> <p>Also even if an new access point is created in the hedge along the short street road this access point will be dangerous access to the site from an extremely narrow road off a shared junction with no visibility. I currently walk around the village at least twice a day and – this has not been addressed. It will also further destroy valuable habitat for wildlife in this area. The whole area is a natural habitat for bats who of a spring / summer evening at dusk can be seen flying around station road / short street area, roosting in The Grange and nearby trees.</p>

	<p>Development of the whole site would significantly harm the character and appearance of the area including the local landscape and setting of the village within the countryside. Any large scale removal of existing boundary trees or hedgerows would significantly erode existing landscape character of the area The development of this site would have a detrimental landscape impact that cannot be mitigated</p> <p>Development of the site would cause harm to the setting of listed buildings and the character of the CA. Site assessed as having a heritage impact that would cause significant detrimental harm to identified heritage assets</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP50 - Land adjacent to Short Street, Chillenden (GOO006)
Rep ID	SDLP477
Rep Status	Processed
Consultee ID	1266348
Consultee Full Name	Mr Richard Himsworth Richard Himsworth
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP50 Land adjacent to Short Street, Chillenden (GOO006)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I am a resident where this damaging of a rural hamlet by an unnecessary, unwarranted proposal development will be felt most strongly. I have received no contact or documentation about this proposal from Dover District Council to myself personally. I believe there is a legal responsibility on Dover District Council to have undertaken such contact, correspondence towards me.</p> <p>I also require feedback which again I believe you are legally responsible to do on the previous submission made by myself some months ago.</p> <p>I require you to confirm that due diligence has been applied including possible notifiable relationships between landowner selling the land for possible development and those involved in the constructing and advising on the local plan.</p> <p>The access to the proposed site is totally unsuitable (both from Short Street and Station Road) and as my land adjoins said site I will not allow incursions onto my land by any construction vehicles. Please advise when any council official makes an inspection on the major access problems because as a council tax payer to Dover District Council for the last 24 years I wish to verbally comment on the ill advised situation.</p> <p>In the Dover District Council Local Plan March 2021 Highway Comments showed that the removal of hedges would be required to create appropriate visibility splays. I understand a company advising the landowner state that the hedges should remain. I expect confirmation on what will happen to these hedges. There is no footpath on this very narrow road.</p> <p>I must advise that a flood study of the site has been compiled by QVA Consulting disputing your Flood Risk Level 1 grading that allowed the development to be put forward when clearly the risk is Level 2.</p> <p>I require you to explain to me how this proposed development will enhance the well being of the local council taxpayers and residents of this rural, unspoilt hamlet. What is the solid research and facts?</p> <p>I am delighted that the target for house building has been downgraded to an advisory rather than a compulsory one by the Levelling Up Secretary 'if it threatens the rural and suburban areas!' and in my opinion, along with many others, this proposed site most certainly does.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP50 - Land adjacent to Short Street, Chillenden (GOO006)
Rep ID	SDLP478
Rep Status	Processed
Consultee ID	1331693

Consultee Full Name	Mr Michael Darby
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	GOO006 Land adjacent to Short Street, Chillenden CT3 1PR
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>a) The Dover Local Plan fails to achieve Legal validity due to the "Flood Risk Level 1" grading that permitted the proposed development, on the green field site adjacent to Short Street, Chillenden CT3 1PR (Site GOO006), to be put forward and consequently included in the draft Local Plan when clearly the risk is demonstrably Flood risk Level 2. This has been professionally and independently verified by QVA Consulting a copy of whose report is available. The risk of flooding of the plot (Site GOO006) is exceedingly high and this applies critically to the local residents already living on Short Street, who have previously suffered from flooding and whose risk of suffering fresh flooding will be dramatically increased should development of the low point in our valley be permitted. Obviously if development is permitted, future residents of permitted houses on the plot (GOO006) will have an extreme likelihood of future flooding as there is very minimal possibility of any developer being able to take effective action to counter the threat.</p> <p>b) The Dover Local Plan Review is unsound due to the Flood Risk Level 1 grading that allowed the development to be included when clearly the risk is demonstrably Flood risk Level 2. Dover District Council have failed to engage with the local community or seek reliable, unbiased representations. The BTF document is clearly unsound and contains dubious local information. One has to ask why? I have suspicions that it may be possible that there could well be an established relationship between BTF and the land owner.</p> <p>c) There has been no attempt by Dover District Council to engage in their Duty to Cooperate with the local community and the time scale for consultation is far too short allowing very little opportunity for the local community to take action. Fortunately one of our villagers has been able to engage, at very short notice and I suspect great personal expense QVA Consulting to undertake an indepth SURFACE WATER ASSESSMENT & FLOOD STUDY a copy of which will be submitted.</p> <p>d) I personally feel that Dover District Council seem to have engaged with everyone except the affected local community and would point out that the Secretary of State, Michael Gove, is presently changing the National Policy requirements for local housing development and I would suggest that the process should be suspended until such time as a clear way forward is put in place by the HM Government which I understand may include a legal requirement for councils to consult with local communities rather than dictate to them.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance	The Dover Local Plan fails to achieve Legal validity due to the Flood Risk Level 1 grading that permitted the proposed development on the green field site adjacent to Short Street, Chillenden CT3 1PR (Site GOO006) to be put forward and included in the Local Plan when clearly the risk is demonstrably Flood risk Level 2. This has been professionally and independently verified by QVA Consulting. The risk of flooding of the plot (Site GOO006) is very high and this applies especially to the local residents already living on Short Street, whose risk of suffering flooding will be dramatically increased should the low point in our valley be developed.

with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	It will not be possible to render the Dover Local Plan legally compliant while it contains the green field site adjacent to Short Street, Chillenden CT3 1PR (Site GOO006) due to the misrepresentation of the flood risk.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Dover District Council appear to have failed in their statutory duties and can not be trusted to represent the will of the voters and residents of Chillenden.
Include files	
Local Plan Consultation Point	SAP50 - Land adjacent to Short Street, Chillenden (GOO006)
Rep ID	SDLP501
Rep Status	Processed
Consultee ID	1265436
Consultee Full Name	Mrs Lesley RICHARDSON
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP50 - Land adjacent to Short Street, Chillenden (G00006)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	1. FLOOD RISK. Myself and all the residents surrounding this site are most anxious and concerned. We all know it to be a serious flood risk. It has flooded in the past (1984). And in more recently has water logged properties. We have employed a professional flood consultant expert to help support our concerns. Please find a comprehensive document attached below. 2. It is a very big risk to our National Heritage. Directly next to a Listed Medeival Hall house (The Grange), dating back to1287.. one of the oldest houses in England. Historically, agricultural farmland surrounds the site and is a busy working farm with limited access and road structure. Just single track lanes, which frequently break up with water damage and farm vehicles.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	1025 Short Street, Chillenden - QVA Tech. Note - SW Assessment & Flood Study (2022 12 06).pdf
Local Plan Consultation Point	SAP50 - Land adjacent to Short Street, Chillenden (GOO006)
Rep ID	SDLP754
Rep Status	Processed
Consultee ID	1267998
Consultee Full Name	Mr Paul Allen
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP50
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails	I consider the plan is unsound in that it was put together by specifically targeting land owners and developers and asking them which sites they would like to have developed. This has led to a local landowner seeking to make money by proposing the development of a totally inappropriate

to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>site in Chillenden (SAP50). Justification for this was in a report from BTF Partnership, a company with family connections to the landowner. This illustrates the unsound nature of the proposal.</p> <p>The site is in the lowest part of the village, which is in effect a bowl with all roads and fields running down in to the village. I believe others will be covering the flood risk nature of the site.</p> <p>The Site is accessed off a single track road that Dover District Council as agents for Kent County Council have failed to maintain over the years. They have failed as the Highways Authority to repair it after the extreme use by heavy farm vehicles. It is unsatisfactory for the houses already there let alone for any additional ones. Also during construction it will be virtually impossible to access the site.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The inappropriate development of site SAP50 should be removed from the Local Plan at this consultation stage.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP50 - Land adjacent to Short Street, Chillenden (GOO006)
Rep ID	SDLP747
Rep Status	Processed
Consultee ID	1331629
Consultee Full Name	Mr Andy Beeching
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP50 - Land adjacent to Short Street, Chillenden (GOO006)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified

	Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The evidence detailed in the Dover Local Plan regarding the potential to develop site SAP50 - Land adjacent to Short Street, Chillenden (GOO006) is flawed and inaccurate. It is further inconsistent with the Climate Emergency declaration of November 4th 2019 as it makes no consideration for the impact of this development on surrounding properties.</p> <p>An independent assessment of the site conducted by QVA Consulting (attached) provides an evidence based analysis of the site and identifies the following key conclusions</p> <ul style="list-style-type: none"> - current EA/SFRA surface water mapping does not reflect specific topography at the site - 98% of the site is at a high risk of surface water flooding - Conventional or SuDS drainage of the development is precluded by topography (no outfall), hydrogeology (no infiltration) and statutory flood risk obligations (increased flood risk offsite) - Measures required to pass the Exception Test would increase flood risk offsite. <p>As regards the Climate Emergency declaration and duty of care, I refer you to Section 19 (1A) of the Planning and Compulsory Purchase Act 2004, which states</p> <p>“Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority’s area contribute to the mitigation of, and adaptation to, climate change.”</p> <p>Clearly a development that has the potential in increase the impacts of climate change on the local area including neighbouring properties is contra to the clear direction of said Act and the Climate Emergency declaration by DDC.</p> <p>Also attached is the final report of the National Infrastructure Committee on Reducing the Risks of Surface Water Flooding. It states Climate change and urbanisation are set to put more properties at risk. The number of properties in areas at high risk is set to increase by 2055, including:</p> <ul style="list-style-type: none"> • an increase of around 20,000-135,000 properties in areas at high risk due to the impacts of climate change, which will increase the intensity and frequency of heavy rainfall • an increase of around 35,000-95,000 properties due to new development putting more pressure on drainage systems. <p>A further 50,000-65,000 properties may be put in areas at high risk due to unplanned increases in impermeable surfaces (e.g. front gardens being paved over), which, alongside new development, is part of ‘urbanisation’– the conversion of natural (often permeable) environments to urban ones where rainwater cannot enter natural drainage systems.</p> <p>The greenfield site off Short Street is a natural run off for surface water and as such a natural mitigator of flood risks for existing properties along Short Street as well the noted heritage site of The Grange.</p> <p>Recently reported changes to the Levelling Up an Regeneration Bill state that the former targets for Local Authorities will no longer be relevant or compulsory. This means an abandoning of damaging centralised mandatory housing targets that have led to needless, unaffordable and poorly designed greenfield developments in favour of an advisory system that takes local character and need into account.</p> <p>Despite further registered concerns at the Reg 18 stage regards heritage (proximity to a listed building of significant historical importance) , environment (removal of hedgerows, destruction of wildlife habitat and hunting grounds for owls and bats), access and egress (site is approached on a single track road and has 3 other access points for local inhabitants), it is disappointing that the comments of the local community and Parish Council have been ignored and disregarded without consultation or direct contact. This leads to the conclusion that the process is fundamentally a tick box exercise and does not have communities’ best interests as the central pillar.</p>

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Removal of SAP50 - Land adjacent to Short Street, Chillenden (GOO006) from the local plan. It is not required economically, it is not relevant to sustainability of the local community, it is contra to climate change requirements and is likely to cause immeasurable future harm to adjoining properties. It is based on flawed assumptions and should be disregarded as a potential development site.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Given the flawed evidence for the site's inclusion it is preferable to explain in person the potential impact on adjoining properties as a result of increased flood potential.
Include files	NIC-Reducing-the-Risk-of-Surface-Water-Flooding-Final-28-Nov-2022.pdf 1025 Short Street, Chillenden - QVA Tech. Note - SW Assessment & Flood Study (2022 12 06).pdf (1)
Local Plan Consultation Point	SAP50 - Land adjacent to Short Street, Chillenden (GOO006)
Rep ID	SDLP790
Rep Status	Processed
Consultee ID	1329499
Consultee Full Name	Mr Kenny Ingram
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 50
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	Kenny Ingram [Redacted]

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

09 December 2022

Dear Sir/Madam,

Response to Dover Local Plan Review Submission Local Plan consultation (Regulation 19)

Please accept this letter as our representation to your Regulation 19 Submission Local Plan Consultation.

We consider the Local Plan Review to be unsound, because of the inclusion of Site SAP50 Land adjacent to Short Street Chillenden (site allocation reference: GOO006). The reasons for our representation are set out below.

Soundness

The Plan is not justified because:

Findings from the Sustainability Appraisal in which Chillenden scores “significant negative effect” on the following appear to have been disregarded:

- SA5 resources
 - SA7 flood risk
 - SA10 historic environment
-
- Site SAP50, which is an irregular shaped plot of arable land, lies between Short Street and Station Road, and is approximately 02 hectares in size. It would appear from the Dover District Council Housing and Economic Land Availability Assessment that there could be potential for up to 5 executive homes to be delivered on the site. The current number of dwellings in Chillenden is approximately 45 therefore it follows that if 5 further dwellings were built this would lead to an increase in homes of just over 11%.
-
- There is an old cart track (The Lane) which runs from Short Street to Station Road through the proposed site. The Lane is “unadopted” land and joins the road beside The Glebe (Station Road) and cuts through to Short Street. The exact location reference is GR 270538 to GR 272536. Southern Water own a pumping station on the perimeter of the proposed site and have a right of access along The Lane to the pumping station.
-
- The Lane has been utilised as a safe passage for pedestrians for The Goodnestone Parish Council Minutes often make comment about speeding in Chillenden and Station Road down from Knowlton to its junction with Goodnestone Road. Station Road has no speed limiting restrictions and no safety for pedestrians, horse riders or cyclists (without climbing onto the bank or hedgerow), from passing cars or farm vehicles. Therefore, using The Lane provides a significant amount of safety to this group of road users.
-
- The Lane does become overgrown as it is not designated as a Public Footpath or Bridleway and therefore it does not get “maintained” by either the Kent County Council or the Parish Council in the same way that designated Public Footpaths and Bridleways
-
- Research has established that The Lane or Cart Track is clearly shown on all historic and current OS maps and on ‘Mudges’ map (which dates from early C19th). However, it is not shown as a ‘public right of way’ on the Definitive Map published by Kent County Council who, I understand, are the highway authority. There is little doubt that it is an historic public right of Research is currently underway to establish if there is a mechanism for petitions to be made to the KCC for The Lane to be included on the Definitive Map.
-
- The proposed site SAP50 is shown on the Dover District Council Local Plan as one area, but it should be shown as two distinct areas either side of The Lane. Additionally, one side of the potential site is within a Conservation Area whilst the other side is not. Clearly, residents of Chillenden and the Parish, are concerned that The Lane would be “swallowed up” by any development.

1 SA5 Resources

- The key objective of the National Planning Policy Framework is a presumption in favour of sustainable development, which is the fundamental basis for the assessment of applications. This involves economic, social, and environmental considerations. The main aim of Policy SP1 is: “to develop sustainable communities and seek to ensure that adequate community facilities are provided.” The commission for Rural Communities’ State of the Countryside document sets out key services which it perceives as being important to the sustainability of a rural community. These are:
 - Banks
 - Petrol Station/ car sales/repairs
 - Shops
 - Post Office
 - GP surgeries
 - Dentists

Sustainable communities are defined as those possessing a range of services and alternative modes of transport, to minimise the daily use of the car.

- Chillenden does not comply with this definition by virtue of the lack of facilities in the hamlet. There are no community facilities other than the pub, the local church and village hall.
- There are poor transport links to and from The bus service is limited to a return bus route weekly on Wednesday, (Canterbury), Thursday (Sandwich) and Saturday (Canterbury). The service leaves Chillenden around 10:30 and returns around 13:30, and there are no services on Sundays or Bank Holidays. There is a school bus, which travels along Short Street, that services the village daily during school terms. This service is under review and is highly likely to be reduced in January 2023.
- There is very little employment within Chillenden meaning residents travel out of the area for work, and as the public transport is limited this means residents depend upon the use of a private vehicle which contributes to the number of vehicles within Chillenden and travelling on the district’s road network, with the resultant congestion and pollution.
- In order to gain access to the nearest Rural service centre at Aylesham, which provides a wider range of facilities and a better bus service, would involve an hours walk along roads without pavements or lighting. The nearest local train station is again at Aylesham; however, it has limited parking.
- Chillenden has been identified in the small villages and hamlets category in the settlement hierarchy where windfall infill development would be acceptable in principle. In order to ensure any windfall schemes are integrated properly within Chillenden, any development proposals would need to show how it can complement Chillenden’s existing settlement character in terms of its layout, design, scale, and appearance.

2.7 It is believed that the development of the site would:

- Create a significant adverse impact on the amenity of the existing residents of both Short Street and Station (14 households, approx. 33% of the total number of households).
- It would result in significant harm to the landscape and heritage
- It is not capable of having safe lighting and pedestrian access provided without a significant impact on neighbours or on the integrity of the street scene.

It is therefore argued that windfall infill development of the site cannot be satisfactorily integrated into the existing settlement.

2.8 Although only one of a wide range of background studies which fed into the Sustainability Appraisal and Growth Options work the document titled Topic Paper Rural Settlement Hierarchy (Regulation 18 Consultation on the draft local plan Dated August 2022) states that in terms of facilities Chillenden scored 6 and fell into the category of having low level sustainable facilities. This is a lower score than that stated in the December 2020 paper.

2.9 The study concluded:

The continued national policy emphasis on sustainable development means that housing development should, where possible, be concentrated in the three urban centres of the District, Dover, Deal and Sandwich, with new development in the rural areas focused on villages commensurate with their scale and position in the hierarchy, unless local factors, including flood risk and environmental designations, dictate otherwise.

Nothing has changed in respect to the amenities available in Chillenden since these Studies were published.

3.1 Access and egress to this site would be via either Short Street or Station Road which are both single lane with no pedestrian provision and with pinch points that could not be modified easily. Emergency access via the single-track roads would be problematic. Any road widening or highway improvements to facilitate access to housing on the site may require the purchase of land for such works.

3.2 Parts of Short Street are bordered by existing residential properties, which are situated directly adjacent to the highway, and the volume and nature of the increase in traffic would have a significant impact on their residential amenities.

3.3 A working farm, Yew Tree Farm, is situated at the junction of Short Street and the main road through Chillenden. Short Street is used regularly each day by agricultural vehicles travelling to and from the farmyard and the fields.

Short Street towards Station Road.

Short Street towards the village.

Short Street towards junction with Station Road

Station Road junction with Short Street

Station Road towards Cave Lane

1 SA7 Flood risk

4.1 The Level 2 Strategic Flood Risk Assessment categorises Site SAP50, as being a site in Flood Zone 1 with >40% of the site at risk from surface water flooding. 62% of the site is considered developable.

4.2 The SAP50 Site Allocation entry in the Reg 19 Consultation, indicates that a site-specific Flood Risk Assessment is required to guide development to areas of low flood risk, in accordance with the Sequential and Exception Tests

4.3 A locally commissioned Surface Water Assessment and Flood Study (ANNEX A) reviewed the Chillenden catchment hydrology, local topography and observed, historical flood events and demonstrates that the SFRA flood mapping used by Dover District Council in Site Allocation assumptions, does not reflect the topography, or observed flood behaviour, at the site. Specifically, this Flood Study concludes that:

- Current EA/SFRA surface water flood mapping does not reflect specific topography at the site.
- 98% of the site is at a high risk of surface water flooding.
- Conventional or SuDS drainage of the development is precluded by topography (no outfall), hydrogeology (no infiltration) and statutory flood risk obligations (increased flood risk offsite).
- Measures required to pass the Exception Test would increase flood risk offsite.

4.4 Site SAP50 falls into the category 'Sites in Flood Zone 1 and with a High Chance of Surface Water Flooding', which are listed in Table 2 of Dover District Council's Strategic Flood Risk Assessment Level 2, Sequential and Exception Test Summary and Review Note, May 2022.

4.5 Although site SAP50 is in Flood Zone 1 and would pass the Sequential test for residential land use, the known surface water flooding issues effectively put the flood risk into the categories of Flood Zone 2 (flood risk between 1 in 100 years and 1 in 1,000 years) and Flood Zone 3 (Flood Risk > 1 in 100 years).

1 SA10 Historic Environment.

5.1 Part of the site is adjacent to the Conservation Area and part within. It is also adjacent to a grade II listed building (The Grange) and is within an Area of Archaeological Protection.

5.2 Part of the site is visible from the grade II listed windmill due to the lack of vegetation and forms an important transition area between the village and the rural landscape.

5.3 The Conservation Area is characterised by large open spaces and very loose development grain. Many of the historic buildings have an agricultural character.

5.4 Development of the site at the number of units indicated would result in dense development which would be contrary to the character of the Conservation Area causing harm. The site has been assessed as having a heritage impact that would cause significant detrimental harm to identified heritage assets.

6.1 There are currently two empty dilapidated residential properties on Griffin Hill in Chillenden. These two properties are a depreciating asset and have a negative impact on their immediate surroundings. The Government has placed a responsibility on Local Authorities to bring empty homes back into use which in turn would reduce the need to build on green field sites.

6.2 Although the DDC have been informed regarding these properties it would appear they have not exercised their powers known as Empty Dwelling Management Orders to take over the management of these properties which have been unoccupied for a number of years.

6.3 These properties would provide affordable housing for two families as opposed to 5 executive type houses which would not generally be within the budget of young families.

1 Conflict of Interest

7.1 The landowner who is proposing to sell the land on which site SAP50 is deemed suitable for building on belongs to Lord FitzWalter. Lord FitzWalter's son is Edward Plumtre who in turn works for a company called BTF Partnership as an associate director.

7.2 BTF Partnership offer a wide range of professional services to meet the needs of both the rural and commercial land and property owners. In making representations on the Regulation 18 Local Planning Document Lord FitzWalter submitted a report to Dover District Council compiled by BTF in support of building on site SAP50.

7.3 Harry Kenton is also an associate director of BTF. Harry Kenton's father is Nicholas Kenton who is a serving Ward Councillor for a neighbouring ward to Chillenden, - Eastry rural. Cllr Kenton's responsibilities in relation to Dover District Council also include:

- Portfolio holder for planning & environment.
- Chairman of the Local Plan Project Advisory Group

7.4 The purpose of the Local Plan Project Advisory Group is to assist and support the Cabinet/Portfolio Holder for Environment, Waste and Planning regarding the preparation of the Local Plan and other associated documents and to advise Cabinet (via the Portfolio Holder for Environment, Waste and Planning) on the delivery of the Local Plan and other associated documents. The Group is not a decision-making body. Its recommendations are reported back to the Cabinet via the Portfolio Holder for Environment, Waste and Planning.

7.5 With regards to conflicts of interest, members of the Group are expected to declare a conflict of interest, and the precise nature of that interest, as soon as they become aware of its existence. Whilst the existence of an interest may not necessarily bar a member from participating in discussions, members are advised to refer to the relevant protocol of their organisation/governing body.

7.6 One can understand the concerns of local residents with regards to nepotism when you examine the direct links between Lord FitzWalter through BTF to the Chairman of the Local Plan Project Advisory Group.

	<p>8.1 Whilst it is accepted that some growth is required in small hamlets such as Chillenden, this should be proportionate to the relatively limited size of the settlement. However, due to:</p> <ul style="list-style-type: none"> • The location of the Site • The lack of facilities • The adverse impact on existing residents of Short Street • The adverse impact on the existing street scene • The significant harm to the Landscape and Heritage assets • The very real threat of flooding <p>8.2 In relation to the Chillenden site, it is believed that the Dover District Council have not properly considered all the comments within the Sustainability Appraisals but have relied upon a desk top exercise. It is our belief that the proposed site in Chillenden is not sustainable, nor can it be satisfactorily integrated into the existing settlement, nor does it offer the most appropriate strategy for delivering the required growth in housing.</p> <p>8.3 It is also anticipated that the Dover District Council take note of the Government's intention to amend the levelling up bill abolishing mandatory housebuilding targets for local councils.</p> <p>Kind Regards,</p> <p>Kenny Ingram & Joanna Bird</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Reassess SAP%) in relation to the locally commissioned FRA.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>SDLP790 Ingram Att1 - Redacted.pdf</p>
<p>Local Plan Consultation Point</p>	<p>SAP50 - Land adjacent to Short Street, Chillenden (GOO006)</p>

Rep ID	SDLP583
Rep Status	Processed
Consultee ID	1331780
Consultee Full Name	Mr Raymond Holyer
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP50 - Land adjacent to Short Street, Chillenden (GOO006)
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The DDC Local Plan highlights proposed development in Short Street, Chillenden and specifically at Site GOO006. Regrettably there appears to be little reference to an Old Cart Track which proposed development GOO006 is split across.</p> <p>The Cart Track (known locally as "The Lane"), which is, I understand "unadopted" land, joins the road beside The Glebe (Station Road) and cuts through to Short Street. The exact location reference is GR 270538 to GR 272536</p> <p>The Lane has been utilised as a safe passage for pedestrians for generations. The Goodnestone PC Minutes often make comment about speeding in Chillenden and the road (Station Road) down from Knowlton to its junction with Goodnestone Road past The Glebe has no speed limiting restrictions and no safety for pedestrians (without climbing into the bank or hedgerow), from a passing car or farm vehicle. Therefore using The Lane provided and still provides a significant amount of safety.</p> <p>The Lane does become overgrown as it is not designated as a Public Footpath or Bridleway and therefore it does not get "maintained" by either Kent County Council or the Parish Council in the same way that designated Public Footpaths and Bridleways are. My father Ron Holyer who was clerk to the Parish Council for many years, amongst many other tasks, regularly maintained The Lane on behalf of the local community. What I can assure you is that on every visit I make to my Mum, who resides at The Glebe, I endeavour to clear a pathway. During my enforced time in Chillenden, as a result of Covid-19, I made a big effort to open up The Lane for all concerned and have seen a significant increase in its use.</p> <p>After some research I have found out that "The Lane" is clearly shown on all historic and current OS maps and on 'Mudges' map (which dates from early C19th). However, it is not shown as a 'public right of way' on the Definitive Map published by Kent County Council who, I understand, are the highway authority. There is little doubt that it is an historic public right of way. It provides access to The Glebe, The Grange, Chillenden House and the Water Company Pumping Station, all of which will need to be retained. I am already in communication with the requisite authorities to have "The Lane" classified as a Restricted Byway.</p>

	<p>I mentioned in my opening paragraph about the DDC Local Plan and the site in Chillenden (GO0006) that is marked Green as a potential development site. The potential site is shown on the DDC Local Plan as one area but actually it should be shown as 2 distinct areas either side of The Lane. Additionally one side of the potential site is within a Conservation Area whilst the other side is not. Clearly I and other residents of the Village and indeed Parish, are keen that The Lane is not "swallowed up" should Development eventually be allowed on the site.</p> <p>I attach some photographs which may be helpful.</p> <p>Please let me know if you need any further information or anything clarified</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Ensure that The Old Cart Track (The Lane) remains a safe passageway for pedestrians and that the historic "rights of way" for The Glebe, The Grange and Chillenden House are maintained</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>3BFC28CC-7BAE-4C6B-A784-C831B918FAA7.png (3) 51DBDE60-051A-4402-8818-D383611F6E60.jpeg (2) 3843175A-EDBD-4E53-A603-D6466BC61B7E.jpeg (2)</p>
<p>Local Plan Consultation Point</p>	<p>SAP50 - Land adjacent to Short Street, Chillenden (GOO006)</p>
<p>Rep ID</p>	<p>SDLP749</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331701</p>
<p>Consultee Full Name</p>	<p>Mrs Rosalind Beeching</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>Chillenden 4.291</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The evidence detailed in the Dover Local Plan regarding the potential to develop site SAP50 - Land adjacent to Short Street, Chillenden (GOO006) is flawed and inaccurate. It is further inconsistent with the Climate Emergency declaration of November 4th 2019 as it makes no consideration for the impact of this development on surrounding properties.</p> <p>An independent assessment of the site conducted by QVA Consulting (attached) provides an evidence based analysis of the site and identifies the following key conclusions</p> <ul style="list-style-type: none"> - current EA/SFRA surface water mapping does not reflect specific topography at the site - 98% of the site is at a high risk of surface water flooding - Conventional or SuDS drainage of the development is precluded by topography (no outfall), hydrogeology (no infiltration) and statutory flood risk obligations (increased flood risk offsite) - Measures required to pass the Exception Test would increase flood risk offsite. <p>As regards the Climate Emergency declaration and duty of care, I refer you to Section 19 (1A) of the Planning and Compulsory Purchase Act 2004, which states</p> <p>“Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority’s area contribute to the mitigation of, and adaptation to, climate change.”</p> <p>Clearly a development that has the potential in increase the impacts of climate change on the local area including neighbouring properties is contra to the clear direction of said Act and the Climate Emergency declaration by DDC.</p> <p>Also attached is the final report of the National Infrastructure Committee on Reducing the Risks of Surface Water Flooding. It states Climate change and urbanisation are set to put more properties at risk. The number of properties in areas at high risk is set to increase by 2055, including:</p> <ul style="list-style-type: none"> • an increase of around 20,000-135,000 properties in areas at high risk due to the impacts of climate change, which will increase the intensity and frequency of heavy rainfall • an increase of around 35,000-95,000 properties due to new development putting more pressure on drainage systems. <p>A further 50,000-65,000 properties may be put in areas at high risk due to unplanned increases in impermeable surfaces (e.g. front gardens being paved over), which, alongside new development, is part of ‘urbanisation’– the conversion of natural (often permeable) environments to urban ones where rainwater cannot enter natural drainage systems.</p> <p>The greenfield site off Short Street is a natural run off for surface water and as such a natural mitigator of flood risks for existing properties along Short Street as well the noted heritage site of The Grange.</p> <p>Recently reported changes to the Levelling Up an Regeneration Bill state that the former targets for Local Authorities will no longer be relevant or compulsory. This means an abandoning of damaging centralised mandatory housing targets that have led to needless, unaffordable and poorly designed greenfield developments in favour of an advisory system that takes local character and need into account.</p> <p>Despite further registered concerns at the Reg 18 stage regards heritage (proximity to a listed building of significant historical importance) , environment (removal of hedgerows, destruction of wildlife habitat and hunting grounds for owls and bats), access and egress (site is approached on a single track road and has 3 other access points for local inhabitants), it is disappointing that the comments of the local community and Parish Council have been ignored and disregarded without consultation or direct contact. This leads to the conclusion that the process is fundamentally a tick box exercise and does not have communities’ best interests as the central pillar.</p>

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The removal of the site from the Local Plan as suitable for development due to the location and heritage of the site as well as its importance as a surface water run-off.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	To explain to the Inspector why the site is not suitable for development.
Include files	1025 Short Street, Chillenden - QVA Tech. Note - SW Assessment & Flood Study (2022 12 06) (1).pdf
Local Plan Consultation Point	SAP50 - Land adjacent to Short Street, Chillenden (GOO006)
Rep ID	SDLP1971
Rep Status	Processed
Consultee ID	1272977
Consultee Full Name	Michael Tarring
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP50
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I wish to make a comment on a specific aspect of the proposal to allow five houses to be built on land in Chillenden reference as GOO006 in the final Local Plan. I have raised the same subject in a letter submitted for the Draft Plan but didn't get an acknowledgement and have only recently found out that the proposals have moved on. Having now read the current documents and the submitted report prepared for the landowners by BTF Partnership I think I need to comment further.

This letter is not to raise objections to the proposal outline but to reiterate the importance of a detailed applicants report on the methods of preventing flood risk not just to the site but to ensure no additional effect to the surrounding land, roads, and buildings around it.

I note that your own report stated that a Flood Risk Assessment will be required and that SUDS should be provided I would have preferred 'Must Be' – but the BTF report baldly states 'not affected by Flood Risk' which even if true for this piece of ground is not for its immediate surroundings. It may be it was where the Ordnance Survey sheet breaks but I notice that the Location Plan accompanying their report cuts out before it needs to show the large pond which sits less than 50 metres away from the proposed site on the lower ground and adjacent to my house and one other.

The pond is dry for most of its life, but it has filled more or less to its rim at least three times in the last 12 years. More often the limited number of working gully's and other inlets which it collects water from have filled or been blocked by mud and debris from the many roads it serves so that the pond stays less than half full while my drive is awash with muddy water coming to within an inch or so from my front door threshold and other openings. This happened twice last year and most recently at the end of August this one (the end of the drought). Both Short Street and Station Road which border around the site in question drain down to the single gully on the corner of Short Street and Griffin Hill.

Plot GPP006 falls gently South Westward towards the nearby properties with the ground continuing to slope slightly around the pond till it hits Griffin Hall where the road starts to rise steeply in both directions. Short Street and Station Road fall less steeply until its South West corner where the falls slows down to a minimum. As both are narrow country lanes there is no drainage other than gravity and there is already fall off from both hard and soft from most adjoining land. I would note that after heavy rainfall surface water continues to flow more steadily and much more muddily from Short/Station Roads than from either of the far steeper ends of Griffin Hill.

I don't believe that plot GOO006 presently contributes any measurable run off to this. The concrete path which runs along the majority of the South Western border is slightly higher than the adjoining grassed area which always seems to be well maintained. I would note that it remained green and lush looking throughout the drought so there is obviously some source of moisture there. Even with a limit of five houses with appendages, access roads, parking, patios etc., there will be a large amount of run off created with likely increases over the years in ways that the Council have no further legal control over (take the brickwork site as an example). On the other hand, the site is big enough to provide a solution. I would suggest the pragmatic Netherlands one of cutting a continuous drainage ditch along the concrete access road at the start of sitework but that is for others to decide. To ignore it will cause everyone involved a load of unnecessary problems for the future.

I hope this letter can be filed somewhere for future consideration and would be grateful if you could acknowledge receipt.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

SAP51 - Land opposite the Conifers, Coldred (SHE013)

Local Plan Consultation Point	SAP51 - Land opposite the Conifers, Coldred (SHE013)
Rep ID	SDLP1551
Rep Status	Processed
Consultee ID	1333333
Consultee Full Name	Mr Colin Tearle
Consultee Company / Organisation	Shepherdswell-with-Coldred Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP51
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Coldred SHE013</p> <p>This development does not comply with Policy T12 – Transport Assessments and Travel Plans.</p> <p>This development should in so far as its size, characteristic and location be designed so that opportunities for sustainable transport modes are maximised and provide for a variety of forms of transport as alternative to travel by private motorised vehicle. The proposed development is within a conservation area which seems a contradiction to DDC's own conservation objectives and would negatively impact the landscape and historic environment that the Conservation Area is intended to protect.</p> <p>The only way to access the facilities of Shepherdswell, ie school, doctor, shop and railway station is along a narrow country lane with no pavements.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	If development of any kind is to be permitted it should be linked to a S106 agreement to improve the facilities within Shepherdswell and Coldred.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP51 - Land opposite the Conifers, Coldred (SHE013)
Rep ID	SDLP1802
Rep Status	Processed
Consultee ID	1331707
Consultee Full Name	Mrs Bethan Tredwell
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP51
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Having read the section of the Dover plan regarding the land in coldred, I have previously objected to the original planning permission submitted by the land owner. My objection still stands, however I have additional concerns that the Dover plan for coldred is not in keeping with the plan for climate change and sustainability.</p> <p>Bus routes through the village are currently under consideration and likely to be discontinued in the summer of 2023. This will result in an increase in vehicles increasing the carbon emissions as the need for transport is not met.</p> <p>The plan states that hedgerows and trees will remain, building on the site will cause destruction of a wild natural habitat in a conservation area.</p> <p>The building of 5 houses will increase the size of the hamlet by 10%, the roads in and around the Hamlet are small country lanes increasing the through traffic would be a hazard as there are no foot paths and increase the potential risk of accidents.</p>

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP51 - Land opposite the Conifers, Coldred (SHE013)
Rep ID	SDLP1951
Rep Status	Processed
Consultee ID	1334249
Consultee Full Name	David Oliver
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP51 (SHE013)
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Dear Local Plan Team SITE DELIVERY Response to blind email Proposed new housing SHE013 SAP51 refers

	<p>I am in receipt today 23.11.22 a copy of an email message which requests an update on the proposal to build 5 dwellings in Coldred. Land opposite the Conifers Coldred Road Coldred CT15 5AR submitted 21.5.21</p> <p>The development is awaiting an 'all matters reserved' decision. If permitted the dwellings will progress immediately to the design code stage and detail design and be developed within the five-year window.</p> <p>CURRENT SITE STATUS</p> <p>Awaiting decision on Outline application 21/00882 (with all matters reserved) for the erection of 5no. detached dwellings submitted 21.5.2021</p> <p>The architect HMMY standing ready to progress to the design code stage</p> <p>Discussions undertaken with major developers over financials and project structure options</p> <p>No external public infrastructure works or enlargements are required.</p> <p>The developments internal infrastructure – utilities, may compromise a first phase, if requirement under 'reserved matters' (a single continuous phase is preferred by developers for this small site).</p> <p>I am advised by interested developers that from breaking ground to broom clean this site requires 12 months assuming traditional methods of construction.</p> <p>Soil investigation. A 2-metre-deep pit has been excavated to gain foundation requirement data and a 57-metre-deep borehole has been drilled and logged to enable heat pump well design. Site cleaning is on-going, and recommendations noted in the environmental report are being undertaken.</p> <p>I am the sole freehold owner of the land</p> <p>The land is not financially burdened nor has legal or physical constraints</p> <p>All reports requested by the planning officer have been submitted. Including a Heritage report I trust this information is satisfactory. Please contact me if you require fleshing out of any of this information.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	

Nonington

Local Plan Consultation Point	Nonington
Rep ID	SDLP933
Rep Status	Processed
Consultee ID	1261008
Consultee Full Name	Dr John Garcia-Rodriguez
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Developments of land around Aylesham, Nonington and Elvington
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>What planning discussions have happened with Nonington Parish Council and equivalents for Aylesham and Elvington? Exhibitions and requests for comments but not proper conversations and discussions. You cannot call this cooperation. The Duty to Cooperate has not been fulfilled - also evidenced by the councils' objections and surprise at these plans.</p> <p>Despite the plan strategically saying that most development is needed in Dover and that it has an imbalance of housing and is unattractive, DDC has decided to inappropriately "promote" Aylesham now a large village, isolated with few amenities, to the status equivalent to Sandwich, a town that has developed over centuries and has many facilities and bus routes based on it. This is not justified and so the plan is not positively prepared.</p> <p>Roads around Aylesham, Nonington and Elvington have already too much traffic. Where are the assessments? The attached map shows how poor the road infrastructure is. the roads are narrow, bendy and almost all without pavements. There are v few bus services - none in Nonington. The plan is not sound as there would be far too much new traffic. So the plan is ineffective, not positively prepared and not justified.</p> <p>Where is the employment to come from? We do not need more space - there are empty units. Snowdown Colliery site is going to remain leased to the NCB Residuary Body and not developed - as confirmed by the owner. Even if it were to be released, the costs of development, whilst preserving key buildings and on this brownfield site, would not be economic. In the plan, this is a pillar of justifying the developments and the need for more housing but it is very tenuous to say the least - so the plan is unjustified and unsound.</p> <p>The population of Dover District and surrounding districts is pretty static. There is not the robust evidence to justify the degree of planned housing expansion. The plan is not justified or positively prepared. Large developments in East Kent provide housing which looks cheap to London boroughs which can place people they are responsible for into East Kent. We have seen this already in several places. Those placed are unlikely to bring prosperity to the region given their dependence on local authorities for housing. This is not serving the needs or wishes of the existing local population so on these two counts the plan is not positively prepared, evidenced or has there been cooperation with locally elected bodies</p>

	<p>like parish councils who are only too aware of relatively large influxes from London into new developments. It is also not effective as many of these people will not have the skills to fill employment needs.</p> <p>The description of one of the areas as a "Country Park" yet it has 420 houses allocated is disingenuous. Is this an attempt to allay concerns? The areas around Aylesham are also earmarked by Canterbury City Council for major development. It would turn the whole area into an isolated housing estate, most people commuting for work elsewhere. The lack of facilities risks widening inequalities as it would be not be attractive to people with the resources to live elsewhere.</p> <p>Given the lack of soundness of this plan, I doubt that it is legally compliant.</p> <p>This is not just nimbyism - we should be planning something that we ourselves could well imagine being keen to move into. I really doubt many DDC planners or councillors or plan inspectors would wish to move into the new estates in the proposed locations and with the lack of facilities that this plan envisages. From the heart - do you really think that this is what you want to do? Create a big housing estate of poorer people? Almost an East Kent ghetto? Large housing estates carefully and optimistically planned and built elsewhere have gone quite wrong for similar reasons - poverty and isolation.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>I cannot see how the current plans can go ahead. There needs to be a rethink, ideally abandoning plans to turn this area predominantly into a large housing estate.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>IMG_3811.jpeg</p>
<p>Local Plan Consultation Point</p>	<p>Nonington</p>
<p>Rep ID</p>	<p>SDLP2010</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1334450</p>
<p>Consultee Full Name</p>	<p>Janet Gambrell</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>Nonington</p>

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Dear Planners and Politicians, I am writing to express my dismay at the plans to develop the area around Nonington, Aylesham and Adisham.</p> <p>1) This is a rural area where there are natural habitats which need to be preserved for wildlife and human regeneration. We need to preserve areas of trees and open spaces. People living here do not want an urban environment imposed on them. We should be preserving such areas for ecological reasons and farmland should be kept for food production. What has happened in Ukraine has brought home to us the problems of reliance on outside sources.</p> <p>2) The infrastructure is not adequate for the present population. We are already being told to limit our use of water. There are not enough schools, hospitals or schools for our needs. The sewage systems would not cope.</p> <p>3) The roads are already overcrowded, causing air pollution and the roads are not properly maintained. Many are country lanes hardly fit for present traffic flow.</p> <p>4) Public transport for our village of Nonington is practically non-existent. Even more cars would be needed.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

SAP52 - Prima Windows, Nonington (NON006)

Local Plan Consultation Point	SAP52 - Prima Windows, Nonington (NON006)
Rep ID	SDLP36
Rep Status	Processed
Consultee ID	1330387
Consultee Full Name	Mr Andrew Hill
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP52
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<ul style="list-style-type: none"> • The construction of 35 new dwellings on land to the east of the Prima windows site would impinge on green land already identified as valuable rural pasture. In addition to the much larger developments proposed for Aylesham, Elvington, Eythorne and Eastry would contribute a very high volume of new traffic, both private vehicles and delivery transport - not to mention construction traffic to the narrow lanes through the village that are already used as a "rat-run" by surrounding settlements, with Mill Lane being particularly badly affected. Furthermore, the proposed new houses being taller than those in Mill Lane would cause exiting properties to be overlooked with the resultant loss of privacy and reduced quality of life. • In addition, there are many concerns locally about possible existing contamination to the industrial portion of the site and, • The inability of existing sewage/ drainage to cope with the greatly increased volume. • The unsuitability of the single access to the site situated as it is on a narrow but already busy road and close to a blind bend.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	There is no local requirement for additional housing in Nonington, the proposal should be refused.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP52 - Prima Windows, Nonington (NON006)
Rep ID	SDLP729
Rep Status	Processed
Consultee ID	1261008
Consultee Full Name	Dr John Garcia-Rodriguez
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP52
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Para 7.548 of the Sustainability Appraisal or Reg 19 states that for SAP52 (NON006) the effects identified throughout this chapter are likely to be particularly acutely felt given the size of potential development relative to the area. <i>This is very true and para 3.72 of this document says that developments will only be permitted at a scale that is appropriate to the size of the settlement and the range of services and community facilities that serve it. Yet here it is.</i></p> <p>To quote the table on page 53 of the SA document states, with my comments in italics</p> <p>"Nonington is identified in the small villages and hamlets category in the settlement hierarchy where windfall infill development would be acceptable in principle. <i>This land is clearly not windfall infill development as it is right on the edge of the village - this principle should not apply</i></p> <p>On this basis it was considered that it was only appropriate to continue with the existing undeveloped Land Allocations Local Plan allocation (NON006), and that to allocate further sites would not be sustainable in this location. NON004 and NON009 were therefore discounted. <i>There is no evidence to support this consideration to continue. As it is not infill there is no basis either. What is the link with further hypothetical sites on this location? Does that mean NON006 continued because the others were discontinued? NON006 needs to be considered on its own merits.</i></p>

This site should never have been allocated in 2005 for housing. It was allocated as brownfield, 60% of the land is paddock, previously orchard. No-one, including members of the Parish Council knew that it had been allocated or that there was even a Land Allocation Plan when development was mooted 6 yrs ago. Please see the section at the end for a summary of the Parish Council Minutes. The consultation for the 2005 plan did not work - this goes against the fundamental principles of planning and DDC's Core Strategy and current Statement of Community Involvement. A recent planning application has generated a huge number of objections. Were people to have been aware of plans to allocate this land in 2005 then DDC would have received very many objections and we would have all known about it. I think this makes the point that this land should be removed from the plan on the basis that the original allocation's consultation did not work. Inclusion in subsequent plans has occurred because there is a presumption to continue what was decided before, assuming that prior decisions were sound - "only appropriate" to use the words on page 53, only this time it wasn't appropriate.

Furthermore, I own part of the land allocated in the revised NON006r, a substantial strip across the whole SE boundary. The revision was to remove College Cottage as it was land unavailable for development. NON006r as it stands is not available for development as I own part of it. This is a second basis for removing this land from the plan.

A number of key considerations have been identified in relation to the proposed site allocation here and these will need to be addressed by the land owner as part of the planning process.

Furthermore, there is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA on the site here. *The SA has not fully identified the heritage aspects associated with this site. In particular heritage aspects to do with a historic wall and that the site includes part of a conservation area and affects the setting of several listed buildings which border the site. This is a third reason to remove this land from the plan.*

Please note that part of the land, the actual Prima site, brownfield, about 40%, is suitable for development - with a few exceptions, this is widely acknowledged. We have held community meetings in my house and discussed this in Parish Council Meetings so I have a good feel for local opinion.

Noningto Parish Council Minutes - evidence for consultation not working

5th July 2017

Prima Windows site had been advertised as a possible site for housing development. Several residents voiced their concerns particularly with regard to a possible conflict with an old wall which may have a preservation order on it. The PC advised that there was little they could do until an actual planning application was made. Parishioner Peter Hobbs may well have knowledge that would be useful.

6th Sept 2017

Following on from the Mill Lane residents attendance at the July meeting a further 3 residents brought up the issue of the Local Development Plan which showed the Prima site and orchard attached to be suitable for housing. The residents were concerned they had not been consulted. Cllr Manion pointed out that the LDP had been on the plan for a number of years and **a lengthy discussion ensued as to what was deemed 'consultation'**. It was agreed that the minutes should show the opposition to the LDP by some Mill Lane residents.

1st Nov 2017

The Prima site, according to the RPC website was now under offer and an outline plan of what 35 houses would look like was also there. The plan also showed College Cottage as demolished with 5 more houses on that plot.

April Newing, Senior Planner, at Dover District Council had emailed the Clerk stating that a review of all land in identified in the Local Development Plan as suitable for development would be undertaken in 2018. However, any planning applications that were made before the review would be dealt with through the usual planning process.

The residents of Mill Lane are forming a group to fight any planning application **and also to highlight the perceived lack of consultation over the site when it was first identified over 15 years ago. The PC did not have any records of the site being included in the LDP or records of any consultation. A resident of Mill Lane argued that this was against democratic principles.**

It was stated that there was no need for affordable housing on the site as there were over 400 being built in Aylesham and more in Whitfield and also there were also no shops or school in the village.

Some did not object to suitable houses being built on the actual Prima site but on the piece of land adjoining to the south.

The status of College Cottage was discussed as to whether it was a listed building.

There were 17 parishioners present at the meeting who thought they would be affected by the planning application.

The PC said that they would need to take into account the views of all parishioners should any application for planning be made.

ACTION ITEM

Write to DDC regarding lack of consultation and highlighting the views of residents to this issue and enquire as to the status of College Cottage

6th Dec 2017

DDC had written to the local MP, Cllr Keen and the Clerk but the response was disappointing in that it gave no details of consultation and stated that any future planning application would go through the normal planning process. Further requests for information would be made.

Cllr Tee read some notes from Ash PC regarding DDC policy on housebuilding and it was stated that DDC had to build at least 510 houses per year for the next ten years. Cllr Tee gave a list of many sites in the Dover area earmarked for possible future housing, including green field sites.

College Cottage was not a listed building.

If a planning application was received then an extraordinary meeting would be called to discuss.

Some residents of Mill Lane backing onto the site had historical access onto the site to burn rubbish etc.

It was decided that producing a Neighbourhood Plan would be considered at an extraordinary meeting on a Saturday morning in February. A flyer would be delivered to all village residents to explain what was proposed and the date of the meeting.

Typical local Neighbourhood Plans can be found using this link:

<https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/Neighbourhood-Planning/Home.aspx>

ACTION ITEMS

Write to DDC again asking for more specific details on consultation

Produce a flyer for discussion and agreement

3rd Jan 2018

DDC had not been in contact since the last meeting.

Cllr Manion said that a Neighbourhood Plan was a lengthy process that would take several years to complete and would require 51% of the residents to agree to it. He also stated that Prima was a brownfield site and was therefore a typical site for development as part of Government policy. The paddock attached to it may be a better option for any objections to development.

Cllr Plumtre had produced a flyer to be distributed to all residents to get their opinions. There was a discussion about the actual wording and a revised flyer was being considered. Once agreed it would be distributed and a special meeting for all parishioners would be called one Saturday in February.

A parishioner stated that College Cottage was 'Under Offer'.

Cllr Plumtre said she would meet with Mill Lane residents to see the site for herself.

ACTION ITEMS

Produce a flyer for discussion and agreement Meet with Mill Lane residents

7th Feb 2018

The PC had now received a communication from Clagues, architects, regarding a planning proposal. They will be holding a public meeting on 22nd February from 3pm to 7pm at the village hall. The PC will try to meet the planners prior to this date. The PC will also deliver flyers about the meeting throughout the village.

7th March 2018

	<p>The open village meeting had taken place and about 100 people attended. Feedback was now being reviewed by Clagues, the architects, and a planning application was expected in April.</p> <p>Comments made by residents would be available online and a summary put into the village magazine.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Regarding this site - remove it from the plan.</p> <p>To include it is obviously not sound.</p> <p>It is also not legally compliant in that there is good evidence that the consultation in 2005 did not happen. Dover District Council has a duty to ensure that consultation is effective and cannot pass off that duty to another body.</p> <p>The Duty to Cooperate was also not fulfilled as there clearly was no effective liaison with Nonington Parish Council which has not memory or record of having been consulted - see attached document which includes some minutes.</p> <p>These errors have resulted in the site remaining in the plan, largely through presumption that what was done can stand unless there is a clear objection from a statutory body.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>I wish to participate as I believe that there has been a miscarriage of justice involving consultation. The reasons should be clear from the arguments and evidence already included.</p>
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP52 - Prima Windows, Nonington (NON006)</p>
<p>Rep ID</p>	<p>SDLP553</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1268302</p>
<p>Consultee Full Name</p>	<p>Roma Capital Group c/o Agent</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	<p>Elizabeth Welch</p>
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP52 - Prima Windows, Nonington (NON006)</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>Yes</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Yes</p>

<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Yes</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>Additional information is requested by DDC regarding availability and deliverability of the site - accordingly the following supporting material is detailed below</p> <p>SAP52 - Prima Windows, Nonington (NON006)</p> <p>A detailed planning application for the development of the site for 29 houses was submitted to the district council in October 2021. The application has been made by Roma Homes, who have an agreement with landowner to develop the site once planning permission has been obtained .</p> <p>The application, reference no. 21/01615, has been subject to public consultation and negotiation with the council's Planning Officers, and has proceeded to a point where agreement with officers has been reached that the scheme proposes an acceptable form of development in all respects and the application is now awaiting a report being made to the Planning Committee with a recommendation for approval. The case officer indicated in September that they would be looking towards reporting the application to the Planning Committee meeting in December 2022 or January 2023, at time of writing it is anticipated that the application would likely be reported to the January meeting.</p> <p>Once a resolution to grant planning permission has been obtained from the committee, the S106 agreement required in connection with the provision of affordable housing and development obligations, will need to be completed with the council, to allow the planning permission to be formally issued.</p> <p>The applicant's intention is to have commenced construction on site within 6 months of the planning permission being issued. This six month time frame will allow for the technical construction drawings to be produced and for any pre-commencement conditions to be discharged. It is anticipated that construction of the development will then take place over the following 22 month period.</p> <p>The application provides details of the proposed technical solutions for the development of the site. The development is not reliant on any off-site infrastructure improvements to allow it to come forward. The site itself has no ownership or infrastructure constraints or extraordinary development costs, the site is considered by the applicant to be viable to develop. For these reasons there are no known legal or technical reason to stop the site being brought forward in accordance with the timescale outlined above once planning permission has been granted.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>No changes required</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Not Applicable</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	

Include files	
Local Plan Consultation Point	SAP52 - Prima Windows, Nonington (NON006)
Rep ID	SDLP1557
Rep Status	Processed
Consultee ID	1252218
Consultee Full Name	Cllr Linda Keen
Consultee Company / Organisation	DDC WARD - Aylesham, Eythorne and Shepherdswell
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP52
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I write in support of the Parish Council's response, and summarise briefly the key points below.</p> <p>1. Validity and accuracy of the Local plan – the Parish Council identifies a number of worrying inaccuracies and inconsistencies (for example, Eythorne does NOT have a railway station), and is particularly critical, in considerable detail, about the UNSOUND Dover Council traffic impact surveys and studies. After extensive and careful analysis of the data, these appear to underestimate to a considerable extent, the real levels of the increased traffic flows in this rural area, resulting from the Plan. This is particularly significant as cumulative traffic impact is a key feature which should limit, to a far greater extent than the Plan indicates, the extent of house building in these rural areas.</p> <p>2. Cumulative impact - although there are only 35 houses to be built in this parish, this village is already suffering more and more from significantly increased traffic flows through the village because of the new developments which have already taken place at Sandwich and Aylesham, and the further Local Plan increases in housing provision both in these areas and other local villages such as Eythorne. To this, should be added the 3000 plus houses scheduled in the just published Canterbury Local Plan at Adisham, right next door to Aylesham. Because all these developments occur sporadically, insufficient attention is paid to the cumulative impact of them. The PC has faced considerable difficulties in getting any mitigation from these developments, which take place a bit at a time, and Nonington does not appear to qualify for any section 106 funding to reduce this adverse incrementally cumulative effect on traffic flows through the village.</p> <p>3. Duty to co-operate – in relation to the Canterbury local plan there appears to have been little or no dialogue, let alone co-operation, between the 2 councils about the cumulative impact of both their local plan house building proposals in this rural area. Moreover, while Canterbury City Council states that the traffic impacts of their proposed Aylesham/Adisham development will be limited by a new bypass, the Council has not provided evidence about the impact of this on the nearby rural roads in the Dover District area. There is an almost total absence of joined up working across the boundaries of the two Council Districts.</p>

	<p>4. Sustainability – given the totally inadequate level of local public transport (thus increasing car dependency), cycle tracks, pedestrian footways, plus the inadequate road infrastructure, loss of farming land, these greenfield developments (76% of all proposed housing is on greenfield sites) do not amount to ‘sustainable development’ as defined in the NPPF</p> <p>5. In conclusion, I quote directly from the Parish Council report’s succinct concluding statement:</p> <p>‘ The additional scale of Canterbury’s proposed development and proximity to Aylesham and the District’s boundary, means that DDC’s Reg 19 plans is not positively prepared as it is not informed by agreements with other authorities or consistent with achieving sustainable development.</p> <p>- It is not justified as it is clearly not based on proportionate traffic or sustainability evidence.</p> <p>- We would argue that this also compromises plan efficacy given the absence of effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Given all the problems identified above, I would argue that the proportions of housebuilding in the greenfield and brownfield sites should be reversed, and that only a small proportion of houses should be built in rural villages such as Nonington – until or unless all these sustainability issues can be resolved. In practice, they cannot because Dover Council has no control over Kent County or national Government spending (basically cutbacks) on highway infrastructure, public transport and other essential rural needs, and has no cash of its own to spend on them. Moreover, Developer contributions will be insufficient for alleviating these problems as well.</p> <p>Given that much of this development will probably be approved anyway, it is essential, that resources are allocated for more public trans[port provision, and traffic calming and speed restriction measures in Nonington – accidents have already happened on this road, and local pedestrian and cyclist safety in the village is already severely compromised. The PC has campaigned for years for these, but, despite accidents, KCC Highways refuse to do anything. And, please, resite the speed limit sign at the new cottages opposite Snowdown Colliery which needs to be placed BEFORE these houses, not mid-way along</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	No
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	SAP52 - Prima Windows, Nonington (NON006)
<p>Rep ID</p>	SDLP1450
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1331661
<p>Consultee Full Name</p>	Chloe Rose
<p>Consultee Company / Organisation</p>	RSPB
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	SAP52
<p>2 - Do you consider this part of the Plan sound?</p>	No

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>We have overlaid Turtle Dove territory data with the proposed sites in the Dover Draft Local Plan (using data from the 2021 National Turtle Dove survey and supporting data from BTO BirdTrack), to see if any developments pose a risk to known Turtle Dove territories.</p> <p>Two proposed sites for development contain recent records of Turtle Dove territories within a 1km area; SAP28 - Land between Eythorne and Elvington and Elvington and SAP52 - Prima Windows, Nonington. While we welcome the consideration of protecting trees and hedgerows within the site, further consideration needs to be provided for Turtle Doves, see below mitigation guidance.</p> <p>Turtle Dove Mitigation Guidance</p> <ol style="list-style-type: none"> 1. Detailed proposals should aim to protect areas of scrub and mature hedgerows suitable for nesting habitat. If destroyed, this habitat can take up to 20 years to establish and become suitable for nesting. 2. Detailed proposals should aim to ensure foraging habitat is available and managed correctly (food shortage is the main factor triggering its decline on their breeding grounds). Alongside this, fresh water sources should be retained and managed sympathetically. 3. Where known breeding birds occur, detailed proposals should feature; nesting habitat, foraging areas and a freshwater source within 350 metres. Studies have shown that recently fledged turtle doves will rarely venture more 350 metres from the nest site (Dunn et al. 2016) and at this stage are likely to: <ul style="list-style-type: none"> I. be very vulnerable to predation. With increased human habitation it is possible there may be adverse effects from generalist predators (e.g. cats) that tend to congregate near to human habitat. (Dunn et al. 2016) and II. incur poor body condition if there is insufficient food nearby in the form of natural arable plant species (as opposed to anthropogenic food resources such as garden bird seed mixes and brassicas) (Dunn et al. 2018). As well as maintaining what habitat is already present for Turtle Doves within the Dover TDFZs, we recommend looking at opportunities to further expand/create areas of suitable habitat to ensure the long-term preservation and prosperity of this species within the Dover district. Further information can be found; www.operationturtledove.org ('helping your turtle doves'). The RSPB can assist with this advice on a case-by-case basis. <p><i>(DDC note - this is an extract from full RSPB representation reference SDLP1435)</i></p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	

Local Plan Consultation Point	Ringwould
Rep ID	SDLP472
Rep Status	Processed
Consultee ID	1259309
Consultee Full Name	Mr Peter Jull
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP53
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Apart from brownfield/greenfield the same constraints and advantages apply to RIN006 rejected at the HELAA stage. It would be entirely sensible for this area to be designed and developed as one.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Expand the extent of SAP53 to include RIN006 and increase the indicative number to 20.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Ringwould
Rep ID	SDLP1195
Rep Status	Processed
Consultee ID	1331099
Consultee Full Name	Rosie Cavalier
Consultee Company / Organisation	Esquire Developments
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3 SP4 SAP40
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>1.0 INTRODUCTION</p> <ul style="list-style-type: none"> • These representations have been prepared by Esquire Developments Ltd, a multi-award-winning SME developer based in Longfield, Kent. • Esquire Development has a number of land interests in Dover, including <ol style="list-style-type: none"> 1 New Townsends Farm, St Margaret's (Appendix 01); 2 Appleton Farm, East Langdon (Appendix 02) and 3 Ringwould Nurseries, Ringwould (Appendix 03) • New Townsend Farm is identified as an emerging allocation identified as SAP40 (STM006) in the Regulation 19 Local Plan. Appleton Farm and Ring would Nurseries are not identified as emerging allocations but put forward as suitable alternative sites. • As a local SME Housebuilder, the development of these sites brings forward the opportunity to help diversify the housing market and offer a wide choice of housing from different developers.

2.0 RESPONSE TO THE REGULATION 19 PLAN

A. New Townsend Farm, St Margaret's-at-Cliffe

- St Margaret's-at-Cliffe is recognised in the Regulation 19 Local Plan as a Local Centre along with Eythorne and Elvington, Eastry, Kingsdown, Shepherdswell, Wingham and Ash. These Local Centres are noted to be the largest of the district's rural settlements. The Local Centres are characterised by the range of services and facilities that they offer, serving the needs of their own residents and those of adjoining small villages and hamlets. We support the recognition within the plan that in order to help sustain and strengthen the role of these local centres, additional housing is considered appropriate. A total of 96 dwellings are allocated within the Regulation 19 Local Plan in St Margaret's-at-Cliffe.
- New Townsend Farm has been identified as an allocated site for 10 dwellings under SAP40 which allocates all small sites in St Margaret's-at-Cliffe. We support the identification of the site for development, and we consider this site to be deliverable in the lifetime of the plan.
- SAP40 includes two sites within St Margaret's-at-Cliffe Land at New Townsend Farm (referred to as STM006) and Land located between Salisbury Road and The Drove way (referred to as STM010). These are shown on the map at Figure 4.12 and are both referred to as SAP40. As a point of transparency, it would be beneficial to separately identify these allocations on the accompanying Plan in order to prevent any confusion.
- We consider that this area has the potential to deliver more dwellings than the allocated number of 10 dwellings as part of a more comprehensive form of development which would, overall, deliver a much enhanced scheme of approximately 20 dwellings alongside significant areas of open spaces offering net biodiversity gain and maintaining views and perceived areas of separation.
- The proposed development would be in keeping with the surrounding pattern of development, reflecting an extension of built form in an eastward direction away from Station Road/High Street in a linear character (see Nelson Park Road, Hardy Road, St Vincent Road and Kingsdown Road for example in **Appendix 04**)
- **Appendix 01** demonstrates how this could come forward and facilitates the ability to deliver this allocation which has a covenant constraint that whilst is not a showstopper, would benefit from an increased capacity of dwellings.
- St Margaret's-at-Cliffe is recognised within SP4 Residential Windfall Development as an area where residential development or infilling will be permitted within or immediately adjoining the settlement boundaries. We consider that the wording of this policy is too restrictive (see SME Network Representations for full position) where it seeks to limit development unless within or immediately adjoining the

settlement boundaries. We consider that the wording of this policy should be amended to reflect a more flexible approach. We would suggest that wording used by Ashford Borough Council in Policy HOU5 from the Ashford Local Plan 2030 adopted February 2019. A copy of this policy wording is provided at **Appendix 05**.

B. Appleton Farm, East Langdon

- East Langdon is recognised in the Regulation 19 Plan as a Larger Village and allocates Land adjacent Langdon Court Bungalow for 40 dwellings (LAN003). We consider that this site has a number of legal constraints that cannot be overcome and is therefore undeliverable. We suggest an alternative site should be proposed for allocation in Appleton Farm, East Langdon.
- East Langdon is categorised as a Larger Village within the Plan and distinguishes between the two distinct parts, the southern part and the northern part.
- East Langdon is recognised within SP4 Residential Windfall Development as an area where residential development or infilling will be permitted within or immediately adjoining the settlement boundaries.
- Paragraph 79 of the NPPF sets out that in order to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. It puts emphasis on the opportunities to grow where this will support local services. The key section of this paragraph is that where there are groups of smaller settlements, development in one village may support services in a village nearby. This is the case for East Langdon and Martin Mills, whereby services are interdependent on each other (by way of example the primary school is located in East Langdon, but the Railway Station is located in Martin Mills).
- We consider the allocated site in East Langdon, Land adjacent Langdon Court Bungalow (LAN003) to be undeliverable in the lifetime of the plan due to a number of restrictive covenants upon the land. The land is subject to restrictions which prevent the erection of any dwellinghouse or other buildings without consent from other parties. This is noted as a land charge and a copy can be found at **Appendix 06**. Our reading of the title indicates the following issues:
 - No sale is permitted until 30 September 2045 without consent of The Church Commissioners for England
 - Transfer dated 22 April 1970 contains Restrictive Covenants on over 5 parcels within the land to benefit and protect the part of the Langdon Court Farm House and farmlands adjoining the proposed land jointly and severally covenant with the personal representatives that they and their successors in title will not at any time erect or suffer to be erected any dwellinghouse or other buildings whatsoever upon the designated land without the written consent of the Personal Representatives.
- These restrictions are sufficient for a developer to not be able to purchase and develop the site.
- Accordingly, alternative sites should be found in East Langdon that are available, suitable and deliverable. Appleton Farm is such a site.
- Appleton Farm represents a parcel of land that is in total approximately 18.5 hectares. It extends from Holland Hill to the north to White Hill to the South. Whilst this is an extensive area, the site has the potential to deliver a modest scale of development of circa 30-35 dwellings on approximately 3.5ha that would offer a suitable alternative to the identified site – See **Appendix 02**.

- The proposal represent a reasonable alternative to the identified site and in a location that is recognised as being sustainable. Indeed, East Langdon and Martin Mills offer one of the few locations in the District outside of the main urban areas offering a railway connection and therefore a greater scale of development could be considered.

C. Ringwould Nurseries, Ringwould

- Ringwould is identified as a Smaller Village and Hamlet within the Plan. It is noted that although there is a limited range of services and facilities available, it is served by a regular bus service and there is a Church within Ringwould. It has close connections to the services and facilities in Kingsdown. Ringwould is located on the A258, the main road connecting Dover and Deal. We support the recognition that in order to help sustain and strengthen the role of smaller villages and hamlets, additional housing is considered appropriate. There is one emerging allocation within Ringwould for 10 units (Land at Ringwould, Alpines, Dover Road).
- Ringwould is identified in Policy SP4 Residential Windfall Development as a settlement appropriate for minor residential development or infilling of a scale that is commensurate with that of the existing settlement.
- The Nursery site is located to the west of Ringwould, with a long frontage to the A258. It comprises approximately 9.2ha and is considered suitable to deliver a wide mix of uses, including residential, retail, care and affordable homes and/or potentially education. Appendix 03 demonstrates how a care/retirement facility could be delivered.
- The mix of uses would help improve the services and facilities available to the existing community of Ringwould, as well as serve a wider catchment. The proposals would inherently improve the sustainability credentials of Ringwould as well as delving a mix of uses which are most in need, including care, affordable homes and potentially education.
- Consideration should be given by the Council as to the opportunity the site presents - including working with the Council's own Housing department to deliver locally required housing needs in partnership with the Council itself.

Please see attached full representations including appedices

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see above and attached representations in full

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	Esquire Reps to Dover Reg 19 Nov 22 inc appendices.pdf

SAP53 - Land at Ringwoud Alpines (RIN002 and RIN004)

Local Plan Consultation Point	SAP53 - Land at Ringwoud Alpines (RIN002 and RIN004)
Rep ID	SDLP33
Rep Status	Processed
Consultee ID	1259309
Consultee Full Name	Mr Peter Jull
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP53
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Apart from brownfield/greenfield the same constraints and advantages apply to RIN006 rejected at the HELAA stage. It would be entirely sensible for this area to be designed and developed as one.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Expand the extent of SAP53 to include RIN006 and increase the indicative number to 20.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP53 - Land at Ringwoud Alpines (RIN002 and RIN004)
Rep ID	SDLP362
Rep Status	Processed
Consultee ID	1252163
Consultee Full Name	Mr Robert Botwright
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP53(RIN004 & RIN002)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I oppose what I believe to be the unsound selection of SAP53(incorporating RIN002 & RIN004) chiefly as it conflicts with DDC Policy SP3 and SP4. I would also take issue regarding the inclusion of RIN002 as its selection appears to conflict with stated objectives of the District Plan itself.</p> <p>SP3 states:</p> <p>"Minor residential development or infilling of a scale that is commensurate with that of the existing settlement will be permitted within the settlement boundaries, as shown on the Proposals Map, of the following settlements:</p> <p>Ashley, Barnsole, Betteshanger, Chillenden, Coldred, Denton, East Studdal, Elmstone, Finglesham, Martin, Martin Mill, Nonington, Ringwoud, Staple, Stourmouth, Sutton, Tilmanstone, West Hougham, West Langdon, Wingham Green, Woodnesborough and Wootton."</p> <p>However, Strategic Policy 3 also makes it clear that, with regard to residential windfall developments:</p> <p>"They tend to be small in scale and can offer a significant contribution to the supply of homes using previously developed land and vacant areas within settlement boundaries."</p> <p>In the document:</p> <p>The Selection of Site Allocations for the Regulation 19 Submission Local Plan September 2022.</p>

On P57. RIN004 is shown as selected for the following reasons:

“Ringwoud is identified in the small villages and hamlets category in the settlement hierarchy where windfall infill development would be acceptable in principle.

To allocate all the sites identified as suitable in Ringwoud would be in conflict with the position of the settlement in the settlement hierarchy and would not lead to sustainable development.

It was therefore considered that RIN004 was the least constrained of the sites and the best related to the settlement, compared to RIN002 and RIN003. These sites were therefore discounted.

A number of key considerations have been identified in relation to the proposed site allocation here and these will need to be addressed by the land owner as part of the planning process.

Furthermore, there is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA on the site here.”

However, as this site clearly lies outside the Ringwoud settlement boundary, any suggestion that “windfall infill development would be acceptable in principle” is incorrect as windfall infill development must be within the settlement boundary.

The reason for selection of RIN004 incorporates the reason why RIN002 and RIN003 were discounted, and therefore included in the ‘list of discounted sites’ on P68.

It is therefore unclear why RIN002 has been resurrected for inclusion, with RIN004, in SAP53?

The landowners have, for obvious financial reasons, suggested in their comments of support that RIN004 and RIN002 are both brownfield/pdl sites, despite DDC identifying them as greenfield. The landowners have also incorrectly suggested that failure to include RIN002 would render it ‘landlocked’, a statement which is also incorrect since any development of RIN004 could easily include access

I submit SAP53 is neither previously developed land nor within the settlement boundary and therefore, by definition, cannot be considered a ‘windfall development’.

I submit it is clear from this statement that SAP53, which is outside the Ringwoud settlement boundary, should not be considered as suitable for housing development.

The ‘Evidence Base’ is incomplete with regard to Landscape Sensitivity and Character Assessments.

33 sites were selected in the district, some being within AONB and some without. The former Ringwoud Alpines site, SAP53, was not included in the sites selected for assessment for reasons unknown. The selection criteria for those sites which were assessed has not been made known either.

In the case of SAP53, DDC have relied on a ‘specialist assessment’ by the Kent Downs, AONB Unit

“who agreed with the DDC Officer assessment that impacts on the landscape and AONB from the development of these two sites could be suitably mitigated with a sensitive landscaping scheme to the south and by the retention of the existing hedgerow to the eastern boundary.”

However, in all probability the AONB Units assessment would have been desk based and only addresses issues relating to daytime views from within the AONB.

	<p>There has been no comment relating to the northern boundary 'street view' of the site, as viewed from the A258, which has specifically been a bone of contention for previous DDC Planning Officers, creating serious issues with regard to providing appropriate levels of access to any proposed development. (E.g. Ref DDC Planning 16/00626). This relates to the existing, long established, dense hedging along the roadside boundary to the site, within the AONB, which is currently accessed via a wooden gate and single vehicle track. In the event of a housing development, this hedgerow screening would need to be, at least partially but substantially removed to accommodate a suitable road access. It should also be noted that current activities within the front (RIN004) part of the site are not visible above the hedge line, whereas 2 storey houses would be.</p> <p>I have appended a current image of the northern boundary street view to emphasise my comment.</p> <p>Issues relating to inevitable sound and light pollution within the AONB appear to have been completely ignored. The impact on existing neighbouring residents would be significant as the SAP53 site is currently a 'dark skies' area which also currently benefits from peace and solitude.</p> <p>Indeed, the impact upon neighbouring residents was one of the 2 reasons upon which the Planning Inspectorates' decision was based to dismiss the appeal with regard to the current landowners previous planning application for this site (DDC16/00626).</p> <p>I believe it is important to mention that in recent times the landowner has failed to responsibly steward the land, particularly with regard to RIN002 as a result of which it has become seriously degraded and is currently the subject of DDC Planning Enforcement action.</p> <p>I have appended 2 further images, the first showing the condition of the land adjacent to my property and the second, as it appears today.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>In accordance with my comments, I ask that SAP53(RIN004 & RIN002) be removed from the Local Plan.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>1B402FA1-D832-4F22-B2C1-792FCDDD826D.jpeg 58621CFA-6210-4888-9593-409189F7BAA2.jpeg 464D30DF-0E8A-489A-AD78-BF4DF34F2C94.jpeg</p>
<p>Local Plan Consultation Point</p>	<p>SAP53 - Land at Ringwould Alpines (RIN002 and RIN004)</p>
<p>Rep ID</p>	<p>SDLP321</p>
<p>Rep Status</p>	<p>Processed</p>

Consultee ID	1331281
Consultee Full Name	Mr MAURICE WEBB
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP53
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I oppose the Unsound Selection of SAP53(RIN002/RIN004) as being Non-compliant with the NPPF Sustainability and Proportionate Evidence requirements and with DDC Policies SP3 and/or SP4</p> <p>Site History.</p> <p>I consider the Site History to be a material fact for consideration.</p> <p>Ringwould Alpines Plant Centre was a privately owned aprox.2.3 ha Horticultural Nursery situated in the Kent North Downs AONB with a vehicular access onto the A258 Dover road. The nursery activity serving commercial, corporate and public customers was centred around 10 Polytunnels on what is now referred to as RIN002 and 2 Polytunnels on RIN004. RIN004 housed a timber potting shed ,several raised timber beds for display of shrubs and bedding plants and a block built toilet/store room. There was also a small gravelled parking area adjacent to the Entrance on the A258 Dover Road. There was no external lighting so public access was limited to daylight hours and the site was closed to the Public throughout the Winter.</p> <p>The Plant Centre holding includes that section of Footpath ER14 which forms the boundary with my property, (DDC note: redacted), and a small strip of woodland the other side of Footpath ER14 lying between Landway and Popples Field.</p> <p>The whole site was purchased by the current owners Kingsdown Water in 2016/17 while they were seeking a Change of Use Planning Permission for the erection of a bottling plant with supporting infrastructure on the parts of the site now identified as RIN002 and RIN004.</p> <p>This PP Application was refused on Appeal and the site remains a Greenfield Agricultural site for Planning Purposes.</p> <p>Kingsdown Water have no Agricultural/Horticultural Interest in the site and have not put the site on the open market as a horticultural holding.</p> <p>The RIN002 and RIN004 parts of the site have been leased and apparently sub-leased to a succession of non Agricultural tenants carrying out a variety of non Agricultural Activities none of which have had the benefit of Planning Permission. The remainder of the site has been left unattended to and is becoming overgrown and untidy, including Footpath ER14.</p> <p>This has resulted in complaints from local residents and the site is now the subject of Enforcement Action which has yet to be resolved.</p> <p>Planning Contravention Notices completed by the owner and tenant(s) have revealed that various small businesses have been renting the land for builder's yard type purposes and that the mobile home on the site is for the night watchman.</p>

The activities on the site have resulted in considerable degradation and contamination of the land which would require considerable restitution measures to return it to its original state. See attached photos

In the first HELAA three parts of Ringwould Alpines identified as RIN002, RIN004 and RIN006 were put forward by Ringwould Alpines's Agent for inclusion as development sites in this Dover Local Plan.

In that HELAA RIN002 was put forward as a 1.19ha PDL site development site for 30 houses but this was considered to be unsuitable for development, RIN004 as a 0.22ha PDL site for 5 houses but was considered to be suitable RIN006 as a 0.7ha Greenfield site was considered to be unsuitable for development.

Only RIN004 was taken forward as a Reg 18 Consultation Proposal but RIN002 was added to RIN004 to form SAP53 in the Sect19 Consultation Proposal

RIN002 and RIN004 are now described in the HELAA2022 as being greenfield after representations were made about its earlier incorrect HELAA description as PDL.

Two remaining parts of Ringwould Alpines also owned by Kingsdown Water but not put forward for inclusion in the Local Plan proposals are a section of the Public Footpath ER14 running from Dover Road to Popples Field between Ringwould Alpines and my property (**DDC note: redacted**), and a small approx 0.1ha strip of woodland located on the other side of the footpath between Landway and grazing land known as Popples Field.

The only vehicular access to these parcels of land is through the rest of the Ringwould Alpines holding so these parcels of land will be landlocked unless vehicular access provisions are made over RIN002 and RIN004.

My property, (**DDC note: redacted**), is a 1.6ha Residential/Equine property the other side of the footpath which forms my boundary with Ringwould Alpines.

My reasons for opposing the selection of SAP53 follow below.

Unsound Site Selection

I consider the Site Selection of SAP53(RIN002/RIN004) to be **unsound** for the following reasons:

1. Non-compliant being not positively prepared as per the NPPF sustainable development and proportionate evidence requirements and non-compliant with either of DDC policies SP3 and P4.

The Settlement Hierarchy was reviewed to ensure that all Local plan development sites proposals were **sustainable**.

In the Settlement Hierarchy Ringwould is one of the small villages where only development **inside** the Village Settlement Boundary could be accepted but SAP53 is **outside** the Ringwould Settlement Boundary. See attached Ringwould Settlement Boundary Map

In SP3 and SP4 the overarching Sustainable Site Allocation Selection criteria is that " The distribution of housing and economic growth in the District will therefore primarily be based on the Settlement Hierarchy, and influenced by site availability, environmental constraints and factors of delivery"

I submit because SAP53 does not comply with the primary Settlement Hierarchy Selection criteria that this rendered the Influencing factors criteria on which the SP53 proposal appears to be based irrelevant.

I submit that ,because of non-compliance with the Sustainability Requirements of the NPPF and policies SP3 and SP4, the SAP53 proposal is **Unsustainable and Unsound**

1 Not justifiable as per the NPPF requirement for it to be based on proportionate evidence.

Inadequate Consideration of Representations made relating to RIN004 and RIN002 has resulted in unbalanced Council Responses and Reg19 Proposals because 21 respondents opposed the RIN004 proposal on issues also relevant to RIN002 and of these 6 directly referred also to RIN002 which was not a Reg 18 proposed site.

The scale of opposition to development of RIN002 is not reflected in the Council's summary of responses in respect of omitted sites because they were raised under the heading of the only Ringwould site proposed in the Reg18 proposal i.e. RIN004.

3 respondents supported the RIN004 proposal of whom 2 including the owner(s) of the site requested the addition of RIN002.

The Council's responses to all the proposed Sect 18 proposal representations is generic not site specific and are not set out alongside the individual Site Allocations proposals.

This " one size fits all" approach does not address site specific issues and results in generalised non-site specific Mitigation measures .

There were 21 opposing representations mainly from local residents and only 3 supporting representation of which 1 was factually incorrect from a local District Councillor claiming the existing site access was adequate for a large development on RIN002, RIN004 and RIN006 and the other was from the site owner, Messrs Bomer a.k.a. Kingsdown Water, seeking to have RIN002 added to RIN004 to maximise the potential housing capacity of his site asking for 41 dwellings and claiming incorrectly that the site was a brownfield site..

In the Reg 19 proposals. said to have taken into account all of the representations together with all other relevant factors, RIN002 has been added to RIN004 to form SAP53(RIN002/RIN004). It can only be concluded that the Council attach little value to the representations made by local residents but great importance to those from the site owner which does nothing to promote public confidence and participation in such Consultation exercises.

I consider the above constitutes **disproportionate** consideration being given to Reg 18 supporting comments resulting in the **unsustainable and unsound** SAP53(RIN002/RIN004) **Reg19 proposal** .

No new evidence emerged in the Regn 18 submissions to justify the addition of RIN002 to RIN004 at this final Reg19 stage of the Local Plan HELAA stage and the proposal itself contains no reason for the addition of RIN2 to SAP53.

Whatever evidence exists to justify the inclusion of RIN002 into the Local Plan at this final late stage must have existed and have been discounted right from the early HELAA stages.

Including RIN002 now at this last final stage of the Local Plan consultation stage makes submitting representations more difficult because of the discouraging, complicated and, to some residents, incomprehensible Reg19 Representation procedure format.

The site promoter now claims that selecting only RIN004 would landlock RIN002.

This potential landlocking issue has been apparent all the time and could be easily resolved..

What is different is that local residents have now discovered that, after being consulted at the Reg18 stage on RIN004 a 0.21 ha AONB site with a proposed indicative total of 5 houses and a capacity to accommodate 7 houses situated between 2 dwellings fronting onto the Dover Road, they are now faced with SAP53(RIN002/RIN004) a 1.41 ha AONB site with an indicative proposal for 10 houses but a capacity of 37 houses situated immediately between and behind several houses and intruding deep into the rest of the AONB on which they were not consulted.

Although there are common issues affecting both RIN002 and RIN004 the SAP53 proposal differs considerable in scale, character and impact on the AONB and neighbouring AONB properties than the earlier RIN004 proposal.

The site currently enjoys "dark skies" but the proposals would create a built up suburban street scene complete with power and telephone poles and wiring infrastructure together with street lighting where none exists which is inappropriate for the AONB setting.

The Site is in an area where >25% of the land is at least Grade 3 Agricultural Land.

The site would require construction of a new side turning serving the 10 new dwellings onto the busy A258 almost immediately opposite the existing Queens Rise side turning on the other side of this road causing increased risk of delays and accidents on this particular section of the A258.

RIN002 extends the SAP53 site further into the AONB making it visible from a popular Footpath ER14 see photos which is part of the Ringwold Alpines holding

and also from my property, **(DDC note: redacted)**,. RIN002 extends behind four Dover Road AONB properties and also has a boundary with my AONB property,**(DDC note: redacted)**,.

No account has been taken of the effects of RIN002 combined with RIN004 on these neighbouring properties.

Local residents who thought it was not necessary to make representations about RIN002 or those who made passing reference to RIN002 can now comment but to do so is rendered more difficult because of the **discouraging, complicated and, to some residents, incomprehensible Reg19 Consultation format** .

I submit the Council's RIN004 Reg 18 Consultation responses and the Reg 19 SAP53(RIN002/ RIN004) Representations format make this latest REG19 Proposal and Consultation **disproportionate, unsustainable and unsound and non-compliant with the Proportionate Evidence of the NPPF and Policies SP3 and SP4.**

3,The Evidence Base is Incomplete.

There are significant omissions in the Evidence Base covering the **Landscape Sensitivity Assessment (LSA) 2021 and Landscape Character Assessment (LCA) Sections** .

None of the Ringwoud Alpines AONB sites are included in either of these Sections of the Evidence Base.

DDC Landscape Character Assessment (LCA) does not include the AONB which is said to be covered by the North Kent Downs AONB Management Unit's own LCA 2020 but this LCA is being updated and has not yet been published on the AONB Unit's website..

The DDC commissioned Landscape Sensitivity Assessment(LSA) report does not include the Ringwoud Alpines AOB sites but because the selection criteria have not been published it has not been possible to identify why.

Many of the 33 Local Plan sites selected for a LSA are in neighbouring settlements and they include AONB and non AONB sites.

The Council claim that the AONB Management Unit were consulted and were satisfied with the proposed mitigation measures but this does not explain why RIN002 and RIN004 were not selected. .

These mitigation measures only address the Local Visual Impact (LVI) aspect of the Ringwoud Alpines sites whereas the LCA and LSA would have addressed not just the LVI impact but also a wide array of other factors affecting not just the AONB but also the wider surrounding landscape inside and outside the AONB.

Issues such as dark skies, ambient noise levels, built environment and the effect on the lives of neighbouring householders, properties etc.

I submit that, because the RIN002 and RIN004 evidence does not include an LCA or an LSA, the SAP53(RIN002/RIN004) element of the Evidence Base is incomplete and makes the SAP53 proposal unsound and non-compliant with with NPPF Sustainability and Proportionate Evidence Requirements and with DDC policies SP3 and SP4

4. The Ringwoud Alpines Plant Centre holding is currently the subject of Unresolved Planning Enforcement action.

This is in respect of non agricultural activities being carried out there without the benefit of Planning Permission. Various small businesses have been renting the land for builders yard type purposes and there is a mobile home on the site for a night watchman.

These activities have resulted in considerable degradation and contamination of the site. See attached photos.

The **Availability and Deliverability** of the Site would be affected by resolution of the Enforcement Action requiring a Planning Application and/or enforced reinstatement of the site to it's previous Agricultural/Horticultural state.

I understand the Enforcement Officer is seeking advice on this at the moment.

In these circumstances I submit that the RIN002 and RIN004 site should not have been included in the Dover Local Plan SAP53(RIN002/RIN004) proposal because all Local Plan sites should be **Available and Deliverable** and that this selection is **unsound because of reasonable doubt over the Site's Availability and Deliverability.**

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I ask that Reg19 Proposal SAP53(RIN004/RIN004) be removed in it's entirety.

The removal of SAP53 which is **unsound** because it does not comply with requirements of the NPPF nor with SP3 and SP4 will remove a proposal that is not **legally compliant and sound** from the Local Plan

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files	Ringwold Settlement Map.png Photo 4.jpg P1040520.JPG
Local Plan Consultation Point	SAP53 - Land at Ringwold Alpines (RIN002 and RIN004)
Rep ID	SDLP273
Rep Status	Processed
Consultee ID	1331383
Consultee Full Name	Mrs Katie Miller
Consultee Company / Organisation	Kent Downs AONB Unit
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP53
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	This site lies wholly within the AONB but is well contained by existing vegetation. The proposed requirements included in site specific requirements to retain and enhance the boundary vegetation and help manage impacts on the AONB are supported.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP53 - Land at Ringwold Alpines (RIN002 and RIN004)
Rep ID	SDLP370
Rep Status	Processed
Consultee ID	1331543
Consultee Full Name	Mrs Dorothy WEBB
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP53
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Now that RIN002 has been added to the Reg19 proposal I would like to express my dismay at its inclusion at this late stage. I, like many others, did not include RIN002 in my previous Reg18 submission and I wish to do so now.</p> <p>Any form of development on the Old Alpine Nursery Site, be it 5 – 10 or 40 houses, would necessitate a new widened road access with a wide splay of the type and width that serves Queens Rise which is almost directly opposite the nursery site.</p> <p>The proposed estate of two storey houses, with its accompanying pedestrian pavements, road signage, street lighting, fenced gardens, garden sheds, individual drives, parking for two cars, garages, parked vehicles, delivery vehicles and all the sounds that emanate from modern closely built properties - plus individual and street lighting, would be completely out of keeping with the ambience of the village and would also block views of the AONB. from the village.</p> <p>The width of the splay needed would displace the bus stop that serves that end of the village. At present the bus stop is positioned in the only safe place that is available and this safe place would no longer be available - meaning that the village would lose a vital amenity.</p> <p>The Nursery site itself is wholly within the AONB and is known to be greenfield, it has always been used for horticulture, no part of it has ever been previously developed. The owners/proposers insinuation that it has been previously developed and is therefore brown field is a deviation from the truth.</p>

DDCs wrongly declared status (PDL) of the site in its original SP18 documents did little to allay the confusion and uncertainty of the sites status and they failed to act quickly to correct the mistake, making the consultation unsound.

The proposed two storey houses would not only have a negative impact upon the village street scene but would be detrimental to the lives of all those living in close proximity. People who chose to live in the peace and beauty of an AONB would find themselves gazing at human activity and light pollution instead of stillness and Dark Skies - - and hearing the sounds of human habitation instead of the calls of owls and foxes.

The two storey houses would have an even greater impact on the wider AONB. – the view from the vantage point of the Freedown on the high North Downs would no longer be that of a sleepy village with a traditional church but dominated by the sight of two storey houses barely hidden behind a thin row of deciduous trees.

Viewed from this position it is obvious that no amount of mitigation could protect the AONB from the bustle of human habitat and of the inevitable noise pollution. Light pollution will be far reaching and all pervading.

I cannot understand why this clearly sensitive site was not subjected to a Landscape Sensitivity Assessment when other sites were. Was it a positive omission or just overlooked? Either way an important aspect of the sites assessment has not been completed, rendering the assessment unfinished and therefore unsound.

Again I cannot understand how the North Downs AONB Management could be satisfied with the proposed mitigation – did anyone from that organization stand atop of the downs and look down on the Nursery Site? If they had done so they would have realized the detrimental impact the sights, sounds and light pollution would have on the AONB – for an organization charged with it's protection – it appears to be a dereliction of duty. I suggest that this provides very strong grounds for refusal.

The public footpath ER14 (also owned by the Developers/Proposers) that runs parallel to the Old Nursery is at present screened from the Nursery by huge piles of earth, rubble, hardcore and dying vegetation. These mounds, once levelled, will reveal an open view of the proposed development of two storey houses. Soft screening is impractical as it will take many years to reach a meaningful height if indeed it is even viable in such impoverished compacted ground.

Has anyone assessed the impact on wildlife? The site was a known habitat for bats and reptiles and is a hunting ground for birds of prey (Owls, Sparrow Hawks, Kestrels, Buzzards etc.), **DDC Redacted** badger, although it is not clear if the present noisy earth moving activities have displaced these animals. I believe that the perpetrators are being investigated by DDC Planning Dept. who are expected to order that the land be returned to its previous state

The village is in a forty mile an hour zone and, within a relatively short space, there are several private drives onto the A258 as well as the much wider entrance splay to Queens Rise, each one of these brings it's own hazards and has the potential to slow/stop the flow of traffic.

The further addition of ten new dwellings, each possessing two/three cars will considerably increase the number of hold ups on the busy A258.

These hazards have been increased by a group of three new properties that all share the same entrance drive and which is directly opposite the Nursery entrance.

The larger estate of Queens Rise, with all of its comings and goings (and the scene of a 'sun-blinded' fatality) is opposite the proposed site and the two entrance splays are only slightly offset and both are close to the point where the road narrows, further increasing danger of serious accidents..

I also feel strongly that there is no good reason for houses to be built on this site. 5 – 10 or 40 family homes – built in a village with no shop and a poor bus service and are of no benefit many people. The DDC Local Plan Site Allocations proposals would meet the Govt's requirements without SAP53 and these houses are just an extra, an insurance if you like.

There is some concern within the village is that these houses will be very attractive to people seeking a second home 'in the country' especially in an AONB and are of little benefit to local people.

The Nursery Site has never been offered on the open market for agricultural use but sold directly to the present owners/proposers for development purposes, and in the interim, an assortment of lease holders have used it as they will. Within in the village there is some speculation as to whether a housing development would ever go ahead or would a reason be sought by the owners/ developers to revert to the original planning application for a Bottling Factory on this site.

DDC Planning Committee have already unanimously rejected an application by the owners/proposers for a Bottling factory on this site – which on appeal - was also rejected by the Planning Inspector who quoted many of the grounds that I have raised in this submission

However this site would benefit the whole of society if it were returned to much needed agricultural use, under the present circumstances it is clear that we need more agricultural land to enable us, as a country, to be more self sufficient.

Only three submissions have been in favour of developing the site, a joint one from the owners/proposers who have stated frequently that the site is brownfield, and another from a District Councillor who appears to think that there is already a suitable entrance when there is not.

Multiple Ringwold residents are known to have objected to this development but many more are confused by the complexity of making a submission, the procedure clearly favours the computer literate leaving others to struggle or give up, for this reason I feel that the consultation is unfair and confusing and unsafe.

The proposed development is outside the village settlement zone, in an AONB and now, declared by DDC. To be Greenfield in an AONB, should have been enough to have prevented its inclusion in the Plan. The decisions to put it forward are, to me, unclear and illogical giving the impression that for whatever reason this particular site has been singled out to allow guidelines to be bypassed.

To sum up –

- It is a Greenfield site in an AONB. And mitigation, i.e. screening, will not serve to prevent harming the AONB
- The new two storey high houses will be visible from the village – from the local footpath adjacent to the site and from further afield along the top of the North Downs and glimpsed at from various viewing points along The Lynch.
- The proposed development is greenfield and outside the village settlement and within an AONB so should have been rejected without question.
- The overall increased volume of traffic onto the 40 mph. busy A258 will interrupt/slow down the traffic flow causing unacceptable hazards to drivers and pedestrians alike.
- The proposed new estate will cause both sound and light pollution within the village and further afield in the wider AONB. In itself enough to reject the application.
- The ambience of the village will be destroyed for ever and the detrimental effect of a busy housing estate within the peaceful AONB. will be permanent.
- The new estate will impact heavily on the lives of those who live in close proximity to the site.
- The site's wildlife habitat will be gone forever and the negative impact on wild-life in the wider area will be contrary to the need to increase biodiversity.
- It is not clear if all the correct procedures have been rigorously followed, The site was not even selected for a Landscape Sensitivity Assessment. I for one have found the lack of reasoning behind this decision confusing and illogical and out of step with guidelines and decisions made for similar areas.
- Decisions made by North Downs AONB Management appear to be just a box ticking exercise without any details or substance. DDC's decision to include a Greenfield site in AONB and outside the Village settlement are incomprehensible, guidelines seem have been conveniently disregarded without due consideration of the obvious and permanent damage that would be inflicted on the village or the AONB. No clear reason has been given for overruling these guidelines.
- The proposed Nursery Site is not immediately ready for development as required. Changes have been made during the two years or so that the Heavy Earth Moving vehicles (some with caterpillar track) have been working on the site. I believe it is very probable that parts of the site is contaminated by crushed/buried unregulated building materials -see attached photos.. We have also witnessed, and frequently formally complained about the thick acrid black smoke, emanating.

Before any work could begin on this site proper screening for contamination should take place./

See attached photos.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I ask for SAP53(RIN002/RIN004) to be removed.

This will result the non-legally compliant and unsound SAP53 not being included in the Local plan

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	img018.jpg img12042022_002.jpg img12042022_003.jpg
Local Plan Consultation Point	SAP53 - Land at Ringwoud Alpines (RIN002 and RIN004)
Rep ID	SDLP509
Rep Status	Processed
Consultee ID	1265863
Consultee Full Name	mr nicholas quested
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	218
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<ol style="list-style-type: none"> 1 In previous Dover council planning department submissions to this site, the road access to the site of the A258 and the consequential disruption to street view that this development would cause would be against the council policy. 2 The site is defined as a greenfield site therefore should be retained within the ANOB, if allowed considerable light pollution and visual destruction would be caused by this development. 3 The site development would be against the councils aims set out in SP3 policy which states that any infilling development should be in the settlement boundaries which this is clearly not.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s)	

you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP53 - Land at Ringwold Alpines (RIN002 and RIN004)
Rep ID	SDLP599
Rep Status	Processed
Consultee ID	1266351
Consultee Full Name	Dr Sharon Danby
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP53 Ringwold Alpines (RIN002 RIN004)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	The site selection is unsound as it is not positively prepared as per the NPPF requirement to achieve sustainable development. The site is outside the village boundary, is greenfield and within the AONB. It is not justified as per NPPF as the site allocation has been changed since regulation 18 consultation and so this has skewed the responses. The scale of opposition to RIN002 is not reflected in the summary of responses

<p>possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>because they were raised under the heading of the only site proposed in regulation 18 ie RIN004. There has also been confusion throughout this process that the site is brownfield when in fact it is greenfield. There is no justification for the addition of RIN002 to RIN004 and this late stage of the consultation process. I submit that this renders the Reg 18 consultation and reg 19 proposals to mitigate issues to be based on disproportionate evidence and therefore unsound.</p> <p>The evidence base is incomplete. RIN002 and RIN004 have not been included as part of the LSA or LCA assessments which renders the evidence base incomplete and unsound.</p> <p>Residents consulted in Reg 18 on a 0.21 ha site with a capacity for 5 dwellings between the existing 2 dwellings that are part of the ribbon development fronting Dover rd. In Reg 19 they are now faced with a 1.41 ha site with a proposal for 10 houses intruding into the AONB on which they have not been previously consulted. This is not consistent with NE2 Landscape character and the Kent Downs; states in section 11.13 that DDC aims: <i>To ensure that all development coming forward over the plan period respects and reflects the character of the landscape in which it is located.</i> SP13 states that <i>the NPPF 2021 requires local plan policies to conserve and enhance the natural environment, to recognise the intrinsic character and beauty of the countryside and the wider benefits from natural capital and ecosystems.</i> It is unsound to include SAP53 in the LDP as it would detract from the beauty of the countryside particularly the adjacent AONB. The Kent Downs AONB management plan 2021-26 says <i>the Kent Downs AONB, perhaps more than any other of Britain's protected landscapes – AONBs, Heritage Coasts or National Parks, has experienced and is experiencing severe development pressure.</i> DEFRA evidence shows <i>'The Kent Downs AONB stands out as an area which has experienced major, but expected, change, showing a rate of urban growth of almost 10%.pa, with the urban area spreading by 14 ha over the decade.'</i> The AONB in Dover District has suffered development at a disproportionate rate which indicates that planning pressures on our district are unsustainable. This current proposal of Reg19 differs considerably in scale and the impact it would have on the AONB is unacceptable for a greenfield site. Due to its topography the site is also highly visible from the AONB. Any ribbon development along Dover Road would require heavy screening to ensure that it did not impact on the AONB.</p> <p>No consideration has been given to the legal right of neighbouring residents to enjoy their homes peacefully. The proposed development in Reg 19 would be considerably more intrusive than a ribbon development along Dover Rd.</p> <p>The site is currently the subject of unresolved planning enforcement action due to activities which have angered residents and resulted in considerable degradation of the site. The site should be cleared and returned to its original agricultural state.</p> <p>For all the above reasons I conclude that the inclusion of SAP53 in its current form is unsound.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The SAP53 site proposal should be limited to a ribbon development along the Dover Road commensurate with the scale of existing dwellings and should have sufficient screening to prevent the dwellings being seen from the AONB. Hedges and trees on site should be retained and full independent study of biodiversity carried out.</p> <p>The site should be cleared and renovated as per any planning enforcement action.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP53 - Land at Ringwoud Alpines (RIN002 and RIN004)</p>
<p>Rep ID</p>	<p>SDLP577</p>

Rep Status	Processed
Consultee ID	1272949
Consultee Full Name	Ms Geraldine Webb
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP53
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I consider the SAP53(RIN002/RIN004) Proposal to be Unsustainable and Unsound for the reasons set out as follows.</p> <p>Set out below are the reasons for my objections to the SAP53(RIN002/RIN004) proposal.</p> <p>My Reg18 submission, objecting to the proposed RIN0004 development of the Old Alpine Nursery site, did not cover RIN002. due to it's (in my opinion) unfair late entry.</p> <p>I now want the strength of my opposition to this addition to be made perfectly clear, the late inclusion by stealth, of five more houses, making it 10 houses in total, and the admission that it could lead to a further 30 or so more houses has caused concern and confusion.</p> <p>The impression given is that the Owners/Proposers have only just 'suddenly changed their minds about their intention' is a weak one, it is more probable that they have withheld their true intentions until the last minute. Misinformation springs to mind.</p> <p>Our local bus service is infrequent and householders choosing to live on the proposed site, will in the main, have to rely on their cars for most contacts outside Ringwoud. Clearly this would greatly increase the number of cars within the village and the effect would be to slow down/stop the already heavy flow of traffic through the village. This presents a valid reason for the proposed development to be dismissed.</p> <p>The proposed site is outside the village settlement, in a Greenfield site and within an AONB and in an area that has not been designated for development. These would have provided valid grounds for the dismissal of this application in the REG 18 proposals before it got this far.</p> <p>However there is more</p> <p>The Nursery site is located centrally on the A258 as it passes through the small village of Ringwoud This road is dangerous along it's entire length, there have been many accidents of varying severities including several fatalities, some within the village itself.</p> <p>The village, in spite of repeated requests from villagers to lower it, is a 40mph. zone.</p> <p>The proposed housing development will necessitate the building of a new splayed entrance/exit road that is wide enough to accommodate two way traffic, and further widened to accommodate pedestrian pavements. The new access road will line up perfectly with a new triple shared driveway directly opposite the required new splay, this in itself should be grounds for rejection.</p> <p>The new proposed splay will be of such a width that it will be almost opposite the Queens Rise splay, (itself the site of a fatality) which in turn, is very close to the point where the road narrows creating even further hazards.</p>

In addition to these obvious larger hazards there are several private drives whose owners have to negotiate exits/entrances onto the A258 on a daily basis and of which I am one.

I live on the seaward side of Ringwould – the same side (and next to) the Old Alpine Nursery, and I have first hand experience of the difficulties in exiting my own property. Indeed I often have to rely upon the kindness of strangers to allow me out and onto the road. This ritual, both for myself and others, takes place every morning and again on the return journey.

Very soon the A258 will be expected to accommodate many more cars as the New Builds in Walmer become occupied. This build up of extra traffic on a busy, fast and dangerous road, that cannot be widened, and is the main route between Dover and Deal, is reason enough to disallow the proposed development

I also feel very strongly that the procedural difficulties of objecting to the proposal are blocking the abilities of some of the villagers who are not fully computer literate, it also should be realized that not everyone has access to a computer. Meetings being organized in the village to help with this problem but time is short and not all can attend. Therefore can it truly be said that opinions have been fairly and accurately represented.

I suggest that the consultation procedure is unsound and that the proposed development should be rejected on those grounds.

I also feel that, misinformation by omission, has had a confusing and chaotic effect on people's ability to make their decisions. Many people do not realize that the Nursery Site is a Greenfield site, the site's status has not been made clear by DDC in some of its previous documents, this inaccuracy has furthered the confusion.

The owner/proposer/lessees have created large mounds of rubble, hardcore and stored building materials plus the burning of garden clearances and the removal of the poly tunnels has indeed caused the Nursery to have a brown appearance, and this has by some, been taken at face value without understanding that 'Brown Field' is a term used for Previously Developed Land, again I say again that this uncertainty would not have arisen if official documents had been correct.

Regretfully it has taken many months of pressing the DDC. Planning Dept. for a formal acknowledgement as to the sites undoubted Green Field status, but this was not put forward to the general public at the start of the consultation period.

The ongoing confusion has led some people into not realizing that they had grounds for objection thus giving the owners/proposers an unfair advantage and making the inclusion of development on this Site unsound.

It is claimed that AONB management are comfortable with the mitigation plans put forward and I feel that this is another example of the lack of knowledge and understanding of this very sensitive site.

Screening will not hide the proposed two storey houses from view either from the A258 or from the footpath that runs parallel to the site, which incidentally is also owned by the Owners/Proposers of the proposed development.

I can also testify, that as a regular horse rider in the AONB, that trees will not screen the two story dwellings from being seen from the Freedown bridleway at the top of the North Downs.– those same two storey dwellings will also be glimpsed at various points along the bridleway as it winds through The Lynch.

Screening will not prevent sound and light pollution from pervading the peace and tranquility of this AONB, our planning authorities should be acutely aware of the potential harm the AONB would suffer, and of their responsibility to protect this beautiful place.

I will continue with, and sum up, my objections.

1st Information is incomplete at best – at worst misleading.

2nd Lives will be put at risk with the addition of many more cars maneuvering onto/exiting from the A258 within a short stretch of this busy 40mph road.

3rd misinformation as to the status of the Old Alpines Nursery site i.e. Brownfield/Greenfield leading to chaotic misunderstandings and confusion.

4th The whole of the site is Greenfield and in an AONB and is in that part of the small village that has not been designated for development so therefore it should not have been included in the Plan.

5th Inadequate assessment by the AONB Management – no local knowledge of the area involved – no understanding of the sites sensitivity – no understanding of the far reaching impact development will have on the AONB. - no knowledge of the number of places that the site can be openly viewed from – no transparency for its surprising decision.

6th misleading late additions to the number of properties being proposed leading to confusion as to how/when/if to submit a new objection.

7th The undeniable impact on the lives/lifestyle of residents closest to the proposed houses.

	<p>8th Confusion over the complicated format of how to object, the effect being to deny some members of the public the ability to easily voice their objections. The elderly, non-computer literate and non-computer owners are at a disadvantage, leading to anxiety and a 'we can't do anything about it' frame of mind. Is this considered to be an open, fair and democratic consultation?</p> <p>9th The visual impact on the ambiance of the village, the introduction of sound pollution where there is presently none and the loss of dark skies where at present there are only stars.</p> <p>10th No transparency as to why the Old Ringwoud Alpine site was not submitted for a Landscape Sensitivity Assessment when other AONB sites have been selected. Why not ? No selection criteria has been published .</p> <p>(11) There is a question mark over the suitability for family homes on the 'much changed' Nursery Site. Large earth moving plant have been working on the land for the last couple of years. Unspecified builders rubble and 'hardcore' has been spread and possibly buried where once there was grass and scrub, large evil smelling fires have been seen and smelt where there were once poly tunnels and clean air. All this contaminated ground will need to be carefully assessed.</p> <p>For all the above reasons I consider the SAP53(RIN002/RIN004) to be Unsustainable and Unsound).</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>I suggest SAP53(RIN002/RIN004) be removed in it's entirety to ensure that this Unsustainable and Unsound site selection is not included in the Dover Local Plan</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>img020.jpg img019.jpg img018.jpg (1)</p>
<p>Local Plan Consultation Point</p>	<p>SAP53 - Land at Ringwoud Alpines (RIN002 and RIN004)</p>
<p>Rep ID</p>	<p>SDLP703</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1273630</p>
<p>Consultee Full Name</p>	<p>Mr. Peter Huggins</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	

<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP53</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified Effective Consistent with National Policy</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>No</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Yes</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>Village Settlement Boundaries The Ringwoud Alpines (SAP53) site is ... 1 . outside the Ringwoud Village Settlement Boundaries, therefore cannot be considered as sustainable. 2 . the site is Greenfield and 3 . has never previously been developed therefore this proposal is unsound.</p> <p>Area of Outstanding Natural Beauty The proposed SAP53 enclave/enclaves are wholly in contrast to the nature of the long established housing types on the south east side of the busy and dangerous A258. These houses of mixed type are all within the AONB. There are no housing estates leading to urbanisation on this side of the A258 and no housing enclaves/estates nor road exit/entrance visibility splays. Allowing such expansion will create precedents for this type of building on this side, well outside the village settlement boundaries and well inside the AONB. Looking at a map of the present housing layouts of the village it can be seen that all new building has been within the Ringwoud Village Settlement Boundaries, all the buildings on the south east side of the A258 are well established by age. The AONB extends out to the centre of the A258 road, so all sides, corners and constituents of the Ringwoud Alpines site are firmly within the AONB. The proposal will inevitably produce noise, light pollution, "dark skies" pollution, dust, dirt and general pollution where non has ever existed before. Following the recent trends for one family to own and use 2 cars, and often 3 cars, there will be pollution and disturbance from this source, where non has ever existed before. From the Kent Downs Area of Outstanding Natural Beauty (AONB) Management Plan 2021-2026, Overview ... "An Area of Outstanding Natural Beauty (AONB) is an exceptional landscape whose distinctive character and natural beauty are so precious that they are safeguarded in the national interest."</p> <p>Consultation Local residents were consulted only on RIN004 in the Local Plan Regulation 18 document , RIN002 not being mentioned. Therefore the proposals re SAP53 are of a different scale and nature to the RIN004 we were consulted on. Any housing enclave/estate on the SAP53 site would necessitate building behind several of the properties fronting the A258 road, vastly expanding the intrusion into the AONB.</p> <p>Amenities Ringwoud has almost no amenities, no school, no shops, no jobs, no doctor, no post office, no cash machine.</p> <p>Previous Inquiries into this Ringwoud Alpines Site There was a Government Inquiry (DOV/16/00626) into the appeal into the refused application to build a "water bottling factory" on this site in 2018. Among reasons for refusal stated were ... 1. The proposal development, by virtue of its scale, form and materials, together with the level of lighting and outdoor commercial activity and the alterations to the vehicular access would lead to an unacceptable detrimental and harmful impact upon the open, natural and scenic beauty of the landscape and the character of the area which would be contrary to policies DM15 and DM16 of the Dover Core Strategy, Policy LLC1 of the AONB Management Plan, and the requirements of the National Planning Policy Framework – paragraphs 115 and 116.</p>

	<p>2. The proposed development would result in additional noise and light spill that would result in a detrimental impact upon the residential amenity of neighbouring occupiers, over and above that expected within a rural locality, and within an Area of Outstanding Natural Beauty. The proposal would therefore prove to be contrary to paragraphs 17 and 115 of the National Planning Policy Framework.</p> <p>For the most part these reasons remain germane to the current proposal albeit this current proposal is for residential and not directly commercial use (in the sense of the original request being that a factory should be built here).</p> <p>Comments</p> <p>There has been a transformation of this ex Ringwoud Alpines site recently into what appears to be a builder's yard producing many complaints by local occupants about this illegal use and the noise, smell and pollution caused. The deliverability of this site is questionable.</p> <p>With regards to the type of dwellings Ringwoud really requires ... there is no mention in any proposal of affordable housing for local people.</p> <p>From the Dover District Council Planning > Planning Policy and Regeneration > Evidence Base > Evidence Base: Housing>Dover District Settlement Review and Hierarchy, under Ringwoud it states ...</p> <p>3.62 Ringwoud</p> <p>Retail; The settlement has one public house and an Alpine Plant Centre but there is no general store or post office.</p> <p>Community; There is a village hall and a local church.</p> <p>Transport; The settlement has three bus services, one runs hourly to Dover and Deal but the other two are less frequent and only run two or six journey's a day.</p> <p>Although the settlement is served by an hourly bus service, the lack of basic local facilities would make this settlement unsuitable for future development</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The Regulation19 Proposal SAP53(RIN004/RIN004) should be entirely removed because it is unsound and does not comply with elements of the NPPF or SP3 or SP4.</p> <p>It is not legally compliant and is unsound.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>SAP53 - Land at Ringwoud Alpines (RIN002 and RIN004)</p>
<p>Rep ID</p>	<p>SDLP537</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331663</p>
<p>Consultee Full Name</p>	<p>Mr Ian Williams</p>
<p>Consultee Company / Organisation</p>	

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP53
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Landscape</p> <p>The <i>Kent Downs AONB Management Plan 2021</i> developed in partnership with Dover District Council and other planning authorities states in paragraph 2.2.2 that the status of the Management Plan combined with the thorough process of Management Plan making and review means that the AONB Management Plan is a material consideration in planning matters and should be afforded weight in decisions. The plan further notes in paragraph 3.1.3 the protection afforded to the AONB should be commensurate with the national and international status of the area and give appropriate weight to the AONB's importance.</p> <p>The individual site appraisal <i>HELLA Appendix 2d Landscape Assessments</i>) notes the biologically rich Local Wildlife Site DO02 The Lynch and Oxney Court Woods, within the AONB. A 2019 management plan by Kent Wildlife Trust for the parish council provides evidence of the environmental capital requiring protection. The assessment also mentions open space site within 400m, and notes the larger of the two areas is not developed.</p> <p>Given the above points it is difficult to understand why the proposal for a site actually in the AONB has been put forward seeing that there must be many potential alternatives for a small number of houses in the larger district allocations.</p> <p>Environment</p> <p><i>HELLA Appendix 3d Environment Assessments</i>.notes On site environmental constraints are present, which would need to be suitably mitigated to enable development, including contaminated land within 400m, groundwater source protection Zone 2, and risk of surface water flooding</p> <p>It is near the A258 road that generates noise pollution above 50/55dB at night.</p> <p>Regarding landscape and environment together, the proposal appears entirely contrary to paragraph 174a of the NPPF: 'protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan)'</p> <p>Sustainability</p> <p><i>The Sustainability Assessment Appendix F</i> makes several observations illustrating that the site is unsustainable:</p> <p>Poor access to the town centre, to secondary school and FE facilities, to a NHS GP surgery, or to the rail network. It is relatively accessible to the local Kingsdown primary school at over 1200m, however there is no safe walking route to the school. There is a footpath, but it is largely through woodland, with an unsafe crossing on the Ringwoud Road. The school is currently oversubscribed. Resident children will have to travel elsewhere by car, or if given preference will result in other schools overflowing from the current population.</p> <p>NPPF paragraph 11 states Plans and decisions should apply a presumption in favour of sustainable development. 11b (1) in particular points to a strong reason for restricting the overall scale, type or distribution of development in the plan area. It appears that this proposal fails to do so.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s)	

you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP53 - Land at Ringwoud Alpines (RIN002 and RIN004)
Rep ID	SDLP625
Rep Status	Processed
Consultee ID	1331790
Consultee Full Name	Julie Davies
Consultee Company / Organisation	CPRE Kent
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP53
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	We object to the inclusion of this site: <ul style="list-style-type: none"> • It is in the AONB • Access onto the A258 is dangerous

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	An application for a bottling plant on the site was refused.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP53 - Land at Ringwould Alpines (RIN002 and RIN004)
Rep ID	SDLP831
Rep Status	Processed
Consultee ID	1331913
Consultee Full Name	Michael Watkins
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	RIN002/RIN004
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible.	The area which the plan affects is a rural area and mostly given to farmland. The encroachment of housing or urbanisation of these areas is unnecessary given the amount of brownfield space locally eg in Dover that has lain empty for years. Local infrastructure can not support more housing, particularly given the fact that larger developments are also planned locally - no thought has been given to schools which are already

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	full in the area. The Dover Road is particularly busy on this stretch with the junction with Sutton lane posing problems regularly for local people and those passing through Ringwoud. This development is not in the best interests for the long term protection of our beautiful rural countryside and we object to this development.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Use land available in the Dover area eg the site where the old leisure centre stood
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP53 - Land at Ringwoud Alpines (RIN002 and RIN004)
Rep ID	SDLP733
Rep Status	Processed
Consultee ID	1331849
Consultee Full Name	Mrs. Margaret Huggins
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP53
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<ul style="list-style-type: none"> • For the old Alpine Gardens site to be adding numerous two storey houses on this plot is ridiculous. Ringwoud is a small village not a housing estate. • To have a large number of houses here will cause detriment to the whole of the village and will certainly cause detriment to the AONB as it will be able to be seen from a distance when people are walking with their dogs and enjoying the peace and quiet of this beautiful area. • The detriment to our wildlife would be considerable, foxes, badgers, pheasants, owls, bats, grass snakes, slow worms, to name just a few, which currently live in and around this site would be driven away by the noise and unwanted light of urban living. • What about all the additional cars coming in and out of this area? As we all know the A258 through the village is always busy and to have numerous extra cars and services coming in and out of this estate would mean considerably more disturbance and danger. There is a bus stop set near this proposed new road. What about the school children and shoppers, including a number of elderly citizens who regularly use buses and wait at the bus stop? Not only would they have to negotiate the heavy traffic of the A258; they would have to consider a new road entrance with the traffic coming and going into the road. Will this mean traffic lights or a roundabout near the Queens Rise entrance and the new estate road entrance? This would be, in my opinion highly dangerous for all bus users hoping to get to their place of work, school or shopping. • Many Ringwoud residents have no car. Basically, to live in Ringwoud you either have to have a car to get to and from the shops or be totally reliant on the bus service. • Consider the pollution that would occur for the people in houses off the A258 in the Ringwoud village. Currently we have traffic at least flowing steadily through the village at 40 miles per hour. The pollution caused by the cars and lorries having to slow down or stop to navigate either a traffic light or roundabout or even the extra traffic coming in and out of the new road for access to the houses will be additional. This will undoubtedly cause further pollution for the residents in the houses beside the A258. • Pollution caused by the houses within the old Alpine Gardens will be to the detriment of the existing houses and residents. At night, currently on a clear night, the stars and planets are a fantastic sight. From horizon to horizon you can currently see the whole sky in all its beauty. With the number of houses currently proposed this will be severely limited due to the additional lighting, not only in the houses but the road lights etc. Like many areas in England are we going to lose our beautiful countryside? • In summary, I believe this old Alpine Gardens should not be used for housing, it is in the AONB and should remain so. Let us keep as much as we can of this lovely area for future generations to come.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The Regulation 19 Proposal SAP53(RIN002/RIN004) should be entirely removed because it is unsound and does not comply. It is not legally compliant and is unsound.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP53 - Land at Ringwoud Alpines (RIN002 and RIN004)
Rep ID	SDLP892

Rep Status	Processed
Consultee ID	1331937
Consultee Full Name	Mrs Martha Meyerowitz
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34 SAP35 RIN002 and RIN004
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The Local Plan introduces significant light pollution into an AONB. The site extends beyond the boundary of the village settlement, a semi rural location lacking facilities and infrastructure to sustain this development. The site is not a brown site. Local public transport is limited and moreso since recent cuts to bus services, there will then be an inevitable marked increase in private transport use, rendering this environmentally and practically unsustainable. The late addition of the second site to this consultation has made it difficult for the public to meaningfully comment. The consultation process is itself complex and insufficiently accessible to members of the public, who may have valid concerns but lack the expertise required to adequately engage with the process.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

Local Plan Consultation Point	SAP53 - Land at Ringwould Alpines (RIN002 and RIN004)
Rep ID	SDLP1498
Rep Status	Processed
Consultee ID	1272957
Consultee Full Name	Kathleen Walsh
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP53
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>Comment relating to SAP53 Ringwould.</p> <p>I oppose the proposal which I believe to be unsound as it is not justified, effective or consistent with national policy for the following reasons:-</p> <p>SAP53 is unsustainable because it lays outside the village settlement boundary. The 'Settlement Hierarchy' policy clearly and specifically states that, in the case of Ringwould and some other defined 'smaller villages', residential development will only be permitted within the settlement boundary.</p> <p>I can see no reason for the inclusion of the site SAP53 in this phase of the Dover Local Plan and question why SAP53 now includes RIN004 and also RIN002, a site which had been discounted during the selection of sites along with RIN003.</p> <p>There seems to be no explanation that I can find anywhere as to why RIN002 has been removed from the 'discounted sites' list and added to RIN004 apart from a suggestion by the landowner that its inclusion is essential to avoid RIN002 becoming 'landlocked'.....this is abject nonsense! As I mention later, an access route through RIN004 to RIN002 is easily achievable.</p> <p>It seems that RIN004 was only retained as it was judged to be the 'least constrained of the sites'. That said, all the Ringwould proposed sites, including RIN004, were/are unsustainable as they conflict with the position of the settlement in the 'settlement hierarchy' which clearly states that development will only be permitted within the settlement boundary.</p> <p>Under the 'initial review of sites', those under 0.25ha were deemed "too small to be allocated", however the site RIN004 has been described as having an area of 0.22ha which is beneath the threshold created by DDC. The size of the site, smaller than the desired minimum, becomes even smaller for development purposes once it incorporates an access route to the 'previously discounted' RIN002.</p> <p>The site, which is 'greenfield', lies entirely within the Kent Downs AONB and while 'screening' is apparently routinely given as a way to solve the problem of 'visual impact', this only relates to the southern site boundary. It is clear that the site frontage along the A258 (Dover Road) which currently comprises mature, extensive hedging, would have to be considerably diminished or removed to accommodate an appropriate entrance with visibility splays. This has historically been an issue for DDC Planning Officers who have stressed the importance of retaining the 'street scene' as it directly impacts views to the AONB.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>For all the above reasons, I ask that SAP53 be removed from the Local Plan.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Not Applicable</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	

Include files	SDLP1498 Walsh Att1.pdf
Local Plan Consultation Point	SAP53 - Land at Ringwould Alpines (RIN002 and RIN004)
Rep ID	SDLP1298
Rep Status	Processed
Consultee ID	1271717
Consultee Full Name	Quinn Estates
Consultee Company / Organisation	Quinn Estates Ltd
Agent Full Name	Lydia Frimley
Agent Company / Organisation	Iceni Projects
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP53
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - This Representation has been made by Iceni Projects on Behalf of Quinn Estates in relation to a Specific Site. Sections relating to strategic / DM Policies will be duplicated to the relevant locations within the Plan.)</p> <p>REPRESENTATIONS TO THE DOVER DISTRICT LOCAL PLAN REGULATION 19 CONSULTATION IN RESPECT OF LAND AT RINGWOULD ALPINES, DOVER</p> <p>On behalf of our client, Quinn Homes we provide comments on the Proposed Submission Version (Regulation 19) of the Draft Dover Local Plan to 2040 in respect of land at Ringwould Alpines, Dover (hereafter referred to as 'the Site'). The site is identified as RIN002 and RIN004 in the Regulation 19 draft Plan and is the sole development allocation at the settlement of Ringwould. A plan showing the extent of the Site and how a scheme of 12 homes could be accommodated on the landholding is contained at Appendix 1 of this representation.</p> <p>Quinn Homes supports the Site as a housing allocation within the new Local Plan to contribute towards meeting Dover District's housing needs over the Local Plan period to 2040. However, Quinn would recommend that the Site is allocated for a minimum of 12 homes instead of the indicative dwelling capacity number of 10.</p> <p>a. The Site and Surrounding Area</p> <p>The site is located east of Dover Road (A258) but within a central location at the settlement. Part of the site lies within the settlement confines and part of the site adjoins the settlement confines. The site is bounded by a mixture of mature trees and hedgerows to the east and south that provide a barrier between the connecting open fields and an obvious edge to the development.</p> <p>The site is relatively flat and does not contain any Public Right of Ways (PRoWs). Existing access to the site is from Dover Road to the north of the site. The closest train stations are Martin Hill and</p>

Walmer, both located approximately 3km to the south east and north of the Site. The closest bus stop is approximately 0.16km from the site on Dover Road and includes services to Canterbury, Tower Hamlets and Dover.

The site is wholly within Flood Zone 1, and is not subject to any designations in the emerging Proposals Map, however the Site just lies within the Area of Outstanding Natural Beauty, together with the adjoining development next to it.

b. Supporting allocation of the site within the Draft Dover District Local Plan

Quinn Homes considers that the approach taken to the delivery of housing in Dover as set out within Regulation 19 Submission Version of the Draft Local Plan is a result of sound plan-making. However, it is considered that the Site subject of this representation could and should be allocated to develop a higher number of houses, with the land having the capacity to deliver at least 12 homes. The number of homes to be delivered at this site could have a bearing as to the whether the site contributes to affordable housing, given the affordable housing threshold. Development in this location could certainly make a greater contribution to social objectives if the development quantum is increased.

Housing needs

Strategic Policy 3 (Housing Growth) addresses that Dover will make provision for at least 10,998 homes in the District over the Plan period, up to 2040. This target will be met through a mix of committed schemes, site allocations and suitable windfall proposals, however not all these are guaranteed to come through and be developed within this time. This along with the fact that the housing target is a minimum means that the Plan should be seeking to optimise development at designated settlements in Policy SP3 and SP4 such as Ringwoud.

The HELAA that was undertaken identifies that just one part of the site, that was previously referred to as RIN002, has the capacity to accommodate up to 30 homes on just that land alone at average density without the remainder of the site. The other section of the site, that was previously referred to as RIN004, was identified to have the capacity to accommodate 7 homes at average density. All together the Site was identified to have capacity for 37 homes at average density, yet the site is only allocated for 10 homes in the draft Local Plan. Quinn Homes aspires to deliver a minimum of 12 homes in this location to maximise the socio-economic benefits of development at this site.

The allocation area has the potential to be expanded directly south to the Site to bring in additional land that Quinn Homes is promoting. This land can be brought forward for development should the Council need additional dwellings to achieve its housing target. An option 2 plan is contained at Appendix 2 of this representation showing how a scheme of 18 homes could be successfully be delivered if the allocation area is extended to the south.

Of all the allocated sites in the Plan, 76.7% are greenfield sites and just 23.3% are brownfield. The subject land is part brownfield and therefore the site makes a positive contribution towards the brownfield: greenfield ratio in the District.

The site is located within the Area of Outstanding Natural Beauty (AONB), however parts of the landholding have previously been developed, the land is well screened through existing field boundaries and boundary hedges and trees and the visual harm to the AONB is therefore expected to be minimal, with the development seen against the backdrop of the existing settlement.

SAP53 - Land at Ringwoud Alpines (RIN002 and RIN004)

Under Policy SAP 53 in the draft Local Plan, the Site is allocated for an indicative dwelling capacity of 10 homes. This is the sole designation at Ringwoud and it is considered that a development of at least 12 homes would be more commensurate with the size of the settlement.

Quinn Homes acknowledges the site-specific issues referenced in the policy and is happy to bring forward a proposal that addresses all of them, including the need to respect the AONB setting through a landscape buffer and make appropriate safeguarding for access to Southern Water infrastructure. Notwithstanding these infrastructure requirements, Quinn still considers that a dwelling capacity of at least 12 homes can be delivered in this location and that this quantum would be more commensurate with the size of the settlement.

c. Conclusion

On behalf of Quinn Homes, we thank you for the opportunity to input into the Dover District Local Plan Regulation 19 Consultation.

Quinn Homes wishes to support Dover in adopting a sound Local Plan that can serve the District across the Plan period. In its current form, the Ringwoud Alpines designation at Ringwoud is supported, although it is considered that a development of at least 12 dwellings would deliver greater socio-economic benefits and a development of this amount would be more commensurate with the size and scale of the settlement. I trust that these comments are of assistance and that these representations will be taken into account. As the promoter of the only allocated site at Ringwoud, Quinn would welcome the opportunity to participate in the forthcoming Examination-in-Public into the Plan if there is to be a session on Ringwoud and contribute to the debate to ensure that the best strategy for the District is found.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant

and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Quinn Estates is a developer with significant land interests in the District, who has an important role in delivering the Plan strategy
Include files	Frimley Icenii (Ringwould Alpines) Em Att1NEW_Redacted.pdf
Local Plan Consultation Point	SAP53 - Land at Ringwould Alpines (RIN002 and RIN004)
Rep ID	SDLP1095
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	SAP 53 Ringwould The A258 is very dangerous for all Ringwould residents, there is no footbridge or pelican crossing with lights, over the busy A258 that runs through the village. It is a greenfield site on the boundary of AONB, as such the Landscape Sensitivity Assessment should have ruled out both sites. We also believe Ringwould is included in Landscape Character Type F – Open Arable Chalk Farmland with Woodland – described in Table 11.1 in NE 2.

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	SAP53 - Land at Ringwoud Alpines (RIN002 and RIN004)
Rep ID	SDLP1609
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP53
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438. SAP 53 Ringwoud: The A258 is very dangerous for all Ringwoud residents, there is no footbridge or pelican crossing with lights, over the busy A258 that runs through the village. It is a greenfield site on the boundary of AONB, as such the Landscape Sensitivity Assessment should have ruled out both sites. We also believe Ringwoud is included in Landscape Character Type F – Open Arable Chalk Farmland with Woodland – described in Table 11.1 in NE 2.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP53 - Land at Ringwoud Alpines (RIN002 and RIN004)
Rep ID	SDLP1757
Rep Status	Processed
Consultee ID	1267645
Consultee Full Name	Alan & Sarah Gleave
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP53
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective

	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note: The text below was extracted from the attached representation</p> <p>The inclusion of SAP 34 and SAP 15 especially, (but also SAP 53 and SAP 35) is not legally compliant with NPPF 2021 item 11. (b)ii 'SPs should provide for objectively assessed needs for housing & other uses, . . . unless(ii) any adverse impacts of doing so would significantly & demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole'. Also it is not compliant with the emerging govt policy announced 5 Dec 2022 by Mr Sunak on stopping compulsory housing targets on LPAs, and empowering LPAs to decide on local needs. DM Policies NE2 (Natural Environment) p.285: It is sound to designate the area inland from Kingsdown, west to Ringwoud, Ripple, Sutton, Studdal and Little Mongeham, south to Guston, as LCT F Open Arable Chalk Farmland with Woodland, F3 Ripple. But it is unsound, ineffective and contradictory to then ignore the designation when selecting the dangerously located, chalk farmland of SAP 34 for development. It is unsound and ineffective to a damaging extent, to list Kingsdown as being a 'Local Centre ; a village providing services for a local rural area and a secondary focus for development in the rural area' Any development at SAP 34 would do the opposite of 'reinforcing the role of the village'; it would in fact choke off the existing parish economy, reducing its attractiveness to tourists, a key location on the Deal Welcomes Walkers initiative. The number of 2nd homes and airB&B in the village proves that dwellings outnumber homes required, so there is NOT an 'objectively assessed need for housing a la NPPF 11' within the Parish'. (Gladman did a landgrab in 2017 in the parish 17/00487 An application rejected by DDC that Gladman took to Planning Inspectorate and won. Currently being built by Taylor Wimpey on A258 as 85 executive homes on land opposition 423-459 Dover Road to the endangerment of all road users of arterial A258 with refusal to put in pavements).</p> <p>SAP 53 Land at Ringwoud Alpines, Dover Road. The selection of the site is also unsound as being incompatible with the The Landscape Sensitivity Assessment (LSA) falling within the AONB . It is not Brownfield. It is surrounded by LCT F 3 arable chalk downland. Access would be from the very busy and dangerous A258 on which not only the settlement but also the larger conurbation depends.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	SDLP1755 Gleave Redacted.pdf
Local Plan Consultation Point	SAP53 - Land at Ringwoud Alpines (RIN002 and RIN004)
Rep ID	SDLP1969
Rep Status	Processed
Consultee ID	1334285

Consultee Full Name	Mr Henry Paice
Consultee Company / Organisation	
Agent Full Name	Kingsdown Conservation Group
Agent Company / Organisation	Kingsdown Conservation Group
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP53
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Extracts from the 24-page submission on DDC Reg 19 Local Plan Consultation, Dover and Deal Green Party. Focused on sites affecting Ringwoud with Kingsdown Parish : The selection of the site is unsound as being incompatible with the Landscape Sensitivity Assessment (LSA) falling within the AONB. The A258 that runs through the middle of Ringwoud carries a heavy and dangerous amount of fast road traffic currently and the addition of more traffic at the access point to site would create yet another dangerous junction, hence the selection of this site is unsound.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	I consider changes to the Plan to be the responsibility of DDC
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	to ensure residents voices are heard
Include files	
Local Plan Consultation Point	SAP53 - Land at Ringwoud Alpines (RIN002 and RIN004)

Rep ID	SDLP1766
Rep Status	Processed
Consultee ID	1267050
Consultee Full Name	Victoria Hughes
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP53
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>To whom it may concern, (Without prejudice)</p> <p>I would like to object to SAP 34 for the reasons as specified below. These reasons also apply to SAP 35, 53 and 15 .</p> <p>The inclusion of SAP 34 is not legally compliant with NPPF 2021 item 11. (b)ii 'SPs should provide for objectively assessed needs for housing & other uses, . . unless(ii) any adverse impacts of doing so would significantly & demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole'. SAP 34 Kingsdown p. 163: The selection of SAP 34 is totally unsound, on 5 different grounds,.</p> <p>Firstly the Highways Assessment of Ringwould Road is inadequate and unsound as regards this site. The facts are that Ringwould Road is signposted as unsuitable for long vehicles, unsuitable for vehicles over 7.5tonnes unsuitable for wide vehicles, the road is painted SLOW in 3 places despite the 50mph signs, and there are 4 sections where the road narrows to single lane passing. The 1400 voters in Kingsdown village (population 2000 + 500? more in summer months due to holiday village + campsite) are all dependent on the Ringwould Road traffic flowing freely. So the selection of SAP 34 for any development is unsound firstly on the grounds of highways assessment unsoundness / inadequacy. Any development would cause dangerous gridlock, involving the cars of current residents, parents of children of the village primary school, construction vehicles and new residents' cars. It is a disgrace that KCC for years have refused to listen to requests to reduce the speed limit on this road and refused also to put in a kerbed pavement on the northern side of Ringwould Road. The economy of the village depends on visitors and residents walking, cycling and horse-riding on the Ringwould Road and any development of SAP 34 would increase the likelihood of fatalities exponentially.</p> <p>The selection of SAP 34 is unsound secondly on the grounds of landscape character, being incompatible with criteria described above in SP 4. the site is on the skyline with sea behind, an iconic view that greets all people arriving in Deal; its selection contradicts the comments in SP4 on individual village identity and character. DM Policies NE2 (Natural Environment) p.285: It is 'sound' to designate the area inland from Kingsdown, west to Ringwould, Ripple, Sutton, Studdal and Little Mongeham, south to Guston, as LCT F Open Arable Chalk Farmland with Woodland, F3 Ripple. But it is unsound, ineffective and contradictory to then ignore the designation when selecting the dangerously located chalk farmland of SAP 34 for development.</p> <p>The selection of SAP 34 is unsound thirdly on the grounds that the Deal / Walmer conurbation of 30,000 depends on the narrow – single lane in places - Ringwould Rd, carrying diverted traffic from the A258 every time A258 is blocked by an RTA or road works. The A258 is the only</p>

	<p>southern entrance to the 30,000 conurbation starting in Upper Walmer stretching to North Deal and Sholden. Diverted traffic is a dangerous nightmare for the village every time it happens, some diverted traffic uses Glen Rd / Liverpool road selected as site for SAP 15 Ray's Bottom in Walmer. This site too, if developed is likely to mean diverted traffic cannot get in / out of Deal /Walmer 30,000 conurbation. Neighbours working for emergency services say they oppose both developments for this reason. Unsound due to being incompatible with SP12, because its lanes periodically become part of the district Strategic Transport Infrastructure. Selection of these sites is completely unsound and non-compliant with all laws / planning regs relating to the prevention of accidents and protection of human life. SAP 34 would result in 'Traffic movements from the development resulting in severe impacts to the highway network that it would not be possible to mitigate', and as such contrary to SP4 2 j within the plan, thus unsound and highly ineffective.</p> <p>The selection of SAP 34 is unsound fourthly on the grounds that it borders the AONB and is valuable arable farmland, needed in times when national food security is of concern. Moreover 4.238 needs correcting, the parish council-owned, biodiversity-rich site of the Lynch / and Freedown woods (that run into Oxney Court Woods) was the subject of a survey by Kent Wildlife Trust in 2017 commissioned by the Ringwold w/ Kingsdown parish council and paid for by DEFRA, which provides evidence of the natural capital within the boundary of the AONB to be protected on the boundary of this site.</p> <p>The selection of SAP 34 is unsound fifthly on the grounds that any development would remove a flood sponge on the top slope of the hill, below which is the Knight's Bottom pumping station and pond which drains towards Rays' Bottom SAP 15, so development here could contribute to flooding (see CC5 p. Flood Risk).</p> <p>Any development of SAP 34 is not legally compliant with emerging government policy, see Mr Sunak statement 5 Dec 2022 announcing dropping of compulsory housing targets for LPAs (Local Planning Authorities such as DDC)'. I would also like to object to SAP 35, 53 and 15 for the same reasons as above.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	SAP53 - Land at Ringwold Alpines (RIN002 and RIN004)
<p>Rep ID</p>	SDLP1820
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1333682
<p>Consultee Full Name</p>	Ms Carolyn Barber

Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP53
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SAP53 is unsound as being incompatible. LSA falling within the AOB.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP53 - Land at Ringwold Alpines (RIN002 and RIN004)
Rep ID	SDLP1970
Rep Status	Processed
Consultee ID	1333808

Consultee Full Name	Patricia Barrington
Consultee Company / Organisation	
Agent Full Name	Kingsdown Conservation Group
Agent Company / Organisation	Kingsdown Conservation Group
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP53
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Extracts from the 24-page submission on DDC Reg 19 Local Plan Consultation, Dover and Deal Green Party. Focused on sites affecting Ringwoud with Kingsdown Parish : SAP53 Land at Ringwoud Alpines, Dover Road. The selection of the site is also unsound as being incompatible with the Landscape Sensitivity Assessment (LSA) falling within the AONB The A258 that runs through the middle of Ringwoud carries a heavy and dangerous amount of fast road traffic currently and the addition of more traffic at the access point to site would create yet another dangerous junction, hence the selection of this site is unsound.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	I consider the changes to the Plan to be the responsibility of DDC
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	to ensure the voice of residents are heard
Include files	
Local Plan Consultation Point	SAP53 - Land at Ringwoud Alpines (RIN002 and RIN004)

Rep ID	SDLP1795
Rep Status	Processed
Consultee ID	1331774
Consultee Full Name	Mr Simon Pollard
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP53
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I am a resident of Kingsdown. My concern is with the consequences of the housing developments at Woodhill Farm (SAP 34 - 50 dwellings) and Courtlands (SAP 35 - 5 dwellings), also adjacent developments at Ringwould Alpines (SAP 53 - 10 dwellings) and at Rays Bottom, Walmer (SAP 15 - 75 dwellings). These are connected by Ringwould Road between Kingsdown and Ringwould, by Glen Road between Kingsdown and Walmer (inland) and by Kingsdown Road between Kingsdown and Walmer (along the seafront). The first two, in particular, are narrow roads with inadequate width at many/most locations for passing traffic. Kingsdown Road is less restrictive. The number of dwellings will inevitably lead to increased car usage for Kingsdown village access, for school access, for work/employment access, for shopping and for general leisure access. There is no meaningful bus service to accommodate all these needs. Kingsdown Primary School will likely be the primary school of choice for the developments I have noted, putting particular strain on these roads. Children at secondary school (and those attending primary schools elsewhere) will all need to use these roads to move out of the referenced development areas. The whole village road network is generally narrow and unsuited for heavy traffic volumes. When discussing these aspects with DDC Planning representatives at the Deal open-day for the Plan, I was advised that the plan does not address these transport needs (and I have not found any text to contradict them.)</p> <p>My main comment therefore is that a full traffic analysis must be made to ensure adequate provision for the daily needs of the developments. Access for construction traffic will be an immediate concern. While not directly related to the quoted paragraphs of the Infrastructure Plan, the village primary school is probably too small to accommodate the likely increase in demand. Road access around it does fall within the reference and is similarly restrictive already.</p> <p>Additionally, for Ringwould Road between Kingsdown and Ringwould there should be pavement(s) (or alternative footpaths) to provide a safe pedestrian route to access the main bus route along the A258 (the Dover-Deal road). The current road is unsafe for pedestrians and cyclists. The junction of Ringwould Road with the A258 will need to be enhanced to accommodate the increased traffic. Similar safe access will be required for Glen Road.</p> <p>It is not clear to me how the narrow road network in Kingsdown can be modified to suit an increased volume of traffic. This might in itself be good reason to object to the developments, but a more positive attitude by the planners and developers is surely required?</p>

	(DDC note: This representation was originally made against the Infrastructure Delivery Plan consultation document but has been duplicated in relevant places against the Local Plan due to the specific site allocation references made)
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP53 - Land at Ringwold Alpines (RIN002 and RIN004)
Rep ID	SDLP1613
Rep Status	Processed
Consultee ID	1333374
Consultee Full Name	Linda Hedley (Clerk)
Consultee Company / Organisation	Ringwold with Kingsdown Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP53
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>After careful consideration of the Local Plan (LP) and on hearing comments from the residents in both Ringwoud and Kingsdown it is considered the LP is unsafe.</p> <p>The Settlement Hierarchy lists Ringwoud as a small village. There are no facilities, notwithstanding that there is a public house which opens intermittently, and the village has developed along the A258 which is the main access between Dover and Dwal. Any extra traffic movements will give an extra ordinary effect on the however small the number of properties.</p> <p>SAP53 is outside the village settlement boundary, is on the main road, is not a brownfield site, having been a plant nursery previously.</p> <p>RIN004 was initially the only site listed in the LP, however between the Regulation 18 and now the Regulation 19, the site RIN004 has been added which has not allowed people to make constructive comments.</p> <p>The 2014 an Inspectors Report stated light pollution should be prevented especially in the AONB areas, the development of this site would be contrary to this and Members see no reason why there should be any relaxation to that statement. The site was not selected for any assessments on landscape sensitivity. With the various issues surrounding the site it is considered contrary to the NPPF, major traffic issues, (even with the small number of properties, due to close proximity of other junctions and the poor layout of the main road), dark skies, AONB, good agricultural land.</p> <p>In addition, given that the site does not comply with the village hierarchy does nor comply with any sustainability and should be removed from the plan.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	That both sites are removed from the Local Plan
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	To emphasise the position of the PC
Include files	
Local Plan Consultation Point	SAP53 - Land at Ringwoud Alpines (RIN002 and RIN004)
Rep ID	SDLP1843
Rep Status	Processed
Consultee ID	1333703
Consultee Full Name	Marion Osborne
Consultee Company / Organisation	

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP53
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SAP34 not legally compliant with NPPF 20-21 items 11 DM policies NE2 (natural environment) P285 The chalk farmland of SAP34 is unsound/unsuitable for development. SAP34 is unsound on the grounds of landscape character being incompatible with criteria in SP4. SAP34 is unsound on the grounds that it borders the AONB and is valuable arable farmland. SAP34 – any development would remove a flood sponge on the top slop of the hill which drains toward Ray Bottom SAP15, so development here would contribute to flooding. SAP35 is unsound in that it involves loss of food producing farmland; destructive of the landscape character and it is in a BOA. SAP53 is unsounds as being incompatible with LSA falling within the AOB. SAP15 is unsounds as incompatible with SP4; 3.71 separation of settlements. Also, it is incompatible with statements in SP14 relating to biodiversity connectivity. The highways assessment of this site is unsound and inadequate. SAP15 4.160 fails to note that Liverpool Road, is a single lane road which becomes gridlocked with traffic from Kingsdown primary school twice a day
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	no comment
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

Staple

Local Plan Consultation Point	Staple
Rep ID	SDLP830
Rep Status	Processed
Consultee ID	1330664
Consultee Full Name	TG Designer Homes c/o Agent (Hobbs Parker)
Consultee Company / Organisation	
Agent Full Name	Elizabeth Welch
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP4 - settlement confines for Barnsole / Policies Map specifically for Barnsole
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The Plan is unsound for failure to include Layham Garden Centre within the proposed settlement confines for Barnsole.</p> <p>Land at Layham Garden Centre is submitted for a low-density residential scheme together with improvements to the existing commercial offer.</p> <p>The proposed houses could be arranged around the creation of a single new access point to enable the existing access to be retained for the improved commercial offer.</p> <p>The site is located to the east of the village of Staple and within the hamlet of Barnsole. This Regulation 19 Submission Version of the Plan recognises that Barnsole is a settlement (as defined in Appendix E of the emerging Plan 'Settlement Hierarchy'), with defined boundaries as set out on the Proposals Map. Emerging Policy SP4 allows for 'Minor residential development or infilling' subject to 11 set criteria (a to k). The settlement confines should be amended to include Layham Garden Centre as part of Barnsole given that the Garden Centre is an important service/facility within the settlement. In amending the settlement confines for Barnsole to include Layham Garden Centre this would allow a small scale proposal, of approximately 10 dwellings, to be considered in line with the emerging Policy SP4.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Amending the proposed settlement confines for Barnsole to include Layham Garden Centre and/or the allocation of the land at Layham Garden Centre to enable a low-density residential scheme and improvements to the existing commercial offer

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	In order to demonstrate the suitability of the site for inclusion within the settlement confines, representing an important facility within Barnsole and to show how a scheme could be incorporated on site
Include files	Site Plan.pdf
Local Plan Consultation Point	Staple
Rep ID	SDLP1907
Rep Status	Processed
Consultee ID	1333859
Consultee Full Name	Andrew Street
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Staple
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We refer to the above mentioned document that is currently available for public consultation. We act on behalf of the owner of the property [redacted] in relation to this matter.</p> <p>We wish to provide the following comments on the Councils proposed housing strategy: Policy DP3 Housing Supply and Growth</p> <p>We consider the policy is Unsound for the following reasons</p> <p>We are concerned that the Council will continue to rely heavily upon large strategic sites to deliver its housing land supply needs. Whilst we have no issue the housing land supply figures, as they are based upon the Government standard methodology calculations, we would advocate it necessary and prudent to provide an additional contingency buffer. We note that the majority of homes are anticipated to come forward in the Whitfield Urban Expansion area.</p> <p>The additional buffer supply or contingency should be brought forward by allocating smaller sites that do not require a large upfront investment in infrastructure costs to facilitate delivery. These smaller sites can also be brought forward by small medium sized (SME developers in the short term and will deliver earlier in the current plan period. Although this may be considered by some to be an over supply above the current housing land supply targets, it is necessary to factor in delays in the delivery of larger sites in the Council's area by the volume or national house builders; especially in the current economic climate.</p>

	<p>It is also an important consideration that Government advocates smaller sites for SME developers in the National Planning Policy Framework (2021) document (paragraph 68). The identification of these smaller sites in the local plan document as opposed to identifying a projected windfall figure allowance provides more certainty for SME developers in pursuing sites for planning permission.</p> <p>Our client has a site that would be suitable for inclusion as a site allocation in the village of Staple. The site itself currently forms part of an extended garden area of Warren House and is well screened from the surrounding rural area by mature trees and landscaping. This site is by definition previously developed land (PDL) as defined in the latest version of the NPPF (2021)</p> <p>Attached is a red line plan of the site and we consider the site is of sufficient size to accommodate a small residential development for between five- six dwellings (see plan 1 attached). Photographs attached for reference.</p> <p>At present, Staple has a very restricted tightly drawn settlement boundary surrounding the village as shown on the attached plans. There is already a small site within the settlement confines identified in the plan document as suitable for development. Therefore, the village is considered a suitable area by the Council for new housing development and is a sustainable location.</p> <p>We therefore ask for the settlement boundary to be expanded to include a residential site allocation as shown on the attached plan (reference plan 2).</p> <p>We trust these comments will be taken into consideration.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>We therefore ask for the settlement boundary to be expanded to include a residential site allocation as shown on the attached plan (reference plan 2).</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Not Applicable</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>Street Att1_Redacted.pdf Street Att2.pdf</p>

SAP54 - Land at Durlock Road, Staple (STA004)

Local Plan Consultation Point	SAP54 - Land at Durlock Road, Staple (STA004)
Rep ID	SDLP373
Rep Status	Processed
Consultee ID	1331544
Consultee Full Name	Mrs. Shelley Morris
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Staple 4.299
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The site lies outside Staple settlement boundary and there is no evidence that it is an exception site. The new development which has been recently built alongside the site, qualified on the grounds of providing 'affordable housing in rural locations beyond the village confines (rural exception schemes)'. HS10 P.12, 2.49 Rural Housing Needs. Currently, the village offers no facilities to merit this new plan going ahead. The pilot bus scheme is to be axed, there is no local primary school within the village and no jobs available. Water pressure levels are dangerously low throughout the village and this road is subject to flooding.</p> <p>In order to build the new development, the proposed site had to be used as a compound for the building materials as there is no on-road parking due to access being onto the single track road.</p> <p>The proposed site was Grade 1 Agricultural Land which had been set aside for many years. During this period a rich habitat became established supporting numerous wildlife species. Since the new development alongside the site is unable to fulfil the net gain in biodiversity provision, there is every reason to see this site set aside permanently for an Offsetting Scheme to compensate for the loss of habitat on the adjacent site.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP54 - Land at Durlock Road, Staple (STA004)
Rep ID	SDLP626
Rep Status	Processed
Consultee ID	1331790
Consultee Full Name	Julie Davies
Consultee Company / Organisation	CPRE Kent
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP54
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	We object. The site lies outside Staple settlement boundary and there is no evidence that it is an exception site. A new development is in progress, adjoins this site and is unable to fulfil the net gain in biodiversity provision. We would like to see this site set aside for an Offsetting Scheme to compensate for the loss of habitat on the adjacent site.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will	

make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP54 - Land at Durlock Road, Staple (STA004)
Rep ID	SDLP1953
Rep Status	Processed
Consultee ID	1274347
Consultee Full Name	David Parfitt
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP54
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Letter from applicant stating they will be submitting plans for 6 dwellings)
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will	

make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP54 - Land at Durlock Road, Staple (STA004)
Rep ID	SDLP1799
Rep Status	Processed
Consultee ID	1331655
Consultee Full Name	Caroline Mason
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP54
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I refer to the new local plan for the development of houses in Durlock Road. This site lies outside Staple settlement boundary and there is no evidence that it is an exception site, therefore I cannot see the benefit of developing this land for several very important reasons: 1. At the moment, the village has no facilities to merit this new plan going ahead. The local bus scheme is to be discontinued, there is no local primary school and no jobs available. In addition, water pressure levels are very low throughout the village and the road is subject to flooding. 2. This land, which was damaged during the development of the affordable housing estate adjacent to it, supported a rich, biodiverse landscape. It has quickly begun to recover and I am sure I don't need to explain to you the importance of biodiversity, not only for its own sake but for the health of our environment. 3. An additional concern is the issue of space during the building of these houses. There is no where for materials, building vehicles and machinery to be stored. There is no on road parking. This site was in fact used as storage for the recent adjacent development. This is of great concern to local residents who will be significantly inconvenienced during the building of these houses. 4. Access to these

	properties will be directly opposite existing driveways across Durlock Road, creating traffic problems in an already narrow and busy road., I strongly object to building any further houses as proposed in the local plan.
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	No
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	

SAP55 - Woodnesborough Small Housing Sites

Local Plan Consultation Point	SAP55 - Woodnesborough Small Housing Sites
Rep ID	SDLP1413
Rep Status	Processed
Consultee ID	1333243
Consultee Full Name	Mr and Mrs Tobin
Consultee Company / Organisation	
Agent Full Name	Mr Reece Lemon
Agent Company / Organisation	Lee Evans Partnership
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Omission Site for SAP55 (Intro / Conclusion)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Representation submitted by Lee Evans On behalf of Mr and Mrs Tobin. Full Representation attached to SDLP1411. This document has been split across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1411.)</p> <p>4. POLICY SAP55 – ‘WOODNESBOROUGH SMALL HOUSING SITES’</p> <p>4.1 Policy SAP55 notes that in addition to the Strategic Housing Allocations and Non-Strategic Housing Allocations identified in the Plan, there are two smaller sites allocated for housing in Woodnesborough. These are listed as:</p> <p>WOO005 Beacon Lane Nursery, Beacon Lane, Woodnesborough (est. 5 dwellings)</p> <p>WOO006 Land south of Sandwich Road, Woodnesborough (est. 10 dwellings)</p> <p>4.2 The provisions of SAP55 as drafted therefore identify an estimated 15 additional dwellings in Woodnesborough over the plan period, subject to two criteria:</p> <p>(a) Planning permission will be granted for proposals that accord with the policies in the Local Plan; and</p> <p>(b) Planning permission will be granted for proposals that address the site-specific issues and requirements for the site set out below</p> <p>4.3 Detailed commentary relating specifically to the two identified sites above is not made here; rather commentary is made to SAP55 as a whole with due regard to its effectiveness and soundness as a policy seeking delivery of small housing sites in Woodnesborough.</p> <p>Estimated Dwelling Numbers</p> <p>4.4 Overall, only 15 dwellings are proposed in Woodnesborough over the plan period. This is seen as a low figure for Woodnesborough. Whilst the settlement is a ‘Smaller Village’, it is considered that</p>

there are other opportunities to support sustainable development in the village. It is recognised that SP4 seeks to support windfall development though – as above – this policy will be ineffective in delivering a reasonable level of growth to the settlement over the plan period given how tightly settlement boundaries have been drawn at Woodnesborough. There are thus limited opportunities to deliver housing at Woodnesborough outside of the above sites, and outside of an estimated 15 dwellings.

4.5 The estimated dwelling numbers directed to Woodnesborough should be first clarified as a minimum quantum of growth.

4.6 Second, the Landowner also considers that further sites should be allocated to provide greater assurance of the deliverability of proportionate growth to the settlement, with related uplift in estimated dwelling numbers.

4.7 The Site could be released for development in a timely fashion (between 1-5 years) in order to reinforce the sustainable growth aspirations for Woodnesborough, supporting local services and facilities whilst contributing to District housing targets.

Proposed Additional Site Allocation – Land off The Street, Woodnesborough (est. 10 dwellings)

4.8 To address the concerns raised above, the Landowner wishes to put forth its own interests as noted throughout this response.

4.9 The representation site is approximately 0.88 hectares of developable land and could provide approximately 10 no. dwellings. It should be noted that the Site was previously assessed in the 2021 Call for Sites Exercise under reference 'TC4S090 - Land off The Street, Woodnesborough, Sandwich'.

This assessment noted that an 'agreed housing number' of 27 dwellings, in excess of the 10 dwellings put forward by the Landowner both in 2021 and at the time of writing. It is noted that the Site was therefore assessed against a much higher quantum of development, and should be revisited at a more modest scale of 10 dwellings.

4.11 The LPA considered – on the basis of 27 dwellings – that the Site was unsuitable noting that:
there would be an unacceptable landscape impact
access is unachievable
footpath access is unachievable
impact on Old Hall Grade II would need assessment

4.12 The Landowner responds to these items below, noting throughout that the allocation of this additional site in Woodnesborough for 10 dwellings would serve to reinforce proportionate development in the village over the plan period as a whole, supporting existing services and facilities, and would be in keeping with the overall thrust of the Vision for the Plan, and would in turn serve to address the concerns surrounding whether SAP55 has been positively prepared and whether it represents a sound basis for planning over the plan period. It is emphasised that an Expression of Interest from a local developer is submitted as part of these representations, reinforcing both the availability and deliverability of the Site.

4.13 An indicative layout has also been included as part of this representation, which has taken into consideration the adjacent listed building, the surrounding countryside and the existing built form within this rural-setting. This is shown in extract below (Figure 3).

Figure 3. Extract of indicative site layout at Land off The Street, Woodnesborough

Character and appearance (including landscape matters)

4.14 The representation site is located on the northern side of The Street, Woodnesborough, directly adjacent to residential development on three sides, and other built development within the vicinity. Development of this site, at the amount proposed (an indicative capacity of circa 10no. dwellings) would be in keeping with, and at a scale proportionate to, the size and form of the existing settlement.

4.15 The location of the representation site sees it directly adjoin the extent of built form within the village of Woodnesborough, and it benefits from access to local services and facilities which are provided

in the locality. The site is not isolated (having consideration to Braintree District Council v SSCLG & ORS [2017] EWHC) by virtue of the presence of other dwellings immediately adjacent to it and cannot be considered as being separate, or remote from, the existing settlement.

4.16 The representation site is not considered to be valuable to the landscape, due to its enclosed nature and limited visual presence, containing no features of landscape value. The site has a different character to the agricultural land surrounding it, since it has been used for the keeping of horses for over 15 years.

4.17 The site is visually well contained in relation to the wider landscape, due to its position between and adjacent to other built form. Whilst the site may be visible from vantage points further to the north, it is considered that a development within the site, which could be set behind a dense landscape buffer, would be read with the existing development in the village and would not appear out of place or incongruous within the landscape.

4.18 As elsewhere, the Site would fall outside of the proposed settlement boundary and within the open countryside. Aside from commentary relating to windfall development at Policy SP4, it is noted that the Site is well-related to the existing village.

4.19 Potential impact(s) from development can be mitigated by ensuring development maintains, conserves and preserves the special qualities of the landscape and surrounding countryside. The visibility of the site from close range views, can be addressed through the high-quality design of buildings and setting buildings within a new landscape framework. Existing trees and planting which form boundary treatments can be retained and enhanced as part of the layout.

4.20 At site level, whilst there would be a change in the land use were the representation site to be developed, there are no rare or unique features within the site that would be impacted and that therefore the effect on site level landscape would not be significant due to the balance between new residential land uses alongside improved vegetation cover, biodiversity value and green infrastructure around the boundaries of the development, enhancing the visual amenity and value of the site within the village.

4.21 The development of this site would provide the opportunity to implement high quality, sustainable architectural design, a new landscape framework and an improved biodiversity value to the site. Crucially the site does not exhibit any rare or unique landscape features and its character is already influenced by its proximity to residential and recreational land uses which surround and enclose the site from the adjacent countryside.

4.22 An indicative landscape framework is shown on the submitted plan in support of this representation and its advocacy of additional allocations at Woodnesborough, showing, principally, additional planting to boundaries to enhance and strengthen the existing screening of the site and create new habitats, to enhance ecology opportunities across the site. The plan also shows new green open space along the site frontage to ensure that the amenities of the village are enhanced. The plan is conceptual at this stage but provides an indication of how the site could be developed in the future to ensure landscape impact is minimised and the ecological value enhanced.

4.23 The HELAA 2021 exercise is therefore considered inadequate in considering how matters of landscape impact(s) might be resolved in development management processes. A detailed LVA or LVIA could be prepared to reflect the above principles, supporting any future application(s). In addition, it is held that the LPA's assessment was flawed in focusing on a proposed capacity of circa 27 dwellings as an 'agreed' figure, contrary to the 10 dwelling capacity put forth by the Landowner, with relative implications for the assessment of landscape harm considered by the District Council at this stage which influenced its decision to exclude the site from further assessment.

4.24 In this regard, the Landowner considers the assessment of the Site under the HELAA 2021 exercise has been inadequately concluded, and thus SAP55 is not based on an effective or sound evidence base. This should be corrected through amendment to SAP55.

Access and Highways (including vehicular and pedestrian access)

4.25 The above drawing (Figure 3) indicates that access would be able to be provided directly off The Street.

4.26 This would require a new vehicular access be made through the bank, in a similar manner to the access created at Elmwood Park. The speed limit is 30mph in this location (Beacon Lane, Oak Hill, The Street). There is no reason to expect a departure from this speed limit.

4.27 Visibility onto The Street could be made good, providing the access is agreed with KCC Highways. Contrary to the findings of the LPA's evidence base (and specifically the HELAA 2021) the highways boundary is shown to include the necessary land to enable suitable access to the Site from The Street (Figure 4). This is confirmed in writing by letter dated 30 April 2004, appended to this letter for information (Appendix 1).

4.28 The capability of providing footpath access to and from the Site could be explored through development management processes though it is noted that the Landowner controls adjoining land.

4.29 In this regard, the Landowner considers the assessment of the Site under the HELAA 2021 exercise has been inadequately concluded, and thus SAP55 is not based on an effective or sound evidence base. This should be corrected through amendment to SAP55.

Figure 4. Highways Boundary extract from The Street, Woodnesborough (Appendix 1)

Heritage and Site Surroundings (including regard to the nearby Listed Building)

4.30 In terms of the relationship with neighbouring properties, the representation site is adjacent to The Old Hall and falls opposite a new development at Elmwood Park. The Site is spacious enough so as to distance development away from neighbouring properties and ensure a high standard of amenity is preserved for existing neighbouring occupants. In order to ensure that there would be no unacceptable impact upon site context and surroundings, it is envisaged that the development of the site would be designed to consider the privacy and amenity of neighbouring occupiers, and would include buildings of appropriate size and scale are provided in the right location with sufficient space from each other and the existing neighbouring properties. The site is well connected and is considered to be sustainably located so as to ensure the wellbeing of future occupants within the village.

4.31 It is anticipated that a heritage assessment could be provided under the context of a planning application to best assess the relationship of the Site to the Old Hall. It is however considered that sufficient set back and an appropriate landscape buffer would provide an appropriate relationship to this listed building. It is noted that the listed building already exists in the setting of two storey residential development, and the proposed site allocation – at 10 dwellings – would not fundamentally change this overall setting.

4.32 It is considered that revisiting the LPA's HELAA 2021 assessment referring to 10 dwellings – and not 27 dwellings as the LPA previously assessed against – would yield a different assessment, and may provide for closer consideration of the Site as an appropriate allocation in the Plan.

Sustainability

4.33 As an overall measure of sustainability, there are a number of key areas that are considered to be significant positives:

- Woodnesborough Village Hall, located within Elmwood Park, directly opposite the site.
- St Mary The Blessed Virgin Church is a 3 minute (0.1) mile away
- Regular bus services (Numbers 542, 43, 43A, 44 and 81) all pass through Woodnesborough and provide links to Dover, Deal and Sandwich.
- A range of shops, services and health care facilities are available in Sandwich, which is accessibly by public transport or by foot (1.6 miles/30 minute walk).
- The representation site is within Flood Zone 1 as identified on the Environment Agency's Flood Risk Map.
- The Site is not shown to fall within any other protected landscapes.

It is noted, that most services and facilities would require a need to travel into neighbouring villages, however, in this instance the development of this site would enhance and maintain the vitality of Woodnesbrough and other settlements such as Eastry, Ash and Sandwich, ensuring there is a need for vital local services.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	SAP55 - Woodnesborough Small Housing Sites
Rep ID	SDLP1411
Rep Status	Processed
Consultee ID	1333243
Consultee Full Name	Mr and Mrs Tobin
Consultee Company / Organisation	
Agent Full Name	Mr Reece Lemon
Agent Company / Organisation	Lee Evans Partnership
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Omission Site for SAP55 (Intro / Conclusion)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	(DDC Note - Representation submitted by Lee Evans On behalf of Mr and Mrs Tobin. Full Representation attached to SDLP1411. This document has been split across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1411.)

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

1. INTRODUCTION

1.1 Lee Evans Partnership LLP is instructed by Mr & Mrs Tobin (hereafter, the Landowner) to submit representations to the Regulation 19 Submission Draft of the Dover District Local Plan 2040.

1.2 The Plan outlines the scale and distribution of new development which is required to meet Dover District's needs to 2040. It further identifies the planning principles and policies to guide decisions on all new developments, including through a series of site allocations and detailed development management policies against which development proposals will be assessed during the plan period to 2040.

1.3 This representation identifies the Landowner's holding at Land Off of The Street, Woodnesborough (hereafter, 'the Site'), and makes a case in support of its allocation for residential development of circa 10 dwellings. It provides detailed comments on the Plan as drafted, including those relating to its soundness, legal compliance, and whether the plan has satisfied the Duty to Cooperate.

1.4 The Site comprises 0.88ha in total and sits within a central location within the village. Although detailed commentary is provided against the Plan as a whole, specific commentary is provided in respect of Emerging Policy SP55 – Woodnesborough Small Housing Sites.

1.5 These representations are supported by the following documents to provide reassurance of the availability, suitability and deliverability of residential development in this location:

Indicative Site Layout, prepared by Lee Evans Partnership LLP

Access Arrangement Technical Note, prepared by GSE

Expression of Interest, from GSE

Letter from Kent County Council Highways, dated 30 April 2004 (appended to this document, Appendix 1)

1.6 The following comments are therefore set out in a positive and constructive manner intended to aid the clarity and implementation of the Plan, structured around the following sections:

Section 2 of this Statement describes the representation site and its surroundings;

Section 3 sets out relevant Planning Policy considerations with reference to the Vision, Objectives and key emerging planning policies;

Section 4 sets out detailed commentary of Emerging Policy SP55 – Woodnesborough Small Housing Sites, and identifies the case for the allocation of the Site to further support the implementation of housing delivery in the village;

Section 5 provides a summary.

1.7 These representations conclude that the Plan can be found legally compliant, and can provide a sound evidence-based approach to planning in the District over the plan period subject to amendment. At present, the Landowner considers that whilst the Plan's overall Vision and Objectives are sound in their aspirations, the allocation of further sites – specifically under the 'small housing sites' policies – would more closely reflect the evidence base and provide a stronger basis for the delivery of housing in the District over the plan period.

1.8 Following review of the LPA's evidence base relating to sites in Woodnesborough, on behalf of Mr and Mrs Tobin we strongly advocate for the inclusion of Land off of The Street, Woodnesborough for residential development of up to 10 no. dwellings as a means of strengthening the effectiveness and overall soundness of Emerging Policies SP3, SP4, and SP55 specifically. The thrust of these policies in delivering high quality growth to meet identified need of at least 10,988 dwellings over the plan period is supported, though the detail of policy delivery mechanisms is not supported in its current form without the type of amendment suggested herein.

1.9 We welcome the opportunity to further assist or provide comment on the preparation of the Plan which will help shape future development in the area; and we welcome look forward to the opportunity to participate at later hearing sessions where appropriate.

2. SITE DESCRIPTION AND PLANNING CONTEXT

2.1 The Site is outlined red on the submitted drawing EMA-2021-49-02. It covers an area of approximately circa 0.88 hectares. The site is located to the north of The Street. There is existing and well-established built form to the north east, south east and south west on The Street, with a recent development being completed at Elmwood Park. Woodnesborough is a village comprising a variety of services and facilities including a church, a number of small businesses a village hall.

Figure 1. Site Location Plan

2.2 The Site, as existing, can be accessed off of Oak Hill past Fir Crest and the adjacent Stables via an existing right of access. Access opportunities are also available via The Street, which runs the length of the Site and through Woodnesborough. This would be the preferred access to any development, with ownership via The Street available without any hindrance (as addressed elsewhere re Kent County Council's ownership strip adjoining the highway).

2.3 A summary of the Site's baseline conditions is set out at Table 1, with further details following below.

Table 1. Site Summary

2.4 Woodnesborough is a small village situated a short distance north of Eastry. The village has a semirural

character, with a fairly consistent ribbon of development along the main road frontage, with agricultural land beyond, into the open countryside. The Site is adjacent to the property, Fir Crest and adjacent stables. The land is used for the keeping of horses. The Site is screened from The Street and the topography of the site is such that the representation site is on a higher ground level than The Street, with a raised bank and planting bounding the Site and The Street.

2.5 The Site is adjacent to a Grade II Listed Building, The Old Hall (Woodnesborough Village Hall), which is of significance to the Village.

2.6 The building's listing UID is 1070075 and the list entry for the building sets out that the building was once a school, then a village hall. The building is constructed of buff brick under a slate roof. It is one storey and plinth with parapet gables and belicote to right, and lozenge-set stack to rear left. Two four centred arched 3 light mullioned and transomed windows with sunk spandrels and label hoods. Boarded central door with four centred gauged head in gabled porch. The NGR is TR3095056976. It is considered that the significance of the building comes from the historical interest, given its previous uses as an important building within the village. The building is also highly detailed and is a good example of a building of its era (19th Century), which demonstrates some architectural significance in the building also.

2.7 In terms of services provided within the village, there is a church, a village hall and a number of small business located within the village, with the majority of services located in surrounding villages/towns of Eastry, Ash and Sandwich including supermarkets, banks, health care and leisure facilities.

2.8 In addition, there are a number of bus-stops located within walking distance of the representation site, providing regular bus services to Deal, Dover, Sandwich and beyond. The service numbers 43, 43A, 44, 91 and 542 run through Woodnesborough. The Sandwich Train Station operates a South Eastern Railway service and is located approximately 1.4 miles from the representation site (approximately a 30 minute walk) or an 8 minute bus ride (service number 81 from bus-stop Oak House) followed by a 3 minute walk.

3. REPRESENTATIONS TO REGULATION 19 LOCAL PLAN CONSULTATION

3.1 As above, the Dover District Local Plan Regulation 19 Submission ('the Plan') establishes the scale and distribution of new development required to meet Dover District's needs to 2040. It identifies a series of site allocations and detailed development management policies against which development proposals will be assessed during the plan period.

3.2 This follows a period of extensive evidence-gathering, and previous consultation on the Regulation 18 Draft Local Plan in 2020. It is emphasised that the Landowners participated in a targeted Call for Sites throughout 2021, advocating for the inclusion of the Site in the Plan.

3.3 Detailed commentary is otherwise provided herein on the Vision, Objectives, and Development Management Policies of the Plan. Commentary is not provided for all policies, and is instead reserved for those considered of most relevance to the Landowner's specific interests to Land off of The Street, Woodnesbrough.

3.4 Section 4 of this response looks in detail at the provisions of Emerging Policy SP55 -Woodnesborough Small Housing Sites, providing a site plan and site analysis in support of further small site allocations in Woodnesborough.

3.5 Commentary is provided principally on Emerging Policies as follows:

SP3- Housing Growth

SP4 – Residential Windfall Development

SP5 – Affordable Housing

CC8 – Tree Planting and Protection

PM1 - Achieving High Quality Design, Place Making and the provision of Design Codes

PM2 – Quality of Residential Development

H1 – Type and Mix of Housing

TI3 – Parking on New Developments

3.6 Commentary is provided using the references above and, where relevant, the paragraph numbers as used in the Regulation 19 Draft.

3.7 Due regard has been had to the wider evidence, and where necessary cross-reference has been made to the LPA's evidence as available as part of this consultation process.

5. CONCLUSION

5.1 These representations conclude that the Plan can be found legally compliant, and can provide a sound evidence-based approach to planning in the District over the plan period subject to amendment.

5.2 Emphasis is placed on the policies relating to residential development, namely those noted under Emerging Policies SP3, SP4, and SAP55. The thrust of these policies in delivering high quality growth in minimum quantities to meet identified need of 10,988 dwellings over the plan period is supported, though the detail of such is not supported in its current form.

5.3 Settlement boundaries are considered too tightly drawn and should be amended to maximise the potential for sustainable development in appropriate locations, specifically adjoining or close to settlements.

	<p>5.4 Windfall development should be recognised as an appropriate mechanism in supporting development potential not considered by the LPA in its HELAA assessment, or otherwise in situations where the LPA has inadequately considered such sites in its evidence base, as applies to Land off The Street, Woodnesborough.</p> <p>5.5 The provisions of SAP55 are considered to lack the necessary effectiveness in delivering on the Plan's overall vision by virtue of allocating sites for delivery of only 15 dwellings, with a lack of sufficient opportunities for meaningful development in otherwise sustainable locations within and adjacent to built form. Albeit the Landowner considers these provisions can be made sound through amendment.</p> <p>5.6 In particular, on behalf of the Landowner we strongly advocate for the inclusion of Land off of The Street, Woodnesborough for residential development of circa 10 dwellings, in the context of Emerging Policy SP55 – Woodnesborough Small Housing Sites.</p> <p>5.7 Specific to the Promoter's interests at Land off The Street, Woodnesborough it is noted that:</p> <p>The Site is well-related to the existing settlement and would not impact any of the special qualities of the surrounding countryside or landscape; Development achieved through either allocation or windfall development would be in the context of retained trees and landscape features which, where appropriate, could be enhanced;</p> <p>Access to the Site can be achieved directly from The Street via KCC Highways Ownership and Landowner Ownership, contrary to the LPA's initial assessment;</p> <p>The local highway network has capacity to accommodate the additional traffic associated with the development, without adverse impact;</p> <p>The Sites falls within the EA Flood Risk Zone 1 (i.e. land assessed as having a less than 1 in 1,000 annual probability, or <0.1% chance of flooding);</p> <p>There are no designated heritage assets within or immediately adjacent to the site, and the development is not considered to affect the setting of any Listed Buildings.</p> <p>5.8 With a view to assisting the LPA in the implementation of its Plan, we welcome the opportunity to further provide comment on the preparation of the Plan which will help shape future development in the area.</p> <p>5.9 We look forward to the opportunity to participate at later hearing sessions where appropriate, advocating for the matters raised here.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>Lemon Lee Evans (The Street, Woodnesborough) 1049 Em Att1_Redacted.pdf Lemon Lee Evans (The Street, Woodnesborough) 1558 Att2.pdf Lemon Lee Evans (The Street, Woodnesborough) 1558 Att3_Redacted.pdf</p>

Introduction to Development Management Policies

Local Plan Consultation Point	Introduction to Development Management Policies
Rep ID	SDLP683
Rep Status	Processed
Consultee ID	1331382
Consultee Full Name	Mr The Dover Society Graham Margery
Consultee Company / Organisation	The Dover Society
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	E4
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Can't comment on legal compliance
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	There is no mention of Section 215 enforcement anywhere in the plan. This is an enforcement tool available to remedy the problem of existing properties, which was raised in our earlier response, but the Local Plan re buildings (H1 TO H7) concentrates upon requirements etc for new builds. This we feel needs to be remedied in connection with attractiveness of the public realm for locals and visitors, maintenance of conservation areas. We also urge increased use of Article 4 Directions in conservation areas and extension to deprived wards in Dover where necessary.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Introduction to Development Management Policies
Rep ID	SDLP669
Rep Status	Processed
Consultee ID	1331770
Consultee Full Name	Cathy Skinner (clerk)
Consultee Company / Organisation	Northbourne Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Development Management Policies
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The development management policies are silent in respect of non-residential schemes in open countryside which are not employment sites. EM1 provides a robust approach for new employment sites in the countryside but the same rigour and balance afforded by the policy would not be available in respect of development management of non-residential schemes which are not employment sites. Examples of such may include charity, club or private venues, entertainment and meeting places, sites for specialist leisure or sports activities, sportsgrounds, off-road motorsports, shooting grounds, general aviation sites, watersports, etc. Such uses may not be commercial enterprises or give rise to employment, but can bring particular issues of noise, visual impact, loss of BMV agricultural land, movement or activity which affects landscape character, loss of residential or landscape amenity, light spill, highways and transport issues, and so on.</p> <p>We believe such proposals should be subject to the same rigour as that set out in EM1 for employment sites in the countryside, and possibly be subject to greater restriction where they are not aligned with strategic interests of the wider plan, such as economic benefit and the rural economy. The NPPF requires the policies recognise the intrinsic beauty of the countryside, and we believe this should apply regardless of the class of development proposed.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	The plan should include policy safeguards that protect the countryside from inappropriate and unsustainable development for all potential non-residential schemes which are not considered employment sites.

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

CC1 - Reducing Carbon Emissions

Local Plan Consultation Point	CC1 - Reducing Carbon Emissions
Rep ID	SDLP55
Rep Status	Processed
Consultee ID	1254085
Consultee Full Name	Mrs Sue Ward
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>In order to combat climate change, we need to reduce vehicle use and maximise carbon sequestration by protecting farm land, green space, trees and hedging. Given that Dover is a net exporter of labour to towns such as Canterbury, Folkestone, Ashford et al, it make no sense to build ever more houses in the wider Dover region, where there are insufficient jobs. Building more houses just means their residents will increase traffic volumes to get to jobs, especially at Whitfield, where there is no nearby rail link. Each new build home emits 80 tons of CO2 in its construction, so we need to be really sure that we can justify each and every house in each and every area.</p> <p>In addition, building on farmland reduces the capacity of the area to sequester carbon and the increased hard surfaces from building augment the damaging impact of surface water run off. The consequent loss of arable land reduces the district's ability to supply its own food, food which therefore has to be brought in from elsewhere at additional cost to the environment.</p> <p>This is contrary to Section 2.8 and 2.11 of the NPPF as it is unsustainable development.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	<p>Reduce the number of houses proposed in Dover district, prioritise brownfield sites in Dover Town and only build houses where there are sufficient jobs for the local population.</p> <p>Take seriously the climate emergency, instead of merely paying lip service to this catastrophe.</p>

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	It is vital that this issue is taken seriously. Everyone needs to take steps immediately to tackle the problem. The Dover plan is totally inadequate in this respect and in fact can only exacerbate the problem of global warming. The issue of global warming and climate change must be given a much higher priority.
Include files	
Local Plan Consultation Point	CC1 - Reducing Carbon Emissions
Rep ID	SDLP165
Rep Status	Processed
Consultee ID	1329874
Consultee Full Name	Ms Nicola Purcell
Consultee Company / Organisation	Aylesham Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>In October 2021, Aylesham Parish Council supported the Climate and Ecological Emergency (CEE) Bill which address the full extent of the climate and nature crisis in the UK. As a result, any local plan should use up-to-date science to make sound recommendations.</p> <p>As the district is extremely water scarce, all possible measures should be implemented to help mitigate water scarcity. The use of Sustainable Urban Drainage systems (SUDs) is required to be prominent in all future developments. This will help to deal with surface water flooding. We welcome the Draft Local Plan's hierarchy of methods of discharge, with the use of combined sewers coming last.</p> <p>This relates to CC6 of SP1 – Surface Water Management.</p> <p>There are a number of options to ensure new homes produce the least possible carbon emissions. Aylesham Parish Council would like to see Dover District Council require the full 2025 Future Homes Standard to be delivered now (this will reduce emissions by between 75-80% compared to current standards), not at some point during the Local Plan's lifetime.</p>

	<p>This relates to CC1 of SP1 – Reducing Carbon Emissions.</p> <p>We welcome the commitment to planting trees within new developments that are native to Kent. This will help to keep the rural feel of Aylesham alive. Currently we often see newly planted trees dying within the first few years of their lives. There must be a comprehensive plan to ensure that these trees reach maturity (part d) and how this will be enforced by the local authority.</p> <p>This relates to CC8 of SP1 – Tree Planting and Protection.</p> <p>Aylesham Parish Council welcomes the commitment to planting larger numbers of trees but feels this must come with a long-term solution to maintaining the trees. Dover District Council must also commit to the full 2025 future homes standard now.</p> <p>Aylesham Parish Council welcomes the addition and enhancement of open spaces and play areas. However, there are two points to note in the IDP: why would S106 monies from Aylesham be spent upgrading play areas in Nonington?; and play areas and open spaces are last to be delivered in developments – this must not happen in the future.</p> <p>Aylesham Parish Council is identified as “Delivery Partners” on a number of projects due to be delivered: we have not been consulted on this prior to the Regulation 19 document being released.</p> <p>The HRA[1] suggests that AYL003 – Land South of Aylesham is “high” suitability for the European Golden Plover, and so all measures must be taken to ensure this SPA protected bird species is still able to migrate and flourish in the area. SAP 25 (mixed use employment) is considered “moderate”.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	CC1 - Reducing Carbon Emissions
<p>Rep ID</p>	SDLP243
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1331112
<p>Consultee Full Name</p>	Miss Emma

	Waller
Consultee Company / Organisation	Kent Wildlife Trust
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC1 Reducing Carbon Emissions
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Kent Wildlife Trust support the mention of the climate emergency and the District's commitment working towards carbon neutral. We advocate for the full 2025 Future Homes Standard to be delivered now, requiring a 75-80% reduction in current emissions, which will help the District reach its net zero target by 2030. At the very least this standard should be introduced via a phased approach across the Plan period to ensure that Dover is meets its targets to be carbon neutral. To tackle the climate emergency, drastic actions will be required during the plan period to ensure that reliance on fossil fuels is phased out but 2050.</p> <p>Emission reduction should also be supported by considering the supply chains of goods and services used in Dover, and supporting the development of local work hubs to reduce commuting.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC1 - Reducing Carbon Emissions
Rep ID	SDLP275
Rep Status	Processed

Consultee ID	1331382
Consultee Full Name	Mr The Dover Society Graham Margery
Consultee Company / Organisation	The Dover Society
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Can't comment on legal compliance
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	We feel that in these critical areas certain verbs should be strengthened for tighter regulation and control. We suggest all words in bold need addressing: all shoulds to be replaced with more enforceable wording eg will, have to, must; recommended replace with eg insist; need to be replaced by ' must to include details'; ' may be accepted' may to be replaced with must .
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC1 - Reducing Carbon Emissions
Rep ID	SDLP525

Rep Status	Processed
Consultee ID	1266351
Consultee Full Name	Dr Sharon Danby
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	CC1 is unsound as developers should be building to Future Homes Standard in Dover District now if climate emergency declaration commitments are to be met. All new buildings, domestic and business, should have solar water heating and PV's. Retrofitting of existing housing stock needs to be done ASAP, installing renewable energy options an insulating. This would go a long way to achieveing climate emergency declaration commitments. This would create green jobs. Too much development in the current weak LDP is on agricultural land (eg Whitfield), internationally rare chalk grassland (eg Wellington Paddocks, Walmer), and rewilded areas (eg Betteshanger), rather than brownfield. This is contrary to NPPF.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Build to Future Homes standard now and have solar thermal and solar PV's on all buildings. Retrofit existing housing stock for renewables and insulation. Do not build on agricultural land, chalk grassland or rewilded sites as this is unsustainable.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC1 - Reducing Carbon Emissions
Rep ID	SDLP538
Rep Status	Processed
Consultee ID	1331747
Consultee Full Name	mrs Jill Griffiths
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	This policy refers only to new development and does not take account of changes, possibly affecting the historic environment that building owners may need to make to mitigate the effects of climate change
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC1 - Reducing Carbon Emissions
Rep ID	SDLP1064
Rep Status	Processed
Consultee ID	1331808
Consultee Full Name	Mr Robert Hogben
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	1 Introduction
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The plan is unsound as it does not comply with the legally binding commitment made by DDC when they declared a climate emergency in 2020 and prepared their climate change strategy. The plan will not do enough to meet the target of the district being net zero by 2050. DDC should be much more ambitious about the green credentials of new housing. If new homes generated their own power, were insulated to the highest standards, and collected rain water, it would greatly help stretched local services and go a long way towards making the housing stock fit for the coming decades.</p> <p>The regulation 19 stage of the consultation is not fit for purpose as it is overly complicated and very difficult to use. The process has left many members of the public including me and my wife feeling overwhelmed and confused as to how to make a representation. For those who are working full time this has been a task for which they do not have enough time. As a result those who may have wanted to make a submission have not been able to. The format of the submission form is also difficult to navigate. Without prior experience of planning law it is difficult to say whether a part of the plan is legal or not. As to the duty to cooperate it is impossible to know. The unsound plan needs updating after the government announcement on 5/12/22 that mandatory housing targets are not to be imposed. The figure of nearly 11,000 is unsustainable and should now be reviewed, particularly with respect to allocated land around Station Rd Walmer and proposed developments around villages.</p> <p>The character and landscape value of the district is being rapidly eroded under the current plan and this must not continue as it is contrary to NPPF 21. It is not sustainable to build on agricultural land which is in short supply as we are only 50% self sufficient in producing food in the UK. The CPRE has found that almost 14,500 hectares of farmland has been permanently lost to development since 2010. The contribution</p>

	<p>from the districts agricultural land is of vital importance. Much of the agricultural land is also vital for flood protection, and field margins are important for wildlife and biodiversity, forming corridors between habitats for vertebrates and nesting and roosting sites for birds. Dover District also has a wealth of character landscapes, AONB, heritage coast, nature reserves, internationally rare chalk grassland and rewilded areas such as Betteshanger Park. Overdevelopment under the last weak plan has meant that these areas are under pressure and being denuded as their boundaries are eroded and wildlife corridors between sites are cut off. The new plan does not do enough to protect these areas, wildlife and biodiversity. Developments should not be allowed to remove ancient woodlands and trees and biodiverse rich habitats even if it is argued that this is for the greater good. This is not sustainable as all nature is interconnected and if it fails then we all fail. The UK is one of the worst countries in the world for biodiversity loss, we have lost half of our biodiversity since the 1970's.</p> <p>Development has been at such a pace that infrastructure cannot keep up. Buses have been cut recently, cycle and pedestrian routes have not been upgraded sufficiently to connect some developments to main bus and train routes without car dependence. Aylesham has not had a secondary school which would mean children could walk to school. Many rural communities are entirely car dependent due to lack of buses and the roads not being safe to use their bikes. Not enough emphasis is put on renovating existing housing stock to provide greener, insulated, fuel efficient homes. Each new build generates around 56 tonnes of embedded carbon. The NPPF states that we should prioritise brownfield sites over greenfield but although there are many opportunities to develop brownfield sites in Dover, this has not been prioritised. Many developments have been for larger houses in villages and there is not enough provision for affordable housing.</p> <p>The wording of the local plan is not definitive, it leaves too many loop holes and vague preferences which enable large developers to argue and get what they want, to maximise profits, not what the people of the Dover area need.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Better mapping and understanding of the Dover District, taking into account internationally rare areas of chalk grassland, woodland and trees wherever they occur.</p> <p>Large buffers around the AONB to protect its character from the built environment. Stronger protection for the AONB and the Ripple LCA F3.</p> <p>Tighter protections on our remaining biodiversity.</p> <p>Tighter definitions in the local plan so that developers have no room to argue what has been specified in the local plan.</p> <p>Hire several biodiversity officers to monitor closely and prevent loss of ancient woodland, chalk grassland, veteran trees, protected wildlife and rich habitats and to actively go out into the community, looking for ways to improve biodiversity by such things as accessing grants for hedge planting and the creation of ponds where ever possible in our district.</p> <p>Employ experts to liaise with farmers in our area to encourage the most environmentally friendly farming and land management practices which will encourage maximum biodiversity in the countryside and maximum sequestration of carbon in soils and biomass.</p> <p>Stop the use of agricultural land for development.</p> <p>Renovate and insulate rather than build new houses, brownfield not greenfield.</p> <p>Turn attention away from destroying village communities with unsustainable housing estates outside their village boundaries.</p> <p>Do not give developers the get out clause of financial mitigation for destruction of wildlife and habitat. No development should further deplete our critically low levels of biodiversity.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>CC1 - Reducing Carbon Emissions</p>
<p>Rep ID</p>	<p>SDLP685</p>
<p>Rep Status</p>	<p>Processed</p>

Consultee ID	1331821
Consultee Full Name	Laura Marney
Consultee Company / Organisation	Deal Town Council
Agent Full Name	Laura Marney
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC1 Reducing Carbon Emissions
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DTC consider CC1 to be unsound (not justified) on the basis that it does not adequately consider the legally binding target for the UK to bring all greenhouse gas emissions to net zero by 2050. Given the unprecedented climate and ecological emergency, it is incumbent on local authorities to take bold action on climate change. The BREEAM 'very good' standard is unambitious and inconsistent with the need to decarbonise at pace and scale. There are two standards above 'very good' - 'excellent' and 'outstanding' - that deliver far greater carbon emissions reductions. New homes built at 'very good' standard will contribute to the need for expensive retrofit to make them fit for the twenty-first century. They will also contribute to increased greenhouse gas emissions making this policy inconsistent with Strategic Policy 1 g) Ensuring that development is designed to reduce vulnerability to, and provide resilience from, the impacts arising from a changing climate, whilst not increasing the potential for increased greenhouse gas emissions in doing so.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<i>We recommend the following modification: To require all new homes to be built to achieve net zero carbon. Where it can be demonstrated this cannot be delivered on-site, developers would then be expected to pay into a carbon off-set fund. This fund would be administered by the Council; and, to require new non-residential development to be built to achieve net zero carbon. Where it can be demonstrated this cannot be delivered on-site, developers would then be expected to pay into a carbon off-set fund.</i> There are precedents for such requirements, e.g. Reading Borough Council Local Plan 2019 Section 4.4.36(c): 'all major new build residential development should be designed to achieve zero carbon homes'.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

Local Plan Consultation Point	CC1 - Reducing Carbon Emissions
Rep ID	SDLP1618
Rep Status	Processed
Consultee ID	1252100
Consultee Full Name	Mrs Amandajayne Hollobon-Baxter
Consultee Company / Organisation	Sandwich Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC1
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Sandwich Town Council strongly supports enforceable standards inline with climate emergency, future proofing development.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	

Include files	
Local Plan Consultation Point	CC1 - Reducing Carbon Emissions
Rep ID	SDLP1096
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<u>DM 5 Climate Change</u> 5.5 Unlike DDC we <u>do</u> consider local energy-efficiency standards stronger than those intended by the national government in its Future Homes building standards to be necessary and more sound and effective. 5.6 Building regulations and enforcement of planning conditions. In recent years in the district, it has taken sometimes years of pestering by dedicated members of the public to get DDC planning enforcement officers out to problems created by larger developers. So this policy will only become sound, effective, meaningful with a significant increase in the number of planning enforcement officers.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	5.7 BREEAM 'very good' standard is the middle of their range, to be sound, the policy needs uplift to BREEAM 'excellent' or 'outstanding'. CC 1 Reducing Climate Emissions The local plan would become compliant with Legality (legally binding Net Zero Strategy, Climate Emergency Declaration 2019 and Climate Change Act 2008), if the steps we recommend in comment on SP1 were to be made requirements for all applicants, to note the transformation of existing homes into future-proof zero carbon home to lift residents out of fuel poverty and to mitigate climate crisis is a key measure.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	CC1 - Reducing Carbon Emissions
Rep ID	SDLP1459
Rep Status	Processed
Consultee ID	1330919
Consultee Full Name	Mrs Heather Twizell
Consultee Company / Organisation	Natural England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC1
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	As with our Regulation 18 comments we welcome the requirements of this policy for development to incorporate features that deliver reductions in carbon emissions, which is in line with the aims of the NPPF and the Government's 25 Year Environment Plan.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC1 - Reducing Carbon Emissions
Rep ID	SDLP1486
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note <i>The text below is an extract from the original representation which is attached to SDLP1438.</i></p> <p>DM 5 Climate Change</p> <p>5.5 Unlike DDC we do consider local energy-efficiency standards stronger than those intended by the national government in its Future Homes building standards to be necessary and more sound and effective.</p> <p>5.6 Building regulations and enforcement of planning conditions. In recent years in the district, it has taken sometimes years of pestering by dedicated members of the public to get DDC planning enforcement officers out to problems created by larger developers. So this policy will only become sound, effective, meaningful with a significant increase in the number of planning enforcement officers.</p> <p>5.7 BREEAM 'very good' standard is the middle of their range, to be sound, the policy needs uplift to BREEAM 'excellent' or 'outstanding'.</p>

	<p>CC 1 Reducing Climate Emissions</p> <p>The local plan would become compliant with Legality (legally binding Net Zero Strategy, Climate Emergency Declaration 2019 and Climate Change Act 2008), if the steps we recommend in comment on SP1 were to be made requirements for all applicants, to note the transformation of existing homes into future-proof zero carbon home to lift residents out of fuel poverty and to mitigate climate crisis is a key measure.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	CC1 - Reducing Carbon Emissions
<p>Rep ID</p>	SDLP1357
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1333128
<p>Consultee Full Name</p>	David Powell
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	Klaire Lander
<p>Agent Company / Organisation</p>	Lander Planning
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	CC1
<p>2 - Do you consider this part of the Plan sound?</p>	Yes
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	Yes

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Lander Planning sent a PDF document which has been split across the relevant sections of the Plan. See Original Attachment on SDLP1346) Reducing carbon emissions is consistent with the NPPF and government direction and this policy is 'effective' and 'justified'. This policy is supported.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC1 - Reducing Carbon Emissions
Rep ID	SDLP1437
Rep Status	Processed
Consultee ID	1333263
Consultee Full Name	Mark Behrendt
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable

<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Not Applicable</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>Response by the Home Builders Federation to the consultation on the Dover District Local Plan.</p> <p>1. Thank you for consulting the Home Builders Federation (HBF) on the Dover District Local Plan that is being proposed for submission to the Secretary of State for examination. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.</p> <p>SP3 – Housing Growth</p> <p>The policy is unsound as it not effective and is not sufficiently justified by the evidence base</p> <p>Housing needs</p> <p>2. The housing requirement of 10,998 over the plan period 2022 to 2040 is consistent with the minimum number of homes the Council should plan for using the standard method. However, what is not clear from the Council's evidence is whether this level of growth will be sufficient to meet the growth aspirations of the Council. Strategic Policy 6 sets out the Council's aspiration to deliver a minimum of 117,290 sqm of additional employment floorspace over the plan period but we could not find evidence to indicate that this number of homes will be sufficient to support the level of economic growth the Council is aspiring to deliver. The NPPF sets out at paragraph 82c that the potential barriers to investment in an area, such as a lack of housing, needs to be addressed in the plan and the Council need to be certain that the housing requirement set out in SP3 is supportive of its aspirations around economic growth.</p> <p>Older people's housing needs</p> <p>3. The HBF is concerned with the limited references to the needs to provide special accommodation for older people. It is noted that the mix of homes on allocated sites will need to take account of the need for such accommodation but there appears to be no indication of whether this will be sufficient to meet the needs identified in the 2019 SHMA update. It also completely ignores the potential to allocate standalone sites to deliver homes for older people and there is no specific policy setting out the need for such accommodation and how the Council will support such development to come forward outside of the strategic allocations. The HBF would recommend that a policy setting out the Council's support for older people's accommodation is include in the plan. In order to be effective, we would suggest that this policy sets out the need for such accommodation and that there a presumption in favour of such development where needs are not being met.</p> <p>Housing supply</p> <p>4. Table 3.1 in the Local Plan states that overall housing supply to meet needs is 11,924, leaving a contingency buffer of 924 homes between housing needs and supply - around 8% of needs. Whilst the HBF welcomes the provision of a buffer between needs and supply we do not consider 8% to be sufficiently large to ensure that needs are met in full over the plan period, especially given that around half of the homes will come from the Whitfield Urban Expansion. In order to ensure the Council's needs are met in full the HBF recommends that a buffer of around 20% is necessary. The additional buffer should be brought forward through the allocation of smaller sites which will deliver earlier in the plan period and provide a buffer in overall supply should there be delays in the delivery of the larger strategic sites in Dover.</p> <p>Meeting affordable housing needs</p> <p>5. The most recent Strategic Housing Market Assessment undertaken by the Council is the 2019 update to the 2017 SHMA. This sets out hat there is a need for 3,387 new affordable homes between 2020 and 2040. No further assessments appear to have been undertaken since that period. However, the latest AMR indicates that 75 affordable homes were built in 2020/21 with permissions for a further 108 units which can be expected to come forward in 2021/22. As such if the SHMA update is used as the basis for affordable housing needs there remains a need for 3,204 homes over the plan period – around 30% of expected supply on sites that are likely to deliver affordable housing¹.</p> <p>6. Whilst this would appear to show that on the basis of SP5 the need for affordable housing would be addressed we note that the delivery of affordable housing in the past has been well below what has been expected. The 2020/21 Authority Monitoring Report indicates on page 19 that delivery since 2010/11, the year the Core Strategy was adopted, has been at around 20% of housing completions. In addition, the viability study indicates that the strategic sites will find it challenging to deliver 30% affordable housing. This would suggest that in order to meet needs the Council will need to allocate additional sites.</p> <p>¹ Total supply of 11,924 less small site windfall allowance of 1,050</p>

Conclusions on housing supply

7. To conclude on housing supply the HBF would recommend that further sites are allocated in this local plan. This would have the twin benefits of meeting the need for affordable housing in the district as well as providing an additional buffer between housing needs and supply.

SP5 – Affordable housing

The policy is unsound as it is not fully justified.

8. This policy requires residential development of 10 or more units to deliver 30% of the homes provided as affordable housing. The update notes on the viability study notes at paragraph 56 that this level of affordable housing requirement is deliverable in high and medium value areas alongside the other costs placed on development by the local plan. However, the study outlines that this level of provision will be challenging on the strategic sites and shows that it would not be viable in lower value areas and in the urban area of Dover. The Council recognises these concerns in part by removing the requirement to provide affordable housing in the urban area of Dover. However, no allowance is made with regard to the lower value areas or strategic sites.

9. Whilst the Council states that aside from the strategic allocation there is little planned development in the lower value area it is still necessary for the policy should reflect this evidence presented by the Council. Paragraph 58 of the NPPF recognises that decision makers should be able to assume that development that a policy compliant scheme is viable. This requires policies that place additional costs on development to reflect the evidence and in cases such as this set different requirements for different areas regardless of the development expectations in those areas. As such the HBF would recommend that the policy is amended to remove the requirement for affordable housing contributions in the lower value areas.

10. It is also notable in tables 10.17 and 10.18 of the Whole Plan Viability Study that the outside of greenfield sites at Deal extra care and sheltered housing for older people is not able to viably deliver affordable housing, Given that such development often comes forward on sustainable PDL sites close to services such development should be specifically excluded within SP5 from providing affordable housing contributions.

CC1 – Reducing Carbon Emissions

The policy is unsound as not consistent with national policy, justified or effective.

11. Through policy CC1 the Council indicate that they expect development to meet the Future Homes Standard (FHS) if this becomes a requirement that is delivered

through local plans. However, the expectation from Government is clear that FHS will be delivered through amendments to the Building Regulations and will not be an optional standard adopted as part of a local plan. The improvements to energy efficiency standards in new buildings and the transition to FHS has already started with the improvements to part L of the Building Regulations that came into force in June of 2022. These will see a circa 30% improvement in CO2 emissions prior to the introduction of FHS which will ensure that new homes are zero carbon ready from 2025. As such it is not necessary to refer to the Future Homes Standard and the Council should remove reference to the standard in policy which will be delivered as part of changes to part L of the Building Regulations.

12. The HBF is also concerned that the Council do not appear to have tested the Future Homes Standard within the update note on the viability assessment. The update note sets out at paragraph 23 that the initial improvements to the energy efficiency introduced in June of 2022 were included but no additional costings have been made with regard to the Future Homes Standard. The Government expects this to cost the house building industry an extra £100 million per year though this fails to recognise that there is likely to be additional electricity connection costs with the move away from gas and that the assumed reduction in the cost of air source heat pumps is unlikely. Given the significant increase in costs from these new standards will come into force in 2025, not long after the expected adoption of this local plan, these costs should have been considered through the viability assessment.

NE1 – Biodiversity Net Gain

Policy is not needed as this will be delivered through the Environment Act and support regulations.

13. Given that the requirement to provide a 10% Biodiversity Net Gain is set out in legislation and supporting regulations and guidance and will be in force when the plan is adopted, the HBF would question whether it is necessary to include a detailed policy on BNG. Including a detailed policy could lead to inconsistency between policy and legislation should this change either prior to the introduction of BNG at the end of 2023, or if there be changes to regulation and guidance in future. As council notes in para 11.6 the policy is intended to reflect the requirements of the Act and as and we would suggest that it would be more appropriate to refer in policy SP14 to the need to deliver a 10% BNG in line with relevant legislation and guidance.

Conclusion

	<p>14. At present we do not consider the plan to be sound, as measured against the tests of soundness set out in paragraph 35 of the NPPF, in the following key areas:</p> <p>Economic growth has not been take into account when considering the minimum number of homes to be planned for;</p> <p>Greater flexibility required in the local plan to ensure needs are met in full;</p> <p>No specific policy with reagrd to the needs of older people</p> <p>Affordable housing policy does not reflect the full evidence on viability</p> <p>References to Future Homes Standard in policy CC1 unnecessary and unjustified</p> <p>No need to include detailed policy on BNG given that this is a requirement of legislation with associated regulations and guidance</p> <p>15. We hope these representations are of assistance in taking the plan forward to the next stage of plan preparation and examination. I would also like to express my interest in attending any relevant hearing sessions at the Examination in Public. Should you require any further clarification on the issues raised in this representation please contact me.</p> <p>2 Building Homes in a changing business environment: an assessment of new and forthcoming additional costs of housing delivery. (HBF, 2022) https://www.hbf.co.uk/documents/12117/HBF report - Building Homes in a Changing Business Environment.pdf</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>To conclude on housing supply the HBF would recommend that further sites are allocated in this local plan. This would have the twin benefits of meeting the need for affordable housing in the district as well as providing an additional buffer between housing needs and supply.</p> <p>It is also notable in tables 10.17 and 10.18 of the Whole Plan Viability Study that the outside of greenfield sites at Deal extra care and sheltered housing for older people is not able to viably deliver affordable housing, Given that such development often comes forward on sustainable PDL sites close to services such development should be specifically excluded within SP5 from providing affordable housing contributions.</p> <p>The HBF is also concerned that the Council do not appear to have tested the Future Homes Standard within the update note on the viability assessment.</p> <p>Given that the requirement to provide a 10% Biodiversity Net Gain is set out in legislation and supporting regulations and guidance and will be in force when the plan is adopted, the HBF would question whether it is necessary to include a detailed policy on BNG. Including a detailed policy could lead to inconsistency between policy and legislation should this change either prior to the introduction of BNG at the end of 2023, or if there be changes to regulation and guidance in future. As council notes in para 11.6 the policy is intended to reflect the requirements of the Act and as and we would suggest that it would be more appropriate to refer in policy SP14 to the need to deliver a 10% BNG in line with relevant legislation and guidance.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>I would also like to express my interest in attending any relevant hearing sessions at the Examination in Public.</p>
<p>Include files</p>	<p>SDLP1431 Behrendt.pdf SDLP1431 Behrendt Em1.pdf</p>
<p>Local Plan Consultation Point</p>	<p>CC1 - Reducing Carbon Emissions</p>
<p>Rep ID</p>	<p>SDLP1897</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1333840</p>
<p>Consultee Full Name</p>	<p>Jon Alldis</p>
<p>Consultee Company / Organisation</p>	<p>Barrat David Wilson Homes</p>

Agent Full Name	Emily Harris
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Full Representation attached to SDLP1883. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1883.) Draft Policy CC1 – reducing Carbon Emissions - COMMENT Draft Policy CC1 states: In the event that the Future Homes Standard is required to be delivered through the planning system, all new residential dwellings must achieve, as a minimum, a reduction in carbon as required by this Standard The Government's response to The Future Homes Standard (January 2021) sets out that the Future Homes Standard will be delivered through amendments to the Building Regulations. In June 2022, some of these amendments came into force. Given this, it is not justified or effective to include a policy that is covered by other relevant legislation. The reference to the Future Homes Standard should be removed from the policy. Recommendation: Reference to the Future Homes Standard is removed from Draft Policy CC1.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

CC2 - Sustainable Design and Construction

Local Plan Consultation Point	CC2 - Sustainable Design and Construction
Rep ID	SDLP283
Rep Status	Processed
Consultee ID	1268017
Consultee Full Name	Ms Penelope James
Consultee Company / Organisation	Dover and Deal Liberal Democrats
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC2
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	N/a
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Is it possible to include a list of essential environment measures that must be implemented in all residential new builds - eg, insulation, heat pumps, solar panels
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	n/a

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC2 - Sustainable Design and Construction
Rep ID	SDLP277
Rep Status	Processed
Consultee ID	1331382
Consultee Full Name	Mr The Dover Society Graham Margery
Consultee Company / Organisation	The Dover Society
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Can't comment on legal compliance
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	We feel that in these critical areas certain verbs should be strengthened for tighter regulation and control. We suggest all words in bold need addressing: all shoulds to be replaced with more enforceable wording eg will, have to, must; recommended replace with eg insist; need to be replaced by ' must to include details'; ' may be accepted' may to be replaced with must .
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC2 - Sustainable Design and Construction
Rep ID	SDLP334
Rep Status	Processed
Consultee ID	1331112
Consultee Full Name	Miss Emma Waller
Consultee Company / Organisation	Kent Wildlife Trust
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC3 - Renewable and Low Carbon Energy
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Renewable energy sources should be expected as standard on all new developments. Further, we call for that developments to demonstrate how they have incorporated all positive principles of the energy hierarchy, including reducing emissions, renewables, increased energy efficiency and energy saving.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	We urge the council to look at local energy schemes and the retrofitting of renewable energies to existing commercial and residential buildings. Such models would benefit both the environment and the local community. Retrofitting of renewable energy has the added benefit of reduced land take for renewables. There is potential that if local renewable energy supply took off that it could serve as an alternative to replacing larger schemes, with reduced impacts on biodiversity if solar panels are being retrofitted to buildings. Crude estimates indicate that the retrofitting of solar panels to 10% of schools nationwide would be equivalent in energy generation to a scheme the size of the Cleve Hill Solar Park. We suggest adding: " <i>The retrofitting of renewable energy technologies to existing buildings, in a way that does not increase land take, will be prioritised</i> " to Policy CC3.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC2 - Sustainable Design and Construction
Rep ID	SDLP526
Rep Status	Processed
Consultee ID	1266351
Consultee Full Name	Dr Sharon Danby
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>5.19 <i>It is acknowledged that not every site or development will be able to meet all the criteria of this policy, but the requirements of Policy CC2 will be sought by the Council through the pre-application process and in the determination of planning applications and will be expected to be followed in all applications for new buildings unless it is demonstrated why they do not apply.</i></p> <p>I think that the above is unsound and not justified as there should be no exceptions to sustainable design. To put this in here gives developers the get out clause which they will all use.</p> <p>It could be argued that no housebuilding is sustainable as each new dwelling generates on average 56 tonnes of carbon. There should be a move to retrofit and renovate within Dover town. There are many substandard homes falling below the minimum SAP rating for habitation.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	<p>No Exceptions to sustainable construction. Removal of 5.19</p> <p>Renovate and retrofit with renewables, insulate well to achieve sustainability in existing homes in Dover town.</p>

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC2 - Sustainable Design and Construction
Rep ID	SDLP969
Rep Status	Processed
Consultee ID	1266351
Consultee Full Name	Dr Sharon Danby
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP 6 Economic growth
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails	<p>This section of the plan is not consistent with NPPF 21 - development must be sustainable - there is no mention of green economic growth. Quality of 'growth' is more important in crisis-ridden 2020 to 2040 than quantity of 'growth'. Because it is more sustainable as we look ahead to 2040 – 2060 and beyond.</p> <p>In the current economic climate energy prices, business rates, public sector cuts are making public and private sector employers (care homes, schools, health centres, hospitality, police (£30 million cut in Kent), buses, independent retail) fear for their survival.</p> <p>To be sound, effective and compliant with the realities of here and now, this is the direction DDC Local Plan should take. The local economy needs pump-priming, national fuel security needs to be enhanced, people need lifting out of fuel poverty. The local plan could do more than allocating sites and floor space.</p>

to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

Transition to a greener economy, a means of making us more resilient economically, will be helped considerably by the ambitions of Port of Dover to decarbonize its estate by 2025 and to take seriously its scope 3 corporate responsibility in an inclusive manner to support local communities and economic players as they transition to a greener business too.

There appears to be little mention of using the Local Plan to improve educational attainment by, for example, specific policies to

a) forge deeper links with FE institutions (eg Dover Technical College) given the skills gap relating to the Green Homes agenda,

b) encourage higher education establishments to develop facilities in the district, and thereby to develop a knowledge-based economy beyond the former Pfizer's site.

c) encourage the long-promised incubation hubs for the newly qualified in the district. This would contribute to raising the average level of earnings in the district and to combating the high levels of deprivation experienced in some wards.

A glaring omission relates to new economic opportunities created by climate-friendly recovery sectors. Three are essential in Dover District. With a 70% rural economy, which is severely challenged by increased costs of imports, and climate problems including water shortage.

Diversification into agri-forestry could become popular among the farming community. It is recommended by Nature-Friendly Farming Network. Examples include

a) protecting arable yields in cases of drought, by planted strips of suitable, native, drought-tolerant trees, (which counter soil erosion, while increasing carbon sequestration) and,

b) bringing back to life existing but neglected, traditionally coppiced woodland, causing it to be harvested for small-scale biomass on a rotational basis. Similarly, short rotation forestry would create rural income and mitigate climate change.

Another key to meeting climate targets is increasing the amount of land used for growing food for people rather than livestock. This would create new outdoor jobs as would replacing imported market-garden food, with locally grown fruit, vegetables and pulses, this is a growth sector too, and is especially sustainable where zero / minimal pesticides are used, and Nature Friendly Farming practices are used. So rural areas, fields and woodland should be valued as locations of employment in themselves.

The up-grading of all rented housing stock (both public and private sector) to zero homes standard, would mean, it doesn't need to be done again before the local and legally-binding national target of 2050, and is thus a pre-requisite for the Local Plan to become legally compliant, and this can be made to benefit the local economy. It will be necessary to ensure that publicly owned rented housing stock stays in public hands. To incentivise private landlords, DDC should set up a register of private landlords, and to qualify for registration, landlords should have to show that homes rented are EPC C in 2023, EPC B in 2024, and zero carbon in 2025. As this will push up the value of their property, landlords should not find it difficult to access cheap loans to carry out the retrofit, (DDC could plan an intermediary role or suggest sources of finance). Tenants will benefit in terms of heating costs saved and improved standards of health, which is also a saving to the public purse. The economy will benefit in terms of jobs created for local trades people.

A third sector would include the fitting and maintenance of renewable energy installations, e.g. small-scale on-shore wind, small and medium scale solar (on domestic or non-residential roofs or to be combined with grazing land below, also on car parks), micro-tidal (tidal currents we are advised are very suitable locally), or 'green gas' as pioneered by

Ecotricity in Hampshire (as the grass-cuttings from Dover's many golf courses and campsites are likely to be suitable). To maintain the returns on investment in these sectors within the regional economy, and stop them being off-shored, a priority should be given to schemes which are 51% or more community-owned.

The Dept for Transport bought the site they wanted for Dover Inland Border Facility from a farmer in Guston for £22million, and in 2022 DfT publicly said the site would not be needed as Dover IBF. Could this become a combination of grazing under solar canopies? Near 2 schools and a sports centre, it is an unsuitable location for the HGV park that is needed at a site further outside the Dover urban area.

Tourism and Tourist / Visitor Accommodation.

It is very unsound, for DDC to fail to make AirB&B owners register with them, so that they can be charged business rate council tax. In terms of housing provision, AirB&B, both nationally, and in Kent's coastal towns especially, have a very negative effect of reducing the private rental market in 2022 and thus forcing up the average monthly rents for private tenants.

The local plan would be more compliant with legality, if DDC regeneration took the greening of the economy more seriously and looked at smaller zero-carbon tourism /transport activity projects within Dover town; harbour trips with zero carbon, solar-powered boats.

Better coach and toilet facilities are needed to boost tourism in Dover.

<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Public Works Loan Board or municipal loans could be used in Dover as in East Sussex, where they've invested in skilled jobs transforming existing homes into zero carbon homes across seven district councils. (The Lewes Model explained Green World).</p> <p>Businesses to be encouraged and helped to have more solar PV and Wind turbines.</p> <p>Solar canopies over the marshalling yards of Port of Dover, to generate energy that fridge trucks (whose engine-idling contaminates Dover) could plug into while waiting to board ferries.</p> <p>Rural economy growth through new farming initiatives (see above).</p> <p>Upgrade housing stock - so creating green jobs</p> <p>Improve facilities to promote tourism in Dover town.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>CC2 - Sustainable Design and Construction</p>
<p>Rep ID</p>	<p>SDLP628</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331790</p>
<p>Consultee Full Name</p>	<p>Julie Davies</p>
<p>Consultee Company / Organisation</p>	<p>CPRE Kent</p>
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>CC2</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified Effective Consistent with National Policy</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Not Applicable</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Not Applicable</p>

6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Paragraph 5.12 refers to the provision of adequate space for composting and paragraph 5.13 refers to green roofs, which are not carried through as policy requirements. Reference to growing food at CC2(d) is welcome, but CPRE queries how much agricultural land will be lost to development in the plan?
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	CPRE Kent would wish to participate at the examination hearings to explore these issues further.
Include files	
Local Plan Consultation Point	CC2 - Sustainable Design and Construction
Rep ID	SDLP1065
Rep Status	Processed
Consultee ID	1331808
Consultee Full Name	Mr Robert Hogben
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	1 Introduction
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy

4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>The plan is unsound as it does not comply with the legally binding commitment made by DDC when they declared a climate emergency in 2020 and prepared their climate change strategy. The plan will not do enough to meet the target of the district being net zero by 2050. DDC should be much more ambitious about the green credentials of new housing. If new homes generated their own power, were insulated to the highest standards, and collected rain water, it would greatly help stretched local services and go a long way towards making the housing stock fit for the coming decades.</p> <p>The regulation 19 stage of the consultation is not fit for purpose as it is overly complicated and very difficult to use. The process has left many members of the public including me and my wife feeling overwhelmed and confused as to how to make a representation. For those who are working full time this has been a task for which they do not have enough time. As a result those who may have wanted to make a submission have not been able to. The format of the submission form is also difficult to navigate. Without prior experience of planning law it is difficult to say whether a part of the plan is legal or not. As to the duty to cooperate it is impossible to know. The unsound plan needs updating after the government announcement on 5/12/22 that mandatory housing targets are not to be imposed. The figure of nearly 11,000 is unsustainable and should now be reviewed, particularly with respect to allocated land around Station Rd Walmer and proposed developments around villages.</p> <p>The character and landscape value of the district is being rapidly eroded under the current plan and this must not continue as it is contrary to NPPF 21. It is not sustainable to build on agricultural land which is in short supply as we are only 50% self sufficient in producing food in the UK. The CPRE has found that almost 14,500 hectares of farmland has been permanently lost to development since 2010. The contribution from the districts agricultural land is of vital importance. Much of the agricultural land is also vital for flood protection, and field margins are important for wildlife and biodiversity, forming corridors between habitats for vertebrates and nesting and roosting sites for birds. Dover District also has a wealth of character landscapes, AONB, heritage coast, nature reserves, internationally rare chalk grassland and rewilded areas such as Betteshanger Park. Overdevelopment under the last weak plan has meant that these areas are under pressure and being denuded as their boundaries are eroded and wildlife corridors between sites are cut off. The new plan does not do enough to protect these areas, wildlife and biodiversity. Developments should not be allowed to remove ancient woodlands and trees and biodiverse rich habitats even if it is argued that this is for the greater good. This is not sustainable as all nature is interconnected and if it fails then we all fail. The UK is one of the worst countries in the world for biodiversity loss, we have lost half of our biodiversity since the 1970's.</p> <p>Development has been at such a pace that infrastructure cannot keep up. Buses have been cut recently, cycle and pedestrian routes have not been upgraded sufficiently to connect some developments to main bus and train routes without car dependence. Aylesham has not had a secondary school which would mean children could walk to school. Many rural communities are entirely car dependent due to lack of buses and the roads not being safe to use their bikes. Not enough emphasis is put on renovating existing housing stock to provide greener, insulated, fuel efficient homes. Each new build generates around 56 tonnes of embedded carbon. The NPPF states that we should prioritise brownfield sites over greenfield but although there are many opportunities to develop brownfield sites in Dover, this has not been prioritised. Many developments have been for larger houses in villages and there is not enough provision for affordable housing.</p> <p>The wording of the local plan is not definitive, it leaves too many loop holes and vague preferences which enable large developers to argue and get what they want, to maximise profits, not what the people of the Dover area need.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Better mapping and understanding of the Dover District, taking into account internationally rare areas of chalk grassland, woodland and trees wherever they occur.</p> <p>Large buffers around the AONB to protect its character from the built environment. Stronger protection for the AONB and the Ripple LCA F3.</p> <p>Tighter protections on our remaining biodiversity.</p> <p>Tighter definitions in the local plan so that developers have no room to argue what has been specified in the local plan.</p> <p>Hire several biodiversity officers to monitor closely and prevent loss of ancient woodland, chalk grassland, veteran trees, protected wildlife and rich habitats and to actively go out into the community, looking for ways to improve biodiversity by such things as accessing grants for hedge planting and the creation of ponds where ever possible in our district.</p> <p>Employ experts to liaise with farmers in our area to encourage the most environmentally friendly farming and land management practices which will encourage maximum biodiversity in the countryside and maximum sequestration of carbon in soils and biomass.</p> <p>Stop the use of agricultural land for development.</p>

	<p>Renovate and insulate rather than build new houses, brownfield not greenfield.</p> <p>Turn attention away from destroying village communities with unsustainable housing estates outside their village boundaries.</p> <p>Do not give developers the get out clause of financial mitigation for destruction of wildlife and habitat. No development should further deplete our critically low levels of biodiversity.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC2 - Sustainable Design and Construction
Rep ID	SDLP1024
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	5.16 CC2
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The County Council was pleased to see that the text highlights the role that historic buildings can play in addressing climate change and refers to Historic England guidance. Old buildings can sometimes be energy efficient than newer ones and of course have already been built. Thus, it may take fewer overall resources to adapt an old building than to demolish it and build a completely new one.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance	

with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC2 - Sustainable Design and Construction
Rep ID	SDLP1620
Rep Status	Processed
Consultee ID	1252100
Consultee Full Name	Mrs Amandajayne Hollobon-Baxter
Consultee Company / Organisation	Sandwich Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC2
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Sandwich Town Council strongly supports enforceable standards inline with climate emergency, future proofing development.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness	

matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC2 - Sustainable Design and Construction
Rep ID	SDLP1385
Rep Status	Processed
Consultee ID	1268408
Consultee Full Name	Mrs Jan Gray
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP24
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	This land has had some work on pipes for the sewage system. It is not effective for the current number of houses as there is a regular sewage stench coming from the corner in your development plan for more housing. There are no places for any children who would move in to this development locally in primary schools. There will be no transport by the time this is built for children to be able to go to secondary schools . None of this housing will be financially achievable by local people or their extended families. The prospective buyers for these homes can only be the cash rich or business purchasers who can avoid many taxes to create income from rents that are unaffordable to local people. There is no infrastructure proposed for this section of the New Dormitory Town encompassing

	and extending both Aylesham and Adisham. No supermarket, no youth centre, no police, no doctors, no dentist, no focal point where communities can meet. No accomodation whatsoever for safeguarding the community. The ability of the land to absorb heavy rainfall is compromised, the ability of the land to absorb CO2 emissions is compromised, the ability of the land to grow food for our local people is removed entirely. We are in a cost of living and coming into an availability of purchasing food for our whole population crisis.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Upgrade the housing stock you have and that housing association has to be of a decent human habitable standard. You have a lot of homes that are damp and mouldy, your relevant departments do not respond adequately nor timely to emergencies such as boiler breakdowns or water leaking through houses. You could just as easily as another authority, have been sued for harm to babies from mould and damp as another local authority was. Build on brownfield sites. build to a good sustainable standard ie passive solar heating, heat pumps etc so that the tenants of the landlords the houses are sold to are warm without draughts and with a low carbon cost to heat. Properly update the water and sewage systems to cope with the massive extra load on systems that are failing with the current load. Put in protections so that our rivers and our seas are no longer discharging fecal matter into our local rivers and the channel where so many like to swim. build a school for our teenagers so poor families don't have to struggle to pay £450 for each child each year for the privilege of going to a secular state school, then being terrified that your children can't get transport to the school anyway. Your planning has a role in the educational and health comprehensive failure for SEND children and along with them secondary school children in your villages, but all this (8k in total) extra housing without any of the vital infrastructure, will make this place like a ghetto.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I consider that this would be a reasonable adjustment to make the consultation process accessible
Include files	
Local Plan Consultation Point	CC2 - Sustainable Design and Construction
Rep ID	SDLP1461
Rep Status	Processed
Consultee ID	1330919
Consultee Full Name	Mrs Heather Twizell
Consultee Company / Organisation	Natural England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC2
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	CC2 - Sustainable Design and Construction We welcome the requirements of this policy for development to achieve the five listed sustainable design objectives, specifically requirement 'd' which is in line with the aims of section 14 of the NPPF and the Government's 25 Year Environment Plan.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC2 - Sustainable Design and Construction
Rep ID	SDLP1358
Rep Status	Processed
Consultee ID	1333128
Consultee Full Name	David Powell
Consultee Company / Organisation	
Agent Full Name	Klaire Lander
Agent Company / Organisation	Lander Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC2
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	

4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Lander Planning sent a PDF document which has been split across the relevant sections of the Plan. See Original Attachment on SDLP1346) Incorporating sustainable design and construction in new developments is consistent with the NPPF and government direction and this policy is 'effective' and 'justified'. This policy is supported.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC2 - Sustainable Design and Construction
Rep ID	SDLP1097
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The local plan will not be compliant with Legality (legally binding Net Zero Strategy, Climate Emergency Declaration 2019 and Climate Change Act 2008), unless DDC adopts zero carbon homes standard. We note the list of councils building zero carbon homes includes; Exeter City Council, (200 finished, 1000 on the way), Leeds (1000 nearing completion), Norwich (100 finished), York, Wales (1400), Oxford (40), Enfield, Meridian Water development (10,000 homes). https://www.theguardian.com/artanddesign/2021/mar/06/eco-homes-become-hot-property-in-uks-zero-carbon-paradigm-shift So the draft wording of DDC nLP we find very weak.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	We recommend this (closely based on ReadingBC Local Plan Adopted 2019 and Oxford City Council Local Plan adopted 2016). ' <i>Given the scale of residential development in Dover up to 2040, achieving the aims of the Climate Change Strategy will not be possible without that development having a minimal impact on carbon emissions. Therefore, the requirement will be that major new housing is built to zero carbon homes standard. A revised Sustainable Design and Construction SPD to be produced in 2023 will contain more detail on achieving this requirement, but in general, where homes are not designed to be carbon neutral, this will mean as a minimum a 40% improvement in the dwelling emission rate over the 2013 Building Regulations plus a contribution of £1,800 per tonne towards carbon offsetting within Dover (calculated as £60 per tonne over a 30 year period). The requirement will increase from 31 March 2028 to at least a 50% reduction in carbon emissions. (based on Oxford City Council adopted local plan)</i> Where it is proposed to meet the zero carbon homes requirement in another way, clear evidence should be provided to demonstrate how it will be achieved at planning application stage. Zero carbon homes is an achievable standard that, until recently, was intended to be a national requirement in the Building Regulations.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	CC2 - Sustainable Design and Construction
Rep ID	SDLP1217
Rep Status	Processed
Consultee ID	1332924
Consultee Full Name	Amy Aldridge
Consultee Company / Organisation	Gladman Developments Ltd
Agent Full Name	Amy Aldridge

Agent Company / Organisation	Gladman Developments Ltd
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC2
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Policy CC2 outlines the requirement for "All applications for new buildings should be accompanied by a Sustainable Design and Construction Statement demonstrating how the requirements of this Policy have been met". While Gladman are supportive of the requirements of Policy CC2, it would be more appropriate for detailed applications to be supported by a Sustainable Design and Construction Statements rather than all applications.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC2 - Sustainable Design and Construction
Rep ID	SDLP1487
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note <i>The text below is an extract from the original representation which is attached to SDLP1438.</i></p> <p>CC 2 Sustainable Design & Construction</p> <p>The local plan will not be compliant with Legality (legally binding Net Zero Strategy, Climate Emergency Declaration 2019 and Climate Change Act 2008), unless DDC adopts zero carbon homes standard. We note the list of councils building zero carbon homes includes; Exeter City Council, (200 finished, 1000 on the way), Leeds (1000 nearing completion), Norwich (100 finished), York, Wales (1400), Oxford (40), Enfield, Meridian Water development (10,000 homes). https://www.theguardian.com/artanddesign/2021/mar/06/eco-homes-become-hot-property-in-uks-zero-carbon-paradigm-shift So the draft wording of DDC nLP we find very weak.</p> <p>We recommend this (closely based on Reading BC Local Plan Adopted 2019 and Oxford City Council Local Plan adopted 2016). 'Given the scale of residential development in Dover up to 2040, achieving the aims of the Climate Change Strategy will not be possible without that development having a minimal impact on carbon emissions. Therefore, the requirement will be that major new housing is built to zero carbon homes standard. A revised Sustainable Design and Construction SPD to be produced in 2023 will contain more detail on achieving this requirement, but in general, where homes are not designed to be carbon neutral, this will mean as a minimum a 40% improvement in the dwelling emission rate over the 2013 Building Regulations plus a contribution of £1,800 per tonne towards carbon offsetting within Dover (calculated as £60 per tonne over a 30 year period). The requirement will increase from 31 March 2028 to at least a 50% reduction in carbon emissions. (Based on Oxford City Council adopted local plan)</p> <p>Where it is proposed to meet the zero carbon homes requirement in another way, clear evidence should be provided to demonstrate how it will be achieved at planning application stage. Zero carbon homes is an achievable standard that, until recently, was intended to be a national requirement in the Building Regulations</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	We recommend this: 'Given the scale of residential development in Dover up to 2040, achieving the aims of the Climate Change Strategy will not be possible without that development having a minimal impact on carbon emissions. Therefore, the requirement will be that major new housing is built to zero carbon homes standard. A revised Sustainable Design and Construction SPD to be produced in 2023 will contain more detail on achieving this requirement, but in general, where homes are not designed to be carbon neutral, this will mean as a minimum a 40% improvement in the dwelling emission rate over the 2013 Building Regulations plus a contribution of £1,800 per tonne towards carbon offsetting within Dover (calculated as £60 per tonne over a 30 year period). The requirement will increase from 31 March 2028 to at least a 50% reduction in carbon emissions.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC2 - Sustainable Design and Construction
Rep ID	SDLP1561
Rep Status	Processed
Consultee ID	1333349
Consultee Full Name	Nikky Warden
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Developments should: reduce the energy load by good layout, orientation and design to maximise natural heating, cooling and lighting, and reduce the heat loss area.</p> <p>Major developments, a solar master plan should show how access to natural light has been optimised in the development, aiming to achieve a minimum daylight standard of 27 per cent Vertical Sky Component and 10 per cent Winter Probable Sunlight Hours</p> <p>All major development proposals should incorporate low carbon or renewable energy generation to achieve regulated carbon emissions levels of 20 per cent less than that required to comply with Building Regulations</p> <p>Developments will be required to connect to existing district energy networks in the locality or, where there is a future network planned, to be designed to be capable of connection to that network.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	

<p>if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Not Applicable</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>SDLP1561 Warden Att1.pdf</p>

CC3 - Renewable and Low Carbon Energy

Local Plan Consultation Point	CC3 - Renewable and Low Carbon Energy
Rep ID	SDLP244
Rep Status	Processed
Consultee ID	1331112
Consultee Full Name	Miss Emma Waller
Consultee Company / Organisation	Kent Wildlife Trust
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC3 - Renewable and Low Carbon Energy
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Renewable energy sources should be expected as standard on all new developments. Further, we call for that developments to demonstrate how they have incorporated all positive principles of the energy hierarchy, including reducing emissions, renewables, increased energy efficiency and energy saving.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	We urge the council to look at local energy schemes and the retrofitting of renewable energies to existing commercial and residential buildings. Such models would benefit both the environment and the local community. Retrofitting of renewable energy has the added benefit of reduced land take for renewables. There is potential that if local renewable energy supply took off that it could serve as an alternative to replacing larger schemes, with reduced impacts on biodiversity if solar panels are being retrofitted to buildings. Crude estimates indicate that the retrofitting of solar panels to 10% of schools nationwide would be equivalent in energy generation to a scheme the size of the Cleve Hill Solar Park. We suggest adding: " <i>The retrofitting of renewable energy technologies to existing buildings, in a way that does not increase land take, will be prioritised</i> " to Policy CC3.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC3 - Renewable and Low Carbon Energy
Rep ID	SDLP276
Rep Status	Processed
Consultee ID	1331383
Consultee Full Name	Mrs Katie Miller
Consultee Company / Organisation	Kent Downs AONB Unit
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC3 – Renewable and Low Carbon Energy Development
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Support – consider an appropriate balance has been struck between supporting renewables and protecting the District's natural resources, including the AONB.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC3 - Renewable and Low Carbon Energy
Rep ID	SDLP967
Rep Status	Processed
Consultee ID	1266351
Consultee Full Name	Dr Sharon Danby
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP 6 Economic growth
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>This section of the plan is not consistent with NPPF 21 - development must be sustainable - there is no mention of green economic growth. Quality of 'growth' is more important in crisis-ridden 2020 to 2040 than quantity of 'growth'. Because it is more sustainable as we look ahead to 2040 – 2060 and beyond.</p> <p>In the current economic climate energy prices, business rates, public sector cuts are making public and private sector employers (care homes, schools, health centres, hospitality, police (£30 million cut in Kent), buses, independent retail) fear for their survival.</p> <p>To be sound, effective and compliant with the realities of here and now, this is the direction DDC Local Plan should take. The local economy needs pump-priming, national fuel security needs to be enhanced, people need lifting out of fuel poverty. The local plan could do more than allocating sites and floor space.</p> <p>Transition to a greener economy, a means of making us more resilient economically, will be helped considerably by the ambitions of Port of Dover to decarbonize its estate by 2025 and to take seriously its scope 3 corporate responsibility in an inclusive manner to support local communities and economic players as they transition to a greener business too.</p> <p>There appears to be little mention of using the Local Plan to improve educational attainment by, for example, specific policies to</p> <ol style="list-style-type: none"> forge deeper links with FE institutions (eg Dover Technical College) given the skills gap relating to the Green Homes agenda, encourage higher education establishments to develop facilities in the district, and thereby to develop a knowledge-based economy beyond the former Pfizer's site. encourage the long-promised incubation hubs for the newly qualified in the district. This would contribute to raising the average level of earnings in the district and to combating the high levels of deprivation experienced in some wards.

A glaring omission relates to new economic opportunities created by climate-friendly recovery sectors. Three are essential in Dover District. With a 70% rural economy, which is severely challenged by increased costs of imports, and climate problems including water shortage. Diversification into agri-forestry could become popular among the farming community. It is recommended by Nature-Friendly Farming Network. Examples include

a) protecting arable yields in cases of drought, by planted strips of suitable, native, drought-tolerant trees, (which counter soil erosion, while increasing carbon sequestration) and,

b) bringing back to life existing but neglected, traditionally coppiced woodland, causing it to be harvested for small-scale biomass on a rotational basis. Similarly, short rotation forestry would create rural income and mitigate climate change.

Another key to meeting climate targets is increasing the amount of land used for growing food for people rather than livestock. This would create new outdoor jobs as would replacing imported market-garden food, with locally grown fruit, vegetables and pulses, this is a growth sector too, and is especially sustainable where zero / minimal pesticides are used, and Nature Friendly Farming practices are used. So rural areas, fields and woodland should be valued as locations of employment in themselves.

The up-grading of all rented housing stock (both public and private sector) to zero homes standard, would mean, it doesn't need to be done again before the local and legally-binding national target of 2050, and is thus a pre-requisite for the Local Plan to become legally compliant, and this can be made to benefit the local economy. It will

be necessary to ensure that publicly owned rented housing stock stays in public hands. To incentivise private landlords, DDC should set up a register of private landlords, and to qualify for registration, landlords should have to show that homes rented are EPC C in 2023, EPC B in 2024, and zero carbon in 2025. As this will push up the value of their property,

landlords should not find it difficult to access cheap loans to carry out the retrofit, (DDC could plan an intermediary role or suggest sources of finance). Tenants will benefit in terms of heating costs saved and improved standards of health, which is also a saving to the public purse. The economy will benefit in terms of jobs created for local trades people.

A third sector would include the fitting and maintenance of renewable energy installations, e.g. small-scale on-shore wind, small and medium scale solar (on domestic or non-residential roofs or to be combined with grazing land below, also on car parks), micro-tidal (tidal currents we are advised are very suitable locally), or 'green gas' as pioneered by Ecotricity in Hampshire (as the grass-cuttings from Dover's many golf courses and campsites are likely to be suitable). To maintain the returns on investment in these sectors within the regional economy, and stop them being off-shored, a priority should be given to schemes which are 51% or more community-owned.

The Dept for Transport bought the site they wanted for Dover Inland Border Facility from a farmer in Guston for £22million, and in 2022 DfT publicly said the site would not be needed as Dover IBF. Could this become a combination of grazing under solar canopies? Near 2 schools and a sports centre, it is an unsuitable location for the HGV park that is needed at a site further outside the Dover urban area.

Tourism and Tourist / Visitor Accommodation.

It is very unsound, for DDC to fail to make AirB&B owners register with them, so that they can be charged business rate council tax. In terms of housing provision, AirB&B, both nationally, and in Kent's coastal towns especially, have a very negative effect of reducing the private rental market in 2022 and thus forcing up the average monthly rents for private tenants.

The local plan would be more compliant with legality, if DDC regeneration took the greening of the economy more seriously and looked at smaller zero-carbon tourism /transport activity projects within Dover town; harbour trips with zero carbon, solar-powered boats.

Better coach and toilet facilities are needed to boost tourism in Dover.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Public Works Loan Board or municipal loans could be used in Dover as in East Sussex, where they've invested in skilled jobs transforming existing homes into zero carbon homes across seven district councils. (The Lewes Model explained | Green World).

Businesses to be encouraged and helped to have more solar PV and Wind turbines.

Solar canopies over the marshalling yards of Port of Dover, to generate energy that fridge trucks (whose engine-idling contaminates Dover) could plug into while waiting to board ferries.

Rural economy growth through new farming initiatives (see above).

Upgrade housing stock - so creating green jobs

Improve facilities to promote tourism in Dover town.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC3 - Renewable and Low Carbon Energy
Rep ID	SDLP686
Rep Status	Processed
Consultee ID	1331821
Consultee Full Name	Laura Marney
Consultee Company / Organisation	Deal Town Council
Agent Full Name	Laura Marney
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC3 Renewable and Low Carbon Energy
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DTC consider CC3 to be unsound (not positively prepared) on the basis that whilst there is a (very welcome) emphasis on protecting our Kent Downs Area of Outstanding Natural Beauty, unlike for residential and business developments, no areas where medium or large scale renewable and low carbon energy development would be considered appropriate have been identified.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	In order to truly encourage renewable and low carbon energy development: <i>We recommend that DDC map the areas within the Dover District that would be potentially suitable to deliver renewable and low carbon energy schemes and append them to the Local Plan in the same way that housing and employment sites have been identified and mapped.</i>

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC3 - Renewable and Low Carbon Energy
Rep ID	SDLP707
Rep Status	Processed
Consultee ID	1331838
Consultee Full Name	Christian Pryce
Consultee Company / Organisation	Dover Harbour Board
Agent Full Name	Paul Carnell
Agent Company / Organisation	Strutt and Parker
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC3 - Renewable and Low Carbon Energy
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>These representations to the Regulation 19 stage local plan consultation are made by Dover Harbour Board. The Harbour Board is responsible for the administration, maintenance and improvement of the harbour at the Port of Dover, which itself is the busiest international roll-on roll-off ferry port in the UK.</p> <p>The Port of Dover is one of the UK's most important strategic economic assets. The Port of Dover is the UK's busiest international ferry port, handling more lorries than all other UK ports. Its operation is capable of facilitating 120 ferry movements and 110 miles of freight per day. £144bn worth of UK trade and 33% of all trade with the EU is handled by the Port of Dover.</p> <p>Further, Dover is the UK's second busiest cruise port. Over 200,000 cruise passengers visit the Port of Dover, a number The Harbour Board is actively looking to grow. Embarkations on day trips and excursions directly boost the local and regional economy, with an average passenger spend equivalent to £322 pre-embarkation, and £84 during a port visit. The benefits to the local Dover economy are significant; it is estimated</p>

that this generates circa £47m of direct passenger spending annually in the local economy. The Port of Dover indirectly supports over 5,000 jobs, many of them in the local area, many of which would be affected by any reduction in cruise calls.

The Port of Dover therefore is a significant stakeholder in Dover District with a large influence on the local economy, both directly in terms of visitors, passenger throughput and employment, and indirectly by its impact on the highway network. The Harbour Board considers that the emerging Dover Local Plan needs to appropriately consider and account for the aspirations of The Harbour Board to improve operations more widely and plan for a low carbon future.

Sustainability and renewable energy

The Harbour Board is also actively taking a role in tackling and mitigating for climate change. Dover's already significant role as the UK's gateway to Europe is expected to grow over the coming years. Methods of transportation and supporting infrastructure needs to adapt and become less reliant on fossil fuels. The Harbour Board is exploring ways in which it can do this, and also provide for its own energy demands into the future.

Whilst the emerging local plan appears to broadly support the aspirations of the Harbour Board on the above points, we have identified two draft policies which require some amendment in order to assist The Harbour Board in delivering its goals for wider improvements to the management of freight and providing for a sustainable future for Port of Dover operations.

The Harbour Board considers that the emerging plan cannot be considered sound without the amendments outlined below, given the national strategic role of Dover Port and the importance of its continued effective operation.

Draft Policy CC3 – Renewable and Low Carbon Energy

Decarbonisation and a move toward green energy are national priorities and are clearly set out in the UK government's commitment to net zero by 2050. Freight and port operations have a large part to play and are directly addressed in the DfT's Transport Decarbonisation Plan (TDP) (2021)³.

The TDP sets out commitments to: consult on phasing out dates for the sale of all new non-zero emission HGVs; to end the sale of new non-zero emission HGVs from 3.5 – 26 tonnes by 2035; and the sale of all new non-zero emission HGVs by 2040. In addition it commits to investment into zero emission HGV technology and other measures to support efficiency improvements in the existing fleet and stimulate demand for zero-emission vehicles.

In terms of maritime freight, the TDP pledges to “*Consult on the appropriate steps to support wider deployment of shore power, including potential regulatory interventions, for both vessels and ports*”. It also states that the government will “*Accelerate the development of zero emission maritime technology and infrastructure in the UK via a £23m Clean Maritime Demonstration Competition and explore establishing a UK Shipping Office for Reducing Emissions.*”

A consultation was held this year (following another pledge in the TDP) on “*Domestic maritime decarbonisation: the course to net zero emissions*” and further commitments were made to exploring economic incentives to promote maritime decarbonisation.

Challenges for the Port of Dover

The Port of Dover is focused on reducing the carbon footprint of freight and ferry traffic in line with these national commitments and has signed an agreement with its partners at Calais and Dunkirk to deliver the world's first ‘Green Shipping Corridor’. Furthermore, decarbonising activity at the Port of Dover will play an important role in delivering Priority 2 ‘Enabling the transition to Net Zero’ as set out in DfT's Future of Freight.

This presents some challenges to the Port of Dover. Firstly, it will need to support the next generation of cleaner ferries with onshore maritime shore power (providing power from a land-based source to a vessel to cover its energy needs at berth). Modern green energy vessels, whether fully electric, hydrogen powered or hybrid, will change energy consumption and demand at the Port.

Secondly, the Port will also have a role to play in providing for electric or hybrid HGVs as they pass through. This will further change energy demands at the Port of Dover, whether that is done at the existing port or at an Inland Terminal.

The Harbour Board has undertaken studies to assess potential power needs over the next 40 years. The report tested two scenarios; ‘High electrification (80% of HGVs are electrified, 100% of ferries)’; and ‘Greater role for Hydrogen fuel’. The high electrification scenario predicts annual electricity consumption reaching 434,000 MWh. This reduces to 61,000 MWh in the scenario where Hydrogen plays a more significant part in future energy mix. The baseline at the time of the study was 17,000 MWh, so both scenarios represent a significant increase in demand for electricity.

The Harbour Board have aspirations to increase onsite renewable power generation capacity to help meet this need from green energy sources and are considering a range of options to ensure the Port of Dover can meet potential future demands and contribute to achieving net zero. This includes more conventional technologies but The Harbour Board also recognises the evolving nature of the renewable technology sector

where new and innovative solutions frequently appear. The possibility of changing government policy on these issues during the course of the plan period must also be taken into account.

The UK government does not currently support development of new on-shore wind, for example. This is by virtue of the Written Ministerial Statement (HCWS42) of 18th June 2015 which states planning permission for onshore wind power would be refused unless sites are identified in a local plan and have community support. However, this moratorium could be lifted during the Plan period, either under the existing government given its recent pledges to increase support for wind power, or through a general election win for Labour which has pledged to remove the ban.

The Local Plan must encourage renewable energy use and be flexible to allow for changes in this fast evolving sector.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Policy CC3 – Renewable and Low Carbon Energy Development

Draft Policy CC3 is broadly supported by The Harbour Board, but it should do more to enable the Port of Dover and others in the District to achieve clean energy goals and allow for future potential innovative technologies and development, including onshore wind power if the national policy position changes.

It is noted that Paragraph 155 of the NPPF states:

“To help increase the use and supply of renewable and low carbon energy and heat, plans should:

- 1 provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);*
- 2 consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and*
- 3 identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.”*

Draft Policy CC3 goes some way to achieving the goals of Paragraph 155, but some further direction is needed in order to promote opportunities for business to draw its energy supply from decentralised renewable sources.

As noted above, The Harbour Board is considering a range of traditional and innovative options to support both Port of Dover operations and at the future inland terminal. For example, it has noted with interest the intention in France to introduce solar canopies at car parks. Decarbonising Port of Dover Operations will require similar innovative approaches (including in conjunction with the facilities contemplated in Policy T14) and these should be encouraged in the Local Plan. This would benefit all businesses in Dover District who all have a part to play in achieving net zero.

The Harbour Board therefore considers the policy should be amended in the following ways:

“New development is encouraged to maximise opportunities for renewable energy by producing, storing and using renewable energy on-site. The Council will also take positive account of, and support development that provides further energy reductions, efficiencies, or delivers retrofitted renewable and low carbon energy measures on or near existing development sites, where measures comply with other policies of the plan.

The Council will encourage the use of Previously Developed Land to provide renewable energy generation or storage to support new and existing development.

Development to generate energy from renewable and low carbon sources will be supported where it is demonstrated that:

- 1 The environmental, social and economic benefits of their proposals are made clear;*
- 2 It will not result in significant harm to the surrounding area, landscape character, natural or heritage assets, habitats, biodiversity, or wildlife (particularly protected species), having special regard to the natural beauty of the Kent Downs AONB;*
- 3 There is no significant loss of amenity to local residents by virtue of visual impact, noise, disturbance or odour;*
- 4 The proposals will conserve and enhance the natural environment through measures such as improvements to biodiversity;*
- 5 There is no loss of the best and most versatile agricultural land, unless that it can be demonstrated that no alternative lower grade land is available;*
- 6 It will not result in an unacceptable impact on the local transport network that cannot be satisfactorily mitigated;*
- 7 Any fuel required is sustainably sourced.”*

Summary

The proposed additional Policy text provides additional certainty to those wishing to deliver renewable energy in Dover District. Importantly, it would provide a stronger policy baseline for the Port of Dover’s aspirations to decarbonise ferry and freight operations as part of the UK’s wider goal to achieve net zero emissions by 2050. The policy would be justified and consistent with National Policy and the UK’s drive to net zero.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	The Port of Dover is a significant stakeholder within Dover District. Matters which effect port operation have a wide impact on the local and national economy. Therefore the presense of the Dover Harbour Board at the Examination in pubic would be helpful for the Inspector.
Include files	
Local Plan Consultation Point	CC3 - Renewable and Low Carbon Energy
Rep ID	SDLP1621
Rep Status	Processed
Consultee ID	1252100
Consultee Full Name	Mrs Amandajayne Hollobon-Baxter
Consultee Company / Organisation	Sandwich Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC3
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Sandwich Town Council strongly supports enforceable standards inline with climate emergency, future proofing development.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC3 - Renewable and Low Carbon Energy
Rep ID	SDLP1462
Rep Status	Processed
Consultee ID	1330919
Consultee Full Name	Mrs Heather Twizell
Consultee Company / Organisation	Natural England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC3
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	CC3 - Renewable and Low Carbon Energy Development While Natural England is highly supportive of renewable and low carbon energy development as a necessary part of addressing the climate emergency we are pleased to see caveats in this policy that will help ensure the right development in the right place. Namely requirements 'b', 'd' and 'e' which will ensure consideration and protection of landscape, habitats, biodiversity and BMV.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will	

make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC3 - Renewable and Low Carbon Energy
Rep ID	SDLP1098
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	See below
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant	CC3 would not be sound without 'Developments of renewable and low carbon energy will be supported and encouraged . . . e) impacts on heritage assets and landscape setting have been minimised, f) there is no significant impact on wildlife habitats, biodiversity (particularly protected species).'

and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	CC3 - Renewable and Low Carbon Energy
Rep ID	SDLP1656
Rep Status	Processed
Consultee ID	1331868
Consultee Full Name	Ruth Marczin-Bundy (Parish Cllr)
Consultee Company / Organisation	Alkham Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	4 PLANNING FOR CLIMATE CHANGE The Plan identifies several measures, including sustainable design, reduction of NOX emissions, modal transport shifts etc Comment 4 Renewable Energy and Low Carbon Energy (DDC Plan – CC3 – 5.21-5.24) I support the broad principles of low carbon design, incorporating low carbon technologies, maximising green infrastructure and consideration of sustainable transport modes and will return to this latter point later in the transport section. No comment is

	<p>made on the introduction of wind turbine development nor on the potential for solar hillside panels on the south facing sides of the valley, as I am not aware of any locally planned development in this respect.</p> <p><i>(DDC note - The full representation from Alkham PC is attached to representation SDLP1653. However, specific comments from the full representation document have been extracted into separate consultation points/policy areas, relevant to the comments made)</i></p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Not Applicable
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
Include files	
Local Plan Consultation Point	CC3 - Renewable and Low Carbon Energy
Rep ID	SDLP1488
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	CC3
<p>2 - Do you consider this part of the Plan sound?</p>	No
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared</p> <p>Justified</p> <p>Effective</p> <p>Consistent with National Policy</p>

4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note <i>The text below is an extract from the original representation which is attached to SDLP1438.</i></p> <p>CC 3 Renewable and Low Carbon Energy Development</p> <p>CC3 would not be sound without 'Developments of renewable and low carbon energy will be supported and encouraged . . . e) impacts on heritage assets and landscape setting have been minimised, f) there is no significant impact on wildlife habitats, biodiversity (particularly protected species).'</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

CC4 - Water Efficiency

Local Plan Consultation Point	CC4 - Water Efficiency
Rep ID	SDLP527
Rep Status	Processed
Consultee ID	1266351
Consultee Full Name	Dr Sharon Danby
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC4
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Rainwater harvesting and grey water recycling are a must for all new homes and need to be retrofitted to existing homes where possible. There is a desperate shortage of water in our district so perhaps central government should not put so much pressure on this area to find new allocations of land for housing.</p> <p>The overall plan is unsound. Allowing more and more building in our district will only result in a water shortage crisis in the future. There is very little above ground water storage for our area and climate change effects are being felt already as we have drier summers. Over abstraction of water by Southern Water is already having negative effects on chalk aquifers in our area and many run dry in summer months where they did not a few years ago. Chalk streams are globally rare.</p> <p>Other councils (eg Reading) have strong policies to protect their water supplies.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>Stronger policies for protection of water supplies and provision for more above ground storage.</p> <p>Retrofitting homes for greywater recycling - thus creating jobs. Greater protection of chalk aquifers from over abstraction of water.</p> <p>In addition to saying <i>All new dwellings must be built to the higher water efficiency...</i> it should also say that they must collect rainwater and specify minimum capacity of barrel required.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC4 - Water Efficiency
Rep ID	SDLP687
Rep Status	Processed
Consultee ID	1331821
Consultee Full Name	Laura Marney
Consultee Company / Organisation	Deal Town Council
Agent Full Name	Laura Marney
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC 4: Water Efficiency
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DTC considers CC4 to be unsound (not justified) as the most appropriate way to bring about increased water efficiency in our severely water-stressed area. The Water for Sustainable Growth Study 2017 correctly asserts that as Dover District is one of the most water scarce areas in the UK, it is appropriate to introduce higher standards than Building Regulations. If recycled properly, greywater can save approximately 70 litres of potable water per person per day in domestic households. These systems are best installed as a new build project or when undergoing major regenerations to a house. (https://www.thegreenage.co.uk/tech/rainwater-harvesting/)
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<i>We recommend the following modification: that grey water recycling and rainwater harvesting systems be a requirement in new developments.</i>

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC4 - Water Efficiency
Rep ID	SDLP1099
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	See below
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	Would only become effective and sound if the following were added ' <i>Given the unwillingness of Southern Water to admit that they are depleting water in our chalk aquifers and their unwillingness to agree to invest in new water collection infrastructure, and given the low cost of initial installation of rainwater harvesting, and the high cost of installation after homes are built, permission will be granted only if designs include the installation of rainwater harvesting and greywater recycling.</i>

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	CC4 - Water Efficiency
Rep ID	SDLP1489
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC4
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC Note The text below is an extract from the original representation which is attached to SDLP1438. CC 4 Water Efficiency Would only become effective and sound if the following were added 'Given the unwillingness of Southern Water to admit that they are depleting water in our chalk aquifers and their unwillingness to agree to invest in new water collection infrastructure, and given the low cost of initial installation of rainwater harvesting, and the high cost of installation after homes are built, permission will be granted only if designs include the installation of rainwater harvesting and greywater recycling.'

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC4 - Water Efficiency
Rep ID	SDLP1497
Rep Status	Processed
Consultee ID	1333275
Consultee Full Name	Adam Harwood
Consultee Company / Organisation	Environment Agency
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC4
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails	Groundwater and Contamination Land

to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

The wording on the water efficiency policy confirms the optional higher water efficiency standard for all new dwellings of 110 litres per person per day and is one that we support, it is also encouraging that the Local Planning Authority “strongly support” proposals seeking more stringent water efficiency measures.

We have the following recommended corrections an alterations that should be made before the Regulation 19 documents are implemented.

Instance 1 Page 232 CC4 - Water Efficiency

“All new dwellings must be built to the higher water efficiency standard under Regulation 36(3) of the Building Regulations, to achieve a maximum use of 110 litres per person per day. The Council will strongly support proposals that seek to reduce daily water consumption even further, through the use of additional measures such as rainwater harvesting. For non-residential development, development must achieve BREEAM 'Very Good' standard overall, including Very Good for addressing maximum water efficiencies under the mandatory water credits, unless it can be demonstrated that it is not technically feasible and viable”

(DDC note - Page 96) 4.38 Where sites are identified as being on contaminated land, then a land contamination assessment will be required. Where sites are in close proximity to noise generating sources like busy road, railways or commercial uses then a noise survey and appropriate mitigation will be required. Where sites are in areas of poor air quality or close to an Air Quality Management Area then an air quality assessment will be required in accordance with Policy NE4 - Air Quality and suitable mitigation should be provided.

The wording contaminated land has a legal definition under Part IIa S 78A. There are no current determined Contaminated Land sites in Dover as far as I know, the wording here needs to be changed to land affected by contamination .

(DDC note - This is an extract from the full Environment Agency representation SDLP1458)

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Not Applicable

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Local Plan Consultation Point

CC4 - Water Efficiency

Rep ID

SDLP1622

Rep Status

Processed

Consultee ID

1252100

Consultee Full Name

Mrs
Amandajayne
Hollobon-Baxter

Consultee Company / Organisation	Sandwich Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC4
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	In view of the need to mitigate against the impact of climate change (drier summers, wetter winters) this policy should be amended to state that all, 'All new dwellings should have grey water systems installed to recycle water, and these should include measures to harvest rainwater using underground or aboveground tanks of up to 5,000 litres for both WC flushing and watering of gardens.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	In view of the need to mitigate against the impact of climate change (drier summers, wetter winters) this policy should be amended to state that all, 'All new dwellings should have grey water systems installed to recycle water, and these should include measures to harvest rainwater using underground or aboveground tanks of up to 5,000 litres for both WC flushing and watering of gardens.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

CC5 - Flood Risk

Local Plan Consultation Point	CC5 - Flood Risk
Rep ID	SDLP49
Rep Status	Processed
Consultee ID	1254085
Consultee Full Name	Mrs Sue Ward
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	5.33
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The junction of Nursery Lane and Singledge Lane in Whitfield has regularly flooded, because the topography directs the surface water run off to this lower lying junction from the fields to the north. Most of the time the water run off is contained within the pit to the northeast of the junction and the long drainage ditch in the field margin to the north west. However, global warming has increased rainfall in winter to such an extent that in recent years, water has had to be pumped out of the pit to prevent flooding. The large scale building of housing in this area will cause a far greater volume of run off than currently comes from the arable field. Such building is therefore unsustainable and contrary to the requirements of NPPF Section 169.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The development should be scaled back to prevent surface water flooding.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Comments have been ignored to date and need to be challenged at the highest level.
Include files	
Local Plan Consultation Point	CC5 - Flood Risk
Rep ID	SDLP245
Rep Status	Processed
Consultee ID	1331112
Consultee Full Name	Miss Emma Waller
Consultee Company / Organisation	Kent Wildlife Trust
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC5 - Flood Risk
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The Plan should seek to promote natural solutions to flood mitigation (see previous comments about using nature based solutions to reduce flooding) and surface water runoff, including the use of SuDS to mitigate surface water runoff and flooding. It should be ensured that SuDS features provide benefits for both flood mitigation, capture of pollutants and benefits for wildlife.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC5 - Flood Risk
Rep ID	SDLP279
Rep Status	Processed
Consultee ID	1331382
Consultee Full Name	Mr The Dover Society Graham Margery
Consultee Company / Organisation	The Dover Society
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC5
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Can't comment on legal compliance
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will	We feel that in these critical areas certain verbs should be strengthened for tighter regulation and control. We suggest all words in bold need addressing: all shoulds to be replaced with more enforceable wording eg will, have to, must; recommended replace with eg insist; need to be replaced by ' must to include details'; ' may be accepted' may to be replaced with must .

make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC5 - Flood Risk
Rep ID	SDLP689
Rep Status	Processed
Consultee ID	1331821
Consultee Full Name	Laura Marney
Consultee Company / Organisation	Deal Town Council
Agent Full Name	Laura Marney
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC 5: Flood Risk
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DTC consider CC 5 and CC to be unsound (not effective) on the basis that looking at developments in isolation, without regard to the 'big picture' for flooding and surface water management in the locality, is deeply flawed. For example, developments at Walmer and Sholden will impact on surface water management and flood risk in North Deal.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	<i>We recommend the following modification be added to both policies: Consideration must be given to the area-wide cumulative impact of existing and planned developments, in addition to the application under consideration.</i>

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC5 - Flood Risk
Rep ID	SDLP734
Rep Status	Processed
Consultee ID	1331844
Consultee Full Name	Miss Irene Bowie
Consultee Company / Organisation	Alkham Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC5 Flood Risk
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The steps being made which relate to water efficiency are welcomed . However the Water Authorities, the Parish Council and local landowners have tried to mitigate risk of flooding as the aquifer fills and manage surface water problems as they arise in Alkham. Sewage regularly backs up in the base of the valley in winter, indicates a lack of capacity for housing expansion, an infrastructure problem which requires addressing.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance	

with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC5 - Flood Risk
Rep ID	SDLP1100
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Wetter winters are a feature of climate change, as are rising sea levels so more of the district (inland and on the coast) is likely to be at risk of flooding.

<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>To become sound the following should be added, '<i>Undeveloped valley bottoms within 3 miles of urban settlements should be left undeveloped both as a means of allowing natural means of flood prevention, and to prevent new homes from being flooded.</i></p> <p>The requirement for floor levels to be 300mm and 600mm above the flood level in Flood Zones 2 and 3 is likely to become inadequate, years before 2040 and so this requirement should be doubled to become more sound. (See also coastal flooding comments CC 7 and CC6 below).</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.</p>
<p>Include files</p>	<p>v4 D&D Greens response 2022 Reg 19 new Local Plan .docx</p>
<p>Local Plan Consultation Point</p>	<p>CC5 - Flood Risk</p>
<p>Rep ID</p>	<p>SDLP1657</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331868</p>
<p>Consultee Full Name</p>	<p>Ruth Marczin-Bundy (Parish Cllr)</p>
<p>Consultee Company / Organisation</p>	<p>Alkham Parish Council</p>
<p>Agent Full Name</p>	<p></p>
<p>Agent Company / Organisation</p>	<p></p>
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>CC5</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>Yes</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p></p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Not Applicable</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Not Applicable</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>4 PLANNING FOR CLIMATE CHANGE</p> <p>The Plan identifies several measures, including sustainable design, reduction of NOX emissions, modal transport shifts etc</p> <p><i>Flood Risk (DDC Plan – CC5 – 5.32-5.40)</i></p> <p><i>Surface water management (DDC Plan – CC6 – 5.41-5.46)</i></p>

	<p>I welcome the steps being made which relate to water efficiency and would advise that through local action, the Water Authorities, the Parish Council and local landowners have tried to mitigate risk of flooding as the aquifer fills and manage surface water problems as they arise in Alkham. However, I have concerns that as sewage regularly backs up in the base of the valley in winter, this possibly indicates a lack of capacity for housing expansion, an infrastructure problem which requires addressing.</p> <p><i>(DDC note - The full representation from Alkham PC is attached to representation SDLP1653. However, specific comments from the full representation document have been extracted into separate consultation points/policy areas, relevant to the comments made)</i></p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Not Applicable
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
Include files	
Local Plan Consultation Point	CC5 - Flood Risk
Rep ID	SDLP1509
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	CC5
<p>2 - Do you consider this part of the Plan sound?</p>	No
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	Positively prepared Justified Effective

	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note <i>The text below is an extract from the original representation which is attached to SDLP1438.</i></p> <p>CC 5 Flood Risk</p> <p>Wetter winters are a feature of climate change, as are rising sea levels so more of the district (inland and on the coast) is likely to be at risk of flooding. To become sound the following should be added, 'Undeveloped valley bottoms within 3 miles of urban settlements should be left undeveloped both as a means of allowing natural means of flood prevention, and to prevent new homes from being flooded.</p> <p>The requirement for floor levels to be 300mm and 600mm above the flood level in Flood Zones 2 and 3 is likely to become inadequate, years before 2040 and so this requirement should be doubled to become sounder. (See also coastal flooding comments CC 7 and CC6 below).</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC5 - Flood Risk
Rep ID	SDLP1505
Rep Status	Processed
Consultee ID	1333275
Consultee Full Name	Adam Harwood
Consultee Company / Organisation	Environment Agency
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC5
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Flood Risk Policy CC5</p> <p>We would recommend a slight amendment to the wording in this policy in order to comply with the NPPF's guidance's definition of a "design flood" Paragraph:002 Reference ID: 7- 002-20220825 Flood risk and coastal change - GOV.UK (www.gov.uk)</p> <p><i>Where development does go ahead, all floor levels for living and sleeping accommodation should be set at a minimum of 300mm and 600mm above the design flood level for Flood Zones 2 and 3 respectively, including an allowance for climate change.</i></p> <p><i>(DDC note - This is an extract from the full Environment Agency representation SDLP1458)</i></p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC5 - Flood Risk
Rep ID	SDLP1553
Rep Status	Processed
Consultee ID	1333333
Consultee Full Name	Mr Colin

	Tearle
Consultee Company / Organisation	Shepherdswell-with-Coldred Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC5
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Sewerage and Drainage. The sewerage and foul water from the majority of properties in Shepherdswell drains into sewers connected to a pumping station at the rear of the East Kent Railway Station. Surface water from roads and paved areas also drain into these sewers and can add considerable load to the pumping station equipment . When the pumps cannot cope with this excess flow, foul flooding occurs in the houses and gardens of properties situated in The Glen. This has already been evidenced by frequent calls to DDC Environmental Services and Southern Water. Permitting the proposals at St Andrews Gardens will necessitate an immediate up-grade to this system to enable it to cope with the increased load, not even taking into account climate changes that result in increased rainfall.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

CC6 - Surface Water Management

Local Plan Consultation Point	CC6 - Surface Water Management
Rep ID	SDLP50
Rep Status	Processed
Consultee ID	1254085
Consultee Full Name	Mrs Sue Ward
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC6
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The junction of Nursery Lane and Singledge Lane has regularly flooded, because the topography directs the run off from the fields to this lower lying junction. Most of the time the water run off is contained within the pit to the northeast of the junction and the long drainage ditch in the field margin to the north west. However, global warming has increased rainfall in winter to such an extent that in recent years, water has had to be pumped out of the pit to prevent flooding. The large scale building of housing in this area will cause a far greater volume of surface water than currently comes from the arable field. Such building is therefore unsustainable and contrary to the requirements of NPPF Section 169.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The development at Whitfield should be scaled back to prevent surface water flooding.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC6 - Surface Water Management
Rep ID	SDLP166
Rep Status	Processed
Consultee ID	1329874
Consultee Full Name	Ms Nicola Purcell
Consultee Company / Organisation	Aylesham Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>In October 2021, Aylesham Parish Council supported the Climate and Ecological Emergency (CEE) Bill which address the full extent of the climate and nature crisis in the UK. As a result, any local plan should use up-to-date science to make sound recommendations.</p> <p>As the district is extremely water scarce, all possible measures should be implemented to help mitigate water scarcity. The use of Sustainable Urban Drainage systems (SUDs) is required to be prominent in all future developments. This will help to deal with surface water flooding. We welcome the Draft Local Plan's hierarchy of methods of discharge, with the use of combined sewers coming last.</p> <p>This relates to CC6 of SP1 – Surface Water Management.</p> <p>There are a number of options to ensure new homes produce the least possible carbon emissions. Aylesham Parish Council would like to see Dover District Council require the full 2025 Future Homes Standard to be delivered now (this will reduce emissions by between 75-80% compared to current standards), not at some point during the Local Plan's lifetime.</p> <p>This relates to CC1 of SP1 – Reducing Carbon Emissions.</p>

We welcome the commitment to planting trees within new developments that are native to Kent. This will help to keep the rural feel of Aylesham alive. Currently we often see newly planted trees dying within the first few years of their lives. There must be a comprehensive plan to ensure that these trees reach maturity (part d) and how this will be enforced by the local authority.

This relates to CC8 of SP1 – Tree Planting and Protection.

Aylesham Parish Council welcomes the commitment to planting larger numbers of trees but feels this must come with a long-term solution to maintaining the trees. Dover District Council must also commit to the full 2025 future homes standard now.

Aylesham Parish Council welcomes the addition and enhancement of open spaces and play areas. However, there are two points to note in the IDP: why would S106 monies from Aylesham be spent upgrading play areas in Nonington?; and play areas and open spaces are last to be delivered in developments – this must not happen in the future.

Aylesham Parish Council is identified as “Delivery Partners” on a number of projects due to be delivered: we have not been consulted on this prior to the Regulation 19 document being released.

The HRA[1] suggests that AYL003 – Land South of Aylesham is “high” suitability for the European Golden Plover, and so all measures must be taken to ensure this SPA protected bird species is still able to migrate and flourish in the area. SAP 25 (mixed use employment) is considered “moderate”.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Local Plan Consultation Point

CC6 - Surface Water Management

Rep ID

SDLP848

Rep Status

Processed

Consultee ID

1331761

Consultee Full Name

Catherine Hoyte

Consultee Company / Organisation

Plainview Planning Ltd

Agent Full Name

Catherine

	Hoyte
Agent Company / Organisation	Plainview Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC6 c
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>CC6 c is not sound and goes against Section 106 of the Water Industry Act (WIA) which states:</p> <p>"F1(1) Subject to the provisions of this section—</p> <p>(a) the owner or occupier of any premises, or</p> <p>(b) the owner of any private sewer which drains premises,</p> <p>shall be entitled to have his drains or sewer communicate with the public sewer of any sewerage undertaker and thereby to discharge foul water and surface water from those premises or that private sewer."</p> <p>This has been tested in the courts and the principle established that a development has the right to communicate with the sewer, regardless of classification. Whilst not totally unreasonable to allow sewer authorities time to upgrade networks to accept further flows following notification of intention to build. The LPA and LLFA also have a responsibility to ensure developments do not increase flood risk, and allowance for time is probably the most sensible route to manage additional flows rather than an absolute prevention.</p> <p>A pragmatic approach would be to have a ranging timescale based on size of development, rather than the blanket 2-years they currently quote and never meet! However, to completely dismiss connections for surface water to foul would make a high proportion of land unnecessarily unviable for development.</p> <p>The LLFA will ensure the discharge hierarchy is followed. If a connection to foul is the only option, the sewer authority will be consulted. The sewer authority has an obligation to adhere to the WIA. The Site-specific Guidance for Managing Flood Risk (2019) is a sensible approach and whilst it discourages surface water to foul only, does not prohibit it</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Remove the absolute prohibition at CC6c or amend to recognise that in some instances this type of connection is necessary and will need to be discussed and agreed with the sewer authority.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC6 - Surface Water Management
Rep ID	SDLP690
Rep Status	Processed
Consultee ID	1331821
Consultee Full Name	Laura Marney
Consultee Company / Organisation	Deal Town Council
Agent Full Name	Laura Marney
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC6 Surface Water Management
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DTC consider CC 5 and CC to be unsound (not effective) on the basis that looking at developments in isolation, without regard to the 'big picture' for flooding and surface water management in the locality, is deeply flawed. For example, developments at Walmer and Sholden will impact on surface water management and flood risk in North Deal.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<i>We recommend the following modification be added to both policies: Consideration must be given to the area-wide cumulative impact of existing and planned developments, in addition to the application under consideration.</i>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC6 - Surface Water Management
Rep ID	SDLP903
Rep Status	Processed
Consultee ID	1331948
Consultee Full Name	Mr Joe Williamson
Consultee Company / Organisation	River Stour Internal Drainage Board
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC6 - Surface Water Management
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Please can you include reference to the requirement for the permission of the River Stour IDB for any works affecting any watercourse within our Drainage District under the terms of the Land Drainage Act (1991) and our associated byelaws.</p> <p>We would also like to draw attention to Byelaw 3, which relates to the discharge of water into our District (whether the site in question lies within our District or not):</p> <p>Control of Introduction of Water and Increase in Flow or Volume of Water</p> <p>No person shall as a result of development (within the meaning of section 55 of the Town and Country Planning Act 1990 as amended ("the 1990 Act")) (whether or not such development is authorised by the 1990 Act or any regulation or order whatsoever or none of them) for any purpose by means of any channel, siphon, pipeline or sluice or by any other means whatsoever introduce any water into any watercourse in the District so as to directly or indirectly increase the flow or volume of water in any watercourse in the District (without the previous consent of the Board).</p> <p>Any such contribution will be a one-off payment, and will serve to facilitate the management of the increased flows resulting from the development into our District.</p> <p>Please refer to our website for further information on the SWDC, our policies and byelaws: https://rsidb.org.uk/consents-byelaws/</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s)	Please can you include reference to the requirement for the permission of the River Stour IDB for any works affecting any watercourse within our Drainage District under the terms of the Land Drainage Act (1991) and our associated byelaws.

<p>you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>We would also like to draw attention to Byelaw 3, which relates to the discharge of water into our District (whether the site in question lies within our District or not):</p> <p>Control of Introduction of Water and Increase in Flow or Volume of Water</p> <p>No person shall as a result of development (within the meaning of section 55 of the Town and Country Planning Act 1990 as amended ("the 1990 Act")) (whether or not such development is authorised by the 1990 Act or any regulation or order whatsoever or none of them) for any purpose by means of any channel, siphon, pipeline or sluice or by any other means whatsoever introduce any water into any watercourse in the District so as to directly or indirectly increase the flow or volume of water in any watercourse in the District (without the previous consent of the Board).</p> <p>Any such contribution will be a one-off payment, and will serve to facilitate the management of the increased flows resulting from the development into our District.</p> <p>Please refer to our website for further information on the SWDC, our policies and byelaws: https://rsidb.org.uk/consents-byelaws/</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Not Applicable</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>CC6 - Surface Water Management</p>
<p>Rep ID</p>	<p>SDLP1623</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1252100</p>
<p>Consultee Full Name</p>	<p>Mrs Amandajayne Hollobon-Baxter</p>
<p>Consultee Company / Organisation</p>	<p>Sandwich Town Council</p>
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>CC6</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified Effective Consistent with National Policy</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Yes</p>

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Higher expectation of maintenance of roads, car parks to prevent flooding and surface water and clearance of drains which often places areas in the town and on the highways of out use.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC6 - Surface Water Management
Rep ID	SDLP1025
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	5.43 CC6
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p><u>Heritage Conservation</u>: The County Council was pleased to see that the text identifies potential impacts on the historic environment from SUDS schemes. Sustainable Drainage Schemes (SuDS) may have both direct and indirect impacts on the historic environment. Direct impacts could include damage to known heritage assets – for example if a historic drainage ditch is widened and deepened as part of SuDS works. Alternatively, they may directly impact on unknown assets such as when SuDS works damage buried archaeological remains. Indirect impacts are when the ground conditions are changed by SuDS works, thereby impacting on heritage assets. For example, using an area for water storage, or improving an area's drainage can change the moisture level in the local environment. Archaeological remains are highly vulnerable to changing moisture levels which can accelerate the decay of organic remains and alter the chemical constituency of the soils. Historic buildings are often more vulnerable than modern buildings to flood damage to their foundations.</p> <p>When SuDS are planned it is important that the potential impact on the historic environment is fully considered and any unavoidable damage is mitigated. This is best secured by early consideration of the local historic environment following consultation with the Kent Historic Environment Record (HER) and by taking relevant expert advice. Kent County Council has recently produced advice for SUDS and the historic environment. It provides information about the potential impact of SuDS on the historic environment, the range of mitigation measures available and how developers should proceed if their schemes are believed likely to impact on heritage assets.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC6 - Surface Water Management
Rep ID	SDLP1106
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	

Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC is right to explain the needs*. *Extreme weather events of climate change include heavy downpours and wetter winters. Arable and grazing fields, especially those on an incline, are vital as flood sponges and need protection. But sometimes the run-off is such that roads are flooded. Both Dover and Deal (Mill Hill) include steep hilly urban areas where residents have witnessed water gushing up more than one meter high from manhole covers, following sudden downpours because the very aged infrastructure is very inadequate. In lower lying streets near the Deal level crossing houses have often been flooded.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Given the gross inadequacy of performance of privatized water companies, revealed in 2021 & 2022, an addition to policy should be made for the policy to become more sound and effective; additional criteria <i>(i) There should be public consultation with parish council and with residents living within 500 meters of the proposed development.</i> A sound DM would be to insist that no permission will be granted unless developers contribute to sustainable urban drainage systems. https://en.wikipedia.org/wiki/Sustainable_drainage_system ". Sustainable urban drainage systems being a mixture of both "hard" (physical infrastructure) & "natural". A sound DM would be to insist that no permission will be granted unless developer is making a contribution to enhance infrastructure, culverts and drains, e.g. through Community Infrastructure Levy.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	CC6 - Surface Water Management
Rep ID	SDLP1359
Rep Status	Processed
Consultee ID	1333128
Consultee Full Name	David

	Powell
Consultee Company / Organisation	
Agent Full Name	Klaire Lander
Agent Company / Organisation	Lander Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC6
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Lander Planning sent a PDF document which has been split across the relevant sections of the Plan. See Original Attachment on SDLP1346) Surface water management in new developments is consistent with national policy and this policy is 'effective' and 'justified' and therefore supported.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC6 - Surface Water Management
Rep ID	SDLP1510
Rep Status	Processed
Consultee ID	1333265

Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC6
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note <i>The text below is an extract from the original representation which is attached to SDLP1438.</i></p> <p>CC 6 Surface Water Management</p> <p>DDC is right to explain the needs*. Given the gross inadequacy of performance of privatized water companies, revealed in 2021 & 2022, an addition to policy should be made for the policy to become sounder and more effective; additional criteria (i) There should be public consultation with parish council and with residents living within 500 meters of the proposed development.</p> <p>A sound DM would be to insist that no permission will be granted unless developers contribute to sustainable urban drainage systems. https://en.wikipedia.org/wiki/Sustainable_drainage_system". Sustainable urban drainage systems being a mixture of both "hard" (physical infrastructure) & "natural" . *Extreme weather events of climate change include heavy downpours and wetter winters. Arable and grazing fields, especially those on an incline, are vital as flood sponges and need protection. But sometimes the run-off is such that roads are flooded. Both Dover and Deal (Mill Hill) include steep hilly urban areas where residents have witnessed water gushing up more than one meter high from manhole covers, following sudden downpours because the very aged infrastructure is very inadequate. In lower lying streets near the Deal level crossing houses have often been flooded. A sound DM would be to insist that no permission will be granted unless the developer is making a contribution to enhance infrastructure, culverts and drains, e.g., through Community Infrastructure Levy.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Add additional criteria (i) There should be public consultation with parish council and with residents living within 500 meters of the proposed development. A sound DM would also be to insist that no permission will be granted unless developers contribute to sustainable urban drainage systems.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC6 - Surface Water Management
Rep ID	SDLP1658
Rep Status	Processed
Consultee ID	1331868
Consultee Full Name	Ruth Marczin-Bundy (Parish Cllr)
Consultee Company / Organisation	Alkham Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC6
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>4 PLANNING FOR CLIMATE CHANGE</p> <p>The Plan identifies several measures, including sustainable design, reduction of NOX emissions, modal transport shifts etc</p> <p><i>Flood Risk (DDC Plan – CC5 – 5.32-5.40)</i></p> <p><i>Surface water management (DDC Plan – CC6 – 5.41-5.46)</i></p> <p>I welcome the steps being made which relate to water efficiency and would advise that through local action, the Water Authorities, the Parish Council and local landowners have tried to mitigate risk of flooding as the aquifer fills and manage surface water problems as they arise in Alkham. However, I have concerns that as sewage regularly backs up in the base of the valley in winter, this possibly indicates a lack of capacity for housing expansion, an infrastructure problem which requires addressing.</p> <p><i>(DDC note - The full representation from Alkham PC is attached to representation SDLP1653. However, specific comments from the full representation document have been extracted into separate consultation points/policy areas, relevant to the comments made)</i></p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s)	

you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Not Applicable

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

CC7 - Coastal Change Management Areas

Local Plan Consultation Point	CC7 - Coastal Change Management Areas
Rep ID	SDLP246
Rep Status	Processed
Consultee ID	1331112
Consultee Full Name	Miss Emma Waller
Consultee Company / Organisation	Kent Wildlife Trust
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC7 Coastal Change Management Areas
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	No mention of biodiversity, habitats or species.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	We suggest amending CC7: <i>Temporary development may be granted time-limited planning permission provided that it is demonstrated through an accompanying Coastal Change Vulnerability Assessment and a Geotechnical Appraisal, undertaken by suitably qualified persons, that the development:</i> <ol style="list-style-type: none"> 1 <i>Requires a coastal or clifftop location;</i> 2 <i>Will be safe and will not increase the risk to life during its planned lifetime;</i> 3 <i>Will not cause the loss of locally identified biodiversity assessts, including Local Wildlife Sites, Local Nature Reserves as well as priority and locally important habitats and species;</i> 4 <i>Provides wider sustainability benefits; and</i> 5 <i>Will not exacerbate rates of coastal change anywhere on the coastline.</i>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC7 - Coastal Change Management Areas
Rep ID	SDLP1264
Rep Status	Processed
Consultee ID	1265940
Consultee Full Name	Miss Karen Banks
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC7
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>RE: RESPONSE TO CONSULTATION ON DOVER DISTRICT LOCAL PLAN TO 2040 - REGULATION 19 SUBMISSION: DRAFT POLICY CC7 – COASTAL CHANGE MANAGEMENT AREA</p> <p>REASON: INCONSISTENCY WITH NATIONAL PLANNING POLICY FRAMEWORK</p> <p>It is noted that the consultation draft policies map shows Coastal Change Management Area [CCMA] designations extending landwards along various parts of the District's coastline, beyond the current policy designation areas. Further to the publication of the Regulation 19 submission version of the plan, for sites falling within a CCMA designation, draft policy CC7 seeks to restrict all permanent development (including householder) and is permissive of temporary development subject to several criteria and where supported by a Vulnerability Assessment and Geotechnical Appraisal.</p> <p><i>(DDC Note - screenshot of policy removed - full representation available as an attachment.)</i></p> <p>The wording of the Regulation 19 CCMA policy is far more restrictive than the earlier Regulation 18 version of the policy (former policy DM8). The latter enabled a more site-specific approach to the assessment of applications within a CCMA designation, which we suggest is more consistent with relevant policies of the National Planning Policy Framework (paragraphs 170-173) and the associated NPPG (paragraphs 071 to 074).</p> <p>With reference to CCMA designations, the Framework states (at paragraph 172) that development in a CCMA will be appropriate only where it is demonstrated that: a) it will be safe over its planned lifetime and not have an unacceptable impact on coastal change; b) the character of the coast including designations is not compromised; c) the development provides wider sustainability benefits; and d) the development does not hinder the creation and maintenance of a continuous signed and managed route around the coast. If necessary to reduce risk to an acceptable level, the Framework suggests the use of time limited permissions (paragraph 173). The NPPG provides further guidance on appropriate development within a CCMA relative to the vulnerability of a site to coastal change and the vulnerability of the development type to that change.</p>

	<p>The NPPG (paragraph 073) identifies that the following forms of development may be appropriate within a CCMA designation, subject to the tests in the Framework (emphasis added):</p> <ul style="list-style-type: none"> • Within the short-term risk areas (i.e. losses are expected within 20-years), a limited range of development directly linked to the coastal strip, such as beach huts, cafes/tea rooms, car parks and sites used for holiday or short-let caravans and camping – all with time-limited planning permissions; • Within the medium (20 to 50-year) and long-term (up to 100-year) risk areas, a wider range of time-limited development, such as hotels, shops, office or leisure activities requiring a coastal location and providing substantial economic and social benefits to the community. Other significant development, such as key community infrastructure, is unlikely to be appropriate unless it has to be sited within the Coastal Change Management Area to provide the intended benefit to the wider community and there are clear, costed plans to manage the impact of coastal change on it and the service it provides; • Existing buildings, infrastructure and land-use subject to the relevant planning permission could adapt and diversify to changing circumstances, where it reduces vulnerability, increases resilience and raises funds to facilitate subsequent relocation • Permanent new residential development (including through change of use) will not be appropriate within a Coastal Change Management Area. <p>It is asserted that the current wording of draft Policy CC7 goes beyond the provisions of the NPPF and places a blanket restriction on all new permanent development (without qualification or definition), including extensions to existing buildings, and denies applicants the ability to respond to the objectives of the CCMA designation, taking into account factors that are relevant to a site and the proposal, including the vulnerability or otherwise of the development proposed and the specific conditions of the site and surroundings. Compliance with CCMA objectives, as expressed through the NPPF and NPPG would be more appropriately considered, where necessary, on a case-by-case basis through the submission of a vulnerability assessment with each application (where necessary) within this area. This approach is supported by National Planning Policy (NPPG paragraph 074). If the development fails to meet the exceptions identified by the NPPG or conflicts with the objectives of the NPPF, then planning permission can be reasonably refused.</p> <p>Collectively the NPPF and NPPG advocate a more nuanced approach to development within CCMA's in a manner that takes account of the nature, type, scale and location of development and hence provides a more site-specific approach to the issue – much like the approach to development within flood risk areas. In this regard, it is suggested that the original wording of the Regulation 18 policy DM8 (see below) was more consistent with national planning policy, for the reasons expressed above.</p> <p><i>(DDC Note - screenshot of Reg 18 policy removed - full representation available as an attachment.)</i></p> <p><i>Please take this representation into account when reviewing the draft local plan (regulation 19).</i></p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	No
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>Coles Rebus Planning 1542 Att2_Redacted.pdf</p>
<p>Local Plan Consultation Point</p>	CC7 - Coastal Change Management Areas
<p>Rep ID</p>	SDLP1625

Rep Status	Processed
Consultee ID	1252100
Consultee Full Name	Mrs Amandajayne Hollobon-Baxter
Consultee Company / Organisation	Sandwich Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC7
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Sandwich Town Council strongly supports this policy to protect our coast.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC7 - Coastal Change Management Areas

Rep ID	SDLP1107
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	We have grave doubts that the 2018 Assessment in the DDC evidence base is adequate, we note NPPF doesn't seem have been updated on this issue since 2012. Since 2018, with the rapid melting of the Greenland Icecap, scientific evidence is that the situation is deteriorating rapidly https://www.forbes.com/sites/davidbressan/2022/08/29/greenlands-melting-ice-sheet-will-cause-major-sea-level-rise/ All along our coast there are homes, roads and other services close to the pebble beaches, at risk of rising sea levels.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	This plan would become more sound if any applicant planning a development of over 20 dwellings within 750 metres of the highwater shore line, and at an altitude of under 12 metres should expect to contribute to the cost of replacing groynes on our beaches / recharging beaches with shingle. The Goodwin Sands provide a natural protection from coastal erosion. As such the Goodwin Sands need protection too and should never be used as a source of gravel, they should never be dredged.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.

Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	CC7 - Coastal Change Management Areas
Rep ID	SDLP1511
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC7
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<i>DDC Note The text below is an extract from the original representation which is attached to SDLP1438.</i> CC 7 Coastal Change Management Areas We have grave doubts that the 2018 Assessment in the DDC evidence base is adequate, we note NPPF doesn't seem to have been updated on this issue since 2012. Since 2018, with the rapid melting of the Greenland Icecap, scientific evidence is that the situation is deteriorating rapidly https://www.forbes.com/sites/davidbressan/2022/08/29/greenlands-melting-ice-sheet-will-cause-major-sea-level-rise/ All along our coast there are homes, roads and other services close to the pebble beaches, at risk of rising sea levels. This plan would become sounder if any applicant planning a development of over 20 dwellings within 750 metres of the highwater shore line, and at an altitude of under 12 metres should expect to contribute to the cost of replacing groyne on our beaches / recharging beaches with shingle. The Goodwin Sands provide a natural protection from coastal erosion. As such the Goodwin Sands need protection too and should never be used as a source of gravel, they should never be dredged.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC7 - Coastal Change Management Areas
Rep ID	SDLP1818
Rep Status	Processed
Consultee ID	1333684
Consultee Full Name	Steve Lucas
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC7
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	RE: DRAFT POLICY CC7 – COASTAL CHANGE MANAGEMENT AREA & EXTENT OF DESIGNATION AS SHOWN ON DRAFT LOCAL PLAN POLICY MAP I am writing in response to the proposed expansion of the Coastal Change Management Area [CCMA] designations extending along parts of the district's coastline. My comments are two-fold: firstly, the proposed designation covers an area of coastline, adjacent to my property, that is currently protected by sea defences; and secondly, the wording of the draft policy is not consistent with the requirements of national planning policy. Extent of Designation The coastline adjacent to my property of Abbotscliff House is classified as 'hold the (existing defence) line' for the short and medium term on the National Coastal Erosion Map [NCEM] compiled by the Environment Agency. This predicts a 'retreat distance' of 0.00m along this stretch

	<p>of shoreline. Extracts from the NCEM are provided at the end of this letter. Furthermore, National Guidance (NPPG) advises that a CCMA should be defined where the shoreline management plan is anything other than hold or advance the line, at any time during its plan period (paragraph 072). I appreciate that the NPPG goes on to advise that where there is uncertainty about securing funding for the implementation of hold or advance the line, CCMA's can still be applied. However, I would suggest that there would be a high degree of certainty that a 'hold the line' policy will continue for this stretch of coastline by reason of the need to protect the main railway line (including the Highspeed service to London) that runs along the coastline at shore level. I would therefore question why the proposed CCMA designation includes this stretch of coastline.</p> <p>Inconsistency with National Planning Policy</p> <p>The proposed wording of proposed policy CC7 which prohibits all new permanent development within a CCMA designation would not enable a reasoned case to be presented to demonstrate that the particular characteristics of a site or proposal are such that development can, in certain circumstances be permitted. I believe that this overarching restriction on all permanent development within a CCMA, as suggested by policy CC7 is at odds with the approach set out within the national planning policy framework and national guidance which takes a more considered approach.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Not Applicable
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>Lucas 0434 Att2_Redacted.pdf</p>

CC8 - Tree Planting and Protection

Local Plan Consultation Point	CC8 - Tree Planting and Protection
Rep ID	SDLP27
Rep Status	Processed
Consultee ID	1255357
Consultee Full Name	Mr Jamie Pout
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC8
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Tree planting is welcomed but new trees do not always last so this must be planned for.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	There must be a medium to long term plan to inspect new trees and replace these so that they mature to a point when they are sequestering carbon and performing their intended function in term of mitigating against climate change.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC8 - Tree Planting and Protection
Rep ID	SDLP51
Rep Status	Processed
Consultee ID	1254085
Consultee Full Name	Mrs Sue Ward
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC8
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Tree planting takes many years before it becomes effective in sequestering carbon emissions, as this requires mature trees, not saplings. To cut mature trees down to facilitate buildings and then claim that these losses have been mitigated by planting new trees is completely inadequate and constitutes "greenwashing".
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The plan should require the retention of all trees and hedgerows when housing developments are planned, as only mature trees assist in the fight against global warming.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC8 - Tree Planting and Protection
Rep ID	SDLP167
Rep Status	Processed
Consultee ID	1329874
Consultee Full Name	Ms Nicola Purcell
Consultee Company / Organisation	Aylesham Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>In October 2021, Aylesham Parish Council supported the Climate and Ecological Emergency (CEE) Bill which address the full extent of the climate and nature crisis in the UK. As a result, any local plan should use up-to-date science to make sound recommendations.</p> <p>As the district is extremely water scarce, all possible measures should be implemented to help mitigate water scarcity. The use of Sustainable Urban Drainage systems (SUDs) is required to be prominent in all future developments. This will help to deal with surface water flooding. We welcome the Draft Local Plan's hierarchy of methods of discharge, with the use of combined sewers coming last.</p> <p>This relates to CC6 of SP1 – Surface Water Management.</p> <p>There are a number of options to ensure new homes produce the least possible carbon emissions. Aylesham Parish Council would like to see Dover District Council require the full 2025 Future Homes Standard to be delivered now (this will reduce emissions by between 75-80% compared to current standards), not at some point during the Local Plan's lifetime.</p> <p>This relates to CC1 of SP1 – Reducing Carbon Emissions.</p>

We welcome the commitment to planting trees within new developments that are native to Kent. This will help to keep the rural feel of Aylesham alive. Currently we often see newly planted trees dying within the first few years of their lives. There must be a comprehensive plan to ensure that these trees reach maturity (part d) and how this will be enforced by the local authority.

This relates to CC8 of SP1 – Tree Planting and Protection.

Aylesham Parish Council welcomes the commitment to planting larger numbers of trees but feels this must come with a long-term solution to maintaining the trees. Dover District Council must also commit to the full 2025 future homes standard now.

Aylesham Parish Council welcomes the addition and enhancement of open spaces and play areas. However, there are two points to note in the IDP: why would S106 monies from Aylesham be spent upgrading play areas in Nonington?; and play areas and open spaces are last to be delivered in developments – this must not happen in the future.

Aylesham Parish Council is identified as “Delivery Partners” on a number of projects due to be delivered: we have not been consulted on this prior to the Regulation 19 document being released.

The HRA[1] suggests that AYL003 – Land South of Aylesham is “high” suitability for the European Golden Plover, and so all measures must be taken to ensure this SPA protected bird species is still able to migrate and flourish in the area. SAP 25 (mixed use employment) is considered “moderate”.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Local Plan Consultation Point

CC8 - Tree Planting and Protection

Rep ID

SDLP409

Rep Status

Processed

Consultee ID

1266351

Consultee Full Name

Dr
Sharon
Danby

Consultee Company / Organisation

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC8 Tree planting and protection
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>All mature trees should have a tree preservation order. There is no point in needlessly cutting down mature trees to make way for developments as has often been the case (Aldi in Deal for example) only to replace them with young saplings that do not fare well if not cared for properly and can provide only limited carbon sequestration at the beginning of their lives. If we have only 8 years to mitigate the worst effects of climate change then we don't have the luxury of time to allow young trees to mature and start fixing significant amounts of carbon. Younger trees are going to suffer trying to get established with climate change and more drought.</p> <p>New planting should not be considered as an acceptable means by which to mitigate the felling of healthy mature trees. The carbon sequestration benefits and other amenity value of mature trees must be protected, whether under a formal Tree Preservation Order or not. Where it is absolutely unavoidable to remove a mature tree, 10 new trees should be planted with provision made for their ongoing care and protection.</p> <p>Where retaining mature trees on-site requires this to be within a garden of a new development, such trees should then be protected by the making of Tree Preservation Orders.</p> <p>There are a number of developments in the last few years which have been sadly lacking in tree planting – for example Richmond Park in Whitfield. There should be a presumption that new development will not result in the felling of any mature trees. In addition to the trees per dwelling and jobs there should be a requirement that new developments be tree-lined – planting for the benefit of future generations, but also shrubs and hedgerows for immediate carbon sequestration and amenity impact. Hedges sequester carbon both in woody growth above ground and in roots, leaf litter and other soil organic matter at and below ground level. In addition, hedges across slopes capture eroding soil and can increase soil organic carbon.</p> <p>All developments should include tree planting unless not possible (eg infill between houses may not yield enough space)</p> <p>A thorough mapping exercise of local tree cover in the District and a comprehensive strategy to increase it should be developed and published. DDC need to recruit and train staff and allocate money to ensure that staffing and resourcing is sufficient to manage the TPO system system and make sure that trees required for a development are actually planted and maintained properly.</p> <p>Mature trees should never be sacrificed for development. All trees are vital in the fight against climate change.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Map all trees in the Dover District and identify trees that have special significance. All trees need protecting and TPO's should be issued as a matter of course and new TPO officers employed.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC8 - Tree Planting and Protection
Rep ID	SDLP289
Rep Status	Processed
Consultee ID	1331382
Consultee Full Name	Mr The Dover Society Graham Margery
Consultee Company / Organisation	The Dover Society
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC8
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Can't comment on legal compliance
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	We welcome the requirement for planting new trees as a requirement of building developments and to replace felled trees, but there is also need for such trees to be maintained once planted and not neglected. This affects not only climate change but impact upon the local public realm and tourist appeal.

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC8 - Tree Planting and Protection
Rep ID	SDLP247
Rep Status	Processed
Consultee ID	1331112
Consultee Full Name	Miss Emma Waller
Consultee Company / Organisation	Kent Wildlife Trust
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC8 Tree Planting and Protection
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Tree planting should not be the main focus for reducing carbon emissions. We are concerned that the Plan portrays tree planting as an easy way out of reducing emissions. The net zero strategy for the council should include an assessment of the existing carbon stored within the council's estate and protecting it through appropriate land management methods. Tree planting should be used alongside other strategies, such as increase in renewable energy, protecting existing carbon stores (existing trees, woodlands, wetlands and coastal habitats).</p> <p>We are concerned that important habitats such as heathland, open mosaic priority habitat, coastal grasslands, unimproved grasslands and permanent pastures, which are typically void of trees, will be subject to inappropriate tree planting. Many rare botanical, invertebrate and bird species depend on these open habitats. These habitats and the species that rely on them, could be inadvertently destroyed with the planting of trees if tree planting is the main focus at reducing carbon emissions. In the wrong location, tree planting can be exceptionally damaging to wildlife. Dover District Council need to make sure areas designated for tree planting aren't already of value to wildlife.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s)	Policy CC8 should focus on ensuring the right trees are planted in the right place in order to maximise the longevity of trees being planted and ensuring the protection of existing important biodiversity areas.

you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The Plan should include natural regeneration. This is a low carbon way of establishing new woodland through natural seedling establishment. It results in more natural wildlife-rich woods with scrub, such as bramble, protecting growing trees from rabbits and deer without the need for the plastic tree guards or peat based composts that are damaging to the environment.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC8 - Tree Planting and Protection
Rep ID	SDLP681
Rep Status	Processed
Consultee ID	1221958
Consultee Full Name	Ms Bridget Fox
Consultee Company / Organisation	The Woodland Trust
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC8 - Tree Planting and Protection
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	We strongly welcome this policy, and the robust approach to tree retention and replacement. We strongly welcome the requirement in para a) for a minimum of two new trees to be planted for each new dwelling. We further recommend setting a target for overall tree canopy cover as part of this policy. The Woodland Trust supports a target of 30% canopy cover for development sites, including tree-lined streets, community woods, parks and gardens, to be pursued through the retention of important trees, appropriate replacement of trees lost through development, ageing or disease, and by new planting to support green infrastructure.

	<p>We strongly support the policy in para b) that trees should be native Kent species of local provenance. Using native sourced and grown tree stock for new planting is vital to support biodiversity and resilience.</p> <p>We suggest strengthening para h) on tree replacement by saying "at least two trees" and recommend setting a proposed ratio of tree replacement, which reflects the Woodland Trust guidance on <i>Local Authority Tree Strategies</i> (July 2016) with a ratio of at least 2:1 for all but the smallest trees and ratios of up to 8:1 for the largest trees.</p> <p>Overall this is a very sound policy approach that we welcome.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	local-authority-tree-strategies.pdf
Local Plan Consultation Point	CC8 - Tree Planting and Protection
Rep ID	SDLP564
Rep Status	Processed
Consultee ID	1267584
Consultee Full Name	Jason Ransley
Consultee Company / Organisation	Dover Harbour Board
Agent Full Name	John Bowles
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy CC8 - Tree Planting and Protection
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Dover Harbour Board notes the requirement of Policy CC8 - Tree Planting and Protection that a minimum of two new trees will be required to be planted for each new dwelling, and a minimum of one new tree will be required to be planted for every 500 sqm of new commercial floorspace. We support the recognition that in exceptional circumstances a financial contribution towards the planting of trees elsewhere in the District may be acceptable, but this requirement could be potentially highly onerous in an area such as Dover Waterfront where there is a large area of blue infrastructure and limited opportunity for large areas of urban greening. The site offers significant opportunities for increased public access to the marina and waterfront and for enhanced public realm. The policy should reflect these opportunities and recognise that where other regeneration benefits are being delivered the policy will be applied more flexibly.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The policy wording or supporting text should be amended to recognise that on constrained sites which offer significant opportunities for enhanced public realm (and access to such areas) and where other regeneration benefits are being delivered the policy will be applied more flexibly and the need for either on site tree planting or a financial contribution towards the planting of trees elsewhere in the District will be reduced or may be waived entirely.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	N/A
Include files	Waterfront Plan - Update 2022.pdf SDLP0564 Dover Harbour Board - Att 2.pdf (1)
Local Plan Consultation Point	CC8 - Tree Planting and Protection
Rep ID	SDLP654
Rep Status	Processed
Consultee ID	1331795
Consultee Full Name	Mrs Talina Wells
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Climate Change CC8 Trees
2 - Do you consider this part of the Plan sound?	No

<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Effective</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Yes</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Yes</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>Item CC8- Tree planting and protection. Paragraph h</p> <p>-Currently, when TPO trees are felled, there is evidence that trees are not replaced in many cases. It seems to be reliant on the goodwill of the landowner.</p> <p>Is there a means in the local plan to ensure this is carried out.</p> <p>-Is there anyway, going forward, that works to trees within a conservation area (or even wider eg the AONB) that are not subject to TPOs, are loaded onto the planning portal as well?</p> <p>Such trees in CA's are currently subject to 211 notices only which are decided upon by the Tree Officers. This is fine, but all too often the grey area remains where unscrupulous activities on trees are carried out and the public are unaware of whether approval had been granted or not. By the time enquiries are made, the tree has gone and it is too late. The only recourse is fines and replacement (often not checked in recent past years), but this defeats the object of item 5.53 citing the retention of existing trees.</p> <p>There has been tepid agreement that section 211 works to trees with associated location maps, will be loaded on to the planning portal for public informational purposes...but nothing as yet!</p> <p>*item CC8- item 5.57 Hedgerows: More planting of Hedgerows with careful retention of existing. These are as vital as trees for environment cleansing, carbon storage, biodiversity as well as creating wildlife protective corridors. Their significance should be emphasised.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Item CC8- Tree planting and protection. Paragraph h</p> <p>-Currently, when TPO trees are felled, there is evidence that trees are not replaced in many cases. It seems to be reliant on the goodwill of the landowner.</p> <p>Is there a means in the local plan to ensure this is carried out.</p> <p>-Is there anyway, going forward, that works to trees within a conservation area (or even wider eg the AONB) that are not subject to TPOs, are loaded onto the planning portal as well?</p> <p>Such trees in CA's are currently subject to 211 notices only which are decided upon by the Tree Officers. This is fine, but all too often the grey area remains where unscrupulous activities on trees are carried out and the public are unaware of whether approval had been granted or not. By the time enquiries are made, the tree has gone and it is too late. The only recourse is fines and replacement (often not checked in recent past years), but this defeats the object of item 5.53 citing the retention of existing trees.</p> <p>There has been tepid agreement that section 211 works to trees with associated location maps, will be loaded on to the planning portal for public informational purposes...but nothing as yet!</p> <p>*item CC8- item 5.57 Hedgerows: More planting of Hedgerows with careful retention of existing.</p>

	These are as vital as trees for environment cleansing, carbon storage,biodiversity as well as creating wildlife protective corridors. Their significance should be emphasised.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC8 - Tree Planting and Protection
Rep ID	SDLP783
Rep Status	Processed
Consultee ID	1331880
Consultee Full Name	Natasha Styles
Consultee Company / Organisation	McCarthy Stone
Agent Full Name	Natasha Styles
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to?Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC8 - Tree Planting and Protecting Tree Planting
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	CC8 - Tree Planting and Protection Tree Planting Policy CC8 aims to increase tree planting and protect existing tress. NPPF para 16. identifies that 'Plans should.....b) be prepared positively, in a way that is aspirational but deliverable'. Para 131 provides guidance specifically associated with trees and states 'Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users'.

	<p>PPG with respect to viability states that “<i>The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan</i>” (Paragraph: 002 Reference ID: 10-002-20190509).</p> <p>Requiring 2 new trees per new dwelling on site especially for small brownfield sites is not deliverable or realistic and could compromise sustainability development and is therefore contrary to NPPF. The requirement also goes beyond the requirements of the NPPF. Any requirement would also need to be fully evidenced and the requirement incorporated into the viability study. The council should therefore reconsider this element and ensure any such policy approach introduces more flexibility or is deleted.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>To make the plan effective and in line with national policy the following amendments should be made:</p> <p>Delete policy CC8 points a, b c and d.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	No
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
Include files	
Local Plan Consultation Point	CC8 - Tree Planting and Protection
Rep ID	SDLP629
Rep Status	Processed
Consultee ID	1331790
Consultee Full Name	Julie Davies
Consultee Company / Organisation	CPRE Kent
Agent Full Name	
Agent Company / Organisation	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	CC8
<p>2 - Do you consider this part of the Plan sound?</p>	No

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	To ensure that new trees planted as part of any development the policy needs to be enhanced, with regard to bullet point (d) landscaping schemes should require replacement of trees planted where they die or are vandalised. Whilst supporting the approach to tree protection and replacement consideration should also be given to safeguarding trees on rural allocations where they are not subject to or deemed to be worthy of a TPO.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	CPRE Kent would wish to participate at the examination hearings to explore these issues further.
Include files	
Local Plan Consultation Point	CC8 - Tree Planting and Protection
Rep ID	SDLP691
Rep Status	Processed
Consultee ID	1331821
Consultee Full Name	Laura Marney
Consultee Company / Organisation	Deal Town Council
Agent Full Name	Laura Marney
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC8 Tree Planting and Protection
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DTC considers CC 8 to be unsound (not effective, not justified) with the legally binding target for the UK to bring all greenhouse gas emissions to net zero by 2050. DDC have not committed to the retention of mature trees - new planting does not have the same carbon sequestration qualities as mature trees and trees take many years to become effective carbon 'sinks'. DDC have not set out set their criteria for proactively making Tree Protection Orders, their Tree Strategy nor committed staff and resources to undertake this important work.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<i>We recommend the following modifications:</i> <i>New planting should not normally be considered as an acceptable means by which to mitigate the felling of mature trees, and mature trees should be retained wherever possible. The carbon sequestration benefits, and other amenity value of mature trees must be protected, whether under a formal Tree Preservation Order or not.</i> <i>DDC will set out an enhanced criteria for making TPOs, to cover biodiversity and ecosystem services as well as amenity value.</i> <i>DDC will provide appropriate staffing and resources to sustainably and effectively deliver this policy.</i>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC8 - Tree Planting and Protection
Rep ID	SDLP1026
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC8
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The County Council welcomes consideration of the historic aspect of woodlands recognised in this policy.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC8 - Tree Planting and Protection
Rep ID	SDLP1272
Rep Status	Processed
Consultee ID	1271353
Consultee Full Name	Church Commissioners
Consultee Company / Organisation	
Agent Full Name	Mr Andrew Watson

Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC8
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Text Extracted from Document sent from Savills on Behalf of the Church Commissioners. Representation has been split across relevant areas of the Local Plan. Full attachment and introduction to Policy comments can be found under reference SDLP1265 for Shepherdswell Site and SDLP1266 for Eastry Site.) Policy CC8 requires 'A minimum of two new trees will be required to be planted for each new dwelling (this does not apply to applications for conversions and changes of use to residential), and a minimum of one new tree will be required to be planted for every 500sqm of new commercial floorspace created.' The wording of the policy should be made more flexible, particularly for smaller sites where there is less room for open space. DDC should also clarify whether Policy CC8 is in addition to the requirement for tree-lined streets. Recommendation: Amend Policy CC8 to be more flexible for smaller development sites and clarify the requirements of Policy CC8 in line with planning policy for tree-lined streets.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC8 - Tree Planting and Protection
Rep ID	SDLP1108
Rep Status	Processed

Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Experience has caused trust in the planning process to expire in the minds of many of the public. Without independent, robust auditing, and honesty, extracting promises from developers all too often results merely in employment for public relations practitioners. So, an addition to CC 8 is needed for it to become sound.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>This policy would become sound, effective and legally compliant, if the recommendations of KCC report 'Natural Solutions to Climate Change in Kent' of March 2021, paid for from the public purse, on the need for our district's (chalk) grasslands, wetlands, and woodlands to be retained and enhanced, were adopted as a planning guideline.</p> <p>We recommend that the points made be strengthened to become requirements. Also to become sound and effective CC8 needs the addition '<i>Existing trees which are capturing carbon in this decade 2020-2030 and the next 2030 -2040, must be protected. DDC will accelerate the rate of making Tree Preservation Orders and Woodland Preservation Orders and provide appropriate staffing and resources to sustainably and effectively deliver this policy, honest, independent evidence from an arboriculturalist will be required if felling is requested on grounds of tree disease.</i> Vague promises 'to facilitate tree planting and protection where possible' are a very inadequate response, non-compliant with legality, because replacing existing trees with trees that will only start their carbon capture career in 2040 will not allow the UK or Kent to meet its climate change targets.</p> <p>So, an addition to CC 8 is needed for it to become sound. 'Where permission is given subject to conditions regarding tree retention, tree planting and / or biodiversity enhancement, applicants will need to agree to abide by 'robust auditing' (as Wildlife Trusts insisted that the Environmental Bill legislate for). This means that honest, objective, before-and-after evaluations / baseline measurements must be used. DDC councillors on the planning cttee have in recent years pointed out how very inadequate and misleading the sketchy, google-map-based ecology reports paid for by developer applicants are. Developers are ill-placed to self-certify their own work in this area, and DDC need a DM policy requiring Environmental Impact Assessments on all planning applications for developments of over 15 dwellings on greenfield or rewilded brownfield sites.'</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	CC8 - Tree Planting and Protection
Rep ID	SDLP1463
Rep Status	Processed
Consultee ID	1330919
Consultee Full Name	Mrs Heather Twizell
Consultee Company / Organisation	Natural England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC8
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Natural England welcome the inclusion of this tree planting policy within the Local Plan. We are particularly pleased to see the policy being for trees of local provenance. We further welcome the intention to incorporate a specific Tree Strategy into your Authority's Green Infrastructure Strategy to provide more detailed guidance on the delivery of this policy. This is important as consideration will need to be given to existing natural interest features (peat, priority habitat, priority species, protected sites etc) and public access in decisions about where trees are planted (on or off site), to ensure the Right Tree in the Right Place. We would encourage you to expand point 'd' in the 'Tree Planting' section of the policy to explicitly secure inclusion of aftercare for newly-planted trees in order to maximise survival rates and achieve desired outcomes for carbon, people and nature.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC8 - Tree Planting and Protection
Rep ID	SDLP1418
Rep Status	Processed
Consultee ID	1333243
Consultee Full Name	Mr and Mrs Tobin
Consultee Company / Organisation	
Agent Full Name	Mr Reece Lemon
Agent Company / Organisation	Lee Evans Partnership
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC8
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Representation submitted by Lee Evans On behalf of Mr and Mrs Tobin. Full Representation attached to SDLP1411. This document has been split across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1411.) POLICY CC8 – Tree Planting and Protection 3.30 Policy CC8 addresses tree planting and protection. Whilst the principles of such are supported in creating pleasant places to live and work, the detail of this policy is particularly onerous, and far too prescriptive to the extent of potentially constraining development. 3.31 In respect of criterion (a) there is not considered to be a robust evidence base in place to justify or otherwise explain why “a minimum of two new trees will be required to be planted for each new dwelling”. This directive is unnecessary as a development management policy, and is best

	<p>reserved for detailed consideration of any future applications in the District. The objective of increasing the natural character of sites is supported, but this must not simply be applied through blanket policy. The provision of trees on site should be informed by site specific assessment, including assessment of the existing trees on site. This criterion (a) should be deleted.</p> <p>3.33 Criterion (d) requires the provision of a detailed landscaping scheme and landscape management plan should be submitted for all major development schemes, including, but not limited to, details of the trees and shrubs to be planted, and proposals for how the landscaping scheme will be managed and maintained over the lifetime of the development. Again it is considered that the extent of landscaping details provided is sometimes best reserved for the development management process, including through agreement with officers at pre-application stages and the validation of applications as to the precise nature of information provided. It is often the case that the full details of a landscaping scheme are reserved for planning conditions.</p> <p>3.34 For completeness, criteria (b), (c), (e), (f), (g), (h) are otherwise agreed as a suitable basis for development management.</p> <p>In this regard, it is recommended that CC8 be amended to ensure its suitability in development management terms over the plan period. It is suggested that such amendment could be picked up as a Main Modification in due course.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	CC8 - Tree Planting and Protection
<p>Rep ID</p>	SDLP1218
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1332924
<p>Consultee Full Name</p>	Amy Aldridge
<p>Consultee Company / Organisation</p>	Gladman Developments Ltd
<p>Agent Full Name</p>	Amy Aldridge

Agent Company / Organisation	Gladman Developments Ltd
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC8
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Policy CC8 outlines the Council's commitment to tree protection and planting, which Gladman are supportive of. Criterion d of Policy CC8 outlines the requirement for "a detailed landscaping scheme and landscape management plan should be submitted for all major development schemes", Gladman would advise that the wording of this part of Policy CC8 is made more specific to request this plan from detailed major developments.</p> <p>(DDC Note - Text Extracted from Document sent from Gladman Developments Ltd. Full attachment can be found under the introduction comment reference SDLP1192)</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC8 - Tree Planting and Protection
Rep ID	SDLP1571
Rep Status	Processed
Consultee ID	1333349
Consultee Full Name	Nikky Warden
Consultee Company / Organisation	

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC8
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Reference CC8 5.56: 'as part of the Council's Green Infrastructure Strategy a Tree Strategy will be prepared to accompany this Plan and provide detailed guidance on the delivery of this Policy.'</p> <p>A review of Canopy Coverage improvement over time and is one that is supported/endorsed by the UK Government.</p> <p>More tree officers are urgently needed, with an increase in resources DDC will accelerate the rate of making Tree Preservation Orders and Woodland Preservation Orders and sustainably and effectively deliver this policy.</p> <ol style="list-style-type: none"> 1 All healthy trees are 2 "All mature trees to be retained" - Wording to include retain all mature trees, Justification -Not all ancient woodland is carbon sequestration for 100 years. There is a need to be thinking of carbon sequestration for 100 years. <p>Veteran and Notable trees Veteran and notable trees throughout Dover District must be given better protection going forward otherwise we will never have ancient trees with all the habitat benefits that they provide as they gradually decay in the third stage of their life. Two online mapping systems, TreeZilla.org and the Woodland Trust Ancient Tree inventory.</p> <p>DDC must look at a longer time horizon and focus on tree life spans, planning for more than 50 -100 years ahead. Succession planting now for the trees that will be lost through old age.</p> <ol style="list-style-type: none"> 1 New development will be not permitted unless 80% of existing trees <p>Any trees or plants that within a period of 10 years from the completion of the development die, are removed or become seriously damaged or diseased, shall be replaced in the next planting season with others of similar size and species as those originally planted, unless the Local Planning Authority gives written approval to any variation. GROUND: To ensure that the work is carried out within a reasonable period in accordance with the NPPF.</p> <ol style="list-style-type: none"> 1 Trees that die from natural causes will be Only trees independently certified as dying or diseased to be felled and only subject to a suitable replacement being planted. Where trees are being felled because of overcrowding, thinning rather than removal of all trees should be considered wherever possible. <p>Independent evidence from an arboriculturist will be required if felling is requested on grounds of tree disease.</p> <ol style="list-style-type: none"> 1 Replanting -Although there is no statutory duty on the County Council to replace any diseased trees that are removed, there is a general duty on local authorities to 'conserve biodiversity 2 for 1 replanting policy to be supportable in the face of the climate emergency. 2 Trees should be native Kent species of local provenance. Species selection will be compatible with KC's plan B, pollinators, - consideration of appropriate selection to survive changes in the 100 Year horizon. 3 There will be consideration of chalk geology when selecting and planting trees, to ensure Hedges and shrubs may be more appropriate selection. 4 All applications for trees to be felled will be assessed by the DDC Environment & Horticulture Officer <p>/ The Tree Officer following a visit to the site and independent assessment.</p>

- 1 Works required for structural reasons i.e., impact of root damage to foundations and drains, must be supported by structural engineering evidence as well as a report from the DDC Environment & Horticulture Officer (The Tree Officer)
- 2 Where there are reports and evidence of pre-emptive tree felling and or habitat destruction which undermines the inadequate 10% biodiversity net gain. The applicant must be required to enhance biodiversity net gain by 30-50% as determined by the LPA
- 3 Remedial tree works e., Crown lift / Crown thin / Height reduction etc. to be kept to a maximum of 1.5m-2.0 m reduction unless the DDC Environment & Horticulture Officer / The Tree Officer authorises otherwise. All tree applications must contain full measurements in line with BS3998:2010, to make the requested percentage reduction meaningful. Sympathetic management and a fixed reduction of the canopy lost to pruning should not be exceeded. It is good practice according to British Standards document "BS 3998:2010 - Tree work. Recommendations" to include all tree measurements in applications – otherwise a percentage is meaningless.

- 1 There are not any set qualifications for a Tree Surgeon. Therefore DDC needs to set a policy that assessments and tree work should be undertaken only by Tree Surgeons holding City & Guilds, HND or BTEC in Forestry and Arboriculture, or a bachelor's or master's degree in forestry, arboriculture, countryside management, forest management or woodland ecology and conservation. Ideally and in addition they should be a member of a professional organisation such as the Arboricultural Association or The International Society of For Tree Inspection work other specific qualifications that should be considered are LANTRA awarded Tree Inspection qualifications at various levels and Diploma in Arboriculture & Forestry. Many councils around the UK operate a Preferred Supplier list.
- 2 It is an unfortunate part of the planning process that often it is the person applying for building permission work to trees, who contracts the Arboricultural survey that is appended to their The resulting surveys are often biased, and implausible, and trees are routinely given a category C and classed as not worthy of retention. Policy recommendations (above) would go some way towards mitigating this.
- 3 Re-define TPO legislation re "amenity" to encompass the benefits of Biodiversity and Ecoservices, pollution control, Mental health, cooling effect, access to green spaces, run-off, flooding infrastructure TPO about to go under consultation as part of England National Tree
- 4 Location of new trees- creation of shared spaces not just located in the gardens of new builds. Incorporation of new community green spaces for each larger development.
- 5 Street trees –avenues of native trees preferred; consideration of others more suitable for surviving on-going climate change, Climate adaption- trees for the Wider pavements for inclusion of trees (LP design section). Adequate tree pits. Use of geotextiles to separate infrastructure from tree roots. (green and blue company) <https://greenblue.com/gb/home/>
- 6 Hedgerow wildlife corridors

Hedgerows are hugely important in the environment as wildlife corridors – linking disparate areas of woodland and parks together. Fragmentation of tree covered areas, leads to a gradual diminution of biodiversity, the overrunning of one species, such as Ivy or Alexanders and reduction in flora and fauna supported by the area. Hedgehogs, for example, can travel 12 miles in one night along hedgerows linked to gardens and out to non-residential areas. source: <https://www.countryfile.com/wildlife/mammals/our-guide-to-hedgehogs-where-to-see-and-how-to-help-hedgehogs-in-your-garden/> accessed 19/11/2020. Hedges "are valued too for the major role they have to play in preventing soil loss and reducing pollution, and for their potential to regulate water supply and to reduce flooding. Hedgerows have a role to play in taking greenhouse gases out of circulation through carbon storage if they can expand in size. Certainly, any loss exacerbates climate change to some extent" (Hedgelink.org.uk – 24/09/2020). It will be quicker and easier to ameliorate the impact of climate change by planting hedgerows, in some location. They take up less space and provide an identified function (enclosure), whilst providing environmental services in respect of carbon capture and habitat provision.

- 1 Hedgerow maintenance

It is a criminal offence under the Wildlife and Countryside Act to disturb nesting birds.

However, birds can roost in any month of the year. We require the applicant to check for nesting or roosting birds before undertaking works to trees and if birds are found to be nesting, for works to be postponed until nesting is complete. If birds present on the site are of high conservation concern ('red list*' or 'amber list' birds**), permission for the works should be refused unless there are overwhelming reasons for it to be given.

- No tree works should be permitted to take place during the main nesting period from March until the end of August. Birds can nest or roost in any month of the year.

(* House Sparrow, Starling, Song Thrush, turtledoves, ** Hedge Sparrow (Dunnock)).

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant

and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	SDLP1561 Warden Att1.pdf
Local Plan Consultation Point	CC8 - Tree Planting and Protection
Rep ID	SDLP1664
Rep Status	Processed
Consultee ID	1331868
Consultee Full Name	Ruth Marczin-Bundy (Parish Cllr)
Consultee Company / Organisation	Alkham Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC8
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Tree planting - (DDC plan - CC8 – 5.52-5.59).</p> <p>Tree planting is actively underway in the valley at 'Chilton Magic Garden'. Our aim is to educate children and families into the importance of trees and nature in our world, by engaging them in habitat creation and tree planting for wildlife and increase biodiversity, to develop climate change resilience and to reduce carbon emissions through carbon storage. Woodlands help to maintain air quality and aid water attenuation, they preserve soils and prevent flooding. The community of the valley are working towards increasing the AONB to make the Alkham Valley a beautiful, nature retreat for people to connect with nature and wildlife, which contributes to overall greater health and well-being for locals and visitors.</p>

	(DDC note - The full representation from Alkham PC is attached to representation SDLP1653. However, specific comments from the full representation document have been extracted into separate consultation points/policy areas, relevant to the comments made)
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC8 - Tree Planting and Protection
Rep ID	SDLP1562
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC8
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note <i>The text below is an extract from the original representation which is attached to SDLP1438.</i></p> <p>If existing mature trees of a good size to capture carbon now, are replaced in 'urban expansion' areas (SAP 1, SAP 24, SAP 28) by young saplings that will not be able to capture a similar amount of carbon for 40 to 50 years, then the plan will not be legally compatible with Environment Act 2021. Therefore, to become sound and legally compliant SP14 should require that for every 10,000m2 (roughly 50 dwellings of 200m2 per dwelling) of housing, one open space of 150m2 and another woodland area of 150m2 should be provided, these allocations to be non-transferable between 10,000m2 sections. Moreover, development should only be permitted if 90% of existing trees are retained (These retained trees will account for the woodland areas referred to above, and will provide pockets of mature green infrastructure of amenity value to legally binding UK Net zero strategy 2019 and to new residents at little cost or inconvenience to the developer). Any new trees planted must be tended with a guarantee to ensure survival 4 years after development completed.</p> <p>Moreover, to become more sound and effective, we recommend adding, Retain all trees on the perimeter of large developments and pockets of existing trees within developments. Work with Kent Nature Partnership to evaluate, and match protection of all-natural capital. Work to retain and enhance natural capital generally, mindful of the KCC commitment to establish the growth of 1.5 million new planted trees across the county. Similarly, this policy would become sounder if the recommendations of KCC report 'Natural Solutions to Climate Change in Kent' of March 2021 paid for from the public purse, on the need for our district's (chalk) grasslands, wetlands, and woodlands to be retained and enhanced were adopted as a planning guideline.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC8 - Tree Planting and Protection
Rep ID	SDLP1360
Rep Status	Processed
Consultee ID	1333128
Consultee Full Name	David Powell
Consultee Company / Organisation	

Agent Full Name	Klaire Lander
Agent Company / Organisation	Lander Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC8
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Lander Planning sent a PDF document which has been split across the relevant sections of the Plan. See Original Attachment on SDLP1346) The provision of tree planting in new developments and the protection of existing trees is consistent with national policy and this policy is 'effective' and 'justified' and therefore supported.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	CC8 - Tree Planting and Protection
Rep ID	SDLP1626
Rep Status	Processed
Consultee ID	1252100
Consultee Full Name	Mrs Amandajayne Hollobon-Baxter

Consultee Company / Organisation	Sandwich Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC8
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Sandwich Town Council strongly support tree planting and protection. CC8: Tree Planting and Protection Existing trees which are capturing carbon in this decade 2020-2030 and the next 2030 -2040, must be protected Tree planting • b. Addition - that Trees should be climate resilient trees Kent species, consideration of appropriate selection to survive changes in the climate -100 Year horizon. • Species selection will be compatible with KCC's plan Bee, pollinators Tree Protection and Replacement • Schedule of inspection management should be initiated to protect trees particularly with periods of prolonged weather • Any trees or plants that within a period of 10 years from the completion of the development die, are removed or become seriously damaged or diseased, shall be replaced in the next planting season with others of similar size and species as those originally planted, unless the Local Planning Authority gives written approval to any variation. To ensure that the work is carried out within a reasonable period in accordance with the NPPF. • All promises from developers regarding tree retention, tree planting and biodiversity enhancement must be subject to 'robust auditing'. Honest, objective, before-and-after evaluations / baseline measurements must be used. • Retain all trees on the perimeter of large developments and pockets of existing trees within developments. • 90 - 100% of existing healthy trees retained on new developments.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Sandwich Town Council strongly support tree planting and protection. CC8: Tree Planting and Protection Existing trees which are capturing carbon in this decade 2020-2030 and the next 2030 -2040, must be protected Tree planting • b. Addition - that Trees should be climate resilient trees Kent species, consideration of appropriate selection to survive changes in the climate -100 Year horizon. • Species selection will be compatible with KCC's plan Bee, pollinators Tree Protection and Replacement • Schedule of inspection management should be initiated to protect trees particularly with periods of prolonged weather • Any trees or plants that within a period of 10 years from the completion of the development die, are removed or become seriously damaged or diseased, shall be replaced in the next planting season with others of similar size and species as those originally planted, unless the Local Planning Authority gives written approval to any variation. To ensure that the work is carried out within a reasonable period in accordance with the NPPF. • All promises from developers regarding tree retention, tree planting and biodiversity enhancement must be subject to 'robust auditing'. Honest, objective, before-and-after evaluations / baseline measurements must be used. • Retain all trees on the perimeter of large developments and pockets of existing trees within developments. • 90 - 100% of existing healthy trees retained on new developments.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	

Include files	
Local Plan Consultation Point	CC8 - Tree Planting and Protection
Rep ID	SDLP1863
Rep Status	Processed
Consultee ID	1271717
Consultee Full Name	Quinn Estates
Consultee Company / Organisation	Quinn Estates Ltd
Agent Full Name	James Waterhouse
Agent Company / Organisation	Iceni projects
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC8
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Full Representation attached to SDLP1860. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1860.)</p> <p>d. Policy CC8 – Tree Planting and Protection</p> <p>While supportive of securing appropriate landscaping within new developments, Quinn Estates questions the evidence base that justifies a prescriptive policy requirement for a minimum of two new trees to be planted for each new dwelling and, similarly, a requirement of one new tree being planted for every 500sqm of new commercial floorspace created. The policy requirements appear to be arbitrary and, applied universally without consideration of site-specific characteristics, could compromise optimising the capacity of sites, especially previously developed land where the emphasis is on achieving higher densities. Given the Plan already has Policy NE1 requiring a minimum 10% net biodiversity gain, it is considered that the numeric tree planting requirement in Policy CC8 is not justified and may even hinder the ability to secure net biodiversity gain in certain instances, subject to the ecology baseline position.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Quinn Estates is a developer with significant land interests in the District, who has an important role in delivering the Plan strategy
Include files	
Local Plan Consultation Point	CC8 - Tree Planting and Protection
Rep ID	SDLP1898
Rep Status	Processed
Consultee ID	1333840
Consultee Full Name	Jon Alldis
Consultee Company / Organisation	Barrat David Wilson Homes
Agent Full Name	Emily Harris
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	CC8
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Full Representation attached to SDLP1883. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1883.) Draft Policy CC8 – Tree Planting and Protection - COMMENT Draft Policy CC8 requires a minimum of two new trees to be planted for each new dwelling with a presumption of these to be planted on site. Where it is demonstrated that the new trees cannot be provided on site a financial contribution will be required. BDW support the delivery of new trees on site and respect the requirements of NPPF paragraph 131. However, concern is raised over the impact to design, landscape character and viability in relation to such a prescriptive requirement. It is also not clear whether these trees are sought over and above the national requirement for tree-lined streets. In respect of design, incorporating large amounts of trees on small - medium scale development with limited strategic open space, could directly impact the developable area and consequently,

impact on placemaking aspects. Furthermore, significant tree cover within a residential area can have impacts to daylighting levels and residential amenity. When considering landscape character, the NPPF paragraph 130 (c) states that planning policies should ensure that developments “are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)”. Trees make an important contribution to the landscape setting and have the ability to significantly change the character of an area. Thus, Draft Policy CC8 should take this into account. Whilst the Whole Plan Viability Study (2020) notes the two tree requirement at paragraph 8.52, the viability assessment is not clear how the inclusion of these impacts the development costs. BDW have concerns that this level of planting could impact the viability of a development alongside other policy requirements. Finally, where a financial contribution is sought, the contribution should be in accordance with the tests set out in NPPF paragraph 57. With the above in mind, it is considered that the policy should be updated to encourage two trees to be planted where there will be no design, landscaping, viability or other issues caused by doing so. A reasonable and proportionate contribution for off-site planting will be requested where on-site planting cannot be achieved on site unless there are viability issues which prohibit this.

Recommendation: Draft Policy CC8 is updated to read:

- a) A minimum of two new trees will be required encouraged to be planted for each new dwelling (this does not apply to applications for conversions and changes of use to residential), and one new tree will be required encouraged to be planted for every 500sqm of new commercial floorspace created.
- b) The planting of these trees should not impact the design quality or landscape character of the area.
- c) Trees should be native Kent species, of local provenance from a bio-secure source, and should be standard size in specification as a minimum.
- d) A presumption that the trees will be planted on-site rather than off-site will apply. For major development where it is demonstrated that new trees cannot be provided on-site, a proportionate financial contribution will be required towards the planting of trees off-site in accordance with the requirements of the Council's Green Infrastructure Strategy unless there are demonstrable viability concerns.

Additionally, the Council should seek to clarify the relationship of these trees to the national requirement to deliver tree-lined streets.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

PM1 - Achieving High Quality Design, Place Making and the provision of Design Codes

Local Plan Consultation Point	PM1 - Achieving High Quality Design, Place Making and the provision of Design Codes
Rep ID	SDLP309
Rep Status	Processed
Consultee ID	1331395
Consultee Full Name	Ms Jo Edwards
Consultee Company / Organisation	Sport England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM1
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Sport England supports this policy that aligns with our Active Design Guidance prepared jointly with Public Health England and published in 2015. The guidance is currently being updated and the Council may wish to reference it in the supporting text. The guidance that can be viewed in full at https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design The guidance includes a number of case studies demonstrating how Active Design principles have been incorporated within new residential and mixed use schemes and also how they can be incorporated within existing environments.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	N/A
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	PM1 - Achieving High Quality Design, Place Making and the provision of Design Codes
Rep ID	SDLP688
Rep Status	Processed
Consultee ID	1221958
Consultee Full Name	Ms Bridget Fox
Consultee Company / Organisation	The Woodland Trust
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM1 - Achieving High Quality Design
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	We welcome this policy in particular the reference to tree-lined streets in 4b) and to incorporating trees in the public realm and development sites in 5c).
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	residential-developments-and-trees.pdf
Local Plan Consultation Point	PM1 - Achieving High Quality Design, Place Making and the provision of Design Codes
Rep ID	SDLP565
Rep Status	Processed
Consultee ID	1267584
Consultee Full Name	Jason Ransley
Consultee Company / Organisation	Dover Harbour Board
Agent Full Name	John Bowles
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy PM1 - Achieving High Quality Design, Place Making and the provision of Design Codes
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Dover Harbour Board supports the objective of achieving high quality design as set out in Policy PM1 – Achieving High Quality Design, Place Making and the Provision of Design Codes and welcomes the inclusion of recognition in the policy that higher density development will be encouraged in sustainable and accessible locations such as at Dover Waterfront.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	N/A

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	N/A
Include files	
Local Plan Consultation Point	PM1 - Achieving High Quality Design, Place Making and the provision of Design Codes
Rep ID	SDLP630
Rep Status	Processed
Consultee ID	1331790
Consultee Full Name	Julie Davies
Consultee Company / Organisation	CPRE Kent
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Policy PM1(2b) requires densities of between 30-50 net dwellings per hectare. CPRE as an organisation strongly believes that where land is given over to development, it should be used as efficiently as possible - as appropriate for that site's location. The higher the density, the more benefits accrue, and the more land is saved.</p> <p>High density building does not equate to high rise apartment blocks. CPRE London published a report in 2019 on this issue called "Double the density, halve the land needed"https://www.cprelondon.org.uk/wp-content/uploads/sites/10/2020/02/DoubleTheDensityHalveTheLandNeeded_1.pdf. This sets out both the benefits of higher density design along with providing examples of higher density developments being achieved by a variety of means. This includes a mixed-use residential development at Springhead Park, Ebbsfleet, Kent where 160dph is being achieved.</p> <p>Further research undertaken by CPRE and Place Alliance (A housing design audit for England, 2020) https://placealliance.org.uk/research/national-housing-audit/ concludes that housing schemes performed more poorly with distance from the urban core and with reduced density. The additional constraints imposed by stronger pre-existing urban context, were considered to encourage a more sensitive design response.</p>

	<p>Building at low density and on green fields is not being done well in terms of design quality. The most successful schemes (as audited in the study of 142 developments) were those at 56dph – which is almost double the national average of 31dph. Moreover, the National Design Code (July 2021) states that density is an essential component of an effective design code.</p> <p>DDC Edit (Link split to fit page)</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	CPRE Kent would wish to participate at the examination hearings to explore these issues further.
Include files	
Local Plan Consultation Point	PM1 - Achieving High Quality Design, Place Making and the provision of Design Codes
Rep ID	SDLP657
Rep Status	Processed
Consultee ID	1331795
Consultee Full Name	Mrs Talina Wells
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	SP8 p.59
<p>2 - Do you consider this part of the Plan sound?</p>	No
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	Effective
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	Yes

<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Yes</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>Item SP8- Dover Town Centre.</p> <p>Additional suggestions:</p> <ul style="list-style-type: none"> a) Greening the main high street via avenue of ornamental trees. b) Less licensing of gambling establishments c) Encourage more world cuisine eateries, in addition to traditional ones. d) More street art installations eg old Banksy wall as a nautical/ seascape backdrop to the anchor in situ-or even treat this site akin to Trafalgar Square's 4th plinth. This would create a continual cycle of interest from the art community. e) In time...the high street going down to the port, to transform into a 'La Rambla' type tourist destination. To include Bench Street, and surrounds, being regenerated simultaneously. f) Collaboration with the Premier Inn and the freeholder of the Gateway Flats & garages etc - in order to refurbish the currently shabby elevations facing the town centre. g) Collaboration with the stores in St James retail park which back onto the A20/ sea face, to reinvigorate the aesthetic appeal here and complement the regeneration of the town centre. h) Use of scenic printed hoarding panels to disguise dilapidated buildings etc pending renovations. i) Encourage the perception first, which will then transform into a reality that Dover is a destination of choice, rather than a mere place for transit. <p>This will demand a holistic tourism strategy. Dover could certainly be marketed in terms of its unique heritage. It has one of the most iconic natural landforms in the whole of the UK - The white cliffs. The panoramic vistas from the coastal cliffs are unrivalled. The visitor is able to easily ascend the cliffs to take in the unrivalled panorama that is soon to be designated as a world Heritage site - the Dover Straits. Dover also contains not only one of the most spectacular, beautiful and historic castles in Europe, but it also contains the oldest building structure in England- the Roman lighthouse. A tourist strategy could easily be constructed around the huge Roman remains in the Town. The Roman house, somewhat tired, contains historic treasures.</p> <p>One could obviously then develop a whole complimentary strategy around the role Dover played in the defence of Britain. From Napoleon, to the central role in Dunkirk and ultimately being the frontline of Britain.</p> <p>Alternative tour interests could easily be developed. Dover's almost unique cliff top chalkland habitat would attract an array of nature enthusiasts. There are several rare species of flora and fauna found in this area - including many orchids and associated plants. There is the river Dour one of the rare chalk streams in the world.</p> <p>The historic Saxon-Shore way walk to the unique St Margaret's Bay. In addition to breathtaking views, this will take visitors past one of the largest colonies of Skylarks in the South East, Peregrine falcons, Red-billed Choughs, past the lighthouse -the first in the world to be powered by electricity etc, descend the subterranean tunnels to the unique Fan-Bay shelter, stopping off for brief refreshment at Britains closest pub to France. Children and adults can then indulge in rock pooling in the stunning bay which was home to both Noel Coward and the Ian Fleming.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Item SP8- Dover Town Centre.</p> <p>Additional suggestions:</p> <ul style="list-style-type: none"> a) Greening the main high street via avenue of ornamental trees. b) Less licensing of gambling establishments c) Encourage more world cuisine eateries, in addition to traditional ones. d) More street art installations eg old Banksy wall as a nautical/ seascape backdrop to the anchor in situ-or even treat this site akin to Trafalgar Square's 4th plinth. This would create a continual cycle of interest from the art community. e) In time...the high street going down to the port, to transform into a 'La Rambla' type tourist destination. To include Bench Street, and surrounds, being regenerated simultaneously. f) Collaboration with the Premier Inn and the freeholder of the Gateway Flats & garages etc - in order to refurbish the currently shabby elevations facing the town centre.

	<p>g) Collaboration with the stores in St James retail park which back onto the A20/ sea face, to reinvigorate the aesthetic appeal here and complement the regeneration of the town centre.</p> <p>h) Use of scenic printed hoarding panels to disguise dilapidated buildings etc pending renovations.</p> <p>l) Encourage the perception first, which will then transform into a reality that Dover is a destination of choice, rather than a mere place for transit. This will demand a holistic tourism strategy. Dover could certainly be marketed in terms of its unique heritage. It has one of the most iconic natural landforms in the whole of the UK - The white cliffs. The panoramic vistas from the coastal cliffs are unrivalled. The visitor is able to easily ascend the cliffs to take in the unrivalled panorama that is soon to be designated as a world Heritage site - the Dover Straits. Dover also contains not only one of the most spectacular, beautiful and historic castles in Europe, but it also contains the oldest building structure in England- the Roman lighthouse. A tourist strategy could easily be constructed around the huge Roman remains in the Town. The Roman house, somewhat tired, contains historic treasures.</p> <p>One could obviously then develop a whole complimentary strategy around the role Dover played in the defence of Britain. From Napoleon, to the central role in Dunkirk and ultimately being the frontline of Britain.</p> <p>Alternative tour interests could easily be developed. Dover's almost unique cliff top chalkland habitat would attract an array of nature enthusiasts. There are several rare species of flora and fauna found in this area - including many orchids and associated plants. There is the river Dour one of the rare chalk streams in the world.</p> <p>The historic Saxon-Shore way walk to the unique St Margaret's Bay. In addition to breathtaking views, this will take visitors past one of the largest colonies of Skylarks in the South East, Peregrine falcons, Red-billed Choughs, past the lighthouse -the first in the world to be powered by electricity etc, descend the subterranean tunnels to the unique Fan-Bay shelter, stopping off for brief refreshment at Britains closest pub to France. Children and adults can then indulge in rock pooling in the stunning bay which was home to both Noel Coward and the Ian Fleming.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	PM1 - Achieving High Quality Design, Place Making and the provision of Design Codes
Rep ID	SDLP661
Rep Status	Processed
Consultee ID	1331795
Consultee Full Name	Mrs Talina Wells
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM1
2 - Do you consider this part of the Plan sound?	No

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Dark Skies and light pollution: This is an important environmental feature which has scarcely been mentioned.</p> <p>I am fortunate to live in St Margarets Bay- at present a naturally dark sky area. Not only is it enclosed by the white cliffs, there is a total absence in the Bay and it's surrounds of any artificial street lighting.</p> <p>However, without protection from this document, I fear this will be under threat.</p> <p>The absence of any planning policy protection is very troubling, as this document will provide the planning policy context for the next 20+ years.</p> <p>If this matter is not specifically mentioned at this stage, developers and individuals will proceed with inappropriate lighting installations which will ruin the environment forever.</p> <p>Surely something can be done at this stage to introduce some protection for our dark skies.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>Dark Skies and light pollution: This is an important environmental feature which has scarcely been mentioned.</p> <p>I am fortunate to live in St Margarets Bay- at present a naturally dark sky area. Not only is it enclosed by the white cliffs, there is a total absence in the Bay and it's surrounds of any artificial street lighting.</p> <p>However, without protection from this document, I fear this will be under threat.</p> <p>The absence of any planning policy protection is very troubling, as this document will provide the planning policy context for the next 20+ years.</p> <p>If this matter is not specifically mentioned at this stage, developers and individuals will proceed with inappropriate lighting installations which will ruin the environment forever.</p> <p>Surely something can be done at this stage to introduce some protection for our dark skies.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	PM1 - Achieving High Quality Design, Place Making and the provision of Design Codes
Rep ID	SDLP1027
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	

Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM1
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p><u>Highways and Transportation</u>: The policy reference to prioritising sustainable transport choices is noted, although this should specify high quality pedestrian and cycle infrastructure to the LTN 1/20 standard.</p> <p><u>PRoW</u>: Reference to Active Travel, the PROW network and ROWIP must be included within this policy.</p> <p><u>Development Investment</u>: The County Council supports the objective of promoting quality design in the built environment.</p> <p><u>Heritage Conservation</u>: The County Council was pleased to see the historic environment highlighted in paragraph 1a of this policy.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Suggested amendments relating to sustainable transport and standards and Active travel and ROWIP
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	PM1 - Achieving High Quality Design, Place Making and the provision of Design Codes
Rep ID	SDLP1276
Rep Status	Processed
Consultee ID	1271353
Consultee Full Name	Church Commissioners
Consultee Company / Organisation	
Agent Full Name	Mr

	Andrew Watson
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Text Extracted from Document sent from Savills on Behalf of the Church Commissioners. Representation has been split across relevant areas of the Local Plan. Full attachment and introduction to Policy comments can be found under reference SDLP1265 for Shepherdswell Site and SDLP1266 for Eastry Site.) Policy PM1 – Achieving High Quality Design, Place Making and the Provision of Design Codes – COMMENTS Policy PM1 focuses on design and states 'Development which is not well designed will not be supported. Where relevant and appropriate, new development must...' accord with a list of design criteria. This policy is not effective, nor is it justified. There is no information available to demonstrate what development would be 'relevant' or 'appropriate'. As such, there is scope for the policy to be interpreted inconsistently and leaves it open to challenge. Therefore, we request that the Council should clarify the parameters of these terms in the plan. Criteria b further states that new development must 'be well designed paying particular attention to scale, massing, rhythm, layout and use of materials appropriate to the locality'. In our view the reference to 'rhythm' should be removed from the policy as it is overly subjective and is not effective. We consider that the other considerations within the policy are capable of ensuring high quality design. Recommendation: DDC should provide further clarification on what is meant by 'relevant and appropriate' and remove any reference to 'rhythm'.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	PM1 - Achieving High Quality Design, Place Making and the provision of Design Codes

Rep ID	SDLP1234
Rep Status	Processed
Consultee ID	1271189
Consultee Full Name	Halsbury Homes
Consultee Company / Organisation	
Agent Full Name	Sean Bashforth
Agent Company / Organisation	Quod
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Policies PM1 (High Quality Design, Placing making and the provision of design codes), PM2 (Quality of Residential Development), PM3 (Providing Open Space), PM4 (Sports Provision) and H1 (Type and Mix of Housing) include prescriptive requirements for major housing developments.</p> <p>As a general principle, it is not evident that the Council has undertaken a review of the impact of such policies (which include minimum internal residential space standards and open space standards) on the deliverability and viability of housing alongside other requirements including affordable housing.</p> <p>In the context of existing policy and delivery of housing at WUE there also needs to be appropriate caveats in relation to how these policies are applied to Whitfield. For instance, Policy H1 (Type and Mix of Housing) requires proposals for 10 or more dwellings to demonstrate how the mix of tenure, type and size of housing reflects the Council's latest evidence on housing need and market demand. For WUE this and other policies need to cross refer to the adopted SPD and also take into account what has already been delivered and the pipeline of future development at Whitfield rather than apply district wide requirements.</p> <p>(DDC Note - Text Extracted from Document sent from Quod. Representation has been split across relevant areas of the Local Plan. Full attachment can be found under reference SDLP1232.)</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will	

make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	PM1 - Achieving High Quality Design, Place Making and the provision of Design Codes
Rep ID	SDLP1465
Rep Status	Processed
Consultee ID	1330919
Consultee Full Name	Mrs Heather Twizell
Consultee Company / Organisation	Natural England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM1
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	PM1 – Achieving High Quality Design, Place Making and the provision of Design Codes We welcome the inclusion of this policy setting design standards for high quality placemaking. We are particularly supportive of the following requirements: Movement (3) 'a' and 'c', Nature (4) all points 'a' to 'e', Public Spaces (5) 'a' to 'd'. We are also pleased to see the more general requirement for relevant development to demonstrate how it has responded positively to the Kent Downs AONB Landscape Design Handbook
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	PM1 - Achieving High Quality Design, Place Making and the provision of Design Codes
Rep ID	SDLP1109
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The statements here are sound. Experience indicates that only a bias in favour of public transparency, full consultation with the public and community organisations, and more effective democratic accountability will ensure that powerful, influential, high-profit developers do not cause the statements to be circumvented. A fifth of Tory party donations from property sector News Housing Today The vast majority of the electorate want cleaner, less lobby-laden government.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s)	

you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	PM1 - Achieving High Quality Design, Place Making and the provision of Design Codes
Rep ID	SDLP1406
Rep Status	Processed
Consultee ID	1333152
Consultee Full Name	Mr P & Mrs S Laffin & Rubix Estates Ltd
Consultee Company / Organisation	
Agent Full Name	Mr Reece Lemon
Agent Company / Organisation	Lee Evans Partnership
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM1
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Representation submitted by Lee Evans On behalf of Mr and Mrs Laffin and Rubix Estates. Full Representation attached to SDLP1387. This document has been split across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1387.) POLICY PM1 – Achieving High Quality Design, Place Making and the provision of Design Codes

	<p>3.25 PM1 deals with high quality design for which the Promoter and Landowners are very supportive of. Its contents are not repeated here, though it is noted that the policy wording includes for a large number of criteria across seven topic areas spanning context, built form, and movement, among others.</p> <p>3.26 The Promoter and Landowners commit to delivering a lasting legacy for this Site with high quality design. There are already references to the aspirations of the Plan to achieve high quality design, place making and the provision of Design Codes elsewhere in the Plan's Vision and Strategic Objectives. As drafted, a number of PM1's criteria add little else to this information, and the granular level of detail alluded to might otherwise be best sought in Design Codes applied to specific areas, as also referenced in PM1 itself.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	PM1 - Achieving High Quality Design, Place Making and the provision of Design Codes
<p>Rep ID</p>	SDLP1434
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1333264
<p>Consultee Full Name</p>	National Grid (Avison Young)
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	PM1
<p>2 - Do you consider this part of the Plan sound?</p>	No
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	Consistent with National Policy
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	Not Applicable

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Utilities Design Guidance</p> <p>The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by National Grid infrastructure.</p> <p>National Grid advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines, underground gas transmission pipelines, and other National Grid assets.</p> <p>Therefore, to ensure that Design Policy PM1 is consistent with national policy we would request the inclusion of a policy strand such as:</p> <p><i>“x. taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites.”</i></p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>Therefore, to ensure that Design Policy PM1 is consistent with national policy we would request the inclusion of a policy strand such as:</p> <p><i>“x. taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites.”</i></p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	PM1 - Achieving High Quality Design, Place Making and the provision of Design Codes
Rep ID	SDLP1676
Rep Status	Processed
Consultee ID	1331787
Consultee Full Name	Mr SMBCA SMBCA
Consultee Company / Organisation	St Margarets Bay Conservation Association
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM1

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	New section Required on LIGHT POLLUTION. DDC Local Plan- Regulation 19 Consultation.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	PM1 - Achieving High Quality Design, Place Making and the provision of Design Codes
Rep ID	SDLP1361
Rep Status	Processed
Consultee ID	1333128
Consultee Full Name	David Powell
Consultee Company / Organisation	
Agent Full Name	Klaire Lander
Agent Company / Organisation	Lander Planning

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM1
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Lander Planning sent a PDF document which has been split across the relevant sections of the Plan. See Original Attachment on SDLP1346) Achieving high quality design, place making and the provision of design codes is consistent with national policy and this policy is 'effective' and 'justified' and therefore supported.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	PM1 - Achieving High Quality Design, Place Making and the provision of Design Codes
Rep ID	SDLP1419
Rep Status	Processed
Consultee ID	1333243
Consultee Full Name	Mr and Mrs Tobin
Consultee Company / Organisation	
Agent Full Name	Mr Reece Lemon

Agent Company / Organisation	Lee Evans Partnership
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Representation submitted by Lee Evans On behalf of Mr and Mrs Tobin. Full Representation attached to SDLP1411. This document has been split across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1411.) POLICY PM1 – Achieving High Quality Design, Place Making and the provision of Design Codes 3.36 PM1 deals with high quality design. Its contents are not repeated here, though it is noted that the policy wording includes for a large number of criteria across seven topic areas spanning context, built form, and movement, among others. Many of these criteria are referenced throughout the Plan, and are otherwise subject to site-specific opportunities and constraints. 3.37 As drafted, PM1 appears highly prescriptive and as a checklist for developers – this runs the risk of stifling the design aspirations of applicants and, potentially, could lead to a situation in which a homogeneity of design emerges over the plan period to satisfy what could be read as a 'tick box' exercise. This interpretation of the policy would clearly be at odds with its objectives in securing high quality design. 3.38 In this regard, it is recommended that PM1 be amended to condense the volume of criteria applied. It is suggested that such amendment could be picked up as a Main Modification in due course.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	

Include files	
Local Plan Consultation Point	PM1 - Achieving High Quality Design, Place Making and the provision of Design Codes
Rep ID	SDLP1513
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<i>DDC Note The text below is an extract from the original representation which is attached to SDLP1438.</i> PM 1 – 4 and 6 The statements here are sound. Experience indicates that only a bias in favour of public transparency, full consultation with the public and community organizations, and more effective democratic accountability will ensure that powerful, influential, high-profit developers do not cause the statements to be circumvented
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	PM1 - Achieving High Quality Design, Place Making and the provision of Design Codes
Rep ID	SDLP1650
Rep Status	Processed
Consultee ID	1333382
Consultee Full Name	Mr Colin and Linda Tearle
Consultee Company / Organisation	
Agent Full Name	Gurdev Moore
Agent Company / Organisation	Rubix Estates
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Representation submitted by Rubix Estates. Full Representation attached to SDLP1624. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1624.) POLICY PM1 – Achieving High Quality Design, Place Making and the provision of Design Codes 3.30 PM1 deals with high quality design. Its contents are not repeated here, though it is noted that the policy wording includes for a large number of criteria across seven topic areas spanning context, built form, and movement, among others. 3.31 This is useful in guiding development, though care must be taken to ensure that this volume of criteria is not unduly onerous in the planning application process. There are already references to the aspirations of the Plan to achieve high quality design, place making and the provision of Design Codes elsewhere in the Plan's Vision and Strategic Objectives. As drafted, a number of PM1's criteria add little else to this information, and the granular level of detail alluded to might otherwise be best sought in Design Codes applied to specific

	<p>areas, as also referenced in PM1 itself.</p> <p>3.32 To ensure the effectiveness of the Plan – by way of its effective implementation in the application process - consideration should be given to a reduction in the volume of criteria attached to PM1, which is otherwise addressed in the overarching Vision and Objectives as drafted.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
Include files	
Local Plan Consultation Point	PM1 - Achieving High Quality Design, Place Making and the provision of Design Codes
Rep ID	SDLP1718
Rep Status	Processed
Consultee ID	1333477
Consultee Full Name	Cllr T Byfield
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	PM1
<p>2 - Do you consider this part of the Plan sound?</p>	No
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	Positively prepared Justified Effective Consistent with National Policy

4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438.</p> <p>Dover District plan report on Development management</p> <p><i>I have been tasked with reviewing the Dover local plan in respect of design and development. This is a very large document, so I have tried to break it down into manageable portions.</i></p> <p><i>The Dover plan does acknowledge that there are constant improvements in design and the plan will need to evolve and to consider new technology, improvements in materials and methods of construction.</i></p> <p><i>I have therefore taken the policies which are attached at the end of this document and extracted sections which I think will be of interest the town council and where I believe comment is due.</i></p> <p><i>I believe that the planning committee needs to be aware of these points extracted. My comments in italics</i></p> <p>PM1 – Achieving High Quality Design, Place Making and provision of Design Codes</p> <p>Demonstrate an understanding and awareness of the context of the area (including historical character), appreciate existing built form and respond positively to it. <i>It is unclear how this will be demonstrated; planning applications will need to be expanded so that the committee has sufficient information when considering the application.</i></p> <p>Ensure that new streets are tree-lined and that opportunities are taken to incorporate trees elsewhere in the development in line with Policy CC8. <i>This looks like a planning consideration which we will need to be considered if looking at this type of development.</i></p> <p>Provide high quality multi-functional green open spaces with a variety of landscapes and activities, including play, that also deliver enhanced biodiversity and flood mitigation. <i>Up to now this appears to have been ignored by DDC planning particularly flooding, WTC needs to be aware.</i></p> <p>Ensure that existing features, including trees, natural habitats, boundary treatments and historic street furniture, that positively contribute to the quality and character of an area, are retained, enhanced, and protected. <i>Up to now this appears to have been ignored by DDC planning WTC needs to be aware</i></p> <p>Make appropriate provision for service areas, refuse storage (including waste and recycling bins), and collection areas in accordance with the nature of the development. Such areas and access to them should be appropriately sited and designed to ensure they can:</p> <ol style="list-style-type: none"> i. Perform their role effectively without prejudicing or being prejudiced by other functions and users. ii. Maintain an attractive and coherent street scene and protect visual amenity; and iii. Avoid creating risk to human health or an environmental nuisance. <i>This looks like a planning consideration which we will need to be considered, if looking at this type of development.</i> iv. Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste. This should include ensuring that there is appropriate consideration for residents to be able to segregate their waste to allow for recycling opportunities, including those who live in apartments. <i>This looks like a planning consideration which we will need to be considered if looking at this type of development.</i> v. Ensure that the siting, layout and design of vehicle and cycle parking (including detached garage blocks) is sensitively integrated into the development so as not to dominate the landscape, maintains an attractive and coherent street scene, does not prejudice the wider functionality of public and private space, and creates an effective functional link and relationship with the buildings and areas they serve. To achieve this a range of parking solutions are likely to be required to avoid the dominance of frontage parking. <i>I do not believe that parking in front of the properties is subject to planning at present, this is a national issue so I am unclear as to how this will proceed. This looks like a planning consideration which we will need to be considered if looking at this type of development.</i> <p>Development proposals must provide evidence, through their design and access statements, to demonstrate how they have responded positively to the design policies in the Local Plan and associated guidance, including national and local design guidance, local Design Codes and the National Model Design Code, relevant Neighbourhood Plans, Village Design Statements, Conservation Area Appraisals, site specific development briefs, the Kent Design Guide, Secured by Design Guidance and where appropriate the Kent Downs AONB Landscape Design Handbook. <i>The planning committee will need access to the Kent Design</i></p>

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	SDLP1718 Walmer TC - Att1_Redacted.pdf
Local Plan Consultation Point	PM1 - Achieving High Quality Design, Place Making and the provision of Design Codes
Rep ID	SDLP1894
Rep Status	Processed
Consultee ID	1333840
Consultee Full Name	Jon Alldis
Consultee Company / Organisation	Barrat David Wilson Homes
Agent Full Name	Emily Harris
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>(DDC Note - Full Representation attached to SDLP1883. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1883.)</p> <p>Draft Policy PM1 – Achieving High Quality Design placemaking and provision of Design Codes.- COMMENT BDW is generally supportive of the overarching vision set out within Chapter 4 of the Draft Local Plan. They support DDC's ambition to make Dover District a: "place of aspiration, providing outstanding opportunities for sustainable living". The determination to create places that are well-design and well-built is also supported and should be the basis of new development proposals coming forward in the District. BDW maintain a firm commitment that their development at the Land North of Sandwich Road will be a high quality, landscape-led development that provides a healthy and sustainable environment for future residents. Concern is raised regarding the reference to local design codes. Whilst the notion behind a local design code is supported to ensure that development is seamlessly integrated into the existing built form, it should be noted that design code can also be overly restrictive. This can result in a loss of architectural freedom resulting monotonous design if there is not enough flexibility. It can also negatively affect the viability of a scheme. As such, any design codes should allow for flexibility. It is noted that the Draft Design Policies do not include reference to design codes and instead reference a Local Design Guide which is considered more appropriate. Recommendation: Design codes are not taken forward and instead a Local Design Guide is produced which is used to inform development proposals but not restrict them.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	

PM2 - Quality of Residential Accommodation

Local Plan Consultation Point	PM2 - Quality of Residential Accommodation
Rep ID	SDLP294
Rep Status	Processed
Consultee ID	1331382
Consultee Full Name	Mr The Dover Society Graham Margery
Consultee Company / Organisation	The Dover Society
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Can't comment on legal compliance
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	para 6.22 Whilst commending the requirement with regard to new dwellings we would also urge the inclusion of change of use (COU) conversions to residential use to remedy the problem of some low quality and inadequate space conversions currently.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	PM2 - Quality of Residential Accommodation
Rep ID	SDLP719
Rep Status	Processed
Consultee ID	1331831
Consultee Full Name	Catesby Estates
Consultee Company / Organisation	Catesby Estates
Agent Full Name	Lucy Wilford
Agent Company / Organisation	DHA Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Development Management Policies , Place Making - Policy PM2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	See attached supporting statement Text below (copied from attached statement) added by DD Policy PM2- Quality of Residential Accommodation <i>4.3.1 No objection is raised in principle to the aims of the Policy. However, it not considered reasonable that all developments over 19 dwellings are required to meet M4(2) standards. Houses themselves can generally easily satisfy M4(2) requirements. However, the Building Regulation requirements extend far beyond the home, including impacting the size of parking spaces, the camber of the driveway, pavements and the general approach to the property. Even on the flattest of sites, 100% compliance can still be challenging to achieve and results in additional space implications, once allowing for enlarged parking spaces, which can impact development efficiencies.</i> <i>4.3.2 The PPG3 is explicate in stating that "Local Plan policies should also take into account site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access cannot be achieved or is not viable".</i>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance	See attached supporting statement Text below (copied from attached statement) added by DD 4.3.3 To ensure the Policy is "Consistent with National Planning Policy" and is therefore "Sound", part dil) of Policy PM2 must be amended as follows:

with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	ii On schemes of 20 or more dwellings, the Council will require 5% of the development to be built in compliance with building regulation M4(3)(wheelchair accessible homes);with The remaining development is to be built in compliance with building regulation part M4(2): optimise compliance with building regulation Part M4(2) taking into account site specific factors.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	In order to ensure that our case is properly put forward and understood, and to provide the opportunity to respond to any questions/points raised by the Council and Local Plan Inspector which might result outside the written representations made and following discussion at the EIP.
Include files	Catesby Final Dover District Council Reps .pdf (5)
Local Plan Consultation Point	PM2 - Quality of Residential Accommodation
Rep ID	SDLP769
Rep Status	Processed
Consultee ID	1331834
Consultee Full Name	Kitewood
Consultee Company / Organisation	Kitewood
Agent Full Name	Lucy Wilford
Agent Company / Organisation	DHA Planning
1 - Which Part of the Local Plan does this comment relate to?Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Development Control Policies, Placemaking, Policy PM2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Please see the attached supporting statement Text below (copied from attached statement) added by DDC Policy PM2- Quality of Residential Accommodation 4.3.1 No objection is raised i principle to the aims of the Policy. However, it not considered reasonable that all developments over 19 dwellings are required to meet M4(2) standards. Houses themselves can generally easily satisfy M4(2) requirements. However, the Building Regulation requirements extend far beyond the home, including impacting the size of parking spaces, the camber of the driveway, pavements and the general approach to the property. Even on the flattest of sites, 100% compliance can still be

	<p>challenging to achieve and results in additional space implications, once allowing for enlarged parking spaces, which can impact development efficiencies.</p> <p>4.3.2 The PPG1 is explicate in stating that “Local Plan policies should also take into account site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access cannot be achieved or is not viable”.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Please see the attached supporting statement</p> <p>Text below (copied from attached statement) added by DDC</p> <p>4.3.3 To ensure the Policy is “Consistent with National Planning Policy” and is therefore “Sound”, part dil) of Policy PM2 must be amended as follows:</p> <p>ii On schemes of 20 or more dwellings, the Council will require 5% of the development to be built in compliance with building regulation M4(3)(wheelchair accessible homes);with The remaining development is to be built in compliance with building regulation part M4(2)- optimise compliance with building regulation Part M4(2) taking into account site specific factors.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>In order to ensure that our case is properly put forward and understood, and to provide the opportunity to respond to any questions/points raised by the Council and Local Plan Inspector which might result outside the written representations made and following discussion at the EIP.</p>
<p>Include files</p>	<p>Kitewood Estates Limited Reg19 Dover Local Plan Reprs.pdf (3)</p>
<p>Local Plan Consultation Point</p>	<p>PM2 - Quality of Residential Accommodation</p>
<p>Rep ID</p>	<p>SDLP1028</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331999</p>
<p>Consultee Full Name</p>	<p>Claire Pamberi</p>
<p>Consultee Company / Organisation</p>	<p>Kent County Council</p>
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>PM2</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is ‘unsound’, on which grounds do you consider this to be? (select all that apply)</p>	<p>Consistent with National Policy</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Not Applicable</p>

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The County Council welcomes the commitment set out in PM2 and at section 6.9 which will enable people to remain in their homes and live independently throughout their lives as set out below.</p> <p>The Department for Levelling Up, Housing and Communities identified in June 2019 guidance <i>Housing for older and disabled people</i>, that the need to provide housing for older & disabled people is critical. Accessible and adaptable housing enables people to live more independently and safely, providing safe and convenient homes with suitable circulation space, bathrooms, and kitchens. Kent Adult Social Care requests these dwellings are built to Building Reg Part M4(2) standard (as a minimum) to ensure that they remain accessible throughout the lifetime of the occupants, meeting any changes in the occupant's requirements.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Kent Adult Social Care requests these dwellings are built to Building Reg Part M4(2) standard (as a minimum) to ensure that they remain accessible throughout the lifetime of the occupants, meeting any changes in the occupant's requirements.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	PM2 - Quality of Residential Accommodation
Rep ID	SDLP785
Rep Status	Processed
Consultee ID	1331880
Consultee Full Name	Natasha Styles
Consultee Company / Organisation	McCarthy Stone
Agent Full Name	Natasha Styles
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM2 - Quality of Residential Accommodation
2 - Do you consider this part of the Plan sound?	No

<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Justified Effective Consistent with National Policy</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Not Applicable</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Not Applicable</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p><u>PM2 - Quality of Residential Accommodation</u></p> <p>Policy PM2 d i and ii requires that 'On schemes of up to 19 dwellings, the Council will expect all new build development to be built in compliance with building regulation part M4(2)' and 'ii On schemes of 20 or more dwellings, the Council will require 5% of the development to be built in compliance with building regulation M4(3)(wheelchair accessible homes), with the remaining development to be built in compliance with building regulation part M4(2)'.</p> <p>The council should initially recognise that the proposed changes in building regulations will require all homes to be built to part M4(2) of the Building Regulations. This will remove the need to reference this in the local plan and should be removed.</p> <p>Whilst we acknowledge that PPG <i>Paragraph 003 Reference ID: 63-003-20190626</i> recognises that "the health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support", the council should note that ensuring that residents have the ability to stay in their homes for longer is not, in itself, an appropriate manner of meeting the housing needs of older people.</p> <p>Adaptable houses do not provide the on-site support, care and companionship of specialist older persons' housing developments nor do they provide the wider community benefits such as releasing under occupied family housing as well as savings to the public purse by reducing the stress of health and social care budgets. The recently published Healthier and Happier Report by WPI Strategy (September 2019) calculated that the average person living in specialist housing for older people saves the NHS and social services £3,490 per year. A supportive local planning policy framework will be crucial in increasing the delivery of specialist older persons' housing and it should be acknowledged that although adaptable housing can assist it does not remove the need for specific older person's housing. Housing particularly built to M4(3) standard may serve to institutionalise an older persons scheme reducing independence contrary to the ethos of older persons and particularly extra care housing and this should be recognised within the plan.</p> <p>We would also like to remind the council of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF and that the PPG states that "The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan" (Paragraph: 002 Reference ID: 10-002-20190509). M4 2 and 3 Housing has a cost implication and may serve to reduce the number of apartments that can be provided further reducing viability.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>To be effective and consistent with national policy the following amendments should be made to the plan:</p> <p>Delete Policy PM2 d i and ii</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note</p>	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	PM2 - Quality of Residential Accommodation
Rep ID	SDLP1235
Rep Status	Processed
Consultee ID	1271189
Consultee Full Name	Halsbury Homes
Consultee Company / Organisation	
Agent Full Name	Sean Bashforth
Agent Company / Organisation	Quod
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Policies PM1 (High Quality Design, Placing making and the provision of design codes), PM2 (Quality of Residential Development), PM3 (Providing Open Space), PM4 (Sports Provision) and H1 (Type and Mix of Housing) include prescriptive requirements for major housing developments.</p> <p>As a general principle, it is not evident that the Council has undertaken a review of the impact of such policies (which include minimum internal residential space standards and open space standards) on the deliverability and viability of housing alongside other requirements including affordable housing. In the context of existing policy and delivery of housing at WUE there also needs to be appropriate caveats in relation to how these policies are applied to Whitfield. For instance, Policy H1 (Type and Mix of Housing) requires proposals for 10 or more dwellings to demonstrate how the mix of tenure, type and size of housing reflects the Council's latest evidence on housing need and market demand. For WUE this and other policies need to cross refer to the adopted SPD and also take into account what has already been delivered and the pipeline of future development at Whitfield rather than apply district wide requirements.</p> <p>(DDC Note - Text Extracted from Document sent from Quod. Representation has been split across relevant areas of the Local Plan. Full attachment can be found under reference SDLP1232.)</p>

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	PM2 - Quality of Residential Accommodation
Rep ID	SDLP1219
Rep Status	Processed
Consultee ID	1332924
Consultee Full Name	Amy Aldridge
Consultee Company / Organisation	Gladman Developments Ltd
Agent Full Name	Amy Aldridge
Agent Company / Organisation	Gladman Developments Ltd
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM2
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	Policy PM2 seeks for all residential development to meet the government's latest Nationally Described Space Standards in respect to internal accommodation. The Council should only apply the optional NDSS to all dwellings in accordance with paragraph 130f and footnote 49 of the NPPF. Footnote 29 confirms: '49. Planning policies for housing should make use of the Government's optional technical standards for accessible

<p>possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>and adaptable housing where this would address an identified need for such properties. Policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified.' Further, with regard to NDSS, the PPG confirms: 'Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space standards.' If this optional standard is to become planning policy, the Council must ensure it is justified by meeting the criteria set out in national policy, including need, viability and impact on affordability, Under section d, part ii, the Council require 5% of developments over 20 dwellings to be built in compliance with building regulation M4(3) and the remaining dwellings to be built in compliance with building regulations part M4(2). Again, Gladman support the principle of the policy requirement, but it must be clear that the requirement has been fully evidence on an assessment of need and viability. The current evidence is provided in the Strategic Housing Market Assessment- Partial Update (2019) at paragraph 6.20 and the Council must ensure this remains up to date. To support the delivery of housing, Gladman also consider that the policy wording should include a mechanism to account for site specific circumstances.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	PM2 - Quality of Residential Accommodation
<p>Rep ID</p>	SDLP1362
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1333128
<p>Consultee Full Name</p>	David Powell
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	Klaire Lander
<p>Agent Company / Organisation</p>	Lander Planning
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	PM2
<p>2 - Do you consider this part of the Plan sound?</p>	Yes

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Lander Planning sent a PDF document which has been split across the relevant sections of the Plan. See Original Attachment on SDLP1346) Ensuring new development respects the amenities of neighbouring properties and has acceptable living conditions is consistent with national policy and this policy is 'effective' and 'justified' and therefore supported.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	PM2 - Quality of Residential Accommodation
Rep ID	SDLP1110
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The statements here are sound. Experience indicates that only a bias in favour of public transparency, full consultation with the public and community organisations, and more effective democratic accountability will ensure that powerful, influential, high-profit developers do not cause the statements to be circumvented. A fifth of Tory party donations from property sector News Housing Today The vast majority of the electorate want cleaner, less lobby-laden government.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	PM2 - Quality of Residential Accommodation
Rep ID	SDLP1514
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<i>DDC Note The text below is an extract from the original representation which is attached to SDLP1438.</i> PM 1 – 4 and 6 The statements here are sound. Experience indicates that only a bias in favour of public transparency, full consultation with the public and community organizations, and more effective democratic accountability will ensure that powerful, influential, high-profit developers do not cause the statements to be circumvented
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	PM2 - Quality of Residential Accommodation
Rep ID	SDLP1407
Rep Status	Processed
Consultee ID	1333152
Consultee Full Name	Mr P & Mrs S Laflin & Rubix Estates Ltd

Consultee Company / Organisation	
Agent Full Name	Mr Reece Lemon
Agent Company / Organisation	Lee Evans Partnership
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM2
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Representation submitted by Lee Evans On behalf of Mr and Mrs Lafin and Rubix Estates. Full Representation attached to SDLP1387. This document has been split across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1387.) POLICY PM2 – Quality of Residential Accommodation 3.27 PM2 refines the aspirations of the Plan to reflect the quality of proposed residential development. It outlines the base criteria required in demonstrating how residents can expect to achieve a good quality of living, with regard to space standards, accessibility, and amenity space. 3.28 The intention of this policy is supported in full in realising the Vision and Strategic Objectives set out elsewhere in the Plan. 3.29 The Promoter and Landowners will be promoting high quality design and will endeavour to meet the aspirations of the policy.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	PM2 - Quality of Residential Accommodation
Rep ID	SDLP1420

Rep Status	Processed
Consultee ID	1333243
Consultee Full Name	Mr and Mrs Tobin
Consultee Company / Organisation	
Agent Full Name	Mr Reece Lemon
Agent Company / Organisation	Lee Evans Partnership
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Representation submitted by Lee Evans On behalf of Mr and Mrs Tobin. Full Representation attached to SDLP1411. This document has been split across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1411.)</p> <p>PM2 details the aspirations of the Plan to reflect the quality of proposed residential development and identifies the criteria required in demonstrating how residents can expect to achieve a good quality of living, with regard to space standards, accessibility, and amenity space for new development.</p> <p>3.40 For development of 19 dwellings or less, all new development is expected to incorporate dwellings compliant with Building Regulation Part M4(2), as drafted at draft criterion (d)(i).</p> <p>3.41 It should be recognised that not all sites will be capable of achieving such on every occasion, sometimes owing to site-specific circumstances. The aspiration and expectation of this policy is nonetheless supported, though it is suggested that to best support the implementation of this policy amendment is undertaken as follows [amendments in bold text]:</p> <p>D (i) On schemes of up to 19 dwellings, the Council will expect all new build development to be built in compliance with building regulation part M4(2) where reasonably possible;</p> <p>ii On schemes of 20 or more dwellings, the Council will require where reasonably possible 5% of the development to be built in compliance with building regulation M4(3)(wheelchair accessible homes), with the remaining development to be built in compliance with building regulation part M4(2).</p> <p>3.42 Subject to the above amendment as proposed, we consider the policy to be sound.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant	

and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	PM2 - Quality of Residential Accommodation
Rep ID	SDLP1719
Rep Status	Processed
Consultee ID	1333477
Consultee Full Name	Cllr T Byfield
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	DDC Note: The text below is an extract from the original representation which is attached to SDLP1438. Dover District plan report on Development management <i>I have been tasked with reviewing the Dover local plan in respect of design and development. This is a very large document, so I have tried to break it down into manageable portions.</i>

<p>possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p><i>The Dover plan does acknowledge that there are constant improvements in design and the plan will need to evolve and to consider new technology, improvements in materials and methods of construction.</i></p> <p><i>I have therefore taken the policies which are attached at the end of this document and extracted sections which I think will be of interest the town council and where I believe comment is due.</i></p> <p><i>I believe that the planning committee needs to be aware of these points extracted. My comments in italics</i></p> <p>All new residential development, including conversions, must:</p> <p>a) Be compatible with neighbouring buildings and spaces and not lead to unacceptable living conditions for neighbouring properties through overlooking, noise or vibration, odour, light pollution, overshadowing, loss of natural light or sense of enclosure; <i>overlooking, noise or vibration, odour, light pollution, overshadowing, loss of natural light or sense of enclosure all need to be aware on the planning committee.</i></p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	PM2 - Quality of Residential Accommodation
<p>Rep ID</p>	SDLP1652
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1333382
<p>Consultee Full Name</p>	Mr Colin and Linda Tearle
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	Gurdev Moore
<p>Agent Company / Organisation</p>	Rubix Estates
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	PM2

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Representation submitted by Rubix Estates. Full Representation attached to SDLP1624. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1624.)</p> <p>POLICY PM2 – Quality of Residential Accommodation</p> <p>3.33 PM2 refines the aspirations of the Plan to reflect the quality of proposed residential development. It outlines the base criteria required in demonstrating how residents can expect to achieve a good quality of living, with regard to space standards, accessibility, and amenity space.</p> <p>3.34 The intention of this policy is supported in full in realising the Vision and Strategic Objectives set out elsewhere in the Plan.</p> <p>3.35 That said, there is refinement required in the policy wording. In particular, there should be greater recognition of the possibility that not all sites can deliver the full extent of PM2's requirements. This is best illustrated through Criterion (D) which requires a set percentage mix of dwellings to be built to Part M4(2) / M4(3) standards. It should be revised to recognise that not all sites will be capable of achieving such, sometimes owing to site-specific circumstances. Whilst retaining the aspiration and expectation of this policy to provide for accessible housing, amendment is proposed as follows [amendments in bold text]:</p> <p>(i) On schemes of up to 19 dwellings, the Council will expect all new build development to be built in compliance with building regulation part M4(2).</p> <p>ii On schemes of 20 or more dwellings, the Council will require where reasonably possible 5% of the development to be built in compliance with building regulation M4(3)(wheelchair accessible homes), with the remaining development to be built in compliance with building regulation part M4(2).</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

PM3 - Providing Open Space

Local Plan Consultation Point	PM3 - Providing Open Space
Rep ID	SDLP168
Rep Status	Processed
Consultee ID	1329874
Consultee Full Name	Ms Nicola Purcell
Consultee Company / Organisation	Aylesham Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>In October 2021, Aylesham Parish Council supported the Climate and Ecological Emergency (CEE) Bill which address the full extent of the climate and nature crisis in the UK. As a result, any local plan should use up-to-date science to make sound recommendations.</p> <p>As the district is extremely water scarce, all possible measures should be implemented to help mitigate water scarcity. The use of Sustainable Urban Drainage systems (SUDs) is required to be prominent in all future developments. This will help to deal with surface water flooding. We welcome the Draft Local Plan's hierarchy of methods of discharge, with the use of combined sewers coming last.</p> <p>This relates to CC6 of SP1 – Surface Water Management.</p> <p>There are a number of options to ensure new homes produce the least possible carbon emissions. Aylesham Parish Council would like to see Dover District Council require the full 2025 Future Homes Standard to be delivered now (this will reduce emissions by between 75-80% compared to current standards), not at some point during the Local Plan's lifetime.</p> <p>This relates to CC1 of SP1 – Reducing Carbon Emissions.</p> <p>We welcome the commitment to planting trees within new developments that are native to Kent. This will help to keep the rural feel of Aylesham alive. Currently we often see newly planted trees dying within the first few years of their lives. There must be a comprehensive plan to ensure that these trees reach maturity (part d) and how this will be enforced by the local authority.</p> <p>This relates to CC8 of SP1 – Tree Planting and Protection.</p>

	<p>Aylesham Parish Council welcomes the commitment to planting larger numbers of trees but feels this must come with a long-term solution to maintaining the trees. Dover District Council must also commit to the full 2025 future homes standard now.</p> <p>Aylesham Parish Council welcomes the addition and enhancement of open spaces and play areas. However, there are two points to note in the IDP: why would S106 monies from Aylesham be spent upgrading play areas in Nonington?; and play areas and open spaces are last to be delivered in developments – this must not happen in the future.</p> <p>Aylesham Parish Council is identified as “Delivery Partners” on a number of projects due to be delivered: we have not been consulted on this prior to the Regulation 19 document being released.</p> <p>The HRA[1] suggests that AYL003 – Land South of Aylesham is “high” suitability for the European Golden Plover, and so all measures must be taken to ensure this SPA protected bird species is still able to migrate and flourish in the area. SAP 25 (mixed use employment) is considered “moderate”.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	PM3 - Providing Open Space
<p>Rep ID</p>	SDLP682
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1221958
<p>Consultee Full Name</p>	Ms Bridget Fox
<p>Consultee Company / Organisation</p>	The Woodland Trust
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	PM3 - Providing Open Space

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>It is disappointing that no specific standards are set for access to natural / wild greenspace.</p> <p>We support the principle that residential developments should have access to open space for informal recreation and request that this be expanded to make specific reference to access to the natural environment and to woodland.</p> <p>Natural England's Accessible Natural Green Space Standard recommends that all people should have accessible natural green space:</p> <ul style="list-style-type: none"> - Of at least two hectares in size, no more than 300m (five minutes' walk) from home. - At least one accessible 20-hectare site within 2km of home. - One accessible 100-hectare site within 5km of home. - One accessible 500-hectare site within 10km of home. - A minimum of one hectare of statutory local nature reserves per 1,000 people. <p>The Woodland Trust has developed a Woodland Access Standard to complement the Accessible Natural Green Space Standard. This recommends that:</p> <ul style="list-style-type: none"> - That no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size. - That there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people's homes.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	We recommend adding explicit reference to the Accessible Natural Greenspace Standard and to the Woodland Access Standard.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	PM3 - Providing Open Space
Rep ID	SDLP567
Rep Status	Processed
Consultee ID	1267584

Consultee Full Name	Jason Ransley
Consultee Company / Organisation	Dover Harbour Board
Agent Full Name	John Bowles
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy PM3 - Providing Open Space
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Dover Harbour Board acknowledges the need for new residential development to provide or contribute towards the provision of open space as set out in Policy PM3 – Providing Open Space but, for the purposes of the thresholds set out in Table 6.4, consider that open space in the context of Dover Waterfront should include water areas and public realm since these are an important component of the location and character of this area.</p> <p>Dover Harbour Board welcomes the recognition in the policy that where the thresholds in Table 6.4 are not met, a financial contribution will be sought and presume that this will be subject to the approach adopted in Strategic Policy SP11 – Infrastructure and Developer Contributions to have regard to viability considerations and site-specific circumstances.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Dover Harbour Board requests the inclusion of additional wording in Policy PM3 – Providing Open Space or its supporting text making clear that, for the purposes of the thresholds set out in Table 6.4, open space in the context of Dover Waterfront includes water areas and public realm (since these are an important component of the location and character of this area).
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	N/A
Include files	Waterfront Plan - Update 2022.pdf (5) SDLP0567 Dover Harbour Board - Att 2.pdf
Local Plan Consultation Point	PM3 - Providing Open Space

Rep ID	SDLP786
Rep Status	Processed
Consultee ID	1331880
Consultee Full Name	Natasha Styles
Consultee Company / Organisation	McCarthy Stone
Agent Full Name	Natasha Styles
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM3 Providing Open Space
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	PM3 - Providing Open Space Policy PM3 requires 'Residential development of ten or more dwellings will be required to provide or contribute towards the provision of open space that meets the needs of that development, in addition to appropriate maintenance cost'. The policy sets a quantity per 1000 population. The council should note that the open space needs of older people are much less than that presented in the plan. For older people the quality of open space either on site or easily accessible for passive recreation is much more important than formal open space. The council should therefore acknowledge this within the policy and add the following to policy PM3:
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	To make the plan effective the following amendment should be made to the plan: Add new point to policy PM3 to read: Older people's housing schemes will be exempt from the requirements of policy PM3 so long as high quality open spaces for passive recreation is provided on site or is available in an easily accessible.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	PM3 - Providing Open Space
Rep ID	SDLP1236
Rep Status	Processed
Consultee ID	1271189
Consultee Full Name	Halsbury Homes
Consultee Company / Organisation	
Agent Full Name	Sean Bashforth
Agent Company / Organisation	Quod
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Policies PM1 (High Quality Design, Placing making and the provision of design codes), PM2 (Quality of Residential Development), PM3 (Providing Open Space), PM4 (Sports Provision) and H1 (Type and Mix of Housing) include prescriptive requirements for major housing developments.</p> <p>As a general principle, it is not evident that the Council has undertaken a review of the impact of such policies (which include minimum internal residential space standards and open space standards) on the deliverability and viability of housing alongside other requirements including affordable housing. In the context of existing policy and delivery of housing at WUE there also needs to be appropriate caveats in relation to how these policies are applied to Whitfield. For instance, Policy H1 (Type and Mix of Housing) requires proposals for 10 or more dwellings to demonstrate how the mix of tenure, type and size of housing reflects the Council's latest evidence on housing need and market demand. For WUE this and other policies need to cross refer to the adopted SPD and also take into account what has already been delivered and the pipeline of future development at Whitfield rather than apply district wide requirements.</p> <p>(DDC Note - Text Extracted from Document sent from Quod. Representation has been split across relevant areas of the Local Plan. Full attachment can be found under reference SDLP1232.)</p>

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	PM3 - Providing Open Space
Rep ID	SDLP1273
Rep Status	Processed
Consultee ID	1271353
Consultee Full Name	Church Commissioners
Consultee Company / Organisation	
Agent Full Name	Mr Andrew Watson
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>(DDC Note - Text Extracted from Document sent from Savills on Behalf of the Church Commissioners. Representation has been split across relevant areas of the Local Plan. Full attachment and introduction to Policy comments can be found under reference SDLP1265 for Shepherdswell Site and SDLP1266 for Eastry Site.)</p> <p>Policy PM3 – Providing Open Space - COMMENTS Policy PM3 sets out the requirements for the creation, enhancement and management of open space in new development, including parks and gardens, amenity greenspaces, allotments and equipped play spaces. Part C of the policy requests that a ‘Governance Strategy’ should support developments that propose open space which seeks to set out how the open space will be managed and maintained. Our client agrees with the importance to ensure the management and maintenance of open space and would normally detail how it will be managed via a planning obligation. It would be premature to enter into such agreements with the potential stakeholders before a planning application is determined and, as such, it is recommended that this policy is updated to reflect that a scheme to secure long term management and maintenance of the open space must be secured via planning obligation. Policy PM3 sets out a requirement for a Local Area of Plan (LAP) to be provided on site for development of 25 dwellings or more. Open Space requirements should be allowed to be included for consideration as part of any viability assessments conducted for a development proposal. Therefore, greater flexibility for open space requirements should be made, particularly in regards to smaller development sites.</p> <p>Recommendation: DDC should update Draft Policy PM3 to reflect that a scheme to secure long term management and maintenance of the open space must be secured via planning obligation. DDC should also provide greater flexibility for open space requirements for smaller development sites.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	PM3 - Providing Open Space
<p>Rep ID</p>	SDLP1467
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1330919
<p>Consultee Full Name</p>	Mrs Heather Twizell
<p>Consultee Company / Organisation</p>	Natural England
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM3
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	PM3 – Providing Open Space PM5 – Protection of Open Space, Sports Facilities and Local Green Space Natural England welcomes these two linked policies covering the provision and protection of open space. We appreciate your Authority's commitment towards ensuring that existing deficiencies in open space are not increased and that the future needs of communities are provided for. We are pleased to see that the Plan is supported by a recent Open Space Assessment (2019).
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	PM3 - Providing Open Space
Rep ID	SDLP1111
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	

Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The statements here are sound. Experience indicates that only a bias in favour of public transparency, full consultation with the public and community organisations, and more effective democratic accountability will ensure that powerful, influential, high-profit developers do not cause the statements to be circumvented. A fifth of Tory party donations from property sector News Housing Today The vast majority of the electorate want cleaner, less lobby-laden government.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	PM3 - Providing Open Space
Rep ID	SDLP1515
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale

Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<i>DDC Note The text below is an extract from the original representation which is attached to SDLP1438.</i> PM 1 – 4 and 6 The statements here are sound. Experience indicates that only a bias in favour of public transparency, full consultation with the public and community organizations, and more effective democratic accountability will ensure that powerful, influential, high-profit developers do not cause the statements to be circumvented
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	PM3 - Providing Open Space
Rep ID	SDLP1363
Rep Status	Processed
Consultee ID	1333128

Consultee Full Name	David Powell
Consultee Company / Organisation	
Agent Full Name	Klaire Lander
Agent Company / Organisation	Lander Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM3
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Lander Planning sent a PDF document which has been split across the relevant sections of the Plan. See Original Attachment on SDLP1346) Providing suitable open space in new developments is consistent with national policy and this policy is 'effective' and 'justified' and therefore supported.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	PM3 - Providing Open Space
Rep ID	SDLP1853
Rep Status	Processed

Consultee ID	1333792
Consultee Full Name	James Hambling
Consultee Company / Organisation	RAMAC Holdings Limited
Agent Full Name	Megan King
Agent Company / Organisation	Nexus Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM3
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Full Representation attached to SDLP1851. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1851.)</p> <p>The regeneration of the Stonar Site would accord with specific policies of the emerging Local Plan, including:</p> <ul style="list-style-type: none"> •Policy PM3 (Providing Open Space), which supports development that would provide new public open space.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	PM3 - Providing Open Space

Rep ID	SDLP1864
Rep Status	Processed
Consultee ID	1271717
Consultee Full Name	Quinn Estates
Consultee Company / Organisation	Quinn Estates Ltd
Agent Full Name	James Waterhouse
Agent Company / Organisation	Iceni projects
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM3
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Full Representation attached to SDLP1860. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1860.)</p> <p>e. Policy PM3 – Open Space Quinn Estates wishes to support Policy PM3, but in its current form, the need to have a governance strategy agreed upfront is questioned. This is not considered to be effective, as there will be plenty of instances where the end operator and/or open space management company is yet to be established. In these circumstances, it is requested that Policy PM3 be amended to enable a governance strategy to be conditioned until such the detailed phase of the planning process, where sufficient detail is known as to the detailed layout of space, its function, how spaces will be managed and by whom. Such information is rarely established at outline application stage, because it is usually impractical and undesirable to attempt to do so.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	Quinn Estates is a developer with significant land interests in the District, who has an important role in delivering the Plan strategy

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	PM3 - Providing Open Space
Rep ID	SDLP1895
Rep Status	Processed
Consultee ID	1333840
Consultee Full Name	Jon Alldis
Consultee Company / Organisation	Barrat David Wilson Homes
Agent Full Name	Emily Harris
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Full Representation attached to SDLP1883. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1883.)</p> <p>Draft Policy PM3 – Providing open space - COMMENT PM3 sets out the requirements for the creation, enhancement and management of open space in new development, including parks and gardens, amenity greenspaces, allotments and equipped play spaces. Part C of the policy requests that a 'Governance Strategy' should support developments that propose open space which seeks to set out how the open space will be managed and maintained. BDW agree with the importance to ensure the management and maintenance of open space and would normally detail how it will be managed via a planning obligation. It would be premature to enter into such agreements with the potential stakeholders before a planning application is determined and as such, it is recommended that this policy is updated to reflect that a scheme to secure long term management and maintenance of the open space must be secured via planning obligation.</p> <p>Recommendation: Draft Policy PM3 is updated to reflect that a scheme to secure long term management and maintenance of the open space must be secured via planning obligation.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness	

matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

PM4 - Sports Provision

Local Plan Consultation Point	PM4 - Sports Provision
Rep ID	SDLP3
Rep Status	Processed
Consultee ID	1259844
Consultee Full Name	Mr Andrew Howard-Grigg
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM4 Sports Provision Sections 6.66 & 6.67
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The plan makes reference to a "Playing Pitch Strategy" from 2019. The DDC Website only has details of a Playing Pitch Strategy dated February 2015. If there is an updated document then this should be available on the DDC Website for public viewing in order to consider in conjunction with the proposed local plan policy.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>Clarification of the date of the last Playing Pitch Strategy. If this was indeed February 2015 (data gathered in 2014) then there is a clear need for this to be updated as a significant amount of the data provided regarding Cricket is now inaccurate (club mergers, dissolutions, junior sections, playing facility quality etc.). Any update should also include details in relation to the new Kent Cricket Tiered structure from 2023 which confirms the club position within the pyramid structure and therefore the potential quality of facilities required to participate.</p> <p>As an example, we at Walmer Cricket Club (referred to a Hull Park Sports Club which is now historic as the lease to the ground is now solely in the name of Walmer Cricket Club as hockey is no longer played there due to the absence of a synthetic pitch) now has 2 Saturday, Sunday & Mid-week adult teams plus 3 Junior age group teams. This will also require the amendment of your pitch use allocation data; in 2022 41 Senior and 18 Junior home matches were played on our 10 pitch square, meaning average of 5.9 matches per pitch - nearly double the recommended usage.</p> <p>Despite the large number of housing developments within Sholden where we are based, we have yet to see any direct benefit in terms of Section 106 monies in order to assist bringing our facilities up to the required standard needed to support the provision of sport that we provide e.g. extending the cricket square by at least 2 pitches, re-configuration of the clubhouse to accommodate a separate female changing room with toilet and shower facilities.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	PM4 - Sports Provision
Rep ID	SDLP58
Rep Status	Processed
Consultee ID	1254085
Consultee Full Name	Mrs Sue Ward
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM4
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Most of the existing sports facilities are expensive to use, particularly for families. Obesity is more prevalent in the most socially deprived and financially poorest groups, so most of these plans will not help those in the greatest need. It is of concern that the preservation of the free to use public rights of way network gets no more than a token acknowledgement that it will be protected and enhanced. To surround public rights of way by building renders them useless and unattractive.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Where large scale building is proposed, developers should be required to create new and attractive multi use public rights of way to compensate for those lost in the development.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	PM4 - Sports Provision
Rep ID	SDLP314
Rep Status	Processed
Consultee ID	1331395
Consultee Full Name	Ms Jo Edwards
Consultee Company / Organisation	Sport England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM4 Sports Provision and paragraph 6.81
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Sport England fully supports this policy however, the PPS is now 3 years old and based on older pitch supply and demand data. In accordance with Sport England's guidance it should be reviewed now (stage E) with the NGBs and Sport England to keep it up to date and robust.</p> <p>With regard to the supporting text in paragraph 6.81, Sport England considers in applying its policy on specific proposals that the PPS and IFS provide the robust assessment required and will refer to these in our assessment of any proposal affecting existing or land previously used for sports pitches or built facilities.</p> <p>The omission of a site from either of the PPS or the IFS is not evidence that they are surplus to requirements and therefore, can be lost. Any alternative assessment required in connection with the loss of a playing pitch should be undertaken in accordance with Sport England assessment guidance.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance	Amendments suggested to incorporate above comments

with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	PM4 - Sports Provision
Rep ID	SDLP798
Rep Status	Processed
Consultee ID	1331395
Consultee Full Name	Ms Jo Edwards
Consultee Company / Organisation	Sport England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Evidence Base - Playing Pitch Strategy
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Sport England broadly supports this section however, in accordance with our guidance for the preparation of the PPS and keeping it up to date, and also in accordance with paragraph 98 of the NPPF, we would strongly recommend that the Council reviews the PPS (stage E of the PPS assessment method) as the data on which the recommendations are made is becoming out of date. The PPS data should be reviewed in consultation with the playing pitch NGBs who report significant additional sports participation and demand locally that should be considered, and with Sport England.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant	No changes to the DLP are required at present however the evidence base needs to be brought up to date.

and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	PM4 - Sports Provision
Rep ID	SDLP787
Rep Status	Processed
Consultee ID	1331880
Consultee Full Name	Natasha Styles
Consultee Company / Organisation	McCarthy Stone
Agent Full Name	Natasha Styles
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM4 - Sports Provision
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	PM4 - Sports Provision Policy PM4 requires 'contribute to the provision of new, or enhancement of existing, indoor sports facilities and outdoor playing pitch and sports facilities, to meet the needs of the development, and maintenance of those facilities'. The council should note that needs of older people for sport provision are much less than younger people. For older people the quality of open space either on site or easily accessible for passive

	recreation is much more important than formal sports pitches. The council should therefore acknowledge this within the policy and add the following to policy PM4:
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The following amendment should be made to the plan to ensure it is effective. Add new point to policy PM4: Older people's housing schemes will be exempt from the requirements of policy PM4 so long as high quality open spaces for passive recreation is provided on site or is available in an easily accessible.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	PM4 - Sports Provision
Rep ID	SDLP1029
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM4
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>With reference to paragraph 6.57, the County Council would draw attention to the Lawn Tennis Association (LTA) who currently have funding to support improvements and refurbishments to community tennis facilities. Active Kent, a County Council partner, would be happy to introduce a discussion if this connection has not already been established.</p> <p>Paragraph 6.58 which references the needs identified within the LFFP's around 3G pitches is welcomed - but it is noted that there is potential for further work to be undertaken around opening school facilities for community use. Within Active Kent, funding has been received from Sport England via 'Open Schools Facilities Funding' to support schools with the financial implications around opening their facilities outside of school hours. Active Kent would be willing to work with the District Council to identify school to target as a result of their planning and consultation.</p> <p>Active Kent is keen to understand how the service can support sport and physical activity in the district. Active Kent has access to internal funding streams that could support the development of new initiatives in Dover and are able to offer advice and support on capital developments and look to address shortfall on projects.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Not Applicable
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	PM4 - Sports Provision
<p>Rep ID</p>	SDLP1237
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1271189
<p>Consultee Full Name</p>	Halsbury Homes
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	Sean Bashforth
<p>Agent Company / Organisation</p>	Quod
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	PM4
<p>2 - Do you consider this part of the Plan sound?</p>	No

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Policies PM1 (High Quality Design, Placing making and the provision of design codes), PM2 (Quality of Residential Development), PM3 (Providing Open Space), PM4 (Sports Provision) and H1 (Type and Mix of Housing) include prescriptive requirements for major housing developments.</p> <p>As a general principle, it is not evident that the Council has undertaken a review of the impact of such policies (which include minimum internal residential space standards and open space standards) on the deliverability and viability of housing alongside other requirements including affordable housing.</p> <p>In the context of existing policy and delivery of housing at WUE there also needs to be appropriate caveats in relation to how these policies are applied to Whitfield. For instance, Policy H1 (Type and Mix of Housing) requires proposals for 10 or more dwellings to demonstrate how the mix of tenure, type and size of housing reflects the Council's latest evidence on housing need and market demand. For WUE this and other policies need to cross refer to the adopted SPD and also take into account what has already been delivered and the pipeline of future development at Whitfield rather than apply district wide requirements.</p> <p>(DDC Note - Text Extracted from Document sent from Quod. Representation has been split across relevant areas of the Local Plan. Full attachment can be found under reference SDLP1232.)</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	PM4 - Sports Provision
Rep ID	SDLP1112
Rep Status	Processed

Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The statements here are sound. Experience indicates that only a bias in favour of public transparency, full consultation with the public and community organisations, and more effective democratic accountability will ensure that powerful, influential, high-profit developers do not cause the statements to be circumvented. A fifth of Tory party donations from property sector News Housing Today The vast majority of the electorate want cleaner, less lobby-laden government.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	PM4 - Sports Provision

Rep ID	SDLP1364
Rep Status	Processed
Consultee ID	1333128
Consultee Full Name	David Powell
Consultee Company / Organisation	
Agent Full Name	Klaire Lander
Agent Company / Organisation	Lander Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM4
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Lander Planning sent a PDF document which has been split across the relevant sections of the Plan. See Original Attachment on SDLP1346) Major developments contributing towards sports provision locally is consistent with national policy and this policy is 'effective' and 'justified' and therefore supported.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

Local Plan Consultation Point	PM4 - Sports Provision
Rep ID	SDLP1516
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM4
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<i>DDC Note The text below is an extract from the original representation which is attached to SDLP1438.</i> PM 1 – 4 and 6 The statements here are sound. Experience indicates that only a bias in favour of public transparency, full consultation with the public and community organizations, and more effective democratic accountability will ensure that powerful, influential, high-profit developers do not cause the statements to be circumvented
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

PM5 - Protection of Open Space, Sports Facilities and Local Green Space

Local Plan Consultation Point	PM5 - Protection of Open Space, Sports Facilities and Local Green Space
Rep ID	SDLP396
Rep Status	Processed
Consultee ID	1266669
Consultee Full Name	Mrs Susan Sullivan
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM5
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I am commenting on Policy P5 as, in my view, issues in the district, relating to this policy, may mean the policy is not deliverable and therefore may not be effective over the period of the Plan. My comments relate to Betteshanger Country Park.</p> <p>Under the Reg 19 version of the Local Plan Betteshanger Country Park is assessed as semi/natural green space in both the 2019 Open Space Assessment and the Open Space and Sports Topic Paper 2022. It is shown on the policies map as Protected Open Space (Policy P5) The Council notes the submission of planning applications for this site in the above Topic paper. These are planning applications 22/01152 for a luxury Hotel at the Country Park and DOV22/01158 for a Surfing Lagoon.</p> <p>Related to these applications is the change of use at the Country Park, that has become apparent since 2019 when the Park was bought by Quinn Estates. There is evidence that up until 2015 the saved policy AS2 (from the 2002 Local Plan) was determining how the Country Park should be used. In the past few years it appears that this policy is being ignored. How, when, and if, this change was approved, is unclear.</p> <p>In the document entitled Local Development Scheme. Preparation of the Local Plan Sept 2022. Saved Local Plan policies 2002 it states in 2.3 '2.3 The Dover District Local Plan was adopted in 2002 and covered the period to 2006. In September 2007 the Secretary of State confirmed that a number of the existing Local Plan policies could be 'saved' until they are subsequently superseded by new or revised policies. All of 'saved' 2002 Local Plan policies would be reviewed and replaced as part of the Local Plan review.'</p> <p>It is unclear from the Reg 19 version of the Local Plan how saved policy AS2 was reviewed and what it was replaced with.</p> <p>In the Open Space and Sports Topic Paper 2022 in Appendix 4 it states at 388. Betteshanger Country Park formerly Fowlmead. Recommendation. Retain as it contributes to semi natural/natural green space quantum. It is listed under Protected Open Space.</p> <p>Is this the result of the review? If so it is unfortunate there are no details in this as to what uses will now be acceptable for the Park.</p> <p>The requirement of saved policy AS2 is that the Park should be used for 'low key recreation' that will only be permitted if 'nature conservation interests are safeguarded (and) there is no damage to the ecological value of the site.'</p> <p>Low key recreation is defined under the heading Colliery Spoil Tip:</p>

15.11 'Low key recreational uses such as walking and cycling would be acceptable... this may involve the creation of cycle paths, bridleways, picnic areas and interpretation facilities.' Such a recreational facility would serve some of the informal recreation needs of the Deal Urban area, while providing environmental benefits.'

It should be noted that the Country Park is a site of high biodiversity value, hence the emphasis on protecting its conservation interests. When the Park was first set up a S106 agreement attached to planning permission 02/00905 obliged the Council and the owner to designate the whole Park as a Local Nature Reserve. (see Ref 1) This never happened and the Council is unable to explain why.(see attached S106)

Given the Park's importance for biodiversity and the potential damage to its value under the proposed planning applications, what uses the Council will permit is a crucial issue.

Up until 2015,when planning permission was applied for a Visitor Centre at the Park (DOV1400262 and DOV15/00157) the Council was still abiding by the terms of AS2. At this time Dover District Council was still specifying that the Park should be used for 'low key recreation' as shown below in conditions 13 and 15 attached to the planning permission:

- 1 'The development hereby permitted shall be used for the purposes of a Visitor Centre in accordance with the details shown on drawing number 1750_022-P1 and for no other purpose, including any other purpose within Class D2 of the schedule to the Town & Country Planning (Use Classes) Order 1987 (as amended), or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification. Reason: **To ensure the proper development of the area and continued use of the Country Park for 'low key recreation purposes.'**

15 'Any retail use on the site shall be confined to within the Visitor Centre building hereby permitted and it shall be solely ancillary to the functioning of the Visitor Centre as defined by condition 13 above. Reason: **To ensure the proper development of the area and continued use of the Country Park for low key recreation purpose.'**

Since Quinn Estates has owned the Park this has changed and it appears that AS2 is being ignored and a different set of priorities are being used. In 2019 Dover District Council issued a press release which stated:

'We always recognised that the regeneration of the Betteshanger site had huge potential as a tourism, community and sporting hub and we're pleased that the new owners have committed to finishing the exciting new Visitor Centre and Kent Mining Museum. We look forward to working with Quinn Estates to realise the full potential of Betteshanger Country Park.' (see Ref 2)

The 'full potential' has resulted not only in a new Visitor Centre and Mining Museum but the introduction of 4 wheeled swincars to the Park, motorbike events and of course the planning applications. What has happened to saved policy AS2?

There is also a reference in p105 of the Green and Blue Infrastructure Strategy Evidence report of May 2022, to the possibility of the Park being used to 'attract visitors away from coastal areas where there is high pressure on protected nature conservation sites.'

This is also referred to on Page 167 where it states:

'Betteshanger Country Park is a hub for a range of outdoor recreation and leisure activities. The Park could also help to attract visitors away from sensitive coastal areas.'

Does this mean that the Council is looking favourably on further development at the Park in the hope that people will spend their time there rather than visiting the protected sites at Sandwich and Pegwell Bay ?

Despite the listing of Betteshanger Country Park as Protected Open Space in the Reg 19 Local Plan, it appears there may have been a change of heart at the Council. Saved policy AS2 is no longer being adhered to. What exactly, in policy terms has it been replaced with? And what are the uses that the Council now proposes for the Park?

The local community needs to know and effective delivery of Policy P5 will depend upon it,

Ref 1. The S106 agreement attached to the original planning permission of the Park (DOV 02/00905)

See attached document

Dover District Council has welcomed today's announcement that the future of Betteshanger Country Park has been secured.

Nadeem Aziz, Chief Executive of Dover District Council, said: "We've been involved with the Betteshanger project since the start, so we're delighted that its future has been secured with new owners and that the Country Park will remain open and fully operational.

	<p>"We always recognised that the regeneration of the Betteshanger site had huge potential as a tourism, community and sporting hub, and we're pleased that the new owners have committed to finishing the exciting new Visitor Centre and Kent Mining Museum.</p> <p>"We look forward to working with Quinn Estates to realise the full potential of Betteshanger Country Park."</p> <p>Posted on 02 December 2019</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The Local Plan should specify how policy changes are made and how they inform the public of such changes. If the policy for uses of Betteshanger Country Park has been changed then the Local Plan should give a clear explanation and detail how, when, and by whom, these changes were authorised. It should also set out what new uses have been agreed on.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>I consider this to be necessary in the interests of transparency when it comes to Council decisions/changes of emphasis</p>
<p>Include files</p>	<p>section 106 Betteshanger CP.pdf</p>
<p>Local Plan Consultation Point</p>	<p>PM5 - Protection of Open Space, Sports Facilities and Local Green Space</p>
<p>Rep ID</p>	<p>SDLP181</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1330769</p>
<p>Consultee Full Name</p>	<p>Mr Beat Hochstrasser</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>P. 260, para 6.81: "...facility which demonstrably provides a net benefit to the community"</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Justified Effective</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Not Applicable</p>

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>To allow a small loss of Open Space as outlined below will provide a greater net benefit to the community as it will enable a larger area of Open Space to be restored and improved. The Evidence Base does not justify the current designation which will prevent recommended site improvements (see DDC Evidence Base OPEN SPACE AND PLAY STANDARDS PAPER Dec. 2019 p.17 Table 4.1.4: Rural Analysis Area Quality Summary).</p> <p>The site Off Mill Lane Eastry (site ref 393) is quite large at 0.53 ha and is designated as Amenity Greenspace but with the exception of several trees towards the north of the site. Visually (see pictures attached) this former builders yard and tile manufacturing site is more akin to a brown field site. The site is overgrown by brambles and covered with roof tiles and slag heaps of several tons of building rubble. We argue that while the trees must be protected, the rest of the site has been wrongly classified. This position is also supported by the DDC Evidence Reports: out of all the 120 Open Space sites assessed in the 2019 Open Space Assessment Report, this site is identified as the very lowest scoring amenity green-space in terms of quality (34.4%) and second lowest in terms of value (28.0%).</p> <p>Additional text insert by DDC from comment SDLP468</p> <p>This comment is an amendment to my previous comment in relation to PM5:</p> <p>If the proposed amendment to the Local Plan is approved and subsequent planning application to Dover district Council for a single dwelling is also authorised, provisions will be made to alleviate the current congestion on Mill Lane traffic by providing a car parking space for the adjacent property to the site's East access road, Bushley house. This will result in a further measurable and concrete net benefit to the community.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>This representation seeks to remove a small area from the open space designation of that site. This would enable a single dwelling unit to come forward (self build) under Strategic Policy 3 and taking account of all other Development Management Policies at the time of making the application. Living on site would enable us to restore, improve and manage the remaining open space, improve the quality of the overall site, including both access roads belonging to the site and tree maintenance, resulting in a measured enhancement to Eastry's open space provision and in a net benefit to the community.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	<p>The Open Space and Play Standards Paper (2019, page 17, table 4.1.4) rates 10 Amenity Greenspace sites, including the site "Off Mill Lane Eastry" as being "below quality" and recommends "Enhancing site quality should be explored where possible (e.g. exploring options for improved maintenance, drainage and enhancement of general appearance)."</p> <p>We wish to participate in the oral part of the examination to present how this amendment to the Plan will enhance the site quality and appearance of the area.</p>
Include files	Pics for Land off Mill Lane Eastry.docx Eastry.docx (5)
Local Plan Consultation Point	PM5 - Protection of Open Space, Sports Facilities and Local Green Space
Rep ID	SDLP468
Rep Status	Processed
Consultee ID	1330769
Consultee Full Name	Mr Beat

	Hochstrasser
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM 5
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC Note: Amendment to SDLP0181, SDLP0951, SDLP1150, SDLP1153 This comment is an amendment to my previous comment in relation to PM5: If the proposed amendment to the Local Plan is approved and subsequent planning application to Dover district Council for a single dwelling is also authorised, provisions will be made to alleviate the current congestion on Mill Lane traffic by providing a car parking space for the adjacent property to the site's East access road, Bushley house. This will result in a further measurable and concrete net benefit to the community.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	yes
Include files	
Local Plan Consultation Point	PM5 - Protection of Open Space, Sports Facilities and Local Green Space
Rep ID	SDLP788
Rep Status	Processed

Consultee ID	1331395
Consultee Full Name	Ms Jo Edwards
Consultee Company / Organisation	Sport England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM4 Sports Provision and paragraph 6.81
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Sport England fully supports this policy however, the PPS is now 3 years old and based on older pitch supply and demand data. In accordance with Sport England's guidance it should be reviewed now (stage E) with the NGBs and Sport England to keep it up to date and robust.</p> <p>With regard to the supporting text in paragraph 6.81, Sport England considers in applying its policy on specific proposals that the PPS and IFS provide the robust assessment required and will refer to these in our assessment of any proposal affecting existing or land previously used for sports pitches or built facilities.</p> <p>The omission of a site from either of the PPS or the IFS is not evidence that they are surplus to requirements and therefore, can be lost. Any alternative assessment required in connection with the loss of a playing pitch should be undertaken in accordance with Sport England assessment guidance.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Amendments suggested to incorporate above comments
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

Local Plan Consultation Point	PM5 - Protection of Open Space, Sports Facilities and Local Green Space
Rep ID	SDLP847
Rep Status	Processed
Consultee ID	1331761
Consultee Full Name	Catherine Hoyte
Consultee Company / Organisation	Plainview Planning Ltd
Agent Full Name	Catherine Hoyte
Agent Company / Organisation	Plainview Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM5 and supporting text
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>6.69 - The evidence base does not support this paragraph which references 'valued open spaces' Particularly with reference to semi/natural greenspace .</p> <p>The KKP 2019 Open Space Assessment (the Assessment) Report notes at the top of page 27 that "Most natural and semi-natural provision has not received a quality or value rating as per the project brief specification." No explanation is given as to why not.</p> <p>The Open Space and Sport Topic Paper Sept 2022 (the Topic Paper) notes that "This Topic Paper [therefore] forms an informal update to the 4 reports and should be considered the most up to date position when considering proposals for new open space, enhancements to existing open space and loss of open space, and as the Council's priorities for the delivery of new or open space improvements."</p> <p>At 4.9 and 10 the Topic Paper sets out that each type of space and each individual site was given a separate quality and value score. This leads to the conclusion at 4.12 that with reference to value, the majority of sites were above the threshold reflecting the role and importance of open space provision to local communities and environments. Given the statement at the top of page 27 of the Assessment, this is demonstrably not the case.</p> <p>Specifically, in relation to the sub area of Dover in which site WHI009/open space 280 (with reference the Assessment) sits, only 4 sites out of 28 were assessed individually and given a quality and value score. The results are not representative of the quality and value of all of the identified sites. Those scores relate to just 14% of those sites.</p> <p>The designation of sites of semi/natural grassland to 'ensure that valued open spaces within the District are retained and protected' has not been undertaken based on sound evidence. Assumptions have been made based on the quality and value findings of just 14% of the identified sites.</p> <p>It is also relevant that the Assessment confirms at table 5.1 that semi/natural greenspace provision within Dover District is "sufficient" against the Fields In Trust (FIT) suggested 1.80 hectares per 1,000 population as a guideline quantity standard. In fact its provision is nearly double that of the suggested standard.</p>

	<p>Site WHI009 (HELAA) has been identified as being protected open space - semi/natural greenspace where policy PM5 is applicable. To retain site 280 as protected open space where an over provision is identified and where an individual quality or value score has not been given is not a sound approach and its need for protection is not evidenced or justified.</p> <p>It also does not acknowledge or reflect that planning permission has been granted for development of the site to include improved quality and type of open space that would meet shortfalls in other types of open space.</p> <p>Allocation of the site for development under SAP 13 would ensure that both the previous permission granted and its contribution to informal and formal public space could be secured by the LPA without the applicant needing to undertake further assessment as required under PM5 a to demonstrate surplus in the event that a further permission is required. This assessment has already been undertaken by KKP but has fallen short in terms of assessing this individual piece of land.</p> <p>SITE 376 - Land on the East of Marlborough Road Deal CT14 9LE - this site is identified as amenity greenspace on the policies map. The Assessment notes at Section 6 that Dover District is above the FIT guideline quality standard for provision - more than double the amount suggested exists and in Deal double.</p> <p>Site 376 is not included or mapped in the Assessment and therefore we conclude that it was not assessed for quality or value. Planning permission has been granted for development of the site for housing to include an area of open space. The value of the space has been considered to be in its visual amenity and it does not offer what the Assessment considers to be Amenity Greenspace <i>“Opportunities for informal activities close to home or work or enhancement of the appearance of residential or other areas.”</i>The sole reason this site remains as an open space allocation is to ensure that its area can count toward an identified shortfall in amenity greenspace in this part of the District. That is just a numbers game and is not a sound approach to designation of land.</p> <p>The permission granted for the site recognises that a qualitative improvement to the open space through play area and public access would result from development. This demonstrates the point that retaining the site as desinated open space to 'make up the numbers' is a meaningless approach. The quality of open space and the benefit it can bring to the community is what is of value, not its size. The Open Space and Play Standards Paper confirms that what is needed across the board are quality improvements to existing space.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Remove site 280 as protected open space given there is an overprovision of this type of space in this location, its quality and value has not been soundly assessed and it has planning permission for redevelopment.</p> <p>Whether or not the above amendment is agreed:</p> <p>Amend policy PM5 to acknowledge that not all designated open spaces are of good quality or value and that not all sites have been fully assessed. Given this, a degree of flexibility must be introduced into the policy to allow for a case to be made for alternative type and size of provision given the flaws in the evidence base.</p> <p>Amend PM5 b to remove the requirement net benefit in terms of QUANTITY. A hectare of unusable, overgrown and inaccessible open land is of less value than half a hectare of well maintained, available, accessible and biodiversity rich play space in an area of underprovision, for example. This point is wholly demonstrated through the discussion re site 376.</p> <p>Site 376 - remove the designation of amenity grassland. Its inclusion is solely to make up numbers rather than being based on any quantitative and value assessment. The approach to allocation is not sound.</p> <p>There is also no recognition that planning permission has been granted for development of half of the site and at a minimum this half should be removed from the designation.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>PM5 - Protection of Open Space, Sports Facilities and Local Green Space</p>

Rep ID	SDLP1030
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM5
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The County Council welcomes this policy in respect of PRoW.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	PM5 - Protection of Open Space, Sports Facilities and Local Green Space

Rep ID	SDLP1395
Rep Status	Processed
Consultee ID	1266669
Consultee Full Name	Mrs Susan Sullivan
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM5 - Nomination for Local Green Space Designation
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails	(DDC Note - Attachment includes comments from 8 local residents - names have been redacted) Dear Local Plan Team I am writing on behalf of the Friends of Betteshanger Group to apply for Local Green Space Designation for Betteshanger Country Park. (See attached map) This relates to Policy P5 in the Local Plan. The address of the Park is Betteshanger Country Park, Sandwich Road, Deal CT14 0BF The reasons for nomination are as follows: 1) Tranquillity. The Park is sited away from built up areas and many people use its green space for walking, appreciating nature and enjoying the views over the marshes 2. Richness of Wildlife. The Park is a site of high biodiversity value. In fact when the Park was first set up a S106 agreement attached to the permission obliged the Council and the owner to designate the whole Park as a Local Nature Reserve. This never happened. Recently it has been shown just how important the site still is for wildlife. For example the second most important colony of Lizard orchids in the Country grows there. Lizard orchids are a protected plant and are nationally rare. There are also many birds including Turtle Doves the UK's fastest declining bird, Beavers, reptiles such as Slow worms and Common Lizard, Invertebrates of County importance and over 300 species of native plant. 3) Recreational Value. The Park has great recreational value with walking and cycling trails and a variety of family activities and events. 4) Close proximity. The Park was set up to benefit the local community, especially the mining community at Betteshanger. It is within reasonable walking distance of Sholden, Betteshanger Circle, Hacklinge and Deal. There are footpaths from Sholden and Deal. 5) Demonstrably Special. The Park is demonstrably special in a number of ways: a) Beauty. Much of the Park is visually attractive with trees, open water and marsh views. b) Historical significance. This is a site of great value to the ex mining community and

<p>to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>their descendants hence the provision of the Mining Museum.</p> <p>c) It is very special to local naturalists and people who use it to benefit their physical and mental health. Please see the attachment below which shows the value local people attach to the Park as a local green space.</p> <p>6). Existing designations. The Park has no existing designations.</p> <p>7) Size. The Park is large with clear and defensible boundaries.</p> <p>8) Planning history. The Park was set up in 2004 under planning application 02/00905. Planning granted under applications 14/00262 and 15/00157 for the Visitor Centre including the Cafe and Mining Museum.</p> <p>Two planning applications have been submitted for a Hotel and Surf Lagoon on the site. (22/01152 and 22/01158.)</p> <p>Thank you for considering this request.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>Sullivan 1644 Att1.JPG Susan Sullivan (Residents comments)_Redacted.pdf</p>
<p>Local Plan Consultation Point</p>	<p>PM5 - Protection of Open Space, Sports Facilities and Local Green Space</p>
<p>Rep ID</p>	<p>SDLP1103</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1266669</p>
<p>Consultee Full Name</p>	<p>Mrs Susan Sullivan</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM5
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I am commenting on Policy P5 as, in my view, issues in the district, relating to this policy, may mean the policy is not deliverable and therefore may not be effective over the period of the Plan. My comments relate to Betteshanger Country Park.</p> <p>Under the Reg 19 version of the Local Plan Betteshanger Country Park is assessed as semi/natural green space in both the 2019 Open Space Assessment and the Open Space and Sports Topic Paper 2022. It is shown on the policies map as Protected Open Space (Policy P5) The Council notes the submission of planning applications for this site in the above Topic paper. These are planning applications 22/01152 for a luxury Hotel at the Country Park and DOV22/01158 for a Surfing Lagoon.</p> <p>Related to these applications is the change of use at the Country Park, that has become apparent since 2019 when the Park was bought by Quinn Estates. There is evidence that up until 2015 the saved policy AS2 (from the 2002 Local Plan) was determining how the Country Park should be used. In the past few years it appears that this policy is being ignored. How, when, and if, this change was approved, is unclear.</p> <p>In the document entitled Local Development Scheme. Preparation of the Local Plan Sept 2022. Saved Local Plan policies 2002 it states in 2.3 '2.3 The Dover District Local Plan was adopted in 2002 and covered the period to 2006. In September 2007 the Secretary of State confirmed that a number of the existing Local Plan policies could be 'saved' until they are subsequently superseded by new or revised policies. All of 'saved' 2002 Local Plan policies would be reviewed and replaced as part of the Local Plan review.'</p> <p>It is unclear from the Reg 19 version of the Local Plan how saved policy AS2 was reviewed and what it was replaced with.</p> <p>In the Open Space and Sports Topic Paper 2022 in Appendix 4 it states at 388. Betteshanger Country Park formerly Fowlmead. Recommendation. Retain as it contributes to semi natural/natural green space quantum. It is listed under Protected Open Space.</p> <p>Is this the result of the review? If so it is unfortunate there are no details in this as to what uses will now be acceptable for the Park.</p> <p>The requirement of saved policy AS2 is that the Park should be used for 'low key recreation' that will only be permitted if 'nature conservation interests are safeguarded (and) there is no damage to the ecological value of the site.'</p> <p>Low key recreation is defined under the heading Colliery Spoil Tip:</p> <p>15.11 'Low key recreational uses such as walking and cycling would be acceptable... this may involve the creation of cycle paths, bridleways, picnic areas and interpretation facilities.' Such a recreational facility would serve some of the informal recreation needs of the Deal Urban area, while providing environmental benefits.'</p> <p>It should be noted that the Country Park is a site of high biodiversity value, hence the emphasis on protecting its conservation interests. When the Park was first set up a S106 agreement attached to planning permission 02/00905 obliged the Council and the owner to designate the whole Park as a Local Nature Reserve. (see Ref 1) This never happened and the Council is unable to explain why.</p> <p>Given the Park's importance for biodiversity and the potential damage to its value under the proposed planning applications, what uses the Council will permit is a crucial issue.</p> <p>Up until 2015, when planning permission was applied for a Visitor Centre at the Park (DOV1400262 and DOV15/00157) the Council was still abiding by the terms of AS2. At this time Dover District Council was still specifying that the Park should be used for 'low key recreation' as shown below in conditions 13 and 15 attached to the planning permission:</p> <p>13. 'The development hereby permitted shall be used for the purposes of a Visitor Centre in accordance with the details shown on drawing number 1750_022-P1 and for no other purpose, including any other purpose within Class D2 of the schedule to the Town & Country Planning (Use Classes) Order 1987 (as amended), or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification. Reason: To ensure the proper development of the area and continued use of the Country Park for 'low key recreation purposes.'</p> <p>15 'Any retail use on the site shall be confined to within the Visitor Centre building hereby permitted and it shall be solely ancillary to the functioning of the Visitor Centre as defined by condition 13 above. Reason: To ensure the proper development of the area and continued use of the Country Park for low key recreation purpose.'</p>

Since Quinn Estates has owned the Park this has changed and it appears that AS2 is being ignored and a different set of priorities are being used. In 2019 Dover District Council issued a press release which stated:
 'We always recognised that the regeneration of the Betteshanger site had huge potential as a tourism, community and sporting hub and we're pleased that the new owners have committed to finishing the exciting new Visitor Centre and Kent Mining Museum. We look forward to working with Quinn Estates to realise the full potential of Betteshanger Country Park.' (see Ref 2)
 The 'full potential' has resulted not only in a new Visitor Centre and Mining Museum but the introduction of 4 wheeled swincars to the Park, motorbike events and of course the planning applications. What has happened to saved policy AS2?
 There is also a reference in p105 of the Green and Blue Infrastructure Strategy Evidence report of May 2022, to the possibility of the Park being used to 'attract visitors away from coastal areas where there is high pressure on protected nature conservation sites.'
 This is also referred to on Page 167 where it states:
 'Betteshanger Country Park is a hub for a range of outdoor recreation and leisure activities. The Park could also help to attract visitors away from sensitive coastal areas.'
 Does this mean that the Council is looking favourably on further development at the Park in the hope that people will spend their time there rather than visiting the protected sites at Sandwich and Pegwell Bay ?
 Despite the listing of Betteshanger Country Park as Protected Open Space in the Reg 19 Local Plan, it appears there may have been a change of heart at the Council. Saved policy AS2 is no longer being adhered to. What exactly, in policy terms has it been replaced with? And what are the uses that the Council now proposes for the Park?
 The local community needs to know and effective delivery of Policy P5 will depend upon it,
 There is a second related issue that of the Nature Conservation Management Plan for the Country Park.
 The planning permissions for the Visitor Centre at Betteshanger Country Park (DOV 14/00262 and 15/00157) have a condition (no.4) attached that states the following: 4 'The development shall be carried out in accordance with the approved Nature Conservation Management Plan (JBA Consulting, issue 03 approved under application DOV/14/00262) and agreed Ecological Management Plan Final Report dated October 2015. Reason: In the interests of nature conservation and protection.'
 Why was permission granted for the Visitor Centre when condition 4 had not been met and what has happened to the requirement that a Nature Conservation Management Plan should be in place for the Country Park ? According to the JBA Consulting issue 03 , approved under application DOV14/00262, there is meant to be a further issue 04. Where is it and why isn't it being implemented? This is particularly relevant in the light of the current planning applications for a Hotel and Surf Lagoon at the Park. Looking at the objectives of the Nature Conservation Management Plan issue 03, it is clear that the development proposals would be in direct conflict with the NCMP.
 Issue surrounding Betteshanger Country Park need to be investigated particularly in the light of the Local Plan recommendation that the Park should be retained as semi/natural green space and Protected Open Space.
 Ref 1. The S106 agreement attached to the original planning permission of the Park (DOV 02/00905)
 This is attached to the email accompanying the Representation form

 Ref 2 DDC Welcomes Betteshanger Parks Announcement
 Dover District Council has welcomed today's announcement that the future of Betteshanger Country Park has been secured.
 Nadeem Aziz, Chief Executive of Dover District Council, said: "We've been involved with the Betteshanger project since the start, so we're delighted that its future has been secured with new owners and that the Country Park will remain open and fully operational.
 "We always recognised that the regeneration of the Betteshanger site had huge potential as a tourism, community and sporting hub, and we're pleased that the new owners have committed to finishing the exciting new Visitor Centre and Kent Mining Museum.
 "We look forward to working with Quinn Estates to realise the full potential of Betteshanger Country Park."
 Posted on 02 December 2019

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful

Explanations for the apparent change of policy in relation to Betteshanger Country Park and explicit plans for its future need to be included in the Plan in the interests of transparency and for the benefit of the local community.

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I consider it to be necessary to secure the future of the Park as Protected Open space and part of the semi/natural green space quantum of the district.
Include files	Sullivan 1054 Att2.pdf
Local Plan Consultation Point	PM5 - Protection of Open Space, Sports Facilities and Local Green Space
Rep ID	SDLP1471
Rep Status	Processed
Consultee ID	1330919
Consultee Full Name	Mrs Heather Twizell
Consultee Company / Organisation	Natural England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM5
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	PM3 – Providing Open Space PM5 – Protection of Open Space, Sports Facilities and Local Green Space Natural England welcomes these two linked policies covering the provision and protection of open space. We appreciate your Authority's commitment towards ensuring that existing deficiencies in open space are not increased and that the future needs of communities are provided for. We are pleased to see that the Plan is supported by a recent Open Space Assessment (2019).
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will	

make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	PM5 - Protection of Open Space, Sports Facilities and Local Green Space
Rep ID	SDLP1143
Rep Status	Processed
Consultee ID	1329632
Consultee Full Name	Mr David Hawkes
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP14 DEA008
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I believe the local plan regarding SAP14 and the area designated for development as DEA008 as non compliant given the previous applications for development and the consistent refusal
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	DEA008 should be removed from the plan and designated as protected open space in conjunction with an area that it abutts at it's northern end and off of Marlborough Road The previous refusal for this area are as follows 16/01441 1) Refusal on the grounds that it would seriously harm the visual landscape and character of the countryside contrary to policy DD21 and policies DM15 and DM16 and the NPPF para109

<p>examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>2) would cause harm to the safe and efficient operation of the highway contrary to NPPF Para 32</p> <p>17/00505 1) Refusal on the grounds it is contrary to policy CP1 and DM1 and paragraphs 12,12,17,29,49,55,56,58 and 112 of the NPPF (2012)</p> <p>2) fails to protect the character an appearance of the countryside by causing visual harm contrary to policies CP1, DM1,DM15,and DM16 and paragrahpd 17,29,55,56,58,61,and64 of the NPPF (2012)</p> <p>Plus reasons 3,4 and 5 within the decision notice to refuse.</p> <p>19/00642 1) Refusal on the grounds when taken cumulatively the applicant has not demonstrated cklearly it would not result in detriment to local air quality and</p> <p>2) The propped development of the site with the quantum of housing proposed will adversely affect the visual amenity contry to policy DM15 of the DDc core strategy 2010 and para 170 of the NPPF (2019)</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>PM5 - Protection of Open Space, Sports Facilities and Local Green Space</p>
<p>Rep ID</p>	<p>SDLP1114</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331762</p>
<p>Consultee Full Name</p>	<p>Ms Waite-Gleave Sarah Waite-Gleave</p>
<p>Consultee Company / Organisation</p>	<p>Dover and Deal Green Party</p>
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to?Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified Effective Consistent with National Policy</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>No</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>No</p>

6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	One glaring omission is Betteshanger Country Park formerly Fowlmead. This site was formerly publicly-owned by SEEDA and under SEEDA, designation as Local Nature Reserve was applied for in 2004, but the application got lost. Then the now defunct Hadlow College took it on until their financial problems caused the current developer to snap it up. The site has long been designated as 'low key recreation' by DDC.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The site has rewilded over 30 years and DDC planning portal holds evidence (applications 22/01158 and 22/01152 refer) of how Kent nature / wildlife-concerned NGOs and the Kent Recorder, agree this is a well-loved biodiversity hotspot, a habitat of a number of endangered species. As such, all this site must be designated as a Local Green Space for the Plan to become sound and effective.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	PM5 - Protection of Open Space, Sports Facilities and Local Green Space
Rep ID	SDLP1365
Rep Status	Processed
Consultee ID	1333128
Consultee Full Name	David Powell
Consultee Company / Organisation	
Agent Full Name	Klaire Lander
Agent Company / Organisation	Lander Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM5
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Lander Planning sent a PDF document which has been split across the relevant sections of the Plan. See Original Attachment on SDLP1346)</p> <p>The wording of this policy relating to the protection of 'open space' could be very broadly interpreted and this policy wording should be more tightly drawn to avoid ambiguity. Developments within settlements are generally sustainably located and to restrict development in these areas would be contrary to national planning policy.</p> <p>Other policies in the Local Plan should seek to protect the setting of heritage assets for example. The circumstances set out in the policy are quite far reaching and could preclude many sustainable developments within settlements. This policy should be re-worded to only include outdoor recreation facilities, playing fields and allotments and sites that are designated Local Green Space.</p> <p>This policy wording is not effective or justified in that regard and is not supported.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	PM5 - Protection of Open Space, Sports Facilities and Local Green Space
Rep ID	SDLP1675
Rep Status	Processed
Consultee ID	1331770
Consultee Full Name	Cathy Skinner (clerk)
Consultee Company / Organisation	Northbourne Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM5
2 - Do you consider this part of the Plan sound?	No

<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified Effective Consistent with National Policy</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Not Applicable</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Not Applicable</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>Local Green Space Designation Proposal: Almonry Meadow, Northbourne</p> <p>Northbourne Parish Council proposes the following site for Local Green Space Designation within the new Dover District Local Plan which is currently under preparation at the Regulation 19 stage.</p> <p>Site Details</p> <p>Almonry Meadow, The Drove, Northbourne, Kent The proposed site is wholly owned in title by Northbourne Parish Council</p> <p>Summary of Site Proposal</p> <p>The Almonry Meadow is a community green space of some 1.45ha comprising a playing field, recreation ground, outdoor gym and children's play area.</p> <p>The majority of the site is of open mown grass, the site is bordered by mature, specimen trees, hedgerow and, on its southeastern boundary, by the c19th red brick wall of the listed gardens at Northbourne Court. The site is located to the north of The Street in the historic village of Northbourne. Adjoining the site to the southwest is the Church of St Augustine.</p> <p>The site is proposed to secure formal recognition of its recreation and wellbeing value to the community, its historic setting and links with Northbourne village, and its visual attractiveness and tranquillity.</p> <p>Planning Policy for Local Green Space Designation Consideration has been given to the requirements for Local Green Space Designation within the National Planning Policy Framework (1).</p> <p><i>101. The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient home, jobs and other essential services. Local Green Space should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.</i></p> <p><i>102. The Local Green Space designation should only be used where the green space is: a) in reasonably close proximity to the community it serves; b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and c) local in character and is not an extensive tract of land.</i></p> <p><i>103. Policies for managing development within a Local Green Space should be consistent with those for Green Belts.</i></p> <p>Assessment of Proposed Site Against NPPF Greenspace Criteria</p> <p><i>i. Proximity to the community served The Almonry Meadow is an integral and historic part of Northbourne Village. Located centrally it provides a valued local green space for recreation, village events, relaxation, and wellbeing. The Almonry Meadow is also used by residents of the wider Parish, particularly those living in the former mining community at Circular Road, Betteshanger and residents in nearby Finglesham. The Meadow is both close to and integral to the community it serves. Access to the site is well provided for by various public rights of way to/from the village, via the churchyard, and onwards via the public rights of way through wider registered parkland at Northbourne Court. Vehicle access is provided via The Drove with good car parking provision in the adjacent Northbourne Parish Hall</i></p> <p><i>ii. Significance to the community</i></p> <p>The Meadow has strong historic links to Northbourne where it served as part of the farmstead Almonry Farm, the former Almonry Farmhouse being a listed building adjacent to the meadow. The meadow also has long historic links with the adjacent grade I listed Church of St Augustine2 , the former St. Augustine's Abbey and the adjoining grade II* registered Parkland and Gardens at Northbourne Court3 .</p>

The Almonry Meadow has been a distinct open area within the village for centuries, and more recently has transferred into the ownership of the Parish Council for the long-term benefit of the Parish. The Almonry Meadow serves the community as a multi-purpose green space, used for exercise, recreation, sports, and relaxation in a peaceful, historic and tranquil setting. The Meadow also offers a dedicated children's play area and an exercise space with outdoor gym equipment. The Meadow adjoins the Parish Hall and provides an outside space for summer parties, fetes, and outdoor community events.

The attractive setting and tranquillity of the Meadow is recognised as a particular quality. Northbourne is noted as being strongly tranquil in the Dover District 2020 Landscape Character Assessment⁴ and the location of the Meadow away from roads or major development makes it a valuable local resource for residential wellbeing, unencumbered by noise and disturbance.

iii. Local Character and Site Extent

The Meadow is centrally located in relation to the village, the Church of St Augustine and Northbourne Court. The site is not excessively large, measuring some 1.45ha in area. The Meadow is a well-defined site with clear borders and a strong functional relationship with the village. It is considered that the proposed site is both local in character and is not an extensive tract of land

Planning Practice Guidance – Local Green Space

Government Planning Practice Guidance⁵ provides further considerations for Local Green Space designation. We consider that the proposed site at Almonry Meadow meets these criteria. The proposed Local Green Space does not conflict with site allocations in the draft local plan, nor do we see conflict with the plan in respect of policy making. There are no planning consents on the proposed site and none of significance close to the site where conflict could arise.

It noted that the proposed site is contained within the Northbourne Conservation Area. Planning Practice Guidance recognises this situation where other designations may apply and provides advice:

Different types of designations are intended to achieve different purposes. If land is already protected by designation, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space

The Conservation Area is a heritage designation which seeks to protect the significance of the historic village, listed buildings and their shared setting. The proposed Local Green Space site at Almonry Meadow is considered to have some existing protection in respect of heritage value through the Conservation Area designation. However, our submission proposes that the Almonry Meadow has significance and value to the community beyond heritage with particular importance for recreation, exercise and community events along with the provision of a calm, tranquil green space which promotes wellbeing. The designation as Local Green Space would recognise and protect these qualities in addition to the heritage designation offered by the Conservation Area. We consider that Local Green Space would be an appropriate designation providing additional local benefit.

(DDC note - see attachment for full representation with images and references.)

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Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files	Pays Northbourne PC Em Att1.pdf
Local Plan Consultation Point	PM5 - Protection of Open Space, Sports Facilities and Local Green Space
Rep ID	SDLP1517
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM5
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p><i>DDC Note The text below is an extract from the original representation which is attached to SDLP1438.</i></p> <p>PM5 Protection of . . . Local Green Space</p> <p>One glaring omission is Betteshanger Country Park formerly Fowlmead. This site was formerly publicly owned by SEEDA and under SEEDA, designation as Local Nature Reserve was applied for in 2004, but the application got lost. Then the now defunct Hadlow College took it on until their financial problems caused the current developer to snap it up. The site has long been designated as 'low key recreation' by DDC.</p> <p>The site has rewilded over 30 years and DDC planning portal holds evidence (applications 22/01158 and 22/01152 refer) of how Kent nature / wildlife-concerned NGOs and the Kent Recorder, agree this is a well-loved biodiversity hotspot, a habitat of a number of endangered species. As such, all this site must be designated as a Local Green Space for the Plan to become sound and effective.</p>
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if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	PM5 - Protection of Open Space, Sports Facilities and Local Green Space
Rep ID	SDLP1828
Rep Status	Processed
Consultee ID	1272950
Consultee Full Name	Delia Webb
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	AYL002
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	As Aylesham has already had hundreds of houses built since 2016 in our village, it no longer has the village 'feel', surrounded by houses on all sides. AYL002 is the last remaining green area within the village where children run and play, and walkers / dog walkers can enjoy a safe walk, where they can be seen, so will not be attacked or accosted. I don't think it is too much to ask to leave this space, we as an area have, and are having so many houses built, it is changing the ethos, with no infrastructure being put in the builders plans - yes, done? No!! where AYL004 has 500 homes removed, thank you, but we desperately need a secondary school, a proper supermarket, and another doctors surgery. Persimmons and Barratts should be putting a proper sum in to accomplish this, that 500 homes space could be used for this with their financial help.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance	I don't think it is sound planning or justified to take the last green space away from the village. It is not effective for mental health, exercise space for children to run or play or adults to walk. Your local plan does not even state how many houses, so I cant state what modification is needed, none is the preferred amount.

with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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No

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Include files

PM6 - Community Facilities and Services

Local Plan Consultation Point	PM6 - Community Facilities and Services
Rep ID	SDLP631
Rep Status	Processed
Consultee ID	1331790
Consultee Full Name	Julie Davies
Consultee Company / Organisation	CPRE Kent
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM6
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The 2015 Local Plan provided for a new community building for the Sholden area and a scheme was approved. The need for this building should be carried forward into this plan.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	CPRE Kent would wish to participate at the examination hearings to explore these issues further.
Include files	
Local Plan Consultation Point	PM6 - Community Facilities and Services
Rep ID	SDLP1031
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM6
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The County Council welcomes the clarification on the threshold for developer contributions.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	It is noted that in paragraph 2 of this policy, which considers the potential loss of community facilities, the County Council requests the following amendment: <i>Across the district as a whole, planning permission will only be granted for proposals involving the loss or change of use of community services or facilities in the following exceptional circumstances</i> The County Council requests that the reference in paragraph 6.98 to shared facilities should also be explicitly incorporated into this policy.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	PM6 - Community Facilities and Services
Rep ID	SDLP1113
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The statements here are sound. Experience indicates that only a bias in favour of public transparency, full consultation with the public and community organisations, and more effective democratic accountability will ensure that powerful, influential, high-profit developers do not cause the statements to be circumvented. A fifth of Tory party donations from property sector News Housing Today The vast majority of the electorate want cleaner, less lobby-laden government.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	PM6 - Community Facilities and Services
Rep ID	SDLP1555
Rep Status	Processed
Consultee ID	1333333
Consultee Full Name	Mr Colin Tearle
Consultee Company / Organisation	Shepherdswell-with-Coldred Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	PM6
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>During public consultation the council has been made aware that while there is a recognised need for limited housing growth there are very strong concerns regarding the proposed sites in both Shepherdswell and Coldred and the consequential impact of proposed housing developments in the neighbouring villages of Eythorne and Elvington.</p> <p>New housing without adequate local infrastructure puts significant strain on local amenities such as medical services, school and playgroup places as well as increasing traffic on our roads. The existing sewerage system is already overloaded and any future developments will only exacerbate this problem.</p> <p>Transport. Whilst we are fortunate to have a railway station it does not offer reasonable access to disabled persons or those with limited mobility- it is difficult to envisage how access can be improved.</p> <p>Most bus services have now been withdrawn apart from school services so residents will have to rely on cars for shopping etc. There are no dedicated cycle paths and many cyclists are reluctant to use their bikes because of this traffic congestion.</p> <p>Those residents who want to use the train services must endure walking to the station on roads with limited or no footpaths. Residents in Eythorne and Elvington will have to either use cars to get to the station or walk along a very busy main road - again without footpaths.</p>

	<p>Village Services. The surgery situated in Mill Lane is oversubscribed and patients are very often referred to the Dover branch . There is no “walk in “ service .</p> <p>The village school is again nearly full with no current plans for extending present facilities. The location of the school causes severe traffic congestion at core times. Many parents taking their children to school have to walk up Church Hill which is a narrow, busy road with no footpath. The nearest secondary schools are located in Dover and parents experience considerable difficulty in transporting their children to school.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>If development of any kind is to be permitted it should be linked to a S106 agreement to improve the facilities within Shepherdswell and Coldred. The plan indicates that Dover District Council can fund parish councils from S106 monies when a case is made that this is a good use of funds. Shepherdswell with Coldred Parish Council would like to make a case for funding of community facilities, including improvements to the village hall, its parking facilities, the recreation ground, the cemeteries and improvements to the local school.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	No
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	PM6 - Community Facilities and Services
<p>Rep ID</p>	SDLP1518
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1333265
<p>Consultee Full Name</p>	Cllr John Lonsdale
<p>Consultee Company / Organisation</p>	Walmer Town Council
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	SP14 - Enhancing Green Infrastructure and Biodiversity
<p>2 - Do you consider this part of the Plan sound?</p>	No
<p>3 - If you consider the Plan is ‘unsound’, on which grounds do you consider this to be? (select all that apply)</p>	Positively prepared Justified Effective Consistent with National Policy

4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note <i>The text below is an extract from the original representation which is attached to SDLP1438.</i></p> <p>PM 1 – 4 and 6 The statements here are sound. Experience indicates that only a bias in favour of public transparency, full consultation with the public and community organizations, and more effective democratic accountability will ensure that powerful, influential, high-profit developers do not cause the statements to be circumvented</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

H1 - Type and Mix of Housing

Local Plan Consultation Point	H1 - Type and Mix of Housing
Rep ID	SDLP274
Rep Status	Processed
Consultee ID	1268017
Consultee Full Name	Ms Penelope James
Consultee Company / Organisation	Dover and Deal Liberal Democrats
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	H1
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	n/a
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Is it possible to include a list of essential environmentally friendly measures which should be included as standard in all residential new builds eg, insulation, heat pumps, solar panels, sustainable building materials?
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	n/a

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	H1 - Type and Mix of Housing
Rep ID	SDLP172
Rep Status	Processed
Consultee ID	1329874
Consultee Full Name	Ms Nicola Purcell
Consultee Company / Organisation	Aylesham Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3 Housing growth
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Aylesham Parish Council agrees that there is a need to increase housing stock both nationally and within the Dover district.</p> <p>Over recent years, Aylesham has greatly assisted in helping to increase the numbers of homes within the local community (having delivered 917 homes so far with a further 443 to come). However, it is felt that any future development should be kept to a minimum.</p> <p>This relates to SP3 – Housing Growth.</p> <p>South Aylesham (SAP24) includes a large number of positives (such as inclusion of play parks, open spaces, cycle links and protecting and enhancing wildlife) but there is a lack of firm commitments to facilities. The development makes reference to “a new small convenience shop” which is wholly insufficient for the proposed number of new homes.</p> <p>Dover District Council is looking at updating its parking policy for future developments. Currently the Kent Design Guide and the Kent Design Guide Review: Interim Guidance Note 3 to apply planning constraints. It is welcome to see this referenced in the Draft Local Plan. It is important that future developments allow for independently accessible parking spaces (as opposed to tandem spaces) and that car ports or garages are not included as parking.</p> <p>This will greatly improve parking, especially in rural developments.</p> <p>More considerate parking will greatly improve access for pedestrians as well as safety for pedestrians and cyclists.</p> <p>Aylesham Parish Council believes that a new small convenience shop in any new development would be wholly insufficient. Dover District Council should also look to adopt more stringent parking policy reform.</p> <p>It has been noted on previous planning applications that the sewerage pipes in the village may be at their capacity, so any further developments could push them past their breaking point.</p> <p>This should be addressed before any further development can be considered.</p>

	Current planes for housing development do not go far enough in providing homes that are suitable for disable people or homes that can be easily adapted in the future to meet the needs of home owners. An increase in the number of dwellings built to an accessible standard would be welcomed
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	H1 - Type and Mix of Housing
Rep ID	SDLP807
Rep Status	Processed
Consultee ID	1259612
Consultee Full Name	Mr Chris Shaw
Consultee Company / Organisation	Langdon Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	H1 - Type and Mix of Housing Clause Proposal for 10 or more dwellings ...
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes

6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Amend to include or any Local Housing Needs Assessment at the neighbourhood level
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Category: Soundness: Effective Amend to include or any Local Housing Needs Assessment at the neighbourhood level?
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	H1 - Type and Mix of Housing
Rep ID	SDLP568
Rep Status	Processed
Consultee ID	1267584
Consultee Full Name	Jason Ransley
Consultee Company / Organisation	Dover Harbour Board
Agent Full Name	John Bowles
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy H1 - Type and Mix of Housing
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Dover Harbour Board supports the desire of the Council to provide a range of housing types and sizes in the District to meet the needs of the local community under Policy H1 - Type and Mix of Housing . However, we welcome the recognition at paragraph 7.7 of the supporting text that there may be circumstances (appropriately evidenced) where it is not possible to provide the full range of housing types.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	N/A
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	N/A
Include files	
Local Plan Consultation Point	H1 - Type and Mix of Housing
Rep ID	SDLP529
Rep Status	Processed
Consultee ID	1266351
Consultee Full Name	Dr Sharon Danby
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	H1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective

4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>7.3 Detail is also given within the current SHMA on the dwelling sizes by tenure, with an overall mix sought of 12.2% from one bedroom, 20.4% from two bedrooms, 35.2% from three bedrooms, and 32.2% four or more bedroom dwellings. These tenures may be subject to change in future SHMAs.</p> <p>I consider this unsound as Dover District has an ageing population and therefore requires many more 1 bed retirement flats. There are also many youngsters who cannot afford the prices locally as they are inflated by the many homes snapped up in Deal and on the coast for holiday homes and airbnb's. They also need 1 bed flats. It is ridiculous that over 2/3 of the housing mix proposed are over 3 bedroom. It begs the question who are these actually for? They are not affordable and not for local people. If tasteful, well insulated, green tech, affordable flats were built on the same footprint as these massive executive homes we wouldn't have a housing crisis.</p> <p>These figures should be driven by local demand and not the needs of investors or developers.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	7.3 should read 33% 1 bedroom flats, 33% 2 bed houses and flats, 20% 3 bedroom houses and 14% four or more bedroom houses.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	H1 - Type and Mix of Housing
Rep ID	SDLP709
Rep Status	Processed
Consultee ID	1331369
Consultee Full Name	Mr Richard Henchley
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP35
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Because it is close to London and the area's natural attractions local economically active people are priced out of the housing market for housing they could otherwise afford.</p> <p>Planning conditions should impose a "local connection test" so that the housing can only be bought by people who fulfil the test.</p> <p>The Local and Neighbourhood Plans should contain a proper assessment of the scarcity and cost of housing for locally economically active residents and suitable remedial measures. Accordingly planning law would require applications for planning permission to be determined in line with the development plan reflecting these issues. (There would be no effect on existing housing except, maybe to increase its value).</p> <p>Any section 106 agreement should require a proportionate contribution to the demands imposed by the development on existing and future local infrastructure.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	H1 - Type and Mix of Housing
Rep ID	SDLP497
Rep Status	Processed
Consultee ID	1268017
Consultee Full Name	Ms Penelope James

Consultee Company / Organisation	Dover and Deal Liberal Democrats
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	H1
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	n/a
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	n/a
Include files	
Local Plan Consultation Point	H1 - Type and Mix of Housing
Rep ID	SDLP874
Rep Status	Processed
Consultee ID	1273295
Consultee Full Name	Mr Martin

	Garside
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	H1 - type and mix of housing - section 7.3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Section 7.3 indicates that the district plan seeks an overall housing mix of "12.2% from one bedroom, 20.4% from two bedrooms, 35.2% from three bedrooms, and 32.2% four or more bedroom dwellings". This mix feels very unsound - and simply does not meet the current or future housing challenges we face, especially in southern England. The proposed mix will inhibit the sustainable and effective growth of housing needed in the future. With young people finding it increasingly hard to get on the housing ladder at all - the pressing need is for small one or two bedroom starter homes and flats. Similarly - we face significant societal and other changes - including longer life expectancy and many marriages now ending when couples reach their 50s and 60s. These mean a growing need for small one or two bedroom retirement homes and apartments.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The proposed overall housing mix proposed in the current draft district plan should be comprehensively revised - with a very considerable increase in the goal for new one and two bedroom flats and housing. And a reduction in the number of larger three, four and more bedroom dwellings.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

Local Plan Consultation Point	H1 - Type and Mix of Housing
Rep ID	SDLP946
Rep Status	Processed
Consultee ID	1331292
Consultee Full Name	Mr Robert Harley
Consultee Company / Organisation	Foster & Payne
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	4.55 SAP1 - Whitfield Urban Expansion
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I believe the local plan needs an allocation of specialist housing for older people as described in the attached letter.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	I would like to make the case for an allocation within the Whitfield Urban Expansion area for specialist housing for older people to be made.

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	SDLP0241 Foster and Payne redacted- Att1.pdf (2)
Local Plan Consultation Point	H1 - Type and Mix of Housing
Rep ID	SDLP767
Rep Status	Processed
Consultee ID	1331834
Consultee Full Name	Kitewood
Consultee Company / Organisation	Kitewood
Agent Full Name	Lucy Wilford
Agent Company / Organisation	DHA Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Development Control Policies - H1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>See attached supporting statement</p> <p>Text below (copied from attached statement) added by DDC</p> <p>Policy H1: Type and Mix of Housing</p> <p>4.2.1 No objection in principle is raised in respect of Policy H1, which seeks to ensure a mix of housing is provided which meets identified needs in the District. However, the wording of the policy must be amended to provide greater flexibility to allow for individual site circumstances. This is to ensure the mix is in keeping and reflective of the local character of the area, ensures the most efficient use of Sites, and provides flexibility for developments to respond to changes in market conditions.</p> <p>4.2.2 It is proposed that the policy is amended as follows:</p> <p>Proposals for 10 or more dwellings will be required to demonstrate how the mix of tenure, type and size of housing proposed on site has had regard to reflects the Council's latest evidence of housing need and market demand and contributes towards meeting the varied needs of different households including single person households, couples, families with children, older people, people with disabilities and people wishing to build their own homes. The housing mix should be balanced against meeting other design requirements, such as in Policy PM1.against meeting other design requirements, such as in Policy PM1.</p> <p>Development proposals for standalone older persons housing or other specialist housing are exempt from this requirement and will be supported in principle where the need has been identified by extensive and robust evidence, and where they can be located in a suitable and sustainable way.</p>

	4.2.3 The above change is necessary to ensure the policy aligns with other design considerations in the Reg 19 Local Plan and is "Consistent with National Policy", which also requires other design considerations to be taken into account (NPPF, Sections 11 & 12), to ensure the delivery of high-quality sustainable developments
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	See attached supporting statement Text below (copied from attached statement) added by DDC 4.2.2 It is proposed that the policy is amended as follows: <i>Proposals for 10 or more dwellings will be required to demonstrate how the mix of tenure, type and size of housing proposed on site has had regard to reflects the Council's latest evidence of housing need and market demand and contributes towards meeting the varied needs of different households including single person households, couples, families with children, older people, people with disabilities and people wishing to build their own homes. The housing mix should be balanced against meeting other design requirements, such as in Policy PM1.against meeting other design requirements, such as in Policy PM1.</i> <i>Development proposals for standalone older persons housing or other specialist housing are exempt from this requirement and will be supported in principle where the need has been identified by extensive and robust evidence, and where they can be located in a suitable and sustainable way.</i> 4.2.3 The above change is necessary to ensure the policy aligns with other design considerations in the Reg 19 Local Plan and is "Consistent with National Policy", which also requires other design considerations to be taken into account (NPPF, Sections 11 & 12), to ensure the delivery of high-quality sustainable developments
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	In order to ensure that our case is properly put forward and understood, and to provide the opportunity to respond to any questions/points raised by the Council and Local Plan Inspector which might result outside the written representations made and following discussion at the EIP.
Include files	Kitewood Estates Limited Reg19 Dover Local Plan Reps.pdf (2)
Local Plan Consultation Point	H1 - Type and Mix of Housing
Rep ID	SDLP627
Rep Status	Processed
Consultee ID	1331790
Consultee Full Name	Julie Davies
Consultee Company / Organisation	CPRE Kent
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	H1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified

	Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The 2018-based ONS sub-regional population projections for the district estimate that the 65 and over population will both grow in number, from 28,260 in 2020 to 40,938 in 2040, and in percentage terms rise from 23.6% of the total population in 2020 to 29.4% in 2040. It will be important that future housing provision provides for their needs, be that bungalows or sheltered accommodation. This would help release 3-bedroom homes onto the market.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	CPRE Kent would wish to participate at the examination hearings to explore these issues further.
Include files	
Local Plan Consultation Point	H1 - Type and Mix of Housing
Rep ID	SDLP633
Rep Status	Processed
Consultee ID	1331790
Consultee Full Name	Julie Davies
Consultee Company / Organisation	CPRE Kent
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	H1
2 - Do you consider this part of the Plan sound?	No

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The 2018-based ONS sub-regional population projections for the district estimate that the 65 and over population will both grow in number, from 28,260 in 2020 to 40,938 in 2040, and in percentage terms rise from 23.6% of the total population in 2020 to 29.4% in 2040. It will be important that future housing provision provides for their needs, be that bungalows or sheltered accommodation. This would help release 3-bedroom homes onto the market
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	CPRE Kent would wish to participate at the examination hearings to explore these issues further.
Include files	
Local Plan Consultation Point	H1 - Type and Mix of Housing
Rep ID	SDLP716
Rep Status	Processed
Consultee ID	1331831
Consultee Full Name	Catesby Estates
Consultee Company / Organisation	Catesby Estates
Agent Full Name	Lucy Wilford
Agent Company / Organisation	DHA Planning

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Development Management Policies, New Homes - Policy H1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Please see supporting statement attached Text below (copied from attached statement) added by DDC Policy H1: Type and Mix of Housing <i>4.2.1 No objection in principle is raised in respect of Policy H1, which seeks to ensure a mix of housing is provided which meets identified needs in the District. However, the wording of the policy must be amended to provide greater flexibility to allow for individual site circumstances. This is to ensure the mix is in keeping and reflective of the local character of the area, ensures the most efficient use of Sites, and provides flexibility for developments to respond to changes in market conditions.</i>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Please see supporting statement Text below (copied from attached statement) added by DDC 4.2.2 It is proposed that the policy is amended as follows: Proposals for 10 or more dwellings will be required to demonstrate how the mix of tenure, type and size of housing proposed on site has had regard to reflects the Council's latest evidence of housing need and market demand and contributes towards meeting the varied needs of different households including single person households, couples, families with children, older people, people with disabilities and people wishing to build their own homes. The housing mix should be balanced against meeting other design requirements, such as in Policy PM1. Development proposals for standalone older persons housing or other specialist housing are exempt from this requirement and will be supported in principle where the need has been identified by extensive and robust evidence, and where they can be located in a suitable and sustainable way. 4.2.3 The above change is necessary to ensure the policy aligns with other design considerations in the Reg 19 Local Plan and is "Consistent with National Policy", which also requires other design considerations to be taken into account (NPPF, Sections 11 & 12), to ensure the delivery of high-quality sustainable developments.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	In order to ensure that our case is properly put forward and understood, and to provide the opportunity to respond to any questions/points raised by the Council and Local Plan Inspector which might result outside the written representations made and following discussion at the EIP.
Include files	Catesby Final Dover District Council Reps .pdf (3)
Local Plan Consultation Point	H1 - Type and Mix of Housing
Rep ID	SDLP781

Rep Status	Processed
Consultee ID	1331880
Consultee Full Name	Natasha Styles
Consultee Company / Organisation	McCarthy Stone
Agent Full Name	Natasha Styles
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	H1 - Type and Mix of Housing
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>H1– Type and Mix of Housing</p> <p>Policy H1 was previously policy DM11 in the regulation 18 consultation. We responded to the previous consultation recommending amendments to the policy but this appears to have been disregarded and therefore it is still felt that this policy is not justified, effective or consistent with national policy and therefore unsound.</p> <p>As noted above in our response to para 7.4, whilst the identified need for Housing with Care is low and therefore ought to be reviewed, overall it identifies a considerable need that equates to over 5% of the overall housing requirement. Yet, and mindful of the PPG guidance, the only reference to addressing the housing need of older people is within H1 that states:</p> <p><i>“Development proposals for stand alone older persons housing or other specialist housing are exempt from this requirement and will be supported in principle where the need has been identified by extensive and robust evidence, and where they can be located in a suitable and sustainable way”.</i></p> <p>As detailed in our regulation 18 response, given the identified high level of need, the policy should not require applicants for older peoples housing to prove need. We still believe that given the difficulties in delivering market retirement housing as evidenced by the low levels of delivery in Dover District historically, a stand alone policy should be drafted which actively encourages older persons housing, acknowledging the already proven need and not seeking to restrict it by need or unnecessary locational factors.</p> <p>Although it is acknowledged that the council is seeking to deliver some older persons' housing on allocations (3 allocations), the policy as drafted also infers that the housing needs of older people can simply be met by any housing development over 10 units, including a required proportion (i.e 5% or 1 unit in a 20 unit scheme) being older persons housing. This approach misunderstands the concept of older person housing (which the SHMA identifies and as defined in the PPG) which are group/communities based around shared services. Schemes are normally at least 30 units in order to support those services. Developers should not be required to demonstrate need given the many benefits that such developments bring.</p> <p>Benefits of Older Persons' Housing</p> <p>Older peoples housing produces a large number of significant benefits which can help to reduce the demands exerted on Health and Social Services and other care facilities – not only in terms of the fact that many of the residents remain in better health, both physically and mentally,</p>

but also doctors, physiotherapists, community nurses, hairdressers and other essential practitioners can all attend to visit several occupiers at once. This leads to a far more efficient and effective use of public resources.

Economic

A report '*Healthier and Happier' An analysis of the fiscal and wellbeing benefits of building more homes for later living*' by WPI Strategy for Homes for Later Living explored the significant savings that Government and individuals could expect to make if more older people in the UK could access this type of housing. The analysis showed that:

- 'Each person living in a home for later living enjoys a reduced risk of health challenges, contributing to fiscal savings to the NHS and social care services of approximately £3,500 per year.
- Building 30,000 more retirement housing dwellings every year for the next 10 years would generate fiscal savings across the NHS and social services of £2.1bn per year.
- On a selection of national well-being criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing to housing specially designed for later living.'

Each person living in a home for later living enjoys a reduced risk of health challenges, contributing fiscal savings to the NHS and social care services of approximately £3,500 per year (*Homes for Later Living September 2019*). More detail on these financial savings is set out within the report.

A further report entitled *Silver Saviours for the High Street: How new retirement properties create more local economic value and more local jobs than any other type of residential housing* (February 2021) found that retirement properties create more local economic value and more local jobs than any other type of residential development. For an average 45 unit retirement scheme, the residents generate £550,000 of spending a year, £347,000 of which is spent on the high street, directly contributing to keeping local shops open.

As recognised by the PPG, Retirement housing releases under-occupied family housing and plays a very important role in recycling of housing stock in general. There is a 'knock-on' effect in terms of the whole housing chain enabling more effective use of existing housing. In the absence of choice, older people will stay put in properties that are often unsuitable for them until such a time as they need expensive residential care. A further Report "*Chain Reaction" The positive impact of specialist retirement housing on the generational divide and first-time buyers (Aug 2020)*" reveals that about two in every three retirement properties built, releases a home suitable for a first-time buyer. A typical Homes for Later Living development which consists of 40 apartments therefore results in at least 27 first time buyer properties being released onto the market.

Social

Retirement housing gives rise to many social benefits:

- Specifically designed housing for older people offers significant opportunities to enable residents to be as independent as possible in a safe and warm environment. Older homes are typically in a poorer state of repair, are often colder, damper, have more risk of fire and fall hazards. They lack in adaptations such as handrails, wider internal doors, stair lifts and walk in showers. Without these simple features everyday tasks can become harder and harder
- Retirement housing helps to reduce anxieties and worries experienced by many older people living in housing which does not best suit their needs by providing safety, security and reducing management and maintenance concerns.
- The Housing for Later Living Report (2019) shows that on a selection of wellbeing criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing into housing specifically designed for later living.

Environmental

The proposal provides a number of key environmental benefits by:

- Making more efficient use of land thereby reducing the need to use limited land resources for housing.
- Providing housing in close proximity to services and shops which can be easily accessed on foot thereby reducing the need for travel by means which consume energy and create emissions.
- Providing shared facilities for a large number of residents in a single building which makes more efficient use of material and energy resources.

It is therefore clear there will be a significant increase in older persons' over the Plan Period and the provision of suitable housing and care to meet the needs of this demographic should be a priority of the emerging Local Plan in line with the draft plan's evidence especially given national policy requirements and benefits such schemes provide.

<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Recommendation:</p> <p>Policy H1 is considered unsound as it is not justified, effective or consistent with national policy unless the following amendments are made.</p> <ol style="list-style-type: none"> 1 That Policy H1 be amended to delete reference to the housing needs of older people and is replaced by a standalone policy that encourages the provision of such housing in acknowledgement of the already identified need, referring to the types of older persons housing identified in the NPPG and the SHMA. <p>While we appreciate that no single planning approach will be appropriate for all areas, an example policy is provided that, we hope, will provide a useful reference:</p> <p><i>“The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations. The Council aims to ensure that older people are able to secure and sustain independence in a home appropriate to their circumstances by providing appropriate housing choice, particularly retirement housing and Extra Care Housing/Housing with Care. The Council will, through the identification of sites, allowing for windfall developments, and / or granting of planning consents in sustainable locations, provide for the development of retirement accommodation, residential care homes, close care, Extra Care and assisted care housing and Continuing Care Retirement Communities.”</i></p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>H1 - Type and Mix of Housing</p>
<p>Rep ID</p>	<p>SDLP1032</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331999</p>
<p>Consultee Full Name</p>	<p>Claire Pamberi</p>
<p>Consultee Company / Organisation</p>	<p>Kent County Council</p>
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>H1</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>Yes</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Not Applicable</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Not Applicable</p>

6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The County Council is supportive of this policy.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	H1 - Type and Mix of Housing
Rep ID	SDLP780
Rep Status	Processed
Consultee ID	1331880
Consultee Full Name	Natasha Styles
Consultee Company / Organisation	McCarthy Stone
Agent Full Name	Natasha Styles
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	7.4
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy

4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Older person's need – Para 7.4</p> <p>The council identifies at para 7.4 of the draft plan that <i>“The SHMA also prescribes that 576 units of housing for older people and 66 units of housing with care should be provide within the identified need and identifies a need for 990 additional spaces of Registered Care for housing those aged 65 and over between 2020 and 2040. This forms part of the institutional population and is in addition to the housing supplied within the local housing need identified above”.</i></p> <p>We identified in our response to the previous consultation that the very low Housing with Care (also known or Extra Care) requirement is surprising as generally there is a high level of need for such accommodation and active encouragement should be provided given that housing for older people aims to maintain independence with the help of care tailored to the needs of the individual. This is an attractive alternative to the formalised living environment of a Care Home. We recommended through the regulation 18 consultation that the evidence should be reviewed. This has not been undertaken as the same need figures have been taken forward. We also recommended that the housing requirement for older persons housing even at the low figure is some 5% of the overall housing requirement and therefore a significant consideration and housing need that the Local Plan should address which again doesn't appear to have been considered fully.</p> <p>Government's policy, as set out in the revised NPPF, is to boost significantly, the supply of housing. Paragraph 60 reads <i>“To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.”</i></p> <p>The revised NPPF looks at delivering a sufficient supply of homes, Paragraph 62 identifies within this context, the size, and type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies including older people.</p> <p>In June 2019 the PPG was updated to include a section on Housing for Older and Disabled People, recognising the need to provide housing for older people. <i>Paragraph 001 Reference ID: 63-001-20190626 states:</i></p> <p><i>“The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this is projected to double to 3.2 million. Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking”</i> (emphasis added)</p> <p><i>Paragraph 003 Reference ID: 63-003-20190626 recognises that:</i></p> <p><i>“the health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support.”</i></p> <p>Thus, a range of provision needs to be planned for. Paragraph 006 <i>Reference ID: 63-006-20190626</i> sets out;</p> <p><i>“plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require.”</i></p> <p>Therefore, recognising that housing for older people has its own requirements and cannot be successfully considered against criteria for general family housing is important.</p> <p>Although the council has indicated the level of housing need for older within para 7.4 of the plan we do not feel that the evidence used is fully justified. The figures are derived (or summarised) from the Dover Strategic Housing Market Assessment Partial Update Part 2 update, Peter Brett Associates, December 2019. Para 6.7 describes the methodology used to identify older persons needs and at para 6.7 states:</p> <p><i>“The model examines the future requirement of two types of specialist housing; housing for older people and housing with care. Currently there are an estimated 1,056 units of housing for older people and 121 units of housing with care in Dover District. The current prevalence of housing for older people is 95 per thousand head of population aged 75 in Dover District, whilst the prevalence of housing with care is 11 per thousand head of population aged 75 in the District. The SHOP model presumes that, given the significant projected growth in the future population of those aged 75 or over, it is appropriate for authorities to plan to deliver these two types of accommodation at the national prevalence rates in the future, which are 121 units of housing for older people per thousand head of population aged 75 or over, and 15.5 units of housing with care</i></p>

	<p><i>per thousand head of population aged 75 or over. However, the original SHMA found that this approach led to an overestimate of the likely future requirement of this type of housing and it was more suitable to presume that current occupation rates are likely to continue, which more closely reflect the current expectations of local households".</i></p> <p>If the national figures had been used to try and overcome what appears to be an existing shortfall in older person's housing the need figures identified would be higher. It should also be noted that the original SHMA, part 2 entitled 'OAN for affordable housing' by HDH planning and development at para 6.11 says 'If it is presumed that occupation patterns remain at current levels then there is a requirement for 1,178 additional specialist units of which 1,055 should be sheltered housing and 123 extracare housing' and para 7.6 states 'In terms of specialist dwellings for older persons (class C3b), as set out in Chapter 6, it is evidenced that in Dover District an additional 353 affordable and 825 market sheltered and extracare housing units should be provided over the plan period within the identified Objectively Assessed Need'.</p> <p>It is therefore unclear as to how the need figures in para 7.4 has been derived and appears to be low and this figures should be reconsidered. Nevertheless, the housing requirement for older persons housing even at that low figure is some 5% of the overall housing requirement and therefore a significant proportion of housing need that the Local Plan should address fully to be consistent with national policy, effective and justified.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Recommendation:</p> <p>The housing requirement for older people's housing as expressed in para 7.4 should be reconsidered and amended in line with a realistic level of need.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>Unless the housing requirement for older people's housing is reconsidered and justified we feel it is necessary to explain our position as our previous representtaion has been disregarded by the council.</p>
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>H1 - Type and Mix of Housing</p>
<p>Rep ID</p>	<p>SDLP1238</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1271189</p>
<p>Consultee Full Name</p>	<p>Halsbury Homes</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	<p>Sean Bashforth</p>
<p>Agent Company / Organisation</p>	<p>Quod</p>
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>H1</p>

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Policies PM1 (High Quality Design, Placing making and the provision of design codes), PM2 (Quality of Residential Development), PM3 (Providing Open Space), PM4 (Sports Provision) and H1 (Type and Mix of Housing) include prescriptive requirements for major housing developments.</p> <p>As a general principle, it is not evident that the Council has undertaken a review of the impact of such policies (which include minimum internal residential space standards and open space standards) on the deliverability and viability of housing alongside other requirements including affordable housing.</p> <p>In the context of existing policy and delivery of housing at WUE there also needs to be appropriate caveats in relation to how these policies are applied to Whitfield. For instance, Policy H1 (Type and Mix of Housing) requires proposals for 10 or more dwellings to demonstrate how the mix of tenure, type and size of housing reflects the Council's latest evidence on housing need and market demand. For WUE this and other policies need to cross refer to the adopted SPD and also take into account what has already been delivered and the pipeline of future development at Whitfield rather than apply district wide requirements.</p> <p>(DDC Note - Text Extracted from Document sent from Quod. Representation has been split across relevant areas of the Local Plan. Full attachment can be found under reference SDLP1232.)</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	H1 - Type and Mix of Housing
Rep ID	SDLP1158

Rep Status	Processed
Consultee ID	1331728
Consultee Full Name	Oonagh Kerrigan on behalf of Guardian Parks Ltd
Consultee Company / Organisation	DHA on behalf of Guardian Parks Ltd
Agent Full Name	Oonagh Kerrigan
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP45 CAP011 - Land known as the former Archway Filling Station, New Dover Road, Capel-le-Ferne
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<ul style="list-style-type: none"> • The NPPF is explicit in its requirement for strategic policy-making authorities to meet their needs in Paragraph 11 makes clear that: • “Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that: <ul style="list-style-type: none"> 1 <i>All plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including making effective use of land in urban areas) and adapt to its effects;</i> 1 <i>Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:</i> <ul style="list-style-type: none"> 1 <i>the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or</i> 1 <i>any adverse impacts of doing so would significantly and demonstrably outweigh the benefits</i> <ul style="list-style-type: none"> • Paragraph 20 goes on to state that: <p>“Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for:</p>

- 1 *housing (including affordable housing), employment, retail, leisure and other commercial development;*
 - 1 infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
 - 1 *community facilities (such as health, education and cultural infrastructure); and*
 - 1 *conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.”*
- Given this context, the Local Plan review should set out a comprehensive and cohesive approach to future development in Dover district, capable of making sufficient provision for the identified needs, whilst balancing the conservation and enhancement of the natural, built and historic
 - National guidance states that strategic policy-making authorities will need to calculate their local housing need figure at the start of the plan-making This number should be kept under review and revised where appropriate.
 - In calculating the local housing need, paragraph 61 of the NPPF states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance - unless exceptional circumstances justify an alternative approach.
 - Further, in addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned
 - The Standard Method for assessing housing need, issued alongside the Ministerial Statement on 16 December 2020, sets an indicative housing need figure for Dover District of 596 dwellings per annum However, the affordability ratio which factors into the local housing need assessment is updated For Dover District the latest housing need calculation is 611 dwellings per annum (dpa), equating to a total housing need of 10,998 dwellings for the Plan period to 2040. We understand that the Regulation 19 Local Plan seeks to meet this need in full and In addition to the minimum figures, Dover District Council have a set an appropriate contingency buffer of 926 dwellings of the Plan period, equating to 8.4% of the total Plan period figure.
 - For context, the current adopted Core Strategy requirement is 700 dwellings per This followed the adoption of a high-growth strategy in 2010 of 14,000 homes to 2026 based around the recommendations of the Dover Regeneration Strategy and above the minimum 10,100 requirement across the same period, as set out in the emerging (at the time) Regional Spatial Strategy.
 - For the avoidance of doubt, accounting for the Committed Supply Total of 5,282 dwellings, the new Local Plan will be required to allocate land sufficient to accommodate a minimum of 6,642 new homes over the remaining plan period to It is understood that this will be derived from the following sources:
 - Whitfield Urban Expansion Allocation: 2,200 dwellings
 - Local Plan Allocations (excluding Whitfield): 3,392 dwellings

	<ul style="list-style-type: none"> • Windfall Allowance (70 a year from year 4): 1,050 dwellings • On this basis, it is evident that a substantial quantum of Plan-led housing delivery will be required in order to meet the new Local Plan's housing target, and, due to the nature and dwindling supply of available urban land in Dover town and the remaining higher order settlements of Deal and Sandwich, the restrictive effect of the coast, environmental constraints and the limited capacity of the district's remaining mid and lower order settlements to accommodate significant levels of growth, to meet Dover's housing needs suitable brownfield sites will be the best sites to consider irrespective of the need to release greenfield
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Please refer to the attached consultation response submitted on behalf of Guardian Parks Ltd.
Include files	Archway Filling Station Reg 19 Representation_Final.pdf
Local Plan Consultation Point	H1 - Type and Mix of Housing
Rep ID	SDLP1366
Rep Status	Processed
Consultee ID	1333128
Consultee Full Name	David Powell
Consultee Company / Organisation	
Agent Full Name	Klaire Lander
Agent Company / Organisation	Lander Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	H1
2 - Do you consider this part of the Plan sound?	Yes

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Lander Planning sent a PDF document which has been split across the relevant sections of the Plan. See Original Attachment on SDLP1346) Providing a suitable mix of housing tenure, type and size is consistent with national policy and this policy is 'effective' and 'justified' and therefore supported.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	H1 - Type and Mix of Housing
Rep ID	SDLP1115
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	See below
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>To become sound and effective the statement needs to be amended so that it reads 'increase choice by providing substantially more social rented council houses' and also widen opportunities for home ownership'.</p> <p>7.3 The percentages cited are strange and unsound given that most of the population increase expected is due to aging population and smaller households are needed. High profit developers want to build 4 bed exec homes, which also sell as investment; is this why the overall mix sought is 35.2% three bedroom and 32.2% 4 or more bedroom properties ? The statement would be more effective and sound with a higher percentage of 1 and 2 bedroom houses.</p> <p>7.4 Sound</p> <p>Type and Mix of Housing – Affordable Housing As stated above on Strategic Policy 5, we and most residents are entirely opposed to the strategy of Dover Urban Area nil provision of affordable housing. We therefore want to see an amendment in Strategic Policy 4 Residential Windfall Development as follows <i>In the case of planning applications on developments of over 8 dwellings on windfall development sites, within 3 miles of the outer boundaries of Deal / Walmer, permission will only be given if the developer applicant has previously undertaken a development of a similar scale within Dover Urban area which provides a minimum of 30% affordable housing.</i> It would be better if 'affordable housing' were genuine rather than including the Equity grabbing half sales for the over 50s.</p> <p>7.9 We note some small DDC council house developments in Rokesley and Middle Deal wards, but these are nowhere near enough. This would be more sound if PWLB cheap loans were accessed to build 5 – 10 times as many (40 x 10 = 400) new council homes, covenanted so that they (or at least the freehold) would remain publicly owned in perpetuity and available to those who cannot manage home ownership. Social housing tenants should be protected from fuel poverty by building zero carbon, this would make policy more compliant with legality (legally binding Net Zero Strategy, Climate Emergency Declaration 2019 and Climate Change Act 2008). Some of the Affordable Dover Town provision needed, should be low rise apartment blocks, between three and five stories high. With balconies, decent floor space for the occupants, good quality design, and with trees to cool. Many people don't have time for gardening and these sort of homes will help build a "15 minute" neighbourhood; one where people can meet most of their needs within a quarter hour walk.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	H1 - Type and Mix of Housing

Rep ID	SDLP1220
Rep Status	Processed
Consultee ID	1332924
Consultee Full Name	Amy Aldridge
Consultee Company / Organisation	Gladman Developments Ltd
Agent Full Name	Amy Aldridge
Agent Company / Organisation	Gladman Developments Ltd
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	H1
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Gladman recognise the importance of new development opportunities to provide appropriate mixes of housing types, sizes, and tenures to meet the identified housing needs of the area. The Council should be mindful that the housing mix identified in the SHMA Update (2019) only represents a snapshot in time in relation to current housing needs. As such, Gladman consider that the policy is sufficient in providing flexibility going forward so that the Plan can accommodate changes in circumstance at the time of an application being submitted. This allows development opportunities to make best use of land whilst responding to the needs at that time by not being overly prescriptive and allowing applications to respond to local plan monitoring. (DDC Note - Text Extracted from Document sent from Gladman Developments Ltd. Full attachment can be found under the introduction comment reference SDLP1192)
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	H1 - Type and Mix of Housing
Rep ID	SDLP1421
Rep Status	Processed
Consultee ID	1333243
Consultee Full Name	Mr and Mrs Tobin
Consultee Company / Organisation	
Agent Full Name	Mr Reece Lemon
Agent Company / Organisation	Lee Evans Partnership
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	H1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>H1 addresses matters of housing type and mix, and as drafted provides a clear objective for new development in responding to need.</p> <p>3.44 Nevertheless it lacks the necessary specificity as to what this mix should reflect. To ensure the soundness and effective implementation of this policy – and therefore the Plan's overarching vision and objectives – Emerging Policy H1 must directly signpost applicants to an appropriate evidence base or other source of information, first to ensure consistency in approach from all applicants and second to ensure that the LPA retains an up to date record of precisely the need that must be reflected in new development.</p> <p>3.45 The Plan must be capable of implementation and to achieve such, it is important that Applicants have the confidence – at any given time – that an appropriate evidence base can be referred to when informing commercially sensitive decisions at the early stages of site feasibility assessments.</p> <p>3.46 As drafted, the Landowner considers this policy cannot be sound for the reasons above, but can otherwise be made sound with greater specificity as above.</p> <p>3.47 In this regard, it is recommended that H1 be amended to adequately signpost to an evidence base underpinning the LPA's identified housing need. It is suggested that such amendment could be picked up as a Main Modification in due course.</p>

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	H1 - Type and Mix of Housing
Rep ID	SDLP2041
Rep Status	Processed
Consultee ID	1274683
Consultee Full Name	David Reid
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	H1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible.	And a second minor question: Where the Housing policy mentions HMO and the constraints could it be added to the existing problem of large single houses in large grounds which apply for mixed development status to , possibly, pack a mix of house types onto the site to be in 'accord' with the housing needs set by Council?? A current case in point might be the redevelopment of the Deal Police station? Apologies for the ocular acuity problem!!and hope the Police station does get 'tastefully' converted!!

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	H1 - Type and Mix of Housing
Rep ID	SDLP1408
Rep Status	Processed
Consultee ID	1333152
Consultee Full Name	Mr P & Mrs S Laflin & Rubix Estates Ltd
Consultee Company / Organisation	
Agent Full Name	Mr Reece Lemon
Agent Company / Organisation	Lee Evans Partnership
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	H1
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>(DDC Note - Representation submitted by Lee Evans On behalf of Mr and Mrs Labin and Rubix Estates. Full Representation attached to SDLP1387. This document has been split across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1387.)</p> <p>POLICY H1 – Type and Mix of Housing</p> <p>3.30 Type and Mix of Housing is important in responding to the needs of the District over the Plan Period. The Promoter and Landowners will be planning for and designing a market led housing mix to meet a variety of demographics.</p> <p>3.31 As drafted, H1 provides a clear objective for new development in responding to need.</p> <p>3.32 However, to support the implementation of Policy H1 it is essential that the LPA retains an updated SHMA and is able to clearly direct Applicants to readily available information at any given period.</p> <p>3.33 It is recommended that the LPA commits – in the final wording of Policy H1 – to a signposting to the SHMA as the appropriate record of up to date housing need in the District.</p> <p>3.34 Without further clarity, the smooth implementation of Policy H1 is at risk given what otherwise ascribes too much uncertainty to applicants.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	H1 - Type and Mix of Housing
<p>Rep ID</p>	SDLP1540
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1333265
<p>Consultee Full Name</p>	Cllr John Lonsdale
<p>Consultee Company / Organisation</p>	Walmer Town Council
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	H1

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note <i>The text below is an extract from the original representation which is attached to SDLP1438.</i></p> <p>DM 7 New Homes</p> <p>H 1 7.1 To become sound and effective the statement needs to be amended so that it reads 'increase choice by providing substantially more social rented council houses' and also widen opportunities for home ownership'.</p> <p>7.3 The percentages cited are strange and unsound given that most of the population increase expected is due to aging population and smaller households are needed. High profit developers want to build 4 bed exec homes, which also sell as investment; is this why the overall mix sought is 35.2% three bedroom and 32.2% 4 or more-bedroom properties? The statement would be more effective and sounder with a higher percentage of 1- and 2-bedroom houses.</p> <p>7.4 Sound</p> <p>Type and Mix of Housing – Affordable Housing: As stated above on Strategic Policy 5, we and most residents are entirely opposed to the strategy of Dover Urban Area nil provision of affordable housing. We therefore want to see an amendment in Strategic Policy 4 Residential Windfall Development as follows In the case of planning applications on developments of over 8 dwellings on windfall development sites, within 3 miles of the outer boundaries of Deal / Walmer, permission will only be given if the developer applicant has previously undertaken a development of a similar scale within Dover Urban area which provides a minimum of 30% affordable housing. It would be better if 'affordable housing' were genuine rather than including the Equity grabbing half sales for the over 50s.</p> <p>7.9 We note some small DDC council house developments in Rokesley and Middle Deal wards, but these are nowhere near enough. This would be sounder if PWLB cheap loans were accessed to build 5 – 10 times as many (40 x 10 = 400) new council homes, covenanted so that they (or at least the freehold) would remain publicly owned in perpetuity and available to those who cannot manage home ownership. Social housing tenants should be protected from fuel poverty by building zero carbon, this would make policy more compliant with legality (legally binding Net Zero Strategy, Climate Emergency Declaration 2019 and Climate Change Act 2008).</p> <p>Some of the Affordable housing provision needed in Dover Town should be low rise apartment blocks, between three and five stories high. With balconies, decent floor space for the occupants, good quality design, and with trees to cool. Many people don't have time for gardening and these sorts of homes will help build a "15 minute" neighbourhood; one where people can meet most of their needs within a quarter hour walk</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	H1 - Type and Mix of Housing
Rep ID	SDLP1726
Rep Status	Processed
Consultee ID	1333477
Consultee Full Name	Cllr T Byfield
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	H1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note: The text below is an extract from the original representation which is attached to SDLP1438.</p> <p>Dover District plan report on Development management</p> <p><i>I have been tasked with reviewing the Dover local plan in respect of design and development. This is a very large document, so I have tried to break it down into manageable portions.</i></p> <p><i>The Dover plan does acknowledge that there are constant improvements in design and the plan will need to evolve and to consider new technology, improvements in materials and methods of construction.</i></p> <p><i>I have therefore taken the policies which are attached at the end of this document and extracted sections which I think will be of interest the town council and where I believe comment is due.</i></p> <p><i>I believe that the planning committee needs to be aware of these points extracted. My comments in italics</i></p> <p><i>There is no mention of prefabricated housing, which a way of constructing suitable housing in a short time at reduced cost, particularly for affordable housing. The designs these days are well made and not at all like the old prefabs. This is missed opportunity in my mind.</i></p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s)	

you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	H1 - Type and Mix of Housing
Rep ID	SDLP1720
Rep Status	Processed
Consultee ID	1333477
Consultee Full Name	Cllr T Byfield
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	H1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC Note: The text below is an extract from the original representation which is attached to SDLP1438. Dover District plan report on Development management <i>I have been tasked with reviewing the Dover local plan in respect of design and development. This is a very large document, so I have tried to break it down into manageable portions.</i>

	<p><i>The Dover plan does acknowledge that there are constant improvements in design and the plan will need to evolve and to consider new technology, improvements in materials and methods of construction.</i></p> <p><i>I have therefore taken the policies which are attached at the end of this document and extracted sections which I think will be of interest the town council and where I believe comment is due.</i></p> <p><i>I believe that the planning committee needs to be aware of these points extracted. My comments in italics</i></p> <p>b) Proposals for 10 or more dwellings will be required to demonstrate how the mix of tenure, type and size of housing proposed on site reflects the Council's latest evidence of housing need and market demand. <i>This needs to be made available to the planning committee.</i></p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	H1 - Type and Mix of Housing
<p>Rep ID</p>	SDLP1669
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1333382
<p>Consultee Full Name</p>	Mr Colin and Linda Tearle
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	Gurdev Moore
<p>Agent Company / Organisation</p>	Rubix Estates
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	H1
<p>2 - Do you consider this part of the Plan sound?</p>	Yes

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Representation submitted by Rubix Estates. Full Representation attached to SDLP1624. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1624.)</p> <p>Type and Mix of Housing is important in responding to the needs of the District over the Plan Period. It is essential that the mix is not prescriptive or otherwise onerous in what it seeks to impose on new development.</p> <p>3.37 As drafted, H1 provides a clear objective for new development in responding to need.</p> <p>3.38 However, to support the implementation of Policy H1 it is essential that the LPA retains an updated SHMA and is able to clearly direct Applicants to readily available information at any given period.</p> <p>3.39 It is recommended that the LPA commits – in the final wording of Policy H1 – to a signposting to the SHMA as the appropriate record of up to date housing need in the District.</p> <p>3.40 Without further clarity, the smooth implementation of Policy H1 is at risk given what otherwise ascribes too much uncertainty to applicants. It is unrealistic to expect applicants to prepare commercially viable proposals without sufficient direction as to what type and mix of dwellings the LPA expects to be delivered, and therefore what it may support. To better facilitate the implementation of the housing delivery mechanisms of the Plan, certainty must be better provided.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

H2 - Rural Local Needs Housing

Local Plan Consultation Point	H2 - Rural Local Needs Housing
Rep ID	SDLP280
Rep Status	Processed
Consultee ID	1331383
Consultee Full Name	Mrs Katie Miller
Consultee Company / Organisation	Kent Downs AONB Unit
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	H2 – Rural Local Needs Housing
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Support, consider an appropriate balance has been struck between supporting the provision of rural local needs housing and ensuring appropriate safeguards to the Kent Downs AONB and its setting.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	H2 - Rural Local Needs Housing
Rep ID	SDLP634
Rep Status	Processed
Consultee ID	1331790
Consultee Full Name	Julie Davies
Consultee Company / Organisation	CPRE Kent
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	H2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	This policy would benefit from an additional criterion that the development can access nearby services and facilities by active travel modes on safe routes.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	H2 - Rural Local Needs Housing
Rep ID	SDLP1033
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	H2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Further consideration is required in this policy to ensure connectivity for users between existing and new communities.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Further consideration is required in this policy to ensure connectivity for users between existing and new communities.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	H2 - Rural Local Needs Housing
Rep ID	SDLP1277
Rep Status	Processed
Consultee ID	1271353
Consultee Full Name	Church Commissioners
Consultee Company / Organisation	
Agent Full Name	Mr Andrew Watson
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	H2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Text Extracted from Document sent from Savills on Behalf of the Church Commissioners. Representation has been split across relevant areas of the Local Plan. Full attachment and introduction to Policy comments can be found under reference SDLP1265 for Shepherdswell Site and SDLP1266 for Eastry Site.) Policy H2 – Rural Local Housing Needs – COMMENTS Our Client is supportive of the inclusion of a rural exceptions policy in principle, however, it is considered that the wording relating to the proportion of market housing be amended to make the policy justified and more consistent with national policy. Policy H2 states that: 'Proposals which promote market housing as a means of enabling local housing need will not normally be supported as it is expected that all local needs housing coming forward will be delivered without the need for cross market subsidy. Where this is not possible, robust evidence will be required to demonstrate the need for market housing'. The requirements of the policy are not consistent with national policy. Paragraph 78 of the National Planning Policy Framework is supportive of 'some market housing' where it would facilitate the delivery of rural exception sites. As such, Policy H2 should be amended to reflect this and read as follows: 'Subject to a viability assessment, proposals which promote market housing as means of enabling local affordable housing need will not normally be supported as it is expected that all local needs housing coming forward will be delivered without the need for cross market subsidy. Where

	<p>this is not possible, robust evidence will be required to demonstrate the need for market housing'. be supported. The amount of market housing should be limited to that which would make the scheme viable'.</p> <p>Recommendation: DDC should adopt the wording changes suggested in Section 4 of this representation in relation to viability assessments.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	H2 - Rural Local Needs Housing
<p>Rep ID</p>	SDLP1116
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1331762
<p>Consultee Full Name</p>	Ms Waite-Gleave Sarah Waite-Gleave
<p>Consultee Company / Organisation</p>	Dover and Deal Green Party
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
<p>2 - Do you consider this part of the Plan sound?</p>	No
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	Positively prepared Justified Effective Consistent with National Policy
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	No

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	See below
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	(cross ref with E4 below) It is very unsound, for DDC to fail to make AirB&B owners register with them, so that they can be charged Business rate council tax. In terms of housing provision, AirB&B both nationally, and in Kent's coastal / rural towns especially, have a very negative effect of reducing the private rental market and thus forcing up the average monthly rents for private tenants, while we have a cost-of-living crisis. 7.13 Sound. More sound with the addition, ' <i>The work of Kent Community Housing Hub which provides a genuine alternative to developer-led housing schemes designed for high profit, will be brought to the attention of all of the District's parish and town councils, as will the initiative of Shepherdswell and Coldred Community Land Trust</i> '.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	H2 - Rural Local Needs Housing
Rep ID	SDLP1367
Rep Status	Processed
Consultee ID	1333128
Consultee Full Name	David Powell
Consultee Company / Organisation	
Agent Full Name	Klaire Lander
Agent Company / Organisation	Lander Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	H2
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	

4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Lander Planning sent a PDF document which has been split across the relevant sections of the Plan. See Original Attachment on SDLP1346) Providing rural local needs housing is consistent with national policy and this policy is 'effective' and 'justified' and therefore supported.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	H2 - Rural Local Needs Housing
Rep ID	SDLP1681
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	H2
2 - Do you consider this part of the Plan sound?	No

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438. H2 Rural local Housing Needs. (cross ref with E4 below) It is very unsound, for DDC to fail to make Airbnb owners register with them, so that they can be charged Business rate council tax. In terms of housing provision, Airbnb both nationally, and in Kent's coastal / rural towns especially, have a very negative effect of reducing the private rental market and thus forcing up the average monthly rents for private tenants, while we have a cost-of-living crisis. 7.13 Sound. More sound with the addition, 'The work of Kent Community Housing Hub which provides a genuine alternative to developer-led housing schemes designed for high profit, will be brought to the attention of all of the District's parish and town councils, as will the initiative of Shepherdswell and Coldred Community Land Trust'.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	H2 - Rural Local Needs Housing
Rep ID	SDLP1722
Rep Status	Processed
Consultee ID	1333477
Consultee Full Name	Cllr T Byfield
Consultee Company / Organisation	Walmer Town Council

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	H2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p><i>DDC Note: The text below is an extract from the original representation which is attached to SDLP1438.</i></p> <p>Dover District plan report on Development management</p> <p><i>I have been tasked with reviewing the Dover local plan in respect of design and development. This is a very large document, so I have tried to break it down into manageable portions.</i></p> <p><i>The Dover plan does acknowledge that there are constant improvements in design and the plan will need to evolve and to consider new technology, improvements in materials and methods of construction.</i></p> <p><i>I have therefore taken the policies which are attached at the end of this document and extracted sections which I think will be of interest the town council and where I believe comment is due.</i></p> <p><i>I believe that the planning committee needs to be aware of these points extracted. My comments in italics</i></p> <p>c) Include a comprehensive Local Needs Housing Survey of the parish, and adjacent parishes where appropriate, prepared by or in consultation with the Parish Council and with the District Council's Housing Department. <i>This survey needs to be made available to the planning committee I am not aware of any survey including WTC to date.</i></p> <p>d) In the case of settlements in, or surrounded by, the Kent Downs AONB or Heritage Coasts, that the proposal complies in the first instance with the primary requirement of conserving and enhancing landscape and scenic beauty, and where this is demonstrated, that the scale and extent of development is limited, sensitively located and designed to avoid or minimise adverse impacts on these designated landscapes; <i>I have seen no evidence from DDC planning on this issue the planning committee need to be aware</i></p> <p>It is demonstrated that traffic generated from the development can be safely accommodated on the local road network; <i>This is a major concern at present, a number of our objections have been overruled by DDC planning to date. Current traffic surveys are out of date and there is no sign of any improvements to the road networks from Kent highways road improvement schemes to date. No sign of having these developments contributing to the cost of road improvements.</i></p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

H3 - Meeting the needs of Gypsies and Travellers

Local Plan Consultation Point	H3 - Meeting the needs of Gypsies and Travellers
Rep ID	SDLP76
Rep Status	Processed
Consultee ID	1330756
Consultee Full Name	Cllr David Beaney
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	The lane on Belsey Lane Ewell Minnis
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The piece of land in question was in the local plan at reg 18 stage and unfortunately was withdrawn at reg 19 stage. Without out no real justification in my opinion.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	I would like to see a site in Ewell minnis for gypsy and travelling people. Ewell minnis has had GandT resdesints in this hamlet for over 100 years, in my opinion this was the only area within the local plan that would of actually benefited the original families within this committee within Dover. It was sad to see this piece of land be withdrawn especially after giving the local plan pag group all me knowledge and experience due to be part of this community. Unfortunately I don't feel like I was listened to in this area. I believe I was a person to listen to regarding this part of the policy. No different to how we would listen to other professionals in their field.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	H3 - Meeting the needs of Gypsies and Travellers
Rep ID	SDLP281
Rep Status	Processed
Consultee ID	1331383
Consultee Full Name	Mrs Katie Miller
Consultee Company / Organisation	Kent Downs AONB Unit
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	H3
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Taking into account the site's relationship with existing built development at Alkham we do not object in principle to the allocation in this location for a traveller site. Despite being located within the bottom of a valley, the site is relatively open to views from Public Rights of Way that extend up both valley sides, in particular Public Footpath ER165 to the south and Restricted Byway ER177 to the east and Public Footpath ER163 to the north which is also likely to offer views over the site because of the undulating topography. It will therefore be essential for strong vegetative screening along the southern boundary and bolstered screening along the northern boundary to ensure compliance with the requirements in paragraph 176 of the NPPF.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	H3 - Meeting the needs of Gypsies and Travellers
Rep ID	SDLP727
Rep Status	Processed
Consultee ID	1331844
Consultee Full Name	Miss Irene Bowie
Consultee Company / Organisation	Alkham Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Table 7.1 Gypsy and Traveller Intensification Sites (Policy H3) Half Acres Short Lane Alkham CT15 7BZ
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Alkham Parish Council object to this site for the following reasons:</p> <ol style="list-style-type: none"> 1 This site was not identified for consultation in Regulation 18 2 Currently only granted permission for personal use. Not as a gypsy and traveller site. 3 The site lies in the open countryside within a designated Area of Outstanding Natural Beauty 4 It can be seen from within the AONB and has high visual impact 5 There is no evidence of need/requirement 6 There are already significant problems with traffic which will be greatly exacerbated this additional development and the proposed 10 houses on the same narrow lane. <p>The parish council contends that this proposed intensification will have unacceptable impacts on the character, appearance and visual amenity of the locality</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant	

and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	The Parish Council is concerned that this is an unnecessary intensification and there is no evidence of need. Equally there are concerns regarding development in the AONB.
Include files	
Local Plan Consultation Point	H3 - Meeting the needs of Gypsies and Travellers
Rep ID	SDLP842
Rep Status	Processed
Consultee ID	1331919
Consultee Full Name	Alison Heine
Consultee Company / Organisation	
Agent Full Name	Alison Heine
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	H3 and H4
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	Para 7.24- The need for 42 pitches has been demonstrated at appeal to underestimate the true need in this district. The Evidence Base relies on the ARC4 GTAA 2018 which was based on field work carried out Oct-Dec 2017. It is now out of date. The Council claim the study has been updated as part of Site Options review but this was not a proper update. The Council has never provided information to show that turnover on sites can be relied on to meet need. The study does not meet the requirements in PPTs (par 7 (c) for a robust evidence base and the Council

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

has been made aware of this at appeals for sites in this district. It is disheartening to once again be making these comments and discover that no one is listening or paying attention to these concerns. Very few agents are willing/ able to work on behalf of Travellers. Most of those who do so, do not have the time or inclination to also respond to local plan consultations. Yet the Travelling community relies on agents like myself to submit representations to local plans. This is an incredibly time consuming process. I am not funded to do this. The system expects and relies on Councils to be honest, transparent and fair. The Travelling community should not feel disenfranchised by the cost of generating evidence to refute the policies proposed by Councils but from experience I am aware that EIP Inspectors will not question the submitted policies if no one makes representations.

The 2018 GTAA identified a need for 30 pitches of which 18 would be PPTS 2017-2037 and a need to front load this with provision of 15 pitches (of which 12 PPTS) within the first 5 years. The number of pitches granted since 2018 has already exceeded that recommended in the 2018 report for those complying with the PPTS need and there remains outstanding need.

It is not clear if the approach taken by Dover Council incorporates the findings of the Lisa Smith judgment October 2022 which found that the Planning Definition in Annex 1 PPTS discriminates against all Travellers and allocations should be made to address the needs of all Travellers. However according to the 2018 GTAA there was a significant need for those who did not meet the PPTS planning permission and who have not to date been provided for on any sites granted permission since 2018.

In 2018 only 23% of those surveyed were Irish Travellers. The ARC4 study assumed 6 pitches for in migration in the first 5 years and nothing for the remainder of the plan period. Yet since 2017 the following permissions granted have been for Irish Travellers who have moved into the district from elsewhere ie

DDC note: Names redacted. Available to the Inspector on request.

-Westmarsh 8 pitches (various Irish Traveller families, different to original appeal decision)

-(name redacted) The Meadows Alkham +16 statics claimed for family

-(name redacted) plot 2b Hay Hill

-(name redacted) plot 2a Hay Hill

-(name redacted) Strawberry Place, Hay Hill, Eastry 12 statics

This exceeds the assumptions in the GTAA and is further evidence that the 2018 assessment greatly underestimated the need for more pitches in this District.

PARA 7.25-Whilst I agree that a pitch should be approximately 600sq m in size, there should be room for more than a static caravan. Many Travellers want twin unit mobile homes which are much larger than a static caravan. Also pitches should have space for 2 vehicles of which one will often be a larger works vehicle eg transit van. Given the acceptance that pitches should be around 600sqm in size does the Council now acknowledge that permissions granted for additional static caravans at sites on Hay Hill and Alkham Valley should not count as pitches as they were not for additional self contained pitches as now defined by the Council and should not count towards meeting the need in Dover for additional pitches?

7.26-It is not clear why the council is only proposing to allocate sites for 5 pitches. This will be insufficient to meet the need identified in 2020 for proper Traveller pitches. There is an outstanding appeal 8 pitches at Westmarsh for a site previously granted temporary permission. There is a site with 2 pitches due for renewal in 2023 at Alkham, there are current applications pending for 8 pitches at Ash Rd Sandwich, 4 pitches at Falconsview and 3 pitches at Sherleys Farm. Permission has been refused for 3 pitches at Ferne Lane Alkham and an appeal dismissed for another site at Barnsole Rd Staple for 1 pitch. This would suggest an immediate need for as many as 29 pitches not 5 pitches-and that is just the cases that I am aware of. Since this policy was drafted the Council has granted an additional 8 pitches at Waldershare (8th December 2022) that are not included in this policy. The council appear to be acknowledging that this policy approach is wrong before it has even been examined. Policy as prepared fails to address the need identified in 2018 and as such it is not PPTS compliant.

H3/ H4 criteria-Is there a need to two policies when they appear to seek/ address the same matters?

Given that that the Council has failed to follow some of this guidance for infill development on plots at Hay Hill Eastry, the Inspector should visit these sites and be provided with details of what has been approved by the Council on these sites to decide if the permissions granted should count towards meeting the needs of genuine Gypsy Travellers or whether the intensification granted has resulted in layouts that fail to meet site licencing requirements and are sub standard, cramped and unacceptable.

	Table 7.1-The site at Half Acres Alkham was granted permission on appeal earlier in 2022. It is surprising that the Council is now conceding that a site refused permission for 1 pitch is now suitable for 3 pitches. This is a private family site. The additional pitches would be for a need not identified in the 2018 ARC study.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>The policy needs to be informed by a robust up-to-date need assessment.</p> <p>Policy needs to reflect the Lisa Smith judgment issued October 2022 and revisions to the planning definition in PPTS. (see attachment)</p> <p>The Council needs to decide if permissions previously granted for intensification (ie additional caravans not pitches) on land at Hay Hill addresses the needs for Travellers and are suitable for occupation by Travellers given the acceptance at para 7.25 of what a pitch should provide.</p> <p>Additional pitches need to be allocated to address existing and future need in Dover.</p> <p>There is a need for transit provision. Many Travellers pass through Dover to the continent.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	lisa smith judgment october 2022 on ppts definition.pdf
Local Plan Consultation Point	H3 - Meeting the needs of Gypsies and Travellers
Rep ID	SDLP1117
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Sound
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	H3 - Meeting the needs of Gypsies and Travellers
Rep ID	SDLP1682
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	H3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy

4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<i>DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438.</i> Sound
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	H3 - Meeting the needs of Gypsies and Travellers
Rep ID	SDLP1783
Rep Status	Processed
Consultee ID	1331526
Consultee Full Name	Mrs Mairi Jones
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	H3
2 - Do you consider this part of the Plan sound?	No

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note: Please see detailed representation (attached at 1770) which has been divided against numerous consultation points. The representation has images within the test. The text below is an extract from the detailed representation 'by an Alkham resident'.</p> <p>5 Housing Growth</p> <p>5.1 The Green Integration Plan and the local housing plan originally identified considerable growth for Dover District with land initially to be allocated for 14,000 new homes with a target to complete 10,100 homes by 2026. This target now appears to have been reduced and the new plan identifies the broad areas where the growth of the additional homes will be located; notably sites within the Dover urban area, Whitfield, Deal, Sholden and Sandwich.</p> <p>5.2 The Dover District Council Plan justifies its housing allocation growth on the grounds of identified need in line with NPPF and the Department of Levelling Up Housing and Communities criteria and as such has identified a number of choices for housing based on supply, demand, windfall sites etc. As a result a number of small development sites have been identified throughout the District including one in Alkham as well as a plan for a major Urban expansion site at Whitfield.</p> <p>5.3 The District Plan identifies a requirement for an additional 42 traveller pitches throughout the district and identifies two such pitches in Alkham and three others elsewhere.</p> <p>Comment 5</p> <p>a) I welcome the fact that the Plan wishes to increase the types of housing built, encouraging designs to maximise climate benefits and I take no issue with the site for ten houses identified within Alkham and would welcome the development of more affordable housing to encourage more families into the village.</p> <p>b) Alkham has many traveller residents who partake in village life I but would query where the other 37 sites will be accommodated as windfall proposals sites have not been identified. Information on this would be welcome .</p> <p>c) However I must raise severe concerns re the planned development at Whitfield</p> <ul style="list-style-type: none"> • The DDC highlights the requirement for 6350 homes at Whitfield stating that this will be supported by education, primary health and social care , utility services retail and leisure provision as well as the development of the Whitecliff Business Park area at Whitfield which will not only have retail but also light industrial and haulage uses. • The Plan talks at length on the landscaping and it highlights transport networks and in particular references the upgrades required for the Whitfield and the Duke of York Roundabouts It also says that consideration must be given to the local transport links , the Alkham road , the A256 and Whitfield Hill • This matter was raised in 2014 when the Transport Plan for 2015 -2030 was adopted and no action was taken. • Since that time traffic along the Alkham Valley has hugely increased. Representations have been made to the local MP, KCC and a Highway improvement plan submitted all to no avail. • The current plan makes a flawed assumption that householders and businesses will access routes to London via the A20/M20 or A2/M2 whereas in reality they use the Alkham Valley Road , a DECLASSIFIED Road to access the M20. This matter is the subject of more detailed comment later in the report under transport <p>D) As housing increases traffic will continue to expand and radical options to consider the Valley a green space in the middle of urban development with road only open for business residents leisure use and emergency vehicles offering a range of bridleways, walks, cycle routes should be explored. This type of scheme has been successfully carried out in other areas such as the Goyt Valley Derbyshire and can lead to vibrant rural community improved air quality and improved traffic management</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness	Please see appended report

<p>matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>I can speak to any of the points raised in the attached document</p>
<p>Include files</p>	

H4 - Gypsy and Traveller Windfall Accommodation

Local Plan Consultation Point	H4 - Gypsy and Traveller Windfall Accommodation
Rep ID	SDLP284
Rep Status	Processed
Consultee ID	1331383
Consultee Full Name	Mrs Katie Miller
Consultee Company / Organisation	Kent Downs AONB Unit
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	H4 – Gypsy and Traveller Windfall Accommodation
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	While safeguards are included in the policy wording in respect of proposals that come forward within the AONB , we are concerned that these do not align with the requirement contained within the NPPF that 'great weight' be given to the conservation and enhancement of landscape and scenic beauty in AONBs and instead reflects lesser requirements set out in the NPPF for proposals within the AONB setting. The nature of gypsy sites is such that they do not always conserve and/or enhance landscape character. Gypsy sites should only be permitted within the AONB when impact can be appropriately mitigated and the AONB conserved and enhanced. Request criterion (e) is amended.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<ul style="list-style-type: none"> In the case of proposals in, or adjacent to, the AONB or Heritage Coasts, the scale and extent of development is limited, sensitively located and designed to avoid or minimise adverse impacts on these designated landscapes, THAT THE PROPOSAL COMPLIES IN THE FIRST INSTANCE WITH THE PRIMARY REQUIREMENT OF CONSERVING AND ENHANCING LANDSCAPE AND SCENIC BEAUTY, AND WHERE THIS IS DEMONSTRATED, THAT THE SCALE AND EXTENT OF DEVELOPMENT IS LIMITED, SENSITIVELY LOCATED AND DESIGNED TO AVOID OR MINIMISE ADVERSE IMPACT ON THE DESIGNATED LANDSCAPE;
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	To ensure AONB impacts are thoroughly considered.

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	H4 - Gypsy and Traveller Windfall Accommodation
Rep ID	SDLP1015
Rep Status	Processed
Consultee ID	1331919
Consultee Full Name	Alison Heine
Consultee Company / Organisation	
Agent Full Name	Alison Heine
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	H3 and H4
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Para 7.24- The need for 42 pitches has been demonstrated at appeal to underestimate the true need in this district. The Evidence Base relies on the ARC4 GTAA 2018 which was based on field work carried out Oct-Dec 2017. It is now out of date. The Council claim the study has been updated as part of Site Options review but this was not a proper update. The Council has never provided information to show that turnover on sites can be relied on to meet need. The study does not meet the requirements in PPTs (par 7 (c) for a robust evidence base and the Council has been made aware of this at appeals for sites in this district. It is disheartening to once again be making these comments and discover that no one is listening or paying attention to these concerns. Very few agents are willing/ able to work on behalf of Travellers. Most of those who do so, do not have the time or inclination to also respond to local plan consultations. Yet the Travelling community relies on agents like myself to submit representations to local plans. This is an incredibly time consuming process. I am not funded to do this. The system expects and relies on Councils to be honest, transparent and fair. The Travelling community should not feel disenfranchised by the cost of generating evidence to refute the policies proposed by Councils but from experience I am aware that EIP Inspectors will not question the submitted policies if no one makes representations.</p> <p>The 2018 GTAA identified a need for 30 pitches of which 18 would be PPTS 2017-2037 and a need to front load this with provision of 15 pitches (of which 12 PPTS) within the first 5 years. The number of pitches granted since 2018 has already exceeded that recommended in the 2018 report for those complying with the PPTS need and there remains outstanding need.</p> <p>It is not clear if the approach taken by Dover Council incorporates the findings of the Lisa Smith judgment October 2022 which found that the Planning Definition in Annex 1 PPTS discriminates against all Travellers and allocations should be made to address the needs of all Travellers.</p>

However according to the 2018 GTAA there was a significant need for those who did not meet the PPTS planning permission and who have not to date been provided for on any sites granted permission since 2018.

In 2018 only 23% of those surveyed were Irish Travellers. The ARC4 study assumed 6 pitches for in migration in the first 5 years and nothing for the remainder of the plan period. Yet since 2017 the following permissions granted have been for Irish Travellers who have moved into the district from elsewhere ie

DDC note: Names redacted. Available to the Inspector on request.

-Westmarsh 8 pitches (various Irish Traveller families, different to original appeal decision)

-(name redacted) The Meadows Alkham +16 statics claimed for family

-(name redacted) plot 2b Hay Hill

-(name redacted) plot 2a Hay Hill

-(name redacted) Strawberry Place, Hay Hill, Eastry 12 statics

This exceeds the assumptions in the GTAA and is further evidence that the 2018 assessment greatly underestimated the need for more pitches in this District.

PARA 7.25-Whilst I agree that a pitch should be approximately 600sq m in size, there should be room for more than a static caravan. Many Travellers want twin unit mobile homes which are much larger than a static caravan. Also pitches should have space for 2 vehicles of which one will often be a larger works vehicle eg transit van. Given the acceptance that pitches should be around 600sqm in size does the Council now acknowledge that permissions granted for additional static caravans at sites on Hay Hill and Alkham Valley should not count as pitches as they were not for additional self contained pitches as now defined by the Council and should not count towards meeting the need in Dover for additional pitches?

7.26-It is not clear why the council is only proposing to allocate sites for 5 pitches. This will be insufficient to meet the need identified in 2020 for proper Traveller pitches. There is an outstanding appeal 8 pitches at Westmarsh for a site previously granted temporary permission. There is a site with 2 pitches due for renewal in 2023 at Alkham, there are current applications pending for 8 pitches at Ash Rd Sandwich, 4 pitches at Falconsview and 3 pitches at Sherleys Farm. Permission has been refused for 3 pitches at Ferne Lane Alkham and an appeal dismissed for another site at Barnsole Rd Staple for 1 pitch. This would suggest an immediate need for as many as 29 pitches not 5 pitches-and that is just the cases that I am aware of. Since this policy was drafted the Council has granted an additional 8 pitches at Waldershare (8th December 2022) that are not included in this policy. The council appear to be acknowledging that this policy approach is wrong before it has even been examined. Policy as prepared fails to address the need identified in 2018 and as such it is not PPTS compliant.

H3/ H4 criteria-Is there a need to two policies when they appear to seek/ address the same matters?

Given that that the Council has failed to follow some of this guidance for infill development on plots at Hay Hill Eastry, the Inspector should visit these sites and be provided with details of what has been approved by the Council on these sites to decide if the permissions granted should count towards meeting the needs of genuine Gypsy Travellers or whether the intensification granted has resulted in layouts that fail to meet site licencing requirements and are sub standard, cramped and unacceptable.

Table 7.1-The site at Half Acres Alkham was granted permission on appeal earlier in 2022. It is surprising that the Council is now conceding that a site refused permission for 1 pitch is now suitable for 3 pitches. This is a private family site. The additional pitches would be for a need not identified in the 2018 ARC study.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful

The policy needs to be informed by a robust up to date need assessment.

Policy needs to reflect the Lisa Smith judgment issued October 2022 and revisions to the planning definition in PPTS. (see attachment)

The Council needs to decide if permissions previously granted for intensification (ie additional caravans not pitches) on land at Hay Hill addresses the needs for Travellers and are suitable for occupation by Travellers given the acceptance at para 7.25 of what a pitch should provide.

Additional pitches need to be allocated to address existing and future need in Dover.

There is a need for transit provision. Many Travellers pass through Dover to the continent.

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	lisa smith judgment october 2022 on ppts definition.pdf

H5 - Self-Build and Custom Housebuilding

Local Plan Consultation Point	H5 - Self-Build and Custom Housebuilding
Rep ID	SDLP1118
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Would be more sound if residents undertaking zero carbon / low carbon self build were supported or incentivised.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	H5 - Self-Build and Custom Housebuilding
Rep ID	SDLP1865
Rep Status	Processed
Consultee ID	1271717
Consultee Full Name	Quinn Estates
Consultee Company / Organisation	Quinn Estates Ltd
Agent Full Name	James Waterhouse
Agent Company / Organisation	Iceni projects
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	H5
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Full Representation attached to SDLP1860. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1860.)</p> <p>f. Policy H5 – Self Build and Custom Housebuilding Quinn Estates supports the Council's positive policy on self and custom build housing for the District. Quinn Estates (incorporating Quinn Homes) is the leading developer of self/custom build housing in Kent and the company has a number of landholdings where self and custom build housing can realistically be delivered. The self-build market is considered to be strong in the Dover District and there are a host of locations where self and custom build housing can viably be delivered. However, a number of these locations are semi-rural in nature and the limited amount of affordable housing that could be triggered through a small-scale self-build scheme is considered to be low. The policy on affordable housing as part self-build development is ambiguous. The assumption based on the policy framework as set out in the Reg 19 draft is that affordable housing will be triggered on self-build schemes that exceed the threshold of 10/0.5Ha or 6 homes depending upon location. The problem for schemes that are marginally in excess of the threshold is that a small number of affordable properties in an isolated location is unappealing to most Housing Associations, whilst the construction of a small number of properties within a self-build development is difficult to secure. The policy should recognise the practical difficulties under this scenario and the barrier to delivery this creates. In order to address this issue, self and custom housebuilding schemes should exceptionally be permitted to provide an off-site contribution to affordable housing through a financial contribution facilitating a more appropriate, better located affordable housing by a specialist</p>

	Housing Association. The flexibility for self/custom housing developers to agree a commensurate off-site affordable housing contribution would make a positive difference, it would ensure the opportunities to deliver self/custom build are being taken and would increase the delivery of affordable in the District.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Quinn Estates is a developer with significant land interests in the District, who has an important role in delivering the Plan strategy
Include files	
Local Plan Consultation Point	H5 - Self-Build and Custom Housebuilding
Rep ID	SDLP1221
Rep Status	Processed
Consultee ID	1332924
Consultee Full Name	Amy Aldridge
Consultee Company / Organisation	Gladman Developments Ltd
Agent Full Name	Amy Aldridge
Agent Company / Organisation	Gladman Developments Ltd
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	H5
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>Gladman broadly support the inclusion of a policy in respect of self-build and custom housebuilding in line with current government thinking and objectives. However, Gladman consider it is essential that the policy is worded to state that once a self-build and/or custom-build plot has been marketed for twelve months but failed to sell, it will be considered by the Council for development as conventional market housing. (DDC Note - Text Extracted from Document sent from Gladman Developments Ltd. Full attachment can be found under the introduction comment reference SDLP1192)</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	H5 - Self-Build and Custom Housebuilding
<p>Rep ID</p>	SDLP1368
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1333128
<p>Consultee Full Name</p>	David Powell
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	Klaire Lander
<p>Agent Company / Organisation</p>	Lander Planning
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	H5
<p>2 - Do you consider this part of the Plan sound?</p>	Yes
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	Yes

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Lander Planning sent a PDF document which has been split across the relevant sections of the Plan. See Original Attachment on SDLP1346) The policy's support for self-build and custom housebuilding is consistent with national policy and this policy is 'effective' and 'justified' and therefore supported.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	H5 - Self-Build and Custom Housebuilding
Rep ID	SDLP1683
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	H5
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified

	Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438. H5 Self Build and Custom House Building. Would be sounder if residents undertaking zero carbon / low carbon self-build were supported or incentivised.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	H5 - Self-Build and Custom Housebuilding
Rep ID	SDLP1734
Rep Status	Processed
Consultee ID	1271717
Consultee Full Name	Quinn Estates
Consultee Company / Organisation	Quinn Estates Ltd
Agent Full Name	Nicholas Pellegram
Agent Company / Organisation	Iceni projects
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	H5
2 - Do you consider this part of the Plan sound?	No

<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified Effective Consistent with National Policy</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Yes</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Yes</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>(DDC Note - Full Representation attached to SDLP1731. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1731.)</p> <p>Self and Custom build Policy H5 of the Draft Local Plan states that the Council will support Self and Custom House Building schemes on housing sites allocated in the Local Plan and on non-allocated windfall developments subject to compliance with the other Policies in the Local Plan, and where overall this would not result in an over-provision of this type of housebuilding when compared to the Council's supply/demand evidence.</p> <p>The Self-Build and Custom Housebuilding Act 2015 requires relevant authorities, including District Councils, to keep a register of individuals and associations of individuals who are seeking to acquire serviced plots of land for Self-build and Custom Housebuilding. Council's are also required under sections 2 and 2A of the Act to have regard to this and to give enough suitable development permissions to meet the identified demand. The benefits of Self and Custom Build Housing are recognised as diversifying the housing market and increasing customer choice. The NPPF supports the delivery of a variety of land coming forward to meet the needs of groups with specific housing requirements including for those wishing to commission to build their own homes.</p> <p>The Self-Build and Custom House building need as identified from the Council's register is reported annually through the Authority Monitoring Report. The latest Authority Monitoring Report (2019-20) states that since the introduction of the Self-Build and Custom House Building requirements in 2015, there has been 1 plot allowed at appeal, where at appeal it was identified as Self-Build (planning ref. DOV/16/01101). There have also been 18 plots marketed as Self-Build since April 2020 by the developer from planning application 16/01026, however these were not identified as Self-Build on the planning application. On 31st October 2020, there has only been one approved planning application identified as including Self-Build and customhouse building, reference 20/00419, which is also a Quinn site, for which a reserved matters application (ref: 22/01379) is currently pending determination.</p> <p>The Self-Build Need Assessment submitted as part of the application (22/01379), points towards a very strong relative demand for self-build plots in Dover and also identifies Dover as being one of the authorities with the highest demand per capita in the country. Moreover, it is important to highlight that when considering demand in the context of the Local Authority's Self-build register; an Ipsos Mori poll undertaken for NaCSBA in 2016 found that only one in eight people interested in Self-Build were aware of the introduction of Right to Build Registers in England. As a result, the number of expressions of interest on a Local Authority's Self-Build register may substantially underestimate demand.</p> <p>Crucially, the Council's method of updating the Self and Custom Build Register, and resultant understanding of demand within the District, is flawed. The Council reviewed and updated its register in March 2020. All persons and organisations on the first (2016) version of the register were invited to re-register in February 2020, with reminders sent out in March 2020. Those who re-registered and passed the local connectivity and financial solvency tests, had their interest back dated to their original registration date and were placed on part 1 of the register. Those who did not pass the tests but still wished to register their interest in Self and Custom House Building were placed on part 2 of the register.</p> <p>It is not clear from the Council's Authority Monitoring Report and evidence base for the draft Local Plan</p>

	<p>whether additional independent survey work has been undertaken to fully understand the demand for Self and Custom Build housing in the District. As mentioned previously, public knowledge and understanding of Right to Build in England is generally low. The method of the Council to understand demand has wholly relied upon people who had joined the register in 2016 and has not sought to further publicise Right to Build or develop a clearer understanding of demand in the District through additional surveys. This results in an incomplete picture of demand in the local area and resultant lack of allocations for Self-Build or Custom Build sites within the draft Local Plan. Quinn Homes are the leading provider of Self-build in Kent and have assembled their own database of interested Self and Custom Builders. Having facilitated Self and Custom Build development in East Kent, the company is ideally positioned to understand the market requirements and best placed to assist the District in meeting its growing demand for plots. Quinn Homes propose the land subject to this representation as suitable for a Self-build site of 16 dwellings which would assist with addressing the Council's underestimated demand for this housing type.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	H5 - Self-Build and Custom Housebuilding
<p>Rep ID</p>	SDLP1926
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1271717
<p>Consultee Full Name</p>	Quinn Estates
<p>Consultee Company / Organisation</p>	Quinn Estates Ltd
<p>Agent Full Name</p>	Sarah Willson
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	H5

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Iceni Projects, on behalf of Quinn Estates, welcomes the opportunity to submit representations to the Dover District Council Local Plan Regulation 19 Consultation in respect of land at St Edmunds Road, Deal. These representations should be considered alongside the following documents appended to this letter:</p> <ul style="list-style-type: none"> • Appendix 1 – Site Layout Plan <p>The land subject to this representation was previously assessed through the Call for Sites process as part of a significantly larger land parcel (GTM008 – Land North of Ellens Hill). Quinn Estates consider that the revised, smaller site makes a logical extension to Deal in this area, and that site specific constraints can be overcome to deliver housing in Deal. The Site borders the Deal settlement boundary and presents a logical extension to the town in this area. Quinn Estates considers that the land should be allocated for residential development of approximately 16 self-build and 7 affordable homes with associated access and parking, within a landscaped setting. It is considered that the scheme presents an opportunity to provide high-quality family homes, in a highly sustainable location and that the resultant effect of this redevelopment will lead to societal benefits for the local community and a more sustainable development strategy</p> <p>It is Quinn Estate's view that the current suite of allocations in the draft Plan will fail to provide a sufficient level of growth in and around Deal, and that it is over reliant upon a single urban extension to Dover to meet local housing needs, which does nothing to address local affordability issues in Deal. To ensure the soundness of the plan, further Sites, such as the one advocated in this representation, should be allocated to ensure that the Plan's ambitions for the District are delivered.</p> <p><u>a. Land at St Edmunds Road, Deal (the 'Site')</u></p> <p>The Site comprises approximately 1.83ha of land adjoining the Deal settlement boundary. The Site is located on the south-western edge of Deal, bound to the north-east and north-west by residential properties, and to the south-east and south-west by open farmland. The southern boundaries of the site comprise existing hedge and trees. The site is currently in use as grazing land for horses.</p> <p>A public right of way (ref: 0340/ED38/12) bisects the north-eastern corner of the site from northwest to south-east. Access to the site is via an existing gate in the hedgerow joining St Edmunds Road. The closest bus stop is approximately 180m from the Site on St Richards Road and includes services</p> <p>Our services include: archaeology design engagement heritage & townscape landscape planning sustainable development transport Iceni Projects is the trading name of Iceni Projects Limited. Registered in England No. 05359427 to Deal town centre, Walmer, Sandwich, and Kingsdown. St Richard's Road GP Surgery, Payden Pharmacy, St Mary's primary School and the Betteshanger Sports and Social Club are also within approximately 500m of the Site on St Richards Road. The Site is considered to be a sustainable location for residential development.</p> <p>The north-western boundary of the Site adjoins the southern edge of the Mongeham Road Conservation Area. Within the Conservation area are several Grade II listed buildings including 110 and 112 Mongeham Road, Manor Farmhouse and Brewer's Farmhouse. The Site is within Flood Zone 1. Wildlife Trust mapping identifies the Lower Stour Wetlands to the north-west of the Site beyond Mongeham Road, overlain with the Sandwich Bay to Hacklinge Marshes SSSI. There are no other wildlife designations either in the Site or in proximity.</p> <p><u>b. Objection to Tables 3.3 and 4.2 (under the auspices of Policy SP3)</u></p> <p>Quinn Estates suggest that the emerging spatial strategy for the District, as detailed in Tables 3.3 and 4.2 of the Regulation 19 Submission Version of the Draft Local Plan is not based on sound plan-making. The current approach does not acknowledge the sustainability of the town nor its position within the settlement hierarchy. As such, additional sites should be allocated to the town in Table 4.2. Quinn considers that the Site subject to this representation presents an ideal housing site within Deal which is able to overcome the identified constraints to contribute to sustainable housing growth within the settlement.</p> <p>Sustainable distribution of growth</p>

Sustainable development is a key aim of the National Planning Policy Framework at Paragraph 8. In terms of housing delivery, the Council should seek to encourage housing growth in the most sustainable locations, especially when they can ensure the achievement of societal improvements, economic benefits and positive environmental outcomes. In choosing sites, the Council should ensure that new residents can reach established nearby town centres using sustainable modes of transport, to limit pollution arising from motor travel and to support the vitality of the existing community and local economy, without creating environmental harm.

Deal is vibrant coastal town which benefits from access to a wide range of local services within a relatively contained urban environment. The vast majority of the town's facilities lie within walk, cycle and public transport distances. Services include a range of education provision, including primary, secondary and tertiary education. The town benefits from ample leisure opportunities at the sports centre and swimming pool, along with less formal outdoor activities on the seafront and at the Betteshanger Country Park. In addition, the town is highly sustainable in regard to public transport accessibility, being served by mainline rail, the high-speed train service to London and numerous bus routes.

Throughout the evolution of the draft Local Plan, Deal has failed to be allocated sufficient levels of growth commensurate with the sustainable nature of the town. The justification for channelling so little growth to Deal is not considered to be justified by evidence, when all the evidence points to the settlement being such a logical and sustainable location to channel growth to. The principles of sustainability and sound plan making appear to have been absent in key decision taking over spatial choices at the heart of the spatial strategy presented in the draft Plan.

Market and affordable housing delivery

Paragraph 35 of the NPPF outlines how plans are effective where they are found to be deliverable over the plan period. The disproportionately high dependence on Whitfield Strategic Allocation (SAP1) results in a plan which raises considerably uncertainty as to this key soundness test.

Quinn Estates has no objection to large-scale housing development at strategic sites playing an important role in meeting housing need. However, what looks good on paper needs to deliver in practice. However, in a District like Dover where there is a need for the benefits of growth to translate across the District, the spatial strategy should be seeking to unlock growth and inward investment at other key settlements, such as Deal, and this is a significant weakness of the Plan in its current form.

Spatial strategies should reflect that building homes is a complex and risky business. Stronger local markets have higher annual delivery rates, and where there are variations within districts, this should be factored into spatial strategy choices. Further, although large sites can deliver more homes per year over a longer time period, they also have longer lead-in times. Research by Lichfield¹ found the average lead in time for large sites prior to the submission of the first planning application is 3.9 years

This issue with delivery is found to be the case with Whitfield. Of the 5,750 dwellings proposed for the allocation, 3,483 dwellings are considered deliverable in the emerging Plan period. The Council acknowledges that the 2010 Core Strategy included provision for the Site to deliver 5,750 dwellings. Phase 1 of the SAP1 allocation (Dover ref. 10/01010) is underway and as of the 2020/2021 monitoring year, 185 dwellings had been completed with a delivery rate of approximately 50dpa for the past three years. Given this slow progress, it seems likely that although the existing outline planning permission should be completed over the Plan period, a more cautious approach should be taken in terms of the remaining dwellings allocated for the site given its proven issues in delivering housing to date.

Without clear evidence by way of a planning application for these additional dwellings, it is questioned whether Whitfield will ramp up to delivery of 120dpa from 2023/24 and then up to 200dpa from 2026/27 for the remainder of the Plan period. More consideration should therefore be made to the current planning position of the Site and the length of time it has taken so far to deliver housing. Paragraph 73D of the NPPF recommends the inclusion of realistic delivery rates within Local Plans, and the Council should therefore review those proposed for Whitfield and consider building more flexibility and more volume into the pipeline to be able to respond to delivery issues.

It is considered that, particularly with the deliverability issues of the Whitfield Urban Extension to date, additional sites should be allocated for housing to ensure that there is sufficient choice and flexibility in the supply so that the Council can meet its housing requirement throughout the Plan period, as well as to meet the Government's objective to significantly boost the supply of housing as set out in Paragraph 60 of the NPPF.

The delivery of affordable housing also paints a bleak picture within the District. The Council's existing policy on affordable housing, DM5 of the Core Strategy (2010), requires residential development of 15 or more dwellings to provide 30% of the total homes as affordable homes and the Council's affordable housing strategy remains unchanged, save for reducing the requirement to deliver affordable housing within Dover town.

The latest Authority Monitoring Report (2020-2021) profiles how the affordable housing policy has consistently struggled to deliver sufficient levels of affordable housing, with the average being 20%. The failure to deliver sufficient affordable housing is set against a backdrop of worsening affordability in the District. Affordability ratios for Deal show a continued trend of worsening to 9.25 in 2021, with year-on-year worsening from 2012-2018. For the lowest earners, this reaches 9.62 in 2021. The District is less affordable than the national average of 9.05. Median house prices in the District have soared to £285,000, compared to the UK average of £278,000.² In addition, statutory homelessness within the District sits at 137 people and 136 households, 68 with children, are in temporary accommodation within the District as of 2021.³ Whilst there may be

a number of factors contributing to these outcomes, a new spatial strategy that identifies limited housing at Deal is going to deliver limited affordable housing at Deal and the absence of housing will only exacerbate local affordability pressures.

The proposed allocation at Land at St Edmunds Road would therefore assist with relieving local affordability pressures with the proposed 7 affordable units.

Self and custom build

Policy H5 of the Draft Local Plan states that the Council will support self-build and custom house building schemes on housing sites allocated in the Local Plan and on non-allocated windfall developments subject to compliance with the other Policies in the Local Plan, and where overall this would not result in an over-provision of this type of housebuilding when compared to the Council's supply/demand evidence.

The Self-Build and Custom Housebuilding Act 2015 requires relevant authorities, including District Councils, to keep a register of individuals and associations of individuals who are seeking to acquire serviced plots of land for self-build and custom housebuilding. Council's are also required under sections 2 and 2A of the Act to have regard to this and to give enough suitable development permissions to meet the identified demand. The benefits of self and custom build housing are recognised as diversifying the housing market and increasing customer choice. The NPPF supports the delivery of a variety of land coming forward to meet the needs of groups with specific housing requirements including for those wishing to commission to build their own homes.

The Self-Build and Custom House building need as identified from the Council's register is reported annually through the Authority Monitoring Report. The latest Authority Monitoring Report (2019-20) states that since the introduction of the self-build and custom house building requirements in 2015, there has been 1 plot allowed at appeal, where at appeal it was identified as self-build (planning reference 16/01101). There have also been 18 plots marketed as self-build since April 2020 by the developer from planning application 16/01026, however these were not identified as self-build on the planning application. On 31st October 2020, there has only been one planning application identified as including self-build and customhouse building, reference 20/00419, which is also a Quinn site, for which a reserved matters application (ref: 22/01379) is currently pending determination.

The Self-Build Need Assessment submitted as part of the application (22/01379), points towards a very strong relative demand for self-build plots in Dover and also identifies Dover as being one of the authorities with the highest demand per capita in the country. Moreover, it is important to highlight that when considering demand in the context of the Local Authority's self-build register; an Ipsos Mori poll undertaken for NaCSBA in 2016 found that only one in eight people interested in self-build were aware of the introduction of Right to Build Registers in England. As a result, the number of expressions of interest on a Local Authority's self-build register may substantially underestimate demand.

Crucially, the Council's method of updating the self and custom build register, and resultant understanding of demand within the District, is flawed. The Council reviewed and updated its register in March 2020. All persons and organisations on the first (2016) version of the register were invited to re-register in February 2020, with reminders sent out in March 2020. Those who re-registered and passed the local connectivity and financial solvency tests, had their interest back dated to their original registration date and were placed on part 1 of the register. Those who did not pass the tests but still wished to register their interest in self-build customhouse building were placed on part 2 of the register.

It is not clear from the Council's Authority Monitoring Report and evidence base for the draft Local Plan whether additional independent survey work has been undertaken to fully understand the demand for self and custom build housing in the District. As mentioned previously, public knowledge and understanding of Right to Build in England is generally low. The method of the Council to understand demand has wholly relied upon people who had joined the register in 2016 and has not sought to further publicise Right to Build or develop a clearer understanding of demand in the District through additional surveys. This results in an incomplete picture of demand in the local area and resultant lack of allocations for self-build sites within the draft Local Plan.

Quinn Estates are the leading provider of self-build in Kent and have assembled their own database of interested self-builders. Having facilitated self-build development in East Kent, the company is ideally positioned to understand the market requirements and best placed to assist the District in meeting its growing demand for plots. Quinn Estates propose the land subject to this representation as suitable for a self-build site of 16 dwellings which would assist with addressing the Council's underestimated demand for this housing type.

Land at St Edmunds Road

The land subject to this representation was previously assessed through the Call for Sites process as part of a significantly larger land parcel (GTM008 – Land North of Ellens Hill). The Call for Sites Submission proposed 450 dwellings across a 10.74ha land parcel, and was assessed to be unsuitable due to heritage and landscape impact.

	<p>Quinn Estates are pleased to submit for consideration a revised proposal for the smaller land parcel which would deliver much needed new homes, including self-build and affordable homes, for Deal, whilst respecting and responding to the site constraints, namely the sensitive historic setting of the surrounding area to the north-west.</p> <p>Vehicular and pedestrian access to the Site is proposed from the end of St Edmunds Road, utilising the existing gap in the hedgerow serving the field. The indicative site layout plan submitted with this representation details the proposed scheme which would comprise 16 self and custom build plots and 7 affordable units, set within a landscaped setting. The public right of way to the eastern edge of the site is retained, forming part of the landscaped, spacious entrance to the Site. In addition, the existing hedgerows are retained and enhanced, along with an enhanced tree buffer to the north-western boundary of the site where it adjoins the Mongeham Road Conservation Area. Overall, the proposal represents a</p> <p><u>c. Conclusion</u></p> <p>On behalf of Quinn Estates, we thank you for the opportunity to contribute to the Dover District Local Plan Regulation 19 Consultation.</p> <p>The current approach to the spatial strategy in the Draft Local Plan requires amendment to address a significant soundness issue concerning the level of growth identified for Deal, the District's second largest settlement. It is considered that the Plan currently fails to positively plan for a commensurate level of housing and employment at the settlement, as expressed in Policy SP3 and that the available evidence does not support or justify this approach. Moreover, the evidence does support channelling a greater quantum of growth to Deal.</p> <p>Quinn's proposal at the Land at St Edmunds Road presents a sustainable location for growth due to its existing connections to the public transport network and close proximity to a range of services on St Richards Road. The small nature of the site would provide early and accelerated delivery and would assist with reducing the current over reliance on the Whitfield Urban Expansion to provide housing growth for the District. In addition, the site would deliver self-build and affordable housing to address local affordability issues, which the current Plan fails to address.</p> <p>I trust that these comments are of assistance and that these representations will be taken into account in consideration of the current consultation. Quinn would also welcome the opportunity to participate in the forthcoming Examination-in-Public into the Plan and contribute to the debate to ensure that the best strategy for the District is found.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Include GTM008 in the Local Plan for approx 16 self-build and 7 affordable dwellings</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>SDLP1924 Willson Att1 Original Rep.pdf SDLP1924 Willson Att2 Site Layout Plan.pdf</p>
<p>Local Plan Consultation Point</p>	<p>H5 - Self-Build and Custom Housebuilding</p>
<p>Rep ID</p>	<p>SDLP1741</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1271717</p>

Consultee Full Name	Quinn Estates
Consultee Company / Organisation	Quinn Estates Ltd
Agent Full Name	Nicholas Pellegram
Agent Company / Organisation	Iceni projects
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	H5
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Full Representation attached to SDLP1740. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1740.)</p> <p>Self and custom build</p> <p>Policy H5 of the Draft Local Plan states that the Council will support self-build and custom house building schemes on housing sites allocated in the Local Plan and on non-allocated windfall developments subject to compliance with the other Policies in the Local Plan, and where overall this would not result in an over-provision of this type of housebuilding when compared to the Council's supply/demand evidence. The Self-Build and Custom Housebuilding Act 2015 requires relevant authorities, including District Councils, to keep a register of individuals and associations of individuals who are seeking to acquire serviced plots of land for self-build and custom housebuilding. Council's are also required under sections 2 and 2A of the Act to have regard to this and to give enough suitable development permissions to meet the identified demand. The benefits of self and custom build housing are recognised as diversifying the housing market and increasing customer choice. The NPPF supports the delivery of a variety of land coming forward to meet the needs of groups with specific housing requirements including for those wishing to commission to build their own homes.</p> <p>The Self-Build and Custom House building need as identified from the Council's register is reported annually through the Authority Monitoring Report. The latest Authority Monitoring Report (2019-20) states that since the introduction of the self-build and custom house building requirements in 2015, there has been 1 plot allowed at appeal, where at appeal it was identified as self-build (planning reference 16/01101). There have also been 18 plots marketed as self-build since April 2020 by the developer from planning application 16/01026, however these were not identified as self-build on the planning application. On 31st October 2020, there has only been one planning application identified as including self-build and customhouse building, reference 20/00419, which is also a Quinn site, for which a reserved matters application (ref: 22/01379) is currently pending determination.</p> <p>The Self-Build Need Assessment submitted as part of the application (22/01379), points towards a very strong relative demand for self-build plots in Dover and also identifies Dover as being one of the authorities with the highest demand per capita in the country. Moreover, it is important to highlight that when considering demand in the context of the Local Authority's self-build register; an Ipsos Mori poll</p>

undertaken for NaCSBA in 2016 found that only one in eight people interested in self-build were aware of the introduction of Right to Build Registers in England. As a result, the number of expressions of interest on a Local Authority's self-build register may substantially underestimate demand. Crucially, the Council's method of updating the self and custom build register, and resultant understanding of demand within the District, is flawed. The Council reviewed and updated its register in March 2020. All persons and organisations on the first (2016) version of the register were invited to re-register in February 2020, with reminders sent out in March 2020. Those who re-registered and passed the local connectivity and financial solvency tests, had their interest back dated to their original registration date and were placed on part 1 of the register. Those who did not pass the tests but still wished to register their interest in self-build customhouse building were placed on part 2 of the register. It is not clear from the Council's Authority Monitoring Report and evidence base for the draft Local Plan whether additional independent survey work has been undertaken to fully understand the demand for self and custom build housing in the District. As mentioned previously, public knowledge and understanding of Right to Build in England is generally low. The method of the Council to understand demand has wholly relied upon people who had joined the register in 2016 and has not sought to further publicise Right to Build or develop a clearer understanding of demand in the District through additional surveys. This results in an incomplete picture of demand in the local area and resultant lack of allocations for self-build sites within the draft Local Plan.

Quinn Estates are the leading provider of self-build in Kent and have assembled their own database of interested self-builders. Having facilitated self-build development in East Kent, the company is ideally positioned to understand the market requirements and best placed to assist the District in meeting its growing demand for plots. Quinn Estates propose the land subject to this representation as suitable for a self-build site of approximately 10 dwellings which would assist with addressing the Council's underestimated demand for this housing type.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

H6 - Residential Extensions and Annexes

Local Plan Consultation Point	H6 - Residential Extensions and Annexes
Rep ID	SDLP1119
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	See below
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	To become sound the following should be added ' <i>There should always be thorough and meaningful consultation with local residents. With the recent overdevelopment and very congested roads in our coastal towns, impact on road network and road safety should always be assessed</i> '.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	H6 - Residential Extensions and Annexes
Rep ID	SDLP1684
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	H6
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438. H6 Residential extensions and annexes. To become sound the following should be added 'There should always be thorough and meaningful consultation with local residents. With the recent overdevelopment and very congested roads in our coastal towns, impact on road network and road safety should always be assessed'
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

H7 - Houses in Multiple Occupation

Local Plan Consultation Point	H7 - Houses in Multiple Occupation
Rep ID	SDLP293
Rep Status	Processed
Consultee ID	1331382
Consultee Full Name	Mr The Dover Society Graham Margery
Consultee Company / Organisation	The Dover Society
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	H7
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Can't comment on legal compliance
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	We welcome consideration of very local impact, but planning applications should also include the wider impact upon the area of having too many HMOs. Specifically, HMOs should not be permitted in Listed Buildings, Conservation Areas or in close proximity to other HMOs.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	H7 - Houses in Multiple Occupation
Rep ID	SDLP1120
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	See below
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	To become more sound and effective and safe the following should be added, 'd' Assessment of the safety of utility connections (electricity and gas) should be made and evidence provided of the assessment (e.g. by UKpowernetworks) to DDC before permission is given.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	H7 - Houses in Multiple Occupation
Rep ID	SDLP1723
Rep Status	Processed
Consultee ID	1333477
Consultee Full Name	Cllr T Byfield
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	H7
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note: The text below is an extract from the original representation which is attached to SDLP1438.</p> <p>Dover District plan report on Development management</p> <p><i>I have been tasked with reviewing the Dover local plan in respect of design and development. This is a very large document, so I have tried to break it down into manageable portions.</i></p> <p><i>The Dover plan does acknowledge that there are constant improvements in design and the plan will need to evolve and to consider new technology, improvements in materials and methods of construction.</i></p> <p><i>I have therefore taken the policies which are attached at the end of this document and extracted sections which I think will be of interest the town council and where I believe comment is due.</i></p> <p><i>I believe that the planning committee needs to be aware of these points extracted. My comments in italics</i></p> <p>H7 – Houses in Multiple Occupation</p>

	<p>Proposals for Houses in Multiple Occupation will be supported where the proposed development, taken by itself or in combination with existing HMOs in the vicinity of the site, would not result in any of the following: Planning committee need to be aware of the following:</p> <p>a) An adverse impact on the living conditions of existing adjoining residents.</p> <p>b) An unacceptable impact on highway safety, caused by insufficient on-site parking provision thereby resulting in an unacceptable increase in on street parking.</p> <p>c) An adverse impact on the visual amenity and character of the area, including that from inappropriate or insufficient arrangements for refuse and cycle storage.</p> <p><i>It is unclear if this includes Air BnB, there have been a number of planning applications which do not state if this is the purpose, however the committee suspects this is the case. Dover needs a policy on Air BnB like Ramsgate.</i></p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	H7 - Houses in Multiple Occupation
Rep ID	SDLP1685
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	H7

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438. H7 Houses in Multiple Occupation To become more sound and effective and safe the following should be added, 'd' Assessment of the safety of utility connections (electricity and gas) should be made and evidence provided of the assessment (e.g. by UK power networks) to DDC before permission is given.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	H7 - Houses in Multiple Occupation
Rep ID	SDLP2039
Rep Status	Processed
Consultee ID	1274683
Consultee Full Name	David Reid
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	H7
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	And a second minor question: Where the Housing policy mentions HMO and the constraints could it be added to the existing problem of large single houses in large grounds which apply for mixed development status to , possibly, pack a mix of house types onto the site to be in 'accord' with the housing needs set by Council?? A current case in point might be the redevelopment of the Deal Police station? Apologies for the ocular acuity problem!!and hope the Police station does get 'tastefully' converted!!
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

E1 - New Employment Development

Local Plan Consultation Point	E1 - New Employment Development
Rep ID	SDLP285
Rep Status	Processed
Consultee ID	1331383
Consultee Full Name	Mrs Katie Miller
Consultee Company / Organisation	Kent Downs AONB Unit
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	E1 – New Employment Development
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Support, consider an appropriate balance has been struck between supporting the delivery of new employment development, including in rural areas and ensuring appropriate safeguards to the Kent Downs AONB and its setting.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	E1 - New Employment Development
Rep ID	SDLP569
Rep Status	Processed
Consultee ID	1267584
Consultee Full Name	Jason Ransley
Consultee Company / Organisation	Dover Harbour Board
Agent Full Name	John Bowles
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy E1 - New Employment Development
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Dover Harbour Board supports the specific identification of Dover Waterfront as an allocation under Policy E1 – New Employment Development .
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	N/A
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	N/A
Include files	
Local Plan Consultation Point	E1 - New Employment Development
Rep ID	SDLP514
Rep Status	Processed
Consultee ID	1268017
Consultee Full Name	Ms Penelope James
Consultee Company / Organisation	Dover and Deal Liberal Democrats
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	8
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	n/a
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	n/a

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Suggest DDC focus on encouraging <ul style="list-style-type: none"> • the creation of new green businesses and jobs • R&D into green development • the creative sector - create a creative enterprise zone for example
Include files	
Local Plan Consultation Point	E1 - New Employment Development
Rep ID	SDLP986
Rep Status	Processed
Consultee ID	1331770
Consultee Full Name	Cathy Skinner (clerk)
Consultee Company / Organisation	Northbourne Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Development Management Policies
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The development management policies are silent in respect of non-residential schemes in open countryside which are not employment sites. EM1 provides a robust approach for new employment sites in the countryside but the same rigour and balance afforded by the policy would not be available in respect of development management of non-residential schemes which are not employment sites. Examples of such may include charity, club or private venues, entertainment and meeting places, sites for specialist leisure or sports activities, sportsgrounds, off-road motorsports, shooting grounds, general aviation sites, watersports, etc. Such uses may not be commercial enterprises or give rise to employment, but can bring particular issues of noise, visual impact, loss of BMV agricultural land, movement or activity which affects landscape character, loss of residential or landscape amenity, light spill, highways and transport issues, and so on.</p> <p>We believe such proposals should be subject to the same rigour as that set out in EM1 for employment sites in the countryside, and possibly be subject to greater restriction where they are not aligned with strategic interests of the wider plan, such as economic benefit and the rural economy. The NPPF requires the policies recognise the intrinsic beauty of the countryside, and we believe this should apply regardless of the class of development proposed.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant	The plan should include policy safeguards that protect the countryside from inappropriate and unsustainable development for all potential non-residential schemes which are not considered employment sites.

and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	E1 - New Employment Development
Rep ID	SDLP635
Rep Status	Processed
Consultee ID	1331790
Consultee Full Name	Julie Davies
Consultee Company / Organisation	CPRE Kent
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	E1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	An additional criterion should be added for sites that are adjacent to existing or new communities requiring safe active travel routes between them.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	E1 - New Employment Development
Rep ID	SDLP1034
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	E1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	PRoW: The County Council recommends the policy includes reference to the need for sustainable Active Travel options, safety for Non Motorised Users (NMUs) on rural roads and sustainable infrastructure to link to transport hubs, and local facilities, avoiding short car journeys. <u>Heritage Conservation</u> : The County Council welcomes the inclusion of Kent Farmsteads Guidance referenced in this section.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The County Council recommends the policy includes reference to the need for sustainable Active Travel options, safety for Non Motorised Users (NMUs) on rural roads and sustainable infrastructure to link to transport hubs, and local facilities, avoiding short car journeys.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	E1 - New Employment Development
Rep ID	SDLP1121
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No

6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	See below
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>This would become sound and compliant with legality (legally binding Net Zero Strategy, Climate Emergency Declaration 2019 and Climate Change Act 2008), if following added, a priority will be given to the creation of jobs in the climate-friendly recovery sectors with land allocations designated for various forms of agri-forestry, market gardening, and renewable energy projects.</p> <p>More sound if floor space under solar panelled roofs incentivized, with lower business rates.</p> <p>Also more sound with the addition of <i>'all large out-of-town developments should include of co-working spaces, (of interest to all parents who have had to work from home and home school during the pandemic), directly adjacent to car-club spaces and electric bike parking.</i> 8.10 Sound.</p> <p>Employers who are the SMEs in our coastal towns and villages struggle to survive in Nov 2022, because of shortage of staff, and sky-high energy prices. So it would make sense to help existing SME employers survive by directing them to rock-bottom loans to install solar roof panels, so that they became more self-sufficient in energy during daylight hours.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	E1 - New Employment Development
Rep ID	SDLP1660
Rep Status	Processed
Consultee ID	1331868
Consultee Full Name	Ruth Marczin-Bundy (Parish Cllr)
Consultee Company / Organisation	Alkham Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	E1
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>6 EMPLOYMENT</p> <p>6.1 In years gone by the village traditionally had predominately rural employment but this has now declined. No reference is made to the proposed growth of rural enterprises or rural workshop spaces in the Alkham area within the Dover Plans. 6.2 The area currently supports a number of SMEs which contribute to the neighbourhood and surrounding economy. These range from the development of a local vineyard, nature conservation awareness and educational programmes, building contractors, a garden centre, garden services and design, tourism bed and breakfasts, tearoom, hotels and restaurant, electrical business, education coaching, livery and riding tuition, building services, dog grooming, loft conversions to cake decoration</p> <p>Comment 6</p> <p>Employment and Local Economy (DDC Plan – E1) I welcome the proposals within the plan for the development and diversification and encouragement of rural businesses as this will lead to a more sustainable rural economy.</p> <p><i>(DDC note - The full representation from Alkham PC is attached to representation SDLP1653. However, specific comments from the full representation document have been extracted into separate consultation points/policy areas, relevant to the comments made)</i></p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	E1 - New Employment Development
Rep ID	SDLP1686
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	E1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438.</p> <p>DM 8 Employment and Local Economy</p> <p>E1 This would become sound and compliant with legality (legally binding Net Zero Strategy, Climate Emergency Declaration 2019 and Climate Change Act 2008), if following added, a priority will be given to the creation of jobs in the climate-friendly recovery sectors with land allocations designated for various forms of Agri-forestry, market gardening, and renewable energy projects.</p> <p>More sound if floor space under solar paneled roofs incentivized, with lower business rates.</p> <p>Also, it will be found to be sound with the addition of <i>'all large out-of-town developments should include of co-working spaces, (of interest to all parents who have had to work from home and home school during the pandemic), directly adjacent to car-club spaces and electric bike parking.</i></p> <p>8.10 Sound</p> <p>Employers who are the SMEs in our coastal towns and villages struggle to survive in Nov 2022, because of shortage of staff, and sky-high energy prices. So it would make sense to help existing SME employers survive by directing them to rock-bottom loans to install solar roof panels, so that they became more self-sufficient in energy during daylight hours.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	E1 - New Employment Development

Rep ID	SDLP1867
Rep Status	Processed
Consultee ID	1271717
Consultee Full Name	Quinn Estates
Consultee Company / Organisation	Quinn Estates Ltd
Agent Full Name	James Waterhouse
Agent Company / Organisation	Iceni projects
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	E1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Full Representation attached to SDLP1860. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1860.)</p> <p>g. Policy E1 – New Economic Development The approach outlined in Policy E1 is supported, but the concession in Paras 8.8 and 3.119 of Plan that employment development is needed at Deal, does highlight why the Plan is not positively and proactively allocating land for employment at Deal. Given the high reliance commercial development has on road access, it is considered that a minor addition is required to the draft policy to positively support proposals on land adjoining a major road entering a settlement, and not just land adjoining a settlement boundary, as most land adjoining settlement boundaries does not have suitable road access. Accordingly, the following amendment is proposed to Part 1 of Policy E1:</p> <p>“1. At Designated settlements New employment development (office, (E(g)(i), research and development (E(g)(ii), light industrial (E(g)(ii), B2 and B8 uses) will be supported in the following locations and subject to criteria i) to ix) below:</p> <p>a Within existing employment sites as identified on the Policies Map.</p> <p>b On the employment sites allocated in this Plan.</p> <p>c On land within or immediately adjoining the settlement confines of designated settlements or a main road leading into a designated settlement.</p> <p>In the case of proposals for office development (E(g)(i)) in these locations outside of designated town centre boundaries, they will need to satisfy the requirements of the sequential test and impact assessment in accordance with Policy R2...”</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Quinn Estates is a developer with significant land interests in the District, who has an important role in delivering the Plan strategy
Include files	
Local Plan Consultation Point	E1 - New Employment Development
Rep ID	SDLP1778
Rep Status	Processed
Consultee ID	1331526
Consultee Full Name	Mrs Mairi Jones
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	E1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note: Please see detailed representation (attached at 1770) which has been divided against numerous consultation points. The representation has images within the text. The text below is an extract from the detailed representation 'by an Alkham resident'.</p> <p>6 EMPLOYMENT</p> <p>6.1 In years gone by the village traditionally had predominately rural employment but this has now declined. No reference is made to the proposed growth of rural enterprises or rural workshop spaces in the Alkham area within the Dover Plans.</p> <p>6.2 The area currently supports a number of SMEs which contribute to the neighbourhood and surrounding economy. These range from the development of a local vineyard ,building contractors, a garden centre, garden services and design, tourism bed and breakfasts, tearoom, hotels and restaurant , electrical business, education coaching, livery and riding tuition, building services, dog grooming, loft conversions to cake decoration</p>

	<p>Comment 6</p> <p>I welcome the proposals within the plan for the development and diversification and encouragement of rural businesses as this will lead to a more sustainable rural economy</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Please see appended report</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>I can speak to any of the points raised in the attached document</p>
<p>Include files</p>	

E2 - Loss or Redevelopment of Employment Sites and Premises

Local Plan Consultation Point	E2 - Loss or Redevelopment of Employment Sites and Premises
Rep ID	SDLP121
Rep Status	Processed
Consultee ID	1330576
Consultee Full Name	Dr Vince Croud
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 28, 4.208-4.214
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I object to the proposal in the 2040 Local Plan that Eythorne and Elvington become a "Local Centre". I also object to the proposed building around Elvington. The reasons for both objections are set out below.</p> <p>Elvington and Eythorne, although geographically close, have their own distinct heritage, character, culture and community. Elvington was mostly built in the early 20th century to serve the nearby coal mine at Tilmanstone. Eythorne is very much older, with evidence of occupation from the stone age and in the heart of the village are many buildings from the 18th and 19th century. Eythorne is essentially a community founded on agriculture and it is not, and has never been, a mining village. The development of Tilmanstone colliery did not lead to significant housebuilding in Eythorne. In the late 1960s and early 1970s, however, small housing developments sprang up on land originally used for farming and latterly used by the local school and community.</p> <p>There are no existing problems, or conceivable future ones, that would be better served by combining these two individual communities as opposed to keeping them separate. Indeed, it might well be the case that better, more consensual, decision making would occur if the communities were kept unique (for example Coldred and its community driven management of the village centre). It is also evidentially the case that communities that keep their identities have less societal problems and better mental health because of the developed relationships and contacts within the community (people looking out for each other etc). As it stands the countryside is in easy walking or cycling distance for anyone no matter where they live in either community, young or old, and this access is enjoyed by many to the benefit of their mental wellbeing. Where there is urban sprawl, loss of green space and loss of identity, quality of life plummets (cf Thanet). Unnecessary and unsympathetic "planning" has irrevocably harmed many communities, villages and towns over the years, resulting in poor and problematic living environments for future generations to inherit.</p>

There is also no conceivable opportunity that could arise that would only be possible by combining the two communities rather than keeping them as they are now.

The issues facing these communities are many but none are due to them not being combined.

It is proposed that the two separate villages of Eythorne and Elvington are developed as a "Local Centre" based on them "having a very good range of services and facilities". This is a considerable overstatement as the two villages have, in fact, a very limited range of both.

In terms of existing GP services, the nearest is Shepherdswell which is only open between 8.30-10.30 a.m., Monday to Friday, and does not routinely offer an actual GP surgery but only "administrative" or nurse appointments. Overall, the other GP services in the area are stretched to the limit and will struggle to take up the amount of new patients that will arise with significant further new house building in this area. Additional patient numbers will introduce further frustration from the community with getting GP appointments when wanted. Unless GP provision is significantly improved, is properly delivered to time, and is written into the DDC plan then there will be a healthcare crisis in this District.

As well as insufficient GP provision, the area also suffers from inadequate response times from the Ambulance Service, SECAMB. April 2022 saw the worse response times on record for SECAMB. Although things have improved slightly since then, it is still poor and inadequate. Hospital waiting times especially for A&E are also poor. In part, the long waiting times for both hospital appointments and for A&E, as well as poor ambulance response times, are due to the inadequate GP primary care driving people to attend hospital rather than their own GP.

It is practically impossible to get an NHS dentist in this area and most surgeries are not taking on any new patients. This means new arrivals into the area are forced to go private pushing up their cost of living and ultimately leading to further degradation of the NHS provision even though we have all paid for it and it should be readily available.

Local policing is entirely absent in the main and incidences of anti social behaviour, vandalism and theft (for example frequent van break-ins for tools) that have occurred in both villages are largely not dealt with at all by the Police. Most certainly the Police are not being proactive in preventing such crimes. There is also a local drug taking and drug dealing problem, again not tackled.

The bus service for Elvington and Eythorne was always poor and inadequate for it to be used to commute to work. Now KCC has cut bus services further, there will be no public transport serving the villages. This has caused a major problem for school children attending secondary education in Canterbury, Dover and Sandwich and great difficulties for parents in trying to find alternative transport methods that also accommodate their need to attend work. Many in the village have mentioned considering moving away from this area to one that does have public transport for the school trip.

In Section 4.2.11 it mentions a range of tourist attractions available including Wingham Wildlife park, The "Historic park and Garden of Waldershare" and the EKR (East Kent (Heritage) Railway). The first is certainly an excellent attraction. Waldershare Park is, however, a private estate not open to the public. The heritage EKR line runs only one day a week (Sunday) and some bank holidays (not just "a few times a year" as stated in 4.216) from approximately April to October. Although it has a charm of its own and continues to be developed, it is currently of very limited appeal to the general public as it has a short track length and no steam engines.

In the Section on Eythorne and Elvington, and as shown in the plan in Section 4.214, land is shown "Allocated for Employment". This is all very laudable but the employment opportunities must be such that they provide opportunities, careers and suitable salaries for the local population. To date, attracting blue chip employers into this area has not met with tangible success. The Pike Road Industrial Estate businesses such as Tilmanstone Salads, which is a minimum wage employer, are not likely to be attractive to the majority of residents of employable age. More of the same is not going to adequately provide opportunities to deliver a sustainable community. The biggest employers for the communities will probably remain Dover docks and first responders, with others working for service industries from home.

Section 4.218 listing services and facilities has several errors. Eythorne does not have two village halls. It has one pre-cast concrete structure which could be considered a village hall behind Ss Peter and Pauls' Church. It is at the border of Eythorne and Elvington and hence poorly placed for Eythorne residents. It is barely used because of that and is most noted for being a polling station. Eythorne does not have a Cafe and to the best of my knowledge hasn't had one since the last century. It does have a village shop and Post Office combined (they are not separate amenities as might be supposed from the text as written in 4.218). Thus the actual "amenities" in Eythorne are one pub, one "village hall", and one Post Office/shop. It does have two churches (Baptist and CoE) but these are used by a tiny minority of residents and so can hardly be considered to be a significant amenity. According to the Church of England's own figures (2019), less than 1 % of the population attend church regularly. Over 50 % of the UK population are irreligious.

In terms of Elvington, it does not have a church as stated. The rest of the statement regarding Elvington amenities is correct. However, with the advent of services such as Uber Eats, Deliveroo and "Just Eat" etc the community attractiveness of the takeaways is diminished.

Regarding the statement in 4.219, and as clarified above, the settlements do not have much in the way of services and facilities that make them stand out as a place to create a new "Local Centre" unless the critical criteria you are using are possession of a pub, a shop, and unused churches.

Tilmanstone Colliery Welfare Sports Ground, as mentioned in 4.221, is a good facility for sports in the Eythorne and Elvington communities. As a non-profit making charity, however, it requires membership fees or hire fees for use of its facilities and the facilities are thus not freely available. These fees are not onerous however.

The entrance to the primary school which sits on the boundary between lower Eythorne and Elvington, and serves both communities, is on a corner and is a blind bend coming up Church Hill which is problematic for parents dropping off and picking up their children. Church Hill itself is narrow in parts, permitting passage of a vehicle only in one direction at a time, and is a bottle neck. Children arriving by foot from Upper Eythorne have to travel along Shooters hill which already has issues with child safety due to the narrowness of the road and traffic density, resulting in vehicles mounting the pavements to pass. Additional vehicle movements due to more house building will only exacerbate the problem. Traffic build up is also a problem at the staggered junction between Wigmore Lane, Shooters hill and Church hill which has visibility issues. If the new estate exits through Elvington, there will be a build up of traffic on Church Hill trying to exit onto Wigmore Lane using the Staggered junction. If the estate exits through Wigmore Lane then the increased traffic will cause problem trying to cross the staggered junction from Shooters Hill or Church Hill directions.

For sustainability of the community any new building must contain a large component of genuinely affordable housing. At the moment new houses are beyond the reach of the local young and are being bought up by people outside the community, diluting the community common values, or by buy-to-let investors.

It goes without saying that any new development must have searches done to ensure that subsidence and any ground contamination from the extensive Tilmanstone mining activity will not be an issue. Also the area around Elvington village has been found to contain much live WWII ordnance from troops stationed here during the war and this needs to be factored in to pre-building work.

The building on the proposed area will substantially diminish an important green corridor for wildlife movement (especially insects) and a source of food for many types of wildlife.

It is very disappointing to read in Section 4.2.11 that Dover District Council believe that "Shepherdswell, Eythorne and Elvington have their roots in the short-lived East Kent coalfields". Whilst it is certainly the case that Elvington is a (model) colliery village, the roots of both Shepherdswell and Eythorne precede the development of the coal fields by a considerable margin. Both have been occupied since the stone age, have evidence of Roman occupation, are mentioned in the doomsday book and have recorded history since then. Incidentally, it is stated in section 4.211 (and repeated in 4.216) that the EKR line was originally built to serve the Colliery at Tilmanstone. This is factually incorrect as the line was built to

	<p>serve any colliery in the area that might prove to be productive and reached as far as Wingham and also to Richborough at its peak. http://www.dover-kent.com/VILLAGES/18-Eythorne.html</p> <p>In conclusion there is clearly not the necessary infrastructure to support the proposed development and nowhere near enough amenities to justify development as a Local Centre. Progressing with the latter is wholly unnecessary. It would be much better if new villages were developed to support increased population, as was done when coal mining took off, to stop urban sprawl.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>For one, it needs to have guarantees on increases in health care, public transport, policing and schooling written in, commensurate with the increased number of houses, for it to be creditable as a plan to deliver sustainable communities.. Rather than continue "urban sprawl" by having "Local Centres" and diminishing sense of community etc, a much better policy would be to build new villages/towns to accomodate the additional housing as was done when mining started in Kent.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>E2 - Loss or Redevelopment of Employment Sites and Premises</p>
<p>Rep ID</p>	<p>SDLP291</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331382</p>
<p>Consultee Full Name</p>	<p>Mr The Dover Society Graham Margery</p>
<p>Consultee Company / Organisation</p>	<p>The Dover Society</p>
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>E2</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Effective</p>

4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Can't comment on legal compliance
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Whilst we welcome the reuse of former employment sites for housing (particularly social housing), we are very concerned about the detrimental impact upon the existing traffic problems in Coombe Valley Road that would ensue from SAP8 (80 dwellings) and SAP9 (150 dwellings).
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	E2 - Loss or Redevelopment of Employment Sites and Premises
Rep ID	SDLP1122
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Conversion or rebuild of rural buildings for Economic Dev. Purposes. This minor accommodation is welcome, allowing indoor office space.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	It would become more sound if there were protection of outdoor farmland and woodland as locations of employment; There is a need for both office space and also fields / woods / reactivated coppicing sites or sites of agro-forestry ; all serve economically productive purposes.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	E2 - Loss or Redevelopment of Employment Sites and Premises
Rep ID	SDLP1687
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	E2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438. E2 & E3 Conversion or rebuild of rural buildings for Economic Dev. Purposes. This minor accommodation is welcome, allowing indoor office space. It would become more sound if there were protection of outdoor farmland and woodland as locations of employment; There is a need for both office space and also fields / woods / reactivated coppicing sites or sites of Agri-forestry; all serve economically productive purposes.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

E3 - Businesses Operating from a Residential Property

Local Plan Consultation Point	E3 - Businesses Operating from a Residential Property
Rep ID	SDLP1123
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Conversion or rebuild of rural buildings for Economic Dev. Purposes. This minor accommodation is welcome, allowing indoor office space.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	It would become more sound if there were protection of outdoor farmland and woodland as locations of employment; There is a need for both office space and also fields / woods / reactivated coppicing sites or sites of agro-forestry ; all serve economically productive purposes.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	E3 - Businesses Operating from a Residential Property
Rep ID	SDLP1688
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	E3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<i>DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438.</i> E2 & E3 Conversion or rebuild of rural buildings for Economic Dev. Purposes. This minor accommodation is welcome, allowing indoor office space. It would become more sound if there were protection of outdoor farmland and woodland as locations of employment; There is a need for both office space and also fields / woods / reactivated coppicing sites or sites of Agri-forestry; all serve economically productive purposes.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

E4 - Tourist Accommodation and Attractions

Local Plan Consultation Point	E4 - Tourist Accommodation and Attractions
Rep ID	SDLP56
Rep Status	Processed
Consultee ID	1254085
Consultee Full Name	Mrs Sue Ward
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	8.33 and E4
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	8.33 The focus of building so many houses and large retail outlets at Whitfield has resulted in the degeneration of the historic town centre. It is unattractive and unwelcoming and the resulting footfall is much lower than it should be. E4 There are 3 Certificated Locations for touring caravans on Singledge Lane and several others to the East of the proposed Whitfield Urban Expansion. Many users of these sites merely stay overnight before travelling through the port of Dover. Others stay much longer to visit local historic sites, walking in the countryside or just to enjoy a peaceful countryside location. All will be seriously affected by the urban expansion by either the loss of easy access to the port or the loss of peaceful enjoyment of the countryside. This will result in a loss of sustainable rural tourism, contrary to Section 84 of the NPPF.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Focus the building and development on Dover Town Centre and reduce the focus of development at Whitfield.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	E4 - Tourist Accommodation and Attractions
Rep ID	SDLP324
Rep Status	Processed
Consultee ID	1331382
Consultee Full Name	Mr The Dover Society Graham Margery
Consultee Company / Organisation	The Dover Society
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	E4
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Can't comment on legal compliance
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	There is no mention of Section 215 enforcement anywhere in the plan. This is an enforcement tool available to remedy the problem of existing properties, which was raised in our earlier response, but the Local Plan re buildings (H1 TO H7) concentrates upon requirements etc for new builds. This we feel needs to be remedied in connection with attractiveness of the public realm for locals and visitors, maintenance of conservation areas. We also urge increased use of Article 4 Directions in conservation areas and extension to deprived wards in Dover where necessary.

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	E4 - Tourist Accommodation and Attractions
Rep ID	SDLP287
Rep Status	Processed
Consultee ID	1331383
Consultee Full Name	Mrs Katie Miller
Consultee Company / Organisation	Kent Downs AONB Unit
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	E4 – Tourism Accommodation and Attractions
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Support, consider an appropriate balance has been struck between supporting the delivery of new tourism development, including in rural areas and ensuring appropriate safeguards to the Kent Downs AONB and its setting.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will	

make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	E4 - Tourist Accommodation and Attractions
Rep ID	SDLP968
Rep Status	Processed
Consultee ID	1266351
Consultee Full Name	Dr Sharon Danby
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP 6 Economic growth
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails	<p>This section of the plan is not consistent with NPPF 21 - development must be sustainable - there is no mention of green economic growth. Quality of 'growth' is more important in crisis-ridden 2020 to 2040 than quantity of 'growth'. Because it is more sustainable as we look ahead to 2040 – 2060 and beyond.</p> <p>In the current economic climate energy prices, business rates, public sector cuts are making public and private sector employers (care homes, schools, health centres, hospitality, police (£30 million cut in Kent), buses, independent retail) fear for their survival.</p> <p>To be sound, effective and compliant with the realities of here and now, this is the direction DDC Local Plan should take. The local economy needs pump-priming, national fuel security needs to be enhanced, people need lifting out of fuel poverty. The local plan could do more than allocating sites and floor space.</p> <p>Transition to a greener economy, a means of making us more resilient economically, will be helped considerably by the ambitions of Port of Dover to decarbonize its estate by 2025 and to take seriously its scope 3 corporate responsibility in an inclusive manner to support local communities and economic players as they transition to a greener business too.</p>

to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

There appears to be little mention of using the Local Plan to improve educational attainment by, for example, specific policies to

- a) forge deeper links with FE institutions (eg Dover Technical College) given the skills gap relating to the Green Homes agenda,
- b) encourage higher education establishments to develop facilities in the district, and thereby to develop a knowledge-based economy beyond the former Pfizer's site.
- c) encourage the long-promised incubation hubs for the newly qualified in the district. This would contribute to raising the average level of earnings in the district and to combating the high levels of deprivation experienced in some wards.

A glaring omission relates to new economic opportunities created by climate-friendly recovery sectors. Three are essential in Dover District. With a 70% rural economy, which is severely challenged by increased costs of imports, and climate problems including water shortage. Diversification into agri-forestry could become popular among the farming community. It is recommended by Nature-Friendly Farming Network. Examples include

- a) protecting arable yields in cases of drought, by planted strips of suitable, native, drought-tolerant trees, (which counter soil erosion, while increasing carbon sequestration) and,
- b) bringing back to life existing but neglected, traditionally coppiced woodland, causing it to be harvested for small-scale biomass on a rotational basis. Similarly, short rotation forestry would create rural income and mitigate climate change.

Another key to meeting climate targets is increasing the amount of land used for growing food for people rather than livestock. This would create new outdoor jobs as would replacing imported market-gardened food, with locally grown fruit, vegetables and pulses, this is a growth sector too, and is especially sustainable where zero / minimal pesticides are used, and Nature Friendly Farming practices are used. So rural areas, fields and woodland should be valued as locations of employment in themselves.

The up-grading of all rented housing stock (both public and private sector) to zero homes standard, would mean, it doesn't need to be done again before the local and legally-binding national target of 2050, and is thus a pre-requisite for the Local Plan to become legally compliant, and this can be made to benefit the local economy. It will be necessary to ensure that publicly owned rented housing stock stays in public hands. To incentivise private landlords, DDC should set up a register of private landlords, and to qualify for registration, landlords should have to show that homes rented are EPC C in 2023, EPC B in 2024, and zero carbon in 2025. As this will push up the value of their property, landlords should not find it difficult to access cheap loans to carry out the retrofit, (DDC could plan an intermediary role or suggest sources of finance). Tenants will benefit in terms of heating costs saved and improved standards of health, which is also a saving to the public purse. The economy will benefit in terms of jobs created for local trades people.

A third sector would include the fitting and maintenance of renewable energy installations, e.g. small-scale on-shore wind, small and medium scale solar (on domestic or non-residential roofs or to be combined with grazing land below, also on car parks), micro-tidal (tidal currents we are advised are very suitable locally), or 'green gas' as pioneered by Ecotricity in Hampshire (as the grass-cuttings from Dover's many golf courses and campsites are likely to be suitable). To maintain the returns on investment in these sectors within the regional economy, and stop them being off-shored, a priority should be given to schemes which are 51% or more community-owned.

The Dept for Transport bought the site they wanted for Dover Inland Border Facility from a farmer in Guston for £22million, and in 2022 DfT publicly said the site would not be needed as Dover IBF. Could this become a combination of grazing under solar canopies? Near 2 schools and a sports centre, it is an unsuitable location for the HGV park that is needed at a site further outside the Dover urban area.

Tourism and Tourist / Visitor Accommodation.
It is very unsound, for DDC to fail to make AirB&B owners register with them, so that they can be charged business rate council tax. In terms of housing provision, AirB&B, both nationally, and in Kent's coastal towns especially, have a very negative effect of reducing the private rental market in 2022 and thus forcing up the average monthly rents for private tenants.

The local plan would be more compliant with legality, if DDC regeneration took the greening of the economy more seriously and looked at smaller zero-carbon tourism /transport activity projects within Dover town; harbour trips with zero carbon, solar-powered boats.

Better coach and toilet facilities are needed to boost tourism in Dover.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness

Public Works Loan Board or municipal loans could be used in Dover as in East Sussex, where they've invested in skilled jobs transforming existing homes into zero carbon homes across seven district councils. (The Lewes Model explained | Green World).

<p>matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Businesses to be encouraged and helped to have more solar PV and Wind turbines. Solar canopies over the marshalling yards of Port of Dover, to generate energy that fridge trucks (whose engine-idling contaminates Dover) could plug into while waiting to board ferries. Rural economy growth through new farming initiatives (see above). Upgrade housing stock - so creating green jobs Improve facilities to promote tourism in Dover town.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>E4 - Tourist Accommodation and Attractions</p>
<p>Rep ID</p>	<p>SDLP570</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1267584</p>
<p>Consultee Full Name</p>	<p>Jason Ransley</p>
<p>Consultee Company / Organisation</p>	<p>Dover Harbour Board</p>
<p>Agent Full Name</p>	<p>John Bowles</p>
<p>Agent Company / Organisation</p>	<p>Savills</p>
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>Policy E4 - Tourist Accommodation and Attractions</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>Yes</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Yes</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Yes</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>Dover Harbour Board welcomes the recognition of the tourism industry as a major contributor to the local economy, and the measures identified in the new Visitor and Tourism Strategy 'Destination White Cliffs Country: growth strategy for tourism and the visitor economy 2020 to 2030' to increase the number and length of stays. Dover Harbour Board notes that the preferred policy approach in respect of tourism and the visitor economy is to provide more flexible criteria based policy which supports the provision of new tourism facilities in suitable locations in order to support the overarching Tourism Strategy for the council. Dover Harbour Board supports the positive approach of the criteria based Policy E4: Tourist Accommodation and Attractions.</p>

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	N/A
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	N/A
Include files	
Local Plan Consultation Point	E4 - Tourist Accommodation and Attractions
Rep ID	SDLP516
Rep Status	Processed
Consultee ID	1268017
Consultee Full Name	Ms Penelope James
Consultee Company / Organisation	Dover and Deal Liberal Democrats
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	E4, ii
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	n/a

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	n/a
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	<p>Re this statement: <i>In the case of settlements in, or surrounded by, the Kent Downs AONB or Heritage Coasts, that the proposal complies in the first instance with the primary requirement of conserving and enhancing landscape and scenic beauty, and, where this is demonstrated, that the scale and extent of development is limited, sensitively located and designed to avoid or minimise adverse impacts on these designated landscapes;</i></p> <p>We suggest that anomalies, like Lydden Hill Race Circuit, located in the AONB are not permitted in future. Furthermore, that any development such attractions propose is closely scrutinised and local residents concerns are properly listened to before being approved; that such developments are monitored at every stage before and after implementation so as to avoid negative impact on the environment and the lives of local residents.</p>
Include files	
Local Plan Consultation Point	E4 - Tourist Accommodation and Attractions
Rep ID	SDLP520
Rep Status	Processed
Consultee ID	1331555
Consultee Full Name	Mr. Trevor Johns
Consultee Company / Organisation	Alkham Valley Society
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	8.33
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Alkham Valley is an AONB with many ROWs, BOATS and Bridleways and SSSI. Alkham village itself, along with Bussy Ruff and Kersney Abbey provide important tourist attractions for Walkers, Cyclists and Horseriders as well as residents. Visitors are well catered and accommodated for by local business securing local employment. However, the plan needs to address the safety and enjoyment of users and plan for the preservation of the very natural beauty that attracts the visitors in the first place and wins them back again.</p> <p>Horesriding tourism is a very precious disabled and mental health resource and potential source of growth as long as its safe to do so.</p> <p>The sat nav phenomenom is encouraging speeding delivery drivers on to inappropriate single lane roads which are also nominated KCC horse riding routes severely compromising the horse tourism.</p> <p>If the uncalssified rural Alkham valley road becomes a major thoroughfare the valley's attractiveness will be further damaged and soon lost as it will not be safe or enjoyable to visit. Trying to ride walk or cycle is already dangerous and would get worse.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Redirect the through traffic to the intended major routes, and slow the local traffic down.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	E4 - Tourist Accommodation and Attractions
Rep ID	SDLP899
Rep Status	Processed
Consultee ID	1331944
Consultee Full Name	Debbie Turner
Consultee Company / Organisation	
Agent Full Name	Debbie Turner
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	E4

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Dover District Council, in common with many local authorities, pursue policies and strategies on improvements to economic and social indicators based on supporting activities that generate increased numbers of tourists to their district. The reality is that this creates pressures on landscapes and habitats, provides only seasonal or temporary work for local people, places additional demands on existing infrastructure i.e. road networks, refuse and sewage, increases the number of second homes, (a particular problem in Deal and Walmer) thereby pushing up house prices and erodes community cohesion.</p> <p>Dover District Council has indicated its support for the development of Betteshanger Country Park. A proposal to build a surf lagoon and a 120 bed hotel on this site is currently being considered by the Council. In 2004 the Council signed a Section 106 Agreement agreeing to designate the country park a Local Nature Reserve. The Council failed to do this and now the country park is in the ownership of a private property developer who appears to want to turn a place of immense biodiversity and solace for local people into an adventure playground. If the Council approve this development, it will be contrary to its own and national policies on biodiversity and nature conservation.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Improvements to social and economic indicators based on increasing tourists puts pressures on landscapes, habitats, provides only seasonal work and places demands on infrastructure. Dover District has indicated its support for development of Bettshanger country Park (hotel and surf lagoon) but in 2004 a S106 was agreed to designate a local nature reserve.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	It is necessary to participate in the oral part of the examination because often matters can be articulated more effectively this way.
Include files	
Local Plan Consultation Point	E4 - Tourist Accommodation and Attractions
Rep ID	SDLP1035
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	

Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	E4
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The County Council requests specific reference to sustainable transport options within this section as well as reference to the ROWIP.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The County Council requests specific reference to sustainable transport options within this section as well as reference to the ROWIP.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	E4 - Tourist Accommodation and Attractions
Rep ID	SDLP1124
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Green tourism, and 'safe' country lanes, are East Kent assets that it would be very unsound to trash.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>It is very unsound, for DDC to fail to make AirB&B owners register with them, so that they can be charged Business rate council tax. In terms of housing provision, AirB&B both nationally, and in Kent's coastal towns especially, have a very negative effect of reducing the private rental market and thus forcing up the average monthly rents for private tenants, while we have a cost-of-living crisis. It is unsound for DDC not to cause all private landlords to register with the council, so that DDC could promote to private landlords, schemes allowing them to protect their tenants from the worst of fuel poverty, enhance the intrinsic value of their properties, and provide employment for newly qualified tradespersons in insulation skills graduating from EK Colleges, especially Dover College (FE).</p> <p>The local plan would be more compliant with Legality (legally binding Net Zero Strategy, Climate Emergency Declaration 2019 and Climate Change Act 2008), if DDC regeneration took the greening of the economy more seriously and looked at smaller zero-carbon transport activity projects within Dover town; harbour trips with zero carbon, solar-powered boats (like La Rochelle has had for 15 years), like electric hopper mini-buses (like the ones which have been coping with the 1 in 6 gradients of Aix-en-Provence for over 15 years).</p> <p>Economic Growth in Dover, a coastal town aspiring to attract tourists, would be unsound unless it included trebling the number of toilets installed. Tourists as well as residents have toilet needs. For a town with the iconic, historical importance of Dover NOT to have any coach park with lavatorial comfort facilities is a disgrace. The ratio of inhabitants to toilet blocks in Dover town is treble the ratio in other urban areas in the District, 1 : 10,000 or higher. The only coach park in Dover Town has, for 5 years, had 2 signs on Maison Dieu Road telling coach drivers and visiting cardrivers that a toilet exists when in fact it doesn't. At this location in Maison Dieu car park, behind the police station, visitors get out, pay to park and find nothing, merely a sign to a 15 minute walk to Pencester Gardens, difficult when legs are crossed. The DDC website misleads the public on this issue. The lack of toilets is a public health problem which we have referred to Kent Director of Public health.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx

Local Plan Consultation Point	E4 - Tourist Accommodation and Attractions
Rep ID	SDLP1308
Rep Status	Processed
Consultee ID	1333103
Consultee Full Name	Betteshanger Country Park
Consultee Company / Organisation	Betteshanger Country Park
Agent Full Name	Alexander Hamlet
Agent Company / Organisation	Iceni Projects
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	E4
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>REPRESENTATIONS TO THE DOVER DISTRICT LOCAL PLAN REGULATION 19 CONSULTATION IN RESPECT OF BETTESHANGER COUNTRY PARK HOTEL AND SPA, DEAL</p> <p>This representation to the Dover District Local Plan (Regulation 19 Consultation) is made on behalf of our client, Betteshanger Country Park, who have submitted a planning application for a luxury hotel and spa at the Betteshanger Country Park site (LPA Ref: 22/01152) and is currently awaiting determination. A site location plan of the site and a layout plan are attached at Appendices 1 and 2 of this representation.</p> <p>Betteshanger Country Park objects to Policy E4 – Tourist Accommodation and Attractions in its current form, which seeks to boost the tourism and visitor economy of Dover District, but in respect of serviced visitor accommodation, only on sites within or adjoining existing designated settlement confines. This approach constitutes a significant deviation from the Regulation 18 Local Plan Policy E4, which supported tourism proposals where they are located within or adjacent to an existing visitor attraction or accommodation site. There has been no justified or evidenced reason for the deviation in policy between Regulation 18 and Regulation 19. Support for tourist accommodations and visitor attractions across the District should be strongly supported, particularly of the high quality and unique nature of our proposal, which would boost visitors to both the local and wider area. The District currently has a high proportion of day trips. Providing accommodation to convert these into overnight stays will significantly boost the local economy, highlighted in Paragraph 7.14 of the Regulation 18 Local Plan which stated that 'overnight trips are worth seven times more to the local economy than that of a day tripper'.</p> <p>a. Betteshanger Country Park Hotel and Spa ('The site')</p> <p>Betteshanger Country Park submitted a planning application for a luxury Hotel and Spa at</p>

Betteshanger Country Park, Deal ('the site') under the local planning authority reference 22/01152, which is currently awaiting decision from the Council.

The application was submitted in 'full' and seeks permission for the following development:

'Erection of a 120 bed hotel (C1) building with associated spa facilities, gym, restaurant/bar, access, landscaping and parking.'

The site is located to the west of Deal at Betteshanger Country Park on the site of a former spoil tip of the former Betteshanger Colliery. The site is in a well located and sustainable location, with Deal situated approximately c 3 km south of the site where Deal station provides connections into London via Ashford International or Folkestone Central. Bus services into the town centre operate twice an hour, taking 10-15 minutes. There are footpaths and cycle paths directly from the site leading onto Sandwich Road.

The planning application was informed by a series of technical reports and assessments covering matters including air quality and noise, arboriculture, archaeology, ecology, economic benefits, flood risk and drainage, heritage, land contamination, landscape and visual impact, a sequential test and transport.

The proposals for the design of the hotel and spa have been locally inspired, of sustainable and modern design that respectfully sits within a unique landscape environment surrounded by open green space. The proposals have set out to meet the aspirations of paragraph 126 of the NPPF in achieving the creation of high quality, beautiful and sustainable development, that will be acceptable to the community and a place of enjoyment.

A compelling planning case exists to support the planning application being approved and at the heart of this is a strong quantitative and qualitative need for additional visitor accommodation in the District, especially for a luxury hotel at the higher end of the market. This is justified by the declining number of holiday trips to the District as well as the falling value of holiday trips. Both the 'Destination White Cliffs Country – A Growth Strategy for Tourism and the Visitor Economy 2020 to 2030' and the Dover Economic Growth Strategy target growth, investment and development in the District's tourism industry so that the range of visitor accommodation stock is improved and longer stays and higher spend are encouraged. There is a demonstrated need to increase the number of high-quality 4- and 5-star visitor accommodation in Dover District.

This type of accommodation has not been delivered within settlement confines, as currently supported in adopted policy, due to the absence of a signature setting within which to site a hotel of this nature. However, there is a market opportunity for a luxury hotel at Betteshanger Country Park, given the unique selling point of it being sited within a Country Park with growing recreation and leisure appeal for both visitors and existing residents.

The benefits associated with the delivery of the proposed development identify with the three dimensions of sustainable development, comprising economic, social and environmental, as set out in paragraph 8 of the NPPF. The proposed development, as set out in the Economic Benefits Statement will create employment opportunities of around 243 direct and a further 77 indirect construction jobs, 75 direct jobs on site during the peak season and support of around 111 net additional jobs across the South East. Around £22.6 million will be generated in construction GVA across the construction period. The development will significantly boost the number of visitors to Betteshanger Country Park, helping to provide the investment the Country Park needs to thrive and fulfil its potential as an education, sport and tourism destination.

There is an opportunity to improve social interaction between families and friends, connect people to nature and open space and educate visitors on the ecology and history of the Country Park. Job opportunities and training will improve livelihoods and the proposed green and blue infrastructure's connection with nature will provide positive benefits for the health and welfare of visitors. The proposed development would enhance the existing open space and recreational offering of Betteshanger Country Park and increase investment into the landscaping in and around the site to deliver a highly attractive environment that can achieve a biodiversity net gain and ensure maintenance and stewardship of the Country Park for the long-term.

Amendment to Draft Policy E4 – Tourist Accommodation and Attractions to include support for tourism proposals that are located within or adjacent to an existing visitor attraction or accommodation site

Betteshanger Country Park aspires to be able to support the Dover District Local Plan and is supportive of the Plan's objective to support new tourism accommodation and attractions in the District. However, an objection is raised to the policy deviation made from the last Draft Local Plan iteration, which supported tourism proposals located within or adjacent to existing visitor attractions or accommodation sites. The proposed retrogressive policy removes positive policy support for visitor accommodation at existing visitor attractions that happen to lie outside of settlement confines. This policy change is considered to result in significant harm to the tourism strategy for the District, by creating a policy conflict to proposals for luxury hotels, which can only come forward at a signature setting site such as Betteshanger Country Park, which happens to lie beyond a settlement boundary.

To be able to deliver the much-needed high quality tourist accommodation, it is recommended that Policy E4 – Tourist Accommodation and Attractions be amended back to the Regulation 18 draft, which supported visitor accommodation proposals that are located within or adjacent to an existing visitor attraction or accommodation site. For clarity, the policy has reduced the ability to deliver serviced visitor accommodation

from its previous text which stated 'within or adjacent to an existing visitor attraction or accommodation site' to the revised text which only states 'within or adjoining designated settlement confines'.

The 'Destination White Cliffs Country – A Growth Strategy for Tourism and the Visitor Economy 2020 to 2030' published in May 2021 and the 'Dover District Economic Growth Strategy' published in November 2021 make it clear that despite NPPF policy support, there has not been enough high-quality visitor accommodation delivered in the District to support its tourism objectives. It is therefore vital to allow for serviced visitor accommodation in appropriate locations such as adjacent to visitor attractions to enhance and diversify the visitor economy and harness the potential of the District to grow the economy. Not doing so would be disastrous for the District's visitor economy.

There is no evidence to justify the deviation from the Regulation 18 Plan, but there are considerable real-world implications associated with this change in policy wording. The planning application that is awaiting determination by the Council is unnecessarily brought into conflict with the proposed new policy, despite the clear direction of the Regulation 18 Plan and the supporting evidence for the Local Plan clearly highlighting the need for high quality visitor accommodation at existing visitor attractions.

Betteshanger Country Park already attracts people from the local area who are looking to use the existing cycle paths, walk the many trails or visit the recently delivered Visitor Centre, including The Lamp Room restaurant and The Kent Mining Museum. The Country Park has also built a reputation for hosting a variety of public events such as shows, markets, competitions and sporting events, amongst others. A separate Application for a surfing lagoon with a pump track, yoga hub, education hub and holiday pods (LPA Ref: 22/01158) is also awaiting a decision from the Authority that would enhance the role of the Country Park as a unique visitor destination with direct and indirect economic benefits for the District and wider County. The sister applications complement each other and would deliver for Dover District an exciting and distinctive tourism destination unlike anything that currently exists in the District, County or wider Region.

In order to remedy the soundness deficiency with Policy E4, which is considered unsound on the basis of it being ineffective and not positively prepared, the following amendment is requested to section 1 b), which if agreed, would render the policy sound:

"1 Provision of new, improved, upgraded or extended accommodation and attractions

a Proposals for visitor attractions will be supported in appropriate locations across the District where it increases the range and/or quality of tourist facilities and accords with criteria i) to x) below.

b Proposals for serviced visitor accommodation (hotels and B&B development) will be supported within and adjoining designated settlement confines (as defined in Policy SP4) and within or adjacent to an existing visitor attraction or accommodation site subject to criteria i) to x) below..."

c. Conclusion

Betteshanger Country Park aspires to support the District in delivering a sound, justified and effective Local Plan. However, Betteshanger Country Park objects to Policy E4 in its current form, which in respect of serviced visitor accommodation, only supports developments on sites within or adjoining existing designated settlement confines. This approach constitutes a significant deviation from the Regulation 18 Local Plan Policy E4, which supported tourism proposals where they are located within or adjacent to an existing visitor attraction or accommodation site. There has been no justified or evidenced reason for the deviation in policy between Regulation 18 and Regulation 19. Support for tourist accommodation and visitor attractions across the District should be strongly supported, particularly of the high quality and unique nature of our proposal, which would boost visitors to both the local and wider area and make the average overnight visitor worth seven times more to the local economy compared to that of a day tripper. Not amending the policy wording will make it incredibly difficult for the District to meet its tourism and economic objectives for the future, as top-of-the-market hotels cannot be delivered within settlement boundaries, as evidenced through their longstanding non-delivery in the District. However, a luxury hotel can be delivered at the Betteshanger Park existing visitor attraction, due to its signature setting, and the resultant effects of a policy that enables this form of development are as follows:

- Deliver a unique, locally inspired, sustainably designed modern hotel of the highest quality;
- Generate significant direct and indirect economic benefits for the local and regional area, supporting the aspirations established in the 'Destination White Cliffs Country – A Growth Strategy for Tourism and the Visitor Economy 2020 to 2030' and the Dover District Economic Growth Strategy for longer stays, dwell time and spending;
- Connect people with nature, open space and allow the opportunity to educate visitors on the ecology and history of Betteshanger Country Park while enjoying the recreational amenities that are currently provided.

In addition to amending Policy E4 as requested, Betteshanger Country Park also respectfully requests that the Plan formally allocates Betteshanger Country Park for a luxury hotel.

Betteshanger Country Park would welcome the opportunity to participate in the forthcoming Examination-in-Public into the plan and contribute to the debate to ensure the best strategy for the District is found.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s)

you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Betteshanger Country Park has land interests in the District and has an important role in delivering the Plan strategy
Include files	Hamlet Icenii projects (Tourist Accomodations - Betteshanger 1654 Att1_Redacted.pdf
Local Plan Consultation Point	E4 - Tourist Accommodation and Attractions
Rep ID	SDLP1315
Rep Status	Processed
Consultee ID	1333104
Consultee Full Name	The SEAHIVE
Consultee Company / Organisation	The SEAHIVE
Agent Full Name	Alexander Hamlet
Agent Company / Organisation	Icenii Projects
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	E4
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes

6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

REPRESENTATIONS TO THE DOVER DISTRICT LOCAL PLAN REGULATION 19

CONSULTATION IN RESPECT OF BETTESHANGER COUNTRY PARK: THE SEAHIVE, DEAL

This representation to the Dover District Local Plan (Regulation 19 Consultation) is made on behalf of our client, The SEAHIVE, who have submitted a planning application for The SEAHIVE, Holiday Pods and Hub at Betteshanger Country Park, Deal, (hereafter referred to as 'the site') validated 28th September 2022 and at the time of this submitted representation, awaiting decision from the Council (LPA Application Ref: 22/01158). A location plan is provided at Appendices 1 of this representation accordingly.

The SEAHIVE are delighted that the Draft Local Plan supports the tourism and visitor economy with proposed Policy E4 – Tourist Accommodation and Attractions. Support for visitor attractions across the District should be strongly supported, particularly of the high quality and unique nature of the SEAHIVE proposal, which would boost visitors to both the local and wider area and help to boost the number of overnight stays in the District, which is very low in relation to the numbers of people passing through the District. SEAHIVE considers that the Local Plan should be even more proactive than the position outlined in the draft Plan, through a corresponding development allocation for a visitor attraction on the Betteshanger Country Park.

The submitted planning application for this proposal (LPA Ref: 22/01158) sets out how the proposal is in total compliance and sync with the tourism objectives of the 'Destination White Cliffs Country – A Growth Strategy for Tourism and the Visitor Economy 2020 to 2030' as well as the Dover District Economic Growth Strategy. There is a clear demonstrated need for a unique tourism offering in Dover that can improve and diversify existing attractions in the District, support longer stays, dwell time and spending. Betteshanger Country Park is designated as Open Space and has already established itself as a destination offering visitor amenities and attractions in the form of a café/restaurant, Mining Museum, meeting space, cycle and pedestrian paths as well as holding large entertainment events throughout the year. The SEAHIVE would enable the site's community value, as well as tourism value, to be realised.

a. The SEAHIVE, Holiday Pods and Hub ('The site')

The SEAHIVE submitted a planning application for The SEAHIVE, Holiday Pods and Hub at Betteshanger Country Park, Deal ('the site') under the local planning authority reference 22/01158, which is currently awaiting decision from the Council. The application was submitted in 'full' and seeks permission for:

'Erection of a surfing lagoon and pools, hub building (to include café/restaurant/bar lounge, shop, hiring and changing facilities and multi-use space), 15 overnight holiday pods, learning hive, yoga studio, fitness/health and wellbeing facilities, bike/pumptrack and associated roads, paths, car and cycle parking, together with landscaping and necessary access works and associated site infrastructure'.

The site is located to the west of Deal at Betteshanger Country Park on the site of a former spoil tip of the former Betteshanger Colliery. The site is in a well located and sustainable location, with Deal situated approximately c 3 km south of the site where Deal station provides connections into London via Ashford International or Folkestone Central. Bus services into the town centre operate twice an hour, taking 10-15 minutes.

There are footpaths and cycle paths directly from the site leading onto Sandwich Road.

The planning application was informed by a series of technical reports and assessments covering matters including air quality and noise, arboriculture, archaeology, ecology, economic benefits, flood risk and drainage, geotechnical, heritage, land contamination, landscape and visual impact, and transport.

The proposals for the design of the buildings and lagoon will be unique and set a precedent for the highest quality rural architecture for a sports and recreational facility and have been informed by contextual analysis and environmental considerations. The proposals have set out to meet the aspirations of paragraph 126 of the NPPF in achieving the creation of high quality, beautiful and sustainable development, that will be acceptable to the community and a place they will enjoy.

The Economic Benefits Statement submitted as part of the application highlights the declining number of holiday trips to the District as well as the falling value of holiday trips. Both the 'Destination White Cliffs Country – A Growth Strategy for Tourism and the Visitor Economy 2020 to 2030' and the Dover Economic Growth Strategy target growth, investment and development in the District's tourism industry so that visitor experiences are improved and longer stays and higher spend are encouraged. The development proposal offers the opportunity to significantly boost the number of visitors to Deal and Dover, supporting the growing surf community in Kent, as well as attracting visitors from further afield.

There is a unique selling point to this sporting-led tourist attraction that will allow it to compete and differentiate itself from other destinations and complement the tourism offer both in the District and wider County.

The benefits associated with the delivery of the proposed development identify with the three dimensions of sustainable development, comprising economic, social and environmental, as set out in paragraph 8 of the NPPF. The proposed development will create employment opportunities of around 153 direct and a further 194 indirect construction jobs, 100 direct jobs on site during the peak season and support of around 45 to 74 net additional jobs across the South East. Around £14.2 million will be generated in construction GVA across the construction period and at the development site itself, £6 million could be generated in visitor spending with an additional £2 million from those overnight visits at the holiday pods.

Socially, there is an opportunity to engage people in outdoor physical activity that has proven to have positive health and well-being benefits. Working with local businesses, schools and communities, particularly directing efforts at those social groups who are disadvantaged will be possible under this proposal. The proposed development would enhance the existing open space and recreational offering of Betteshanger Country Park with a high quality sport activity that should be of significant community benefit to existing residents, as well as economic benefit in providing a valuable attraction to the District to encourage greater numbers of visitors to visit and stay in the District.

b. Amendment to Draft Policy E4 – Tourist Accommodation and Attractions to include an allocation for tourist attractions at Betteshanger Country Park

The Dover District Local Plan Regulation 19 supports the provision of new, improved, upgraded or extended accommodation and attractions in the District. The SEAHIVE is therefore supportive of the Draft Local Plan's positive approach to supporting new tourism accommodation and attractions in the District. However, it is considered that the Plan could and should be more positively prepared and more specific in its support for the SEAHIVE development at Betteshanger Country Park.

A site-specific allocation for SEAHIVE at Betteshanger Country Park would provide public support to the principle of SEAHIVE being located within the District in a highly suitable, accessible and sustainable location for the infrastructure. Betteshanger Country Park is best placed to accommodate the proposed development of this scale and type within the District, not only because of its proximity to Deal, but also because the land lies in Flood Zone 1, which is rare within the coastal parts of the District. The setting of the site within a 200-acre Country Park offers an opportunity for the management and enhancement of habitats.

Betteshanger Country Park already attracts people from the local area who are looking to use the existing cycle paths, walk the many trails or visit the recently delivered Mining Museum. The Country Park has also built a reputation for hosting a variety of public events such as shows, markets, competitions and sporting events, amongst many others. The addition of the surfing lagoon with a pump track, yoga hub, education hub and holiday pods would accentuate the value of the Country Park as a visitor destination however, as well as a recreational resource of high community value.

Chapter 6 of the NPPF concerns building a strong, competitive economy and Para 81 outlines how planning policies should help build strong and competitive economies where businesses can invest. The allocation of the SEAHIVE at Betteshanger Country Park would create a more positive and proactive Plan that supports innovative and unique proposals such as SEAHIVE and increases the likelihood of important new tourism infrastructure being delivered through a Plan allocation.

c. Conclusion

The SEAHIVE supports in principle a positively prepared, justified, effective, consistent and sound Dover Local Plan and considers there to be much to commend with the existing draft Plan. While SEAHIVE supports the inclusion of a policy that directly targets tourism accommodation and attractions in the District, the Plan could and should be more positively prepared through the allocation of the subject site of Betteshanger Country Park for the SEAHIVE visitor attraction, to cement the Country Park as a unique visitor destination for the District and support the District's economy in the following ways:

- Deliver a unique, innovative and inspiring visitor attraction, setting the precedence for the highest quality rural architecture seen anywhere for a sports and recreational facility;*
- Generate significant economic benefits for the local and regional area, supporting the aspirations established in the 'Destination White Cliffs Country – A Growth Strategy for Tourism and the Visitor Economy 2020 to 2030' and the Dover District Economic Growth Strategy for longer stays, dwell time and spending;*
- Engage people in outdoor physical activity that has proven health and wellbeing benefits.*

The SEAHIVE would welcome the opportunity to participate in the forthcoming Examination-in-Public into the Plan and contribute to the debate to ensure a sound and high quality Local Plan for the District to be delivered.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant

and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	The SEAHIVE is a developer with land interest in the District, who has an important role in delivering the Plan strategy
Include files	Hamlet Icen projects (SEAHIVE) 1657_email_Redacted.pdf
Local Plan Consultation Point	E4 - Tourist Accommodation and Attractions
Rep ID	SDLP1689
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	E4
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438. E4 Tourist Accommodation and Attractions: It is very unsound for DDC to fail to make Airbnb owners register with them, so that they can be charged Business rate council tax. In terms of housing provision, Airbnb both nationally, and in Kent's coastal towns especially, have a very

<p>possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>negative effect of reducing the private rental market and thus forcing up the average monthly rents for private tenants, while we have a cost-of living crisis. It is unsound for DDC not to cause all private landlords to register with the council, so that DDC could promote to private landlords, schemes allowing them to protect their tenants from the worst of fuel poverty, enhance the intrinsic value of their properties, and provide employment for newly qualified tradespersons in insulation skills graduating from EK Colleges, especially Dover College (FE).</p> <p>Green tourism, and 'safe' country lanes, are East Kent assets that it would be very unsound to degrade.</p> <p>The local plan would be more compliant with Legality (legally binding Net Zero Strategy, Climate Emergency Declaration 2019 and Climate Change Act 2008), if DDC regeneration took the greening of the economy more seriously and looked at smaller zero-carbon transport activity projects within Dover town; harbour trips with zero carbon, solar-powered boats (like La Rochelle has had for 15 years), like electric hopper mini-buses (like the ones which have been coping with the 1 in 6 gradients of Aix-en Provence for over 15 years).</p> <p>Economic Growth in Dover, a coastal town aspiring to attract tourists, would be unsound unless it included trebling the number of toilets installed. Tourists as well as residents have toilet needs. For a town with the iconic, historical importance of Dover NOT to have any coach park with lavatorial comfort facilities is a disgrace. The ratio of inhabitants to toilet blocks in Dover town is treble the ratio in other urban areas in the District, 1 : 10,000 or higher. The only coach park in Dover Town has, for 5 years, had 2 signs on Maison Dieu Road telling coach drivers and visiting car drivers that a toilet exists when in fact it doesn't. At this location in Maison Dieu car park, behind the police station, visitors get out, pay to park and find nothing, merely a sign to a 15 minute walk to Pencester Gardens, difficult when legs are crossed. The DDC website misleads the public on this issue. The lack of toilets is a public health problem which we have referred to Kent Director of Public health.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>E4 - Tourist Accommodation and Attractions</p>
<p>Rep ID</p>	<p>SDLP1868</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1271717</p>
<p>Consultee Full Name</p>	<p>Quinn Estates</p>
<p>Consultee Company / Organisation</p>	<p>Quinn Estates Ltd</p>
<p>Agent Full Name</p>	<p>James Waterhouse</p>
<p>Agent Company / Organisation</p>	<p>Iceni projects</p>

<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>E4</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified Effective Consistent with National Policy</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Yes</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Yes</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>(DDC Note - Full Representation attached to SDLP1860. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1860.)</p> <p>h. Policy E4 – Tourism Accommodation and Attractions</p> <p>Whilst Quinn is broadly supportive of Policy E4, objection is raised to the policy deviation made from the last Draft Local Plan iteration, which supported tourism proposals located within or adjacent to existing visitor attractions or accommodation sites. The proposed retrogressive amendment removes positive policy support for visitor accommodation at existing visitor attractions that happen to lie outside of settlement confines. This policy change is considered to result in significant harm to the tourism strategy for the District, by creating a policy conflict to proposals at existing visitor attractions, which provide the scope to deliver new visitor accommodation where existing settlements are unable to. For example, there is no market requirement for a luxury hotel within an existing settlement, but there is a requirement for a luxury hotel at Betteshanger Park, where a signature setting forms a unique selling point.</p> <p>In order to remedy the soundness deficiency with Policy E4, which is considered unsound on the basis of it being ineffective and not positively prepared, the following amendment is requested to section 1 b), which if agreed, would render the policy sound:</p> <p>“1 Provision of new, improved, upgraded or extended accommodation and attractions</p> <p>a Proposals for visitor attractions will be supported in appropriate locations across the District where it increases the range and/or quality of tourist facilities and accords with criteria i) to x) below.</p> <p>b Proposals for serviced visitor accommodation(hotels and B&B development)will be supported within and adjoining designated settlement confines(as defined in Policy SP4) and within or adjacent to an existing visitor attraction or accommodation site subject to criteria i) to x) below...”</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note</p>	<p>Quinn Estates is a developer with significant land interests in the District, who has an important role in delivering the Plan strategy</p>

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

R1 - Primary Shopping Areas

Local Plan Consultation Point	R1 - Primary Shopping Areas
Rep ID	SDLP507
Rep Status	Processed
Consultee ID	1268017
Consultee Full Name	Ms Penelope James
Consultee Company / Organisation	Dover and Deal Liberal Democrats
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	R1
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	n/a
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Suggestion - reward high street shops for environmentally sustainable behaviour regarding shop fronts, lighting, design etc. Encourage shops/companies to be responsible for their impact on society and the environment
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	Suggestion - reward high street shops for environmentally sustainable behaviour regarding shop fronts, lighting, design etc. Encourage shops/companies to be responsible for their impact on society and the environment.

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	R1 - Primary Shopping Areas
Rep ID	SDLP1627
Rep Status	Processed
Consultee ID	1252100
Consultee Full Name	Mrs Amandajayne Hollobon-Baxter
Consultee Company / Organisation	Sandwich Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	R1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The primary shopping area should be widened to extend the SP10 boundary to include Strand Street, Delf Street, The end of the Butchery, Potter Street and Harnett Street. This policy should be amended to state in the final two paragraphs: Sandwich Town Council will support proposals to bring upper floors back into use, including for residential and office use, unless the current use is for retail and the business is viable and valued by the local community. Changes of use to residential will not be permitted on the ground floor of any unit within the Primary Shopping Areas and this will prohibit the loss of any square metres of viable retail space on ground floors.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The primary shopping area should be widened to extend the SP10 boundary to include Strand Street, Delf Street, The end of the Butchery, Potter Street and Harnett Street. This policy should be amended to state in the final two paragraphs: Sandwich Town Council will support proposals to bring upper floors back into use, including for residential and office use, unless the current use is for retail and the business is viable and valued by the local community. Changes of use to residential will not be permitted on the ground floor of any unit within the Primary Shopping Areas and this will prohibit the loss of any square metres of viable retail space on ground floors.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

R2 - Sequential Test and Impact Assessment

Local Plan Consultation Point	R2 - Sequential Test and Impact Assessment
Rep ID	SDLP571
Rep Status	Processed
Consultee ID	1267584
Consultee Full Name	Jason Ransley
Consultee Company / Organisation	Dover Harbour Board
Agent Full Name	John Bowles
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy R2 - Sequential Test and Impact Assessment
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Dover Harbour Board supports the objectives of Policy R2 - Sequential Test and Impact Assessment to restrict retail development and other main town centre uses to existing town centres unless they are supported by other policies in the Plan. However, we request that the policy recognises or clarifies that in locations (such as Dover Waterfront) where there is already a significant amount of floorspace in retail and town centre uses, proposals for the development/reprovision of equivalent floorspace for such uses will not be required to satisfy the Sequential Test requirements of Policy R2.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Dover Harbour Board requests that the wording of Policy R2 or the supporting text is amended to recognises or clarify that in locations (such as Dover Waterfront) where there is already a significant amount of floorspace in retail and town centre uses, proposals for the development/reprovision of equivalent floorspace for such uses will not be required to satisfy the Sequential Test requirements of Policy R2.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	N/A

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	SDLP0571 Dover Harbour Board - Att 2.pdf Waterfront Plan - Update 2022.pdf (4)
Local Plan Consultation Point	R2 - Sequential Test and Impact Assessment
Rep ID	SDLP1126
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	We note statement 'town centres . . . the most sustainable locations, easily accessible by modes of travel other than the private car.'
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	More sound if the recommendation about SMEs and electric hopper buses (our comments E4 above) incentivized. To note E1 above, on floor space / new employment could include out-of-town park for hopper buses with solar canopy so proportion of electrical charging for hopper buses from direct solar.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	R2 - Sequential Test and Impact Assessment
Rep ID	SDLP1690
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	R2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438. R2 Sequential Test and Impact Assessment We note the statement 'town centres . . . the most sustainable locations, easily accessible by modes of travel other than the private car.' It will be sounder if the recommendation about SMEs and electric hopper buses (our comments E4 above) incentivized. To note E1 above, on floor space / new employment could include out-of-town park for hopper buses with solar canopy so proportion of electrical charging for hopper buses from direct solar.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

R3 - Local Shops

Local Plan Consultation Point	R3 - Local Shops
Rep ID	SDLP1629
Rep Status	Processed
Consultee ID	1252100
Consultee Full Name	Mrs Amandajayne Hollobon-Baxter
Consultee Company / Organisation	Sandwich Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	R3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Commercial premises should be supported and encouraged, and new commercial ventures should be given a financial incentive.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Commercial premises should be supported and encouraged, and new commercial ventures should be given a financial incentive.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

R4 - Shop Fronts

Local Plan Consultation Point	R4 - Shop Fronts
Rep ID	SDLP1632
Rep Status	Processed
Consultee ID	1252100
Consultee Full Name	Mrs Amandajayne Hollobon-Baxter
Consultee Company / Organisation	Sandwich Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	R4
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Commercial premises established or vacant should remain commercial and not be permitted to convert to domestic. Should positively reflect and contribute to the character and vitality of this medieval town.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Commercial premises established or vacant should remain commercial and not be permitted to convert to domestic. Should positively reflect and contribute to the character and vitality of this medieval town.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

T11 - Sustainable Transport and Travel

Local Plan Consultation Point	T11 - Sustainable Transport and Travel
Rep ID	SDLP883
Rep Status	Processed
Consultee ID	1265202
Consultee Full Name	Mr GLYN JONES
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	T11 Sustainable Transport and Travel / T12 Transport Statements, Assessments and Travel Plans.
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I feel that the plan is unsound because the solutions are not addressing the long term issues, the priority if Dover District is ever to successfully develop into a thriving long term community is to separate the local community and their communication routes from the high volume of vehicles and HGV's using the Port of Dover permanently.</p> <p>(This text moved from question 9):</p> <p>Traffic generated by additional development should normally be targeted towards the primary and secondary route network in the District. Other routes should not be subject to inappropriate levels of traffic generation or unsuitable traffic movements.</p> <p>I consider that in three areas the current plan to 2040 has not effectively addressed the issues surrounding road safety and traffic congestion.</p> <ol style="list-style-type: none"> 1. The Alkham Valley Road traffic projections indicate that there will be an unacceptably high volume of vehicles using the route through an unclassified through an AONB to join the A20/M20 at the Roundhill Tunnel rather than the A20 from Dover. 2. Increasing the lane widths around the Whitfield roundabout and Duke of York roundabout on the Main A2 route to Dover port is not a safe or viable solution, especially as the new Thames crossing will encourage much more traffic to use the A20 route significantly increasing traffic volumes. <p>The only practical solution that I can identify as a Qualified Chartered Engineer is to separate local and through traffic for the port by installing flyover bridges or underpasses at each site, the projected flow at both sites is unlikely improve road safety for local traffic or access to local facilities.</p> <ol style="list-style-type: none"> 3. The District Council is recommended to review the Gothenburg Model in Sweden to see how that city took action to give the sea front back to the community, again I feel that the solution is an underpass as constructed in Gothenburg. Also nearer to home another very successful project at Conway, North Wales to gave the town back to the community and diverted all Irish Sea ferry traffic underground across the harbour. An access tunnel from the A20 under the western docks across the Dover harbour into the Eastern docks is the only long term solution if Dover

	<p>is ever to be developed into a prosperous town for it's residents. A major Development that needs serious consideration for the next 100 years not just to 2040.</p> <p>These outline comments sound radical but I feel need serious investigation by Dover District Council and ther UK Government before significant investment costs are wasted trying to adapt unsuitable roundabouts and traffic flow systems.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>An undertaking to assess and discuss with government the real requirements required to ensure the proper regeneration and development of the East Kent area ensuring realistic transport flow for vehicles, cycles and pedestrians. Segregating all Port traffic flow requirements far into the future not just 2040.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>T11 - Sustainable Transport and Travel</p>
<p>Rep ID</p>	<p>SDLP502</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1268017</p>
<p>Consultee Full Name</p>	<p>Ms Penelope James</p>
<p>Consultee Company / Organisation</p>	<p>Dover and Deal Liberal Democrats</p>
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>T11 and 10.10</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>Yes</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Not Applicable</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Not Applicable</p>

6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	n/a
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	n/a
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	<p>T11</p> <ul style="list-style-type: none"> • Re local transport - encourage operators to introduce a network wide ticketing system • Improve cycle routes • As well as providing cyclists with secure parking also provide high quality changing facilities. • Need to ensure cycle routes do not come to an abrupt end without warning leaving cyclists no choice but to join the main highway e.g as at the roundabout at the A2 / A256 Junction <p>10.10</p> <p><i>"It may also be desirable or necessary for any proposed management measures to be supported through the development and implementation of a travel plan for the proposed development." We believe "desirable" should be removed. This should be an essential element of any new development.</i></p>
Include files	
Local Plan Consultation Point	T11 - Sustainable Transport and Travel
Rep ID	SDLP549
Rep Status	Processed
Consultee ID	1265202
Consultee Full Name	Mr GLYN JONES
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Sustainable Transport and Travel
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC EDIT: Please see attachment in response to the following email: "I completed the above submission on Wednesday 7th December, it proved to be a bit of a nightmare as the data record will probably show, with the databases freezing and missing key strokes etc. I suspect due to poor internet connectivity in Alkham or the DDC website becoming overloaded? Once I got to the end of the form, there were clearly multipole grammar and spelling corrections to address and several sections the English needed editing. Unfortunately the document froze, so I could not edit sections previously completed. I tried last night to edit the document once registered which according to the guidance should have been possible by amending it to a Ver 2 but I could not find out how to edit it. I think the text on my submission is understandable, but if possible would appreciate if the attached improved text could be considered along with my submission"</p> <p>REFERENCE TO POLICY T12.</p> <p>Unfortunately this policy has clearly identified the primary routes from Dover district to be the A2 to the North and the A20 to the west. No consideration seems to have been given to the regular traffic disruption on the A20 through the Town and A20 between Dover and Folkestone due to regular the inability to manage ferry traffic within the ports infrastructure.</p> <p>The outcome of which is heavy usage of the Unclassified Alkham Valley Road, an unclassified road between the London Road Dover and Hawkinge entry roundabout to the A20. This road is within the AONB for the entire length of its route</p> <p>The councils own modelling data shows clearly that today at the Alkham Valley to London Road the Junctiuon is over capacity during rush hour traffic. Causing traffic to divert onto narrow roads through River and Temple Ewell villages.</p> <p>This problem will be exacerbated when additional housing is constructed in Whitfield and Dover.</p> <p>A document written by Alkham Valley Speedwatch is attached is attached to detail the concerns of Alkham Speedwatch. They cover a significant number of concerns which exist at present and will become major problems in the future. Although the document references numerous areas of the plan the key point is that there is no evidence that the Alkham Valley Road has been considered during the plans development.</p> <p>(This text copied from question 9):</p> <p>Alkham Valley Speedwatch are a group of 10 Volunteers. Speedwatch has significant experience of observing driver behaviour and traffic flow through the Alkham Valley, having been requested in 2017 by the Parish Council to develop a safe traffic management plan for the route for an unclassified road passing through an AONB along it's entire length. Following a survey of residents who were unanimously concerned about speed, traffic volumes, road safety, use by low height heavy HGV's and road kill along the valley road the attached TAG report was published but never actioned. At the request of KCC the Parish Council produced a highways HIP Plan but unfortunately most of the content was mostly rejected by KCC due to lack of funding and the remaining mostly unaffordable from a parish Council Budget.</p> <p>The Alkham Valley road safety issue is not new and has been a source of concern in the Parish for over 30 years. The historic position is described in the attached document. The Plan 2040 needs agreement for a realistic and safe solution for the ANOB & SSI plus the inhabitants of the Alkham Valley Road until at least 2040. It is unacceptable to ignore a road with an overloaded traffic flow for an AONB and projections to increase traffic flow by at least 50% by 2040, denying safe access to cyclists, horse riders, villagers and visitors in the Dover 2040 Plan.</p> <p>DDC EDIT: Please see attachment in response to the following email: "I completed the above submission on Wednesday 7th December, it proved to be a bit of a nightmare as the data record will probably show, with the databases freezing and missing key strokes etc. I suspect due to poor internet connectivity in Alkham or the DDC website becoming overloaded? Once I got to the end of the form, there were clearly multipole grammar and spelling corrections to address and several sections the English needed editing. Unfortunately the document froze, so I could not edit sections previously completed. I tried last night to edit the document once registered which according to the guidance should</p>

	<i>have been possible by amending it to a Ver 2 but I could not find out how to edit it. I think the text on my submission is understandable, but if possible would appreciate if the attached improved text could be considered along with my submission"</i>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>Dover District Council needs to fully consider the impact of the Dover District Traffic plan on the ALKHAM VALLEY ROAD, to assess methods to resolve the A20 traffic congestion problems and implement deterrent methods to prevent commuters overloading the unclassified route through the Alkham Valley by using the Alkham Valley as a "commuter rat run" to the M20.</p> <p>The traffic management plan for the Alkham Valley road needs ensure that Alkham Valley Road to complies with the for normal traffic flow expectations and guidance for an unclassified road passing through an AONB a large area of SSI to the North, plus a small village with a notoriously dangerous z bend in the middle of the village with few safe crossing points for pedestrians. It also needs consider the poor road safety and road traffic accident record of the road, speedwatch, police traffic cameras and prosecution records along a narrow road with has multiple bends, a village with no connecting pavements, poor driver vision and a lane width slightly narrower than the guideline road width between properties in the middle of the village. It should also take into consideration the access requirements for cyclists, horse riders and walkers to the AONB. Also the safety of residents trying to exit blind drives onto a road designed for horse and carts and occasional vehicles.</p> <p>Where vehicles frequently exceed the speedlimit by 40% to 50% and have been prosecuted entering the village 30mph limit at up to 70 mph especially in commuter rush hours as drivers try to avoid traffic disruption on the A20 dual carriageway. There have been at numerous major accidents along the Alkham Valley every year since records began.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	Comment to DDC Alkham Valley Road Safety3.docx Alkham valley KCC brochure A.pdf TAG-Draft-Report-Sept-2018.pdf SDLP0549 Jones Att4.pdf
Local Plan Consultation Point	TI1 - Sustainable Transport and Travel
Rep ID	SDLP636
Rep Status	Processed
Consultee ID	1331790
Consultee Full Name	Julie Davies
Consultee Company / Organisation	CPRE Kent
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	TI1
2 - Do you consider this part of the Plan sound?	No

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Whilst supporting the intentions of criteria (a), (b) and (c) and safeguarding the rights of way network it will also be important that allocated sites both residential and employment are in locations that support active travel. It will also be important that there are active travel routes from residential development to nearby facilities and that they are safe, lit (to be safe for women. Children and young people) and have firm surfaces (not mud paths).
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	CPRE Kent would wish to participate at the examination hearings to explore these issues further.
Include files	
Local Plan Consultation Point	TI1 - Sustainable Transport and Travel
Rep ID	SDLP1037
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	TI1
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The County Council is supportive of this policy.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	TI1 - Sustainable Transport and Travel
Rep ID	SDLP1163
Rep Status	Processed
Consultee ID	1271448
Consultee Full Name	Kevin Bown
Consultee Company / Organisation	National Highways
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	TI1
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We note that TI1 formed DM Policy 4 of the Regulation 18 consultation. We support this policy which notes the need for new developments to provide opportunities to maximise the use of sustainable transport modes which is in line with the NPPF 2021. We recognise that DDC declared a Climate Emergency in 2020 and this policy intervention can help to minimise the need for costly, disruptive and carbon intensive highway infrastructure to mitigate developments, and will better meet the UK's net zero commitments and the need to improve air quality for local communities. We recently published 'Net zero highways: our 2030 / 2040 / 2050 plan.' The document covers our commitment to developing and implementing a programme to improve public transport operations on the SRN, promotion of walking and cycling and measures to reduce the need to travel. We are committed to working with DDC to ensure that the Local Plan development comes forward sustainably.</p> <p>Representation: National Highways are content with Policy TI1</p> <p><i>(Note - This is an extract of the Full National Highways representation which can be located at SDLP1152)</i></p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	TI1 - Sustainable Transport and Travel
Rep ID	SDLP1633
Rep Status	Processed
Consultee ID	1252100
Consultee Full Name	Mrs Amandajayne

	Hollobon-Baxter
Consultee Company / Organisation	Sandwich Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	TI1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	It is vital that High Speed Trains return to Sandwich on a regular scheduled timetable throughout the week.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	TI1 - Sustainable Transport and Travel
Rep ID	SDLP1131
Rep Status	Processed

Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	We have commented above on specific SAPs where the Highways Assessment is inadequate and the reality on the ground is different. This being the case, the Plan would not be sound or compliant with the Localism Act 2011 if local parish-wide public consultation on travel impact of all developments over 15 dwellings were not required.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	T11 would not be sound without : <i>"All new homes must be readily accessible by sustainable transport modes through the provision of high-quality, engineered, safe and direct walking and cycling routes within the permeable site layout.."</i> This would make clear that cycle ways, for example, must be more than a painted line on the road surface (Badly painted lines can be fatal). Also to be rendered more sound by the following final statement: <i>"The Council will safeguard and enhance the rights of way network and other cycle and walking routes from developments that would otherwise compromise their use."</i>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	TI1 - Sustainable Transport and Travel

Rep ID	SDLP1673
Rep Status	Processed
Consultee ID	1331868
Consultee Full Name	Ruth Marczin-Bundy (Parish Cllr)
Consultee Company / Organisation	Alkham Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	TI1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>10 Footpaths, Cycleways, Bridleways and BOATS</p> <p>The Dover District Plan clearly identifies a wish to achieve a modal shift from car to public transport and develop a network of cycle routes and walkways through the district and I believe Alkham can help the District achieve its aims in this respect.</p> <p>10.1 The Parish is crisscrossed by a series of bridleways and footpaths. Several walks have been written up in detail and can be downloaded from the village web site. <i>(see map in attachment)</i></p> <p>10.2 Several problems have been experienced with some of the footpaths, particularly the Bull Run and Pimlico owing to the misuse by vehicles.</p> <p>10.3 A comprehensive plan is therefore required for maintenance, preservation and use of this amenity as part of the local planning proposal.</p> <p>Comment 10</p> <p>In line with the proposals contained within the District Plan I believe thought could also be given to additional paths and cycle routes which should be created to give access safely along the Valley and to develop it as a recreational resource bearing in mind the points raised above about the need to conserve the AONB and SSSIs. If new routes are proposed, it is important to consider the ongoing maintenance costs given the problems encountered already on existing routes. This would go some way to achieving the modal shift referenced within the plan.</p> <p>11 Bridleways</p> <p>11.1 Horse riding is a popular pastime within the parish Figure 2 shows the abundance of bridle paths throughout the parish but again difficulties have been experienced in maintaining these to an acceptable standard. <i>(see attachment for map)</i></p> <p>Comment 11</p> <p>Sustainable Transport and Travel – DDC Plan - TI1)</p>

	<p>Again, in line with the Dover Plan this could further be developed as part of a recreational plan for a conservation Area It should be noted that there are four crossing sites along the Alkham Valley Road. Risk assessments by the Traffic Action Group identified these crossings and the short length of Alkham Valley Road between Pimlico and Megget Lane used by riders as very dangerous given current traffic volumes</p> <p><i>(DDC note - The full representation from Alkham PC is attached. However, specific comments from the full representation document have been extracted into separate consultation points/policy areas, relevant to the comments made)</i></p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Not Applicable
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>Marczin-Bundy Alkham PC Em Att1.pdf</p>
<p>Local Plan Consultation Point</p>	TI1 - Sustainable Transport and Travel
<p>Rep ID</p>	SDLP1693
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1333265
<p>Consultee Full Name</p>	Cllr John Lonsdale
<p>Consultee Company / Organisation</p>	Walmer Town Council
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	TI1
<p>2 - Do you consider this part of the Plan sound?</p>	No
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	Positively prepared Justified Effective

	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438. TI 1 Sustainable Transport and Travel TI1 would not be sound without: "All new homes must be readily accessible by sustainable transport modes through the provision of high-quality, engineered, safe and direct walking and cycling routes within the permeable site layout.." This would make clear that cycle ways, for example, must be more than a painted line on the road surface (Badly painted lines can be fatal). Also, to be to be rendered more sound by the following final statement: " <i>The Council will safeguard and enhance the rights of way network and other cycle and walking routes from developments that would otherwise compromise their use.</i> "
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	TI1 - Sustainable Transport and Travel
Rep ID	SDLP1791
Rep Status	Processed
Consultee ID	1331526
Consultee Full Name	Mrs Mairi Jones
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	TI1

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note: Please see detailed representation (attached at 1770) which has been divided against numerous consultation points. The representation has images within the test. The text below is an extract from the detailed representation 'by an Alkham resident'.</p> <p>10 Footpaths, Cycleways, Bridleways and BOATS</p> <p>The Dover District Plan clearly identifies a wish to achieve a modal shift from car to public transport and develop a network of cycle routes and walkways through the district and I believe Alkham can help the District achieve its aims in this respect.</p> <p>10.1 The Parish is crisscrossed by a series of bridleways and footpaths . Several walks have been written up in detail and can be downloaded from the village web site.</p> <p>10.2 Several problems have been experienced with some of the footpaths, particularly the Bull Run and Pimlico owing to the misuse by vehicles.</p> <p>10.3 A comprehensive plan is therefore required for maintenance, preservation and use of this amenity as part of the local planning proposal.</p> <p>Comment 10 In line with the proposals contained within the District Plan I believe thought could also be given to additional paths and cycle routes which should be created to give access safely along the Valley and to develop it as a recreational resource bearing in mind the points raised above about the need to conserve the AONB and SSSIs. If new routes are proposed it is important to consider the ongoing maintenance costs given the problems encountered already on existing routes. This would go some way to achieving the modal shift referenced within the plan.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Please see appended report.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I can speak to any of the points raised in the attached document
Include files	

T12 - Transport Statements, Assessments and Travel Plans

Local Plan Consultation Point	T12 - Transport Statements, Assessments and Travel Plans
Rep ID	SDLP950
Rep Status	Processed
Consultee ID	1268017
Consultee Full Name	Ms Penelope James
Consultee Company / Organisation	Dover and Deal Liberal Democrats
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	T12 and 10.10
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	10.10 <i>"It may also be desirable or necessary for any proposed management measures to be supported through the development and implementation of a travel plan for the proposed development." We believe "desirable" should be removed. This should be an essential element of any new development.</i>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	n/a
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	T11 <ul style="list-style-type: none"> • Re local transport - encourage operators to introduce a network wide ticketing system

<p>the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<ul style="list-style-type: none"> • Improve cycle routes • As well as providing cyclists with secure parking also provide high quality changing facilities. • Need to ensure cycle routes do not come to an abrupt end without warning leaving cyclists no choice but to join the main highway e.g as at the roundabout at the A2 / A256 Junction <p>10.10</p> <p>"It may also be desirable or necessary for any proposed management measures to be supported through the development and implementation of a travel plan for the proposed development."We believe "desirable" should be removed. This should be an essential element of any new development.</p>
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>T12 - Transport Statements, Assessments and Travel Plans</p>
<p>Rep ID</p>	<p>SDLP838</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331884</p>
<p>Consultee Full Name</p>	<p>Mr Andy Tee</p>
<p>Consultee Company / Organisation</p>	<p>Nonington Parish Council</p>
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to?Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>T12 - Transport Statements, Assessments and Travel Plans10.;7 and 10.8 + itemised additional</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>No</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>No</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>Reg 19 T12 - Transport Statements, Assessments and Travel Plans</p> <p>In item 10.7 set out their goal of 'promoting the delivery of sustainable development' stating that 'Traffic generated by development should normally be targeted towards the primary and secondary route network in the District. Other routes should not be subject to inappropriate levels of traffic generation or unsuitable traffic movements'.</p> <p>Although KCC Highways consulted with DDC on policy (T12) they haven't published benchmark traffic levels or defined 'inappropriate' or 'unsuitable' traffic impacts because 'baseline conditions vary considerably from location to location'. Nor does NPPF para 111 provide a definition of 'severe' or 'unacceptable'. DDC also seek discretionary power over:</p> <ul style="list-style-type: none"> • When or whether Transport Assessments and Travel Plans are required.

- **And to decide what constitutes a severe residual cumulative impact on the local highway on a case by case basis.**

Without the robust benchmark data on existing traffic (as required by MHCLG and DDC's Sustainability Appraisal of Growth Options), it unclear how this will work in practice. Especially given the pressure to deliver on housing targets and the local government financial incentives to facilitate housing inherent the New Homes Bonus which we understand paid £1,728,587 to DDC in 2019.

- The Reg 19 proposed Aylesham South and Snowdown sites are accessed directly from the C195 / Holt Street, which is also the direct route to the A2 from Elvington. This will increase our traffic issues.
- While recognising the 'porosity' of the contiguous rural road network the traffic impacts from the proposed Aylsham site on to Holt Street, WSP data and modelling is restricted to the observation that '*Holt Street is not modelled but anticipated trips for Aylesham Development will leave the network here*'.
- No ACT data has been collected or for traffic heading North on Adelaide Road from Elvington to the A2 or from Aylesham heading south east to Sandwich, Discovery Park and South Thanet

PAS state good evidence should contain reliable, objectively collected recent data and will not contain unjustified assumptions. For the area bounded by the A2, B2046, A256 and A257, we believe the patchy 2018 ACT traffic evidence fails this test as it does not include:

- 1 Disaggregated SERTM data.
- 2 Node Impedance Calculation (ICA)
- 3 VISUM Network Map of existing and proposed roads
- 4 Detailed benchmark capacity PCU per Lane per lane data for Links types including for Rural Roads and Minor Road Rural Village (30mph).
- 5 Education Cat Trips prior matrices .

In assessing whether the Reg 19 sites in Aylesham and Elvington likely to result in inappropriate levels of traffic generation or unsuitable traffic movements' on the C195 route, we reviewed the following data to establish the likely impact:

- 2011 ONS Census data,
- ONS - Nomos data, labor market statistics and DataShine ESRC BODMAS conclusions in the Sustainability Assessment,
- WSP's DDTM and Reg 19 traffic data,
- the Office of rail and Road Estimates of station usage and
- Onsite employment assumptions
- Education commuting data.
- AA Route Planner

The key findings are itemised in Section 4.1 below.

Reg 19 T12 - Conclusions

Reg 19 SA Appendix B confirms the District's residents '*rely heavily on cars to...access employment, education, amenities and services*' and predicts an increase of commuting from Aylesham to Sandwich (the district's 2nd commuting hub) as well as to Thanet and Deal. In addition to reduced onsite employment at Aylesham (reduced in WSP modelling from 1013 in Reg 18 to 263 in Reg 19) and the absence of any direct public transport links to Discovery Park, Deal or Thanet; the absence of Secondary education facilities and the primary education capacity issues in Aylesham will also continue to drive increases in commuting road traffic on the C195.

The conclusions are clear, Aylesham will increase traffic on the surrounding rural road network but what is not clear is how DDC propose to deliver their goal of 'promoting the delivery of sustainable development' or ensure 'Other routes should not be subject to inappropriate levels of traffic generation or unsuitable traffic movements'.

DDC have failed to engage with the conclusions from existing evidence base or commission a sufficiently robust traffic data for the area bounded by A2, B2046, A256 and A257 containing >78% of all Dover Districts Reg 19 housing allocations outside Dover and Whitfield. Consequently there are no clear thresholds against which future applications can be measured. If, as a result, unsound policies are included in the LDP, then no subsequent s106 developer contribution led mitigation will be achievable.

Therefore, we conclude the policy is unsound because:

- 1 This plan is not consistent with achieving sustainable development and therefore cannot be called **positively prepared**.
- 1 Ignoring the area-specific evidence itemized in 4.0 and below, this policy cannot claim to be based on proportionate evidence and., so, cannot be considered

The Duty to Co-operate

DDC were only made aware of Canterbury City Council's (CCC's) Reg 18 plan for 3200 houses north of B2046 and the 420 dwellings on land contiguous to SW Aylesham in September 2022, shortly before the publication of their Reg 19 plan.

We haven't seen a statement of common ground or any evidence of the active ongoing constructive engagement and co-operation required to maximise the effectiveness of local plan in the context of strategic cross boundary matters or of any coherent strategy based on agreements between them.

As all authorities are required to reach agreement on strategic matters before submission we expect this is under review but – based on the absence of co-operation evident to date –we questions whether the legal duty to co-operate can be complied with in a meaningful way.

Scale of Cross Boundary Development Impact on DDC Reg 19 Evidence Base and Plan Soundness

Although DOV/07/01081 and DOV/13/0120 promoted Aylesham as a 'Garden Village', in their Reg 19 plan Dover District Council propose that Aylesham becomes a small Garden Town of 15,000 (LDP 4.196 and **4.199**). Canterbury City Council propose another 3,620 dwelling adjoining Aylesham to create a single 'new town' or Freestanding Garden City with a population of 25-30,000 people. A development of this scale requires realistic assumptions about self-containment, a strong foundation of employment and appropriate infrastructure to avoid creating an unacceptable severe cumulative impact on adjacent road network.

The consideration and mitigation of transport impacts is an essential part of Government's wider policy objectives for sustainable development. The objectives set out in NPPF para 111, DDC's Reg 19 Policy T12 10.8 can only be effective delivered against a robust evidence base that provides the clear benchmarks and thresholds that a planning application can be measured against.

Canterbury City Council's stated Reg 18 position is that the traffic impacts of their proposed new town joining Adisham to Aylesham are mitigated by the planned south Canterbury bypass which, they claim, will reduce traffic impacts as measured across their district. No evidence has been provided to establish how this will mitigate the impact of 3,620 additional dwellings on the rural road network in Dover District.

As highlighted in 1.2.1 (i) above, in relation to DDC's Reg 19 plan, we have existing concerns regarding the absence of a robust transport evidence base for the area bounded by A2, B2046, A256 and A257, collected in advance and benchmarking existing traffic levels so the cumulative impacts of proposed developments on transport networks can be subsequently measured.

- The additional scale of Canterbury's proposed development and proximity to Aylesham and the District's boundary, means that DDC's Reg 19 plans is not positively prepared as it is not informed by agreements with other authorities or consistent with achieving sustainable development.
- It is not justified as it is clearly not based on proportionate traffic or sustainability evidence.

We would argue that this also compromises plan efficacy given the absence of effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground

Traffic Evidence Summary

- 1 Despite the Ministry of Housing, Communities & Local Government 2020 LDP guidance stressing the importance of contextual data such as travel to work areas (and that evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively). Although referenced at a District level in the Sustainability Assessment, none of this contextual or empirical evidence has been considered in the LDP strategic site allocation process in relation to the impact of Aylesham and Elvington on the road network.
- 2 From ONS data to SA commuter patterns and to SHMA 2017 all highlight a strong trend of out-commuting. ONS data shows high car reliance in all major strategic site locations.
- 1 WSP's DDTM (Reg 18 Traffic Plan Assessment 2020 / Regulation 19 Transport Modelling Forecast Main Report or Appendices) report conducted detailed modelling of the Dover and Deal traffic. Other areas were '**modelled in significantly less detail**'.
- 2 Despite recognising the LDP will 'lead to large increases in flow' in Aylesham, WSP's analysis is limited to a handful of ATC's (automatic traffic counters) on the B2046 in 2019. WSP's report offered no conclusions on the area north of the A256 as it was outside the DDTM area. Although concerns were raised at Reg 18 no new traffic data or modelling has been introduced at Reg19. We understand KCC Highways have 'requested projected development flows leaving the currently modelled areas in that direction to sense check on any need to extend the models'. However, given the site-specific impact focus of S106 means it is not an effective framework for mitigating cumulative impacts from multiple spatially distributed developments on a rural road network, we believe a specific LDP policy is required.
- 3 '*Critical locations on the road network with poor accident records should be identified in order to determine if the proposed land allocations will exacerbate existing problems and whether highway mitigation works or traffic management measures will be required to alleviate such problems. The accident records should be compared with accident rates on similar local roads*'. (MHCGL guidance on traffic evidence for LDP)
There have been 4 deaths on Holt / Easole Street within 1.5 miles of the Aylesham Road junction. How many deaths are required in order for Holt Street to qualify as having a poor accident record and to be included in the detailed traffic modelling?
- 1 The Elvington data consists of ATC and manual data counts. By citing proximity to A256, the implicit study assumption is that the A256 is the primary route used. No empirical data collected on the traffic heading to the A2 / M2 / M26 or M25 from Elvington.
- 1 WSP recognised the porosity between the B2046 and the adjacent rural road network, yet provided no analysis of (1) the rural road capacity restrictions or (2) of baseline cumulative traffic from development to date or (3) the projected increase on the road network from the LDP.
- 2 According to WSP, Highways England approved matrix information from the South East Regional Transport Model (SERTM) used by WSP in Deal was only disaggregated using the 2011 Census data for the DDTM area. As noted in 2.2.13 of WSP's 2018 DDTM the

SERTM data is very coarse and with no disaggregation would provide little insight into Elvington and Aylesham commuting patterns via the rural road network

- 3 There is an extensive resource of rural road network ATC data from Aylesham's s106 TA's (2007/ 2014/2018 etc.) that could have been consulted. KCC Highways confirm the ACT data used for Phase 2b of the Aylesham Village Expansion has not been considered.
- 4 WSP's observation on likely traffic impacts of proposed Aylesham Development on the rural road network is restricted to '*Holt Street is not modelled but anticipated trips for Aylesham Development will leave the network here*'. WSP implicitly assumed all traffic for Aylesham will access and leave the site from Dorman Ave North. ATC and modelling evidence shows this assumption to be unsound.
- 1 In their Reg 18 comments on Aylesham KCC raised concerns over '*the impact of the development on the highway network, particularly as Aylesham has no secondary education provision so the need for travel by private vehicle for secondary school age children may be higher than in other areas of the district*'. No modelling of the associated traffic impacts has been provided.
Note - During the development of the 2015 DTM and 2018 DDTM car trips which are made to schools were modelled by WSP. Despite the absence of a Secondary School no similar exercise has been conducted on
- 2 By highlighting the need to expand St Joseph's primary, KCC's Reg 19 comment identify the shortfall of primary places in Aylesham. Unlike in the DDTM area WSP has not modelled car trips which are made to schools for Aylesham or Elvington. There are 378 primary places in Aylesham for a current population of 6,000 with a further 630 houses proposed in this LDP. This is below the national average. As a result the pupils attend schools across the area. For example at Goodnestone & Nonington CE Primary School 43% of pupils come from Aylesham and 30% Elvington creating up to 4 car trips of 1-3 miles each per day.
- 3 KCC Highways informs us that education commuting will be dealt in a Transport Assessment. We have been unable to locate any education commuting evidence in the Transport Assessment evidence for (App no 07/01081) for either Phase 1 or 2 in Aylesham or a School Travel Plan as recommended in Managing Our Roads (DfT, 2003) and The Future of Transport – a Network for 2030 (DfT) White Paper, 2004.
- 1 In Reg 18 comments, KCC raised concerns regarding the additional flow anticipated on Shepherdswell Road due to the narrow, rural nature of the road. Holt Street / Easole St / Sandwich Rd are similar in terms of their physical constraints and traffic levels. Both are 'rat runs' between the A2 A256 and significant coastal settlements. In relation to application 19/00381, Richard Smith (Senior Development Planner - KCC Highways) accepted a reduced vision splay from 45m to 25 metres on Easole Street based on an independent highways report describing Easole Street as being a narrow road, '*in a rural location with a tight bend to the west and a junction to the east. The road has no footways, with high hedges bordering each side of the road, creating an extremely constrained environment. There is evidence of vehicles crossing the centre line; the markings are very worn and hardly visible*'.
 - Passenger entries and exits increased by 19.6%. 2016-17 to 2019-20.
 - Aylesham Population increased by 30% over the same period.
- 1 ORR Passenger entries and exits for Aylesham data shows passenger numbers per head of population dropping Jan 2016- Dec 2020.
NOTE _ 20-21 data discounted because of Covid. 2016 Population=4,980. By March 2018, 493 new dwellings had been completed. Estimated mean new dwelling occupied by 2019- 2020 = 500. Estimated population increase = 1,500.
- 1 WSP's Reg 19 Traffic Report is based on the 2018 DDTM study which undertook a detailed analysis of the rural road network the other (western) side of the A256 using disaggregated SERTM data, Node Impedance Calculation (ICA), mapped out on a VISUM Network map. This established benchmark capacity PCU per Lane data for a range of defined link types including 'Rural Roads' and 'Minor Road Rural Village (30mph)'.
1 In their Sustainability Appraisal of Growth Options in the Dover District Council Local Plan Topic Paper: Overarching Strategy (Part 1) point 1.5. DDC undertook to '*assess growth options in terms its likely effects on environmental...using available evidence including commuting patterns, transport infrastructure, traffic congestion (and related air quality and carbon emissions issues)*'. Although some data was considered, the detailed data was not considered when evaluating the impact of the Aylesham or Elvington sites.
1 In the SA LUC use ONS - Nomos data, labor market statistics and DataShine ESRC BODMAS (using 2011 ONS Census data) to establish commuter patterns. Based on this the Reg 19 SA Appendix B confirms the District's residents '*rely heavily on cars to...access employment, education, amenities and services*' and predicts an increase of commuting from Aylesham to Sandwich (the district's 2nd commuting hub) as well as Thanet and Deal.
1 DDC's LDP Sustainability Appraisal identifies Sandwich as the District's key centre for inbound commuting. The Reg 19 provision of employment sites in Aylesham have been reduced by 85% from 1013 jobs in Reg 18 to 263 jobs in Reg 19. (source WSP main Report (i) Reg 18 and (ii) Reg 19. Reduced onsite employment will increase site generated commuting traffic.
(NOTE The Reg 19 Sustainability Assessment has not been revised to reflect the 85% reduction of onsite jobs, calling its conclusion about Aylesham site sustainability into question).

- 1 The Local Plan (Reg 18 and Reg 19) Sustainability Appraisal for the proposed sites in Aylesham and Elvington is – for traffic purposes - limited to recording the proximity of proposed dwellings to a bus stop and / or train station. The ONS - Nomos data, labor market statistics and DataShine ESRC BODMAS conclusions in the Sustainability Assessment, analysis of car dependency and commuting patterns or journey to work data was considered on the site assessments. This appears to limit real world applicability.
 - 1 None of the evidence base on car dependency in Greenfield ex-urban developments nor car-dependency and the commuting pattern evidence appears to have been considered.
 - 2 SA Section 6.207 states that Eythorne and Elvington already have ‘relatively good access to existing local rail and bus services’. However Eythorne railway station closed to passenger traffic in 1948. In response to our Reg 18 RFI DDC stated that the SA did not claim Elvington ‘already have relatively good access to existing local rail and bus services’. However, this is a direct quote from the SA - 6.207. This claim is factually false but is a base assumption used to justify Aylesham and Elvington’s compliance with SA 4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles.
-
- 1 MHCGL guidance on traffic evidence for LDP states ‘Critical locations on the road network with poor accident records should be identified in order to determine if the proposed land allocations will exacerbate existing problems and whether highway mitigation works or traffic management measures will be required to alleviate such problems. The accident records should be compared with accident rates on similar local roads’. There have been 4 deaths on Holt / Easole Street within 1.5 miles of the Aylesham Road junction. How many deaths are required in order for Holt Street to qualify as having a poor accident record?

Base Data Availability

One problem we encountered is availability of the granular base data that forms the building blocks for the LDP traffic and commuting evidence. We can’t find base data. For example

- The Dover Transport Model (DTM) Local Model Validation Report November 2016 is not available. So we have to rely on DDTM for the base modelling data for additional trips zonal distribution.
- In the SA LUC use ONS - Nomis data, labour market statistics and DataShine ESRC BODMAS (using 2011 ONS Census data) to establish commuter patterns. However, this data set is not available for review.

The SA conclusions suggest a data granularity (e.g. the availability of Aylesham to Deal commuting numbers), that is absent from the methodology employed in LUC’s site-specific sustainability assessments. This would matter less were LUC’s Reg 19 report not used inflated employment assumptions for Aylesham creating unsound sustainability conclusions.

Employment Evidence Driving Commuting

- 1 The Reg 19 SA 51 (Reg 19 Strategic employment allocation policies) and Table 7.6 include former Snowdown Colliery as a strategic site. This incorrect. Aylesham site employment has been reduced from 1,013 onsite jobs in Reg 18 to 267. The sustainability conclusions have not been reassessed. This clearly undermines the deliverability NPPF para 72 b.
- 1 DDC provided site employment estimates to both LUC and WSP for SA and Traffic modelling purposes. Aylesham’s employment modelling conclusions in the 2022 SA are contradictory and misleading. They don’t align with the WSP’s modelling numbers, which **reduced by 84%** from **1,013** onsite jobs in Reg 18 to **267** on site jobs in Reg 19.
- 2 In the Reg 19 SA main report (3: 4.75, SA 3 - 7.160 and table Table 7.6) still cite Aylesham as a 2nd largest employment hub with Land off Holt Street identified as ++ positive effect against. Also true for Reg 19 Appendix B growth and spatial options findings by SA objective, which offer conclusions based on inflated on site employment numbers numbers In Appendix F Snowdown employment drops to a ‘Minor positive (+)’. This looks like a revised assessment that hasn’t then been added into the main report.
 - 1 Why is the discrepancy in Aylesham employment number in the SA?
 - 2 Has the South Aylesham site’s sustainability been reassessed by LUC to reflect the reduction in onsite employment?
 - 3 Why is WSP using a different employment assumption to LUC?
- 1 Trip generation for employment sites (approach agreed with NH and KCC) the potential jobs were calculated using the SQM area of the site and dependant on the land use type an employment number was provided have not been used in the SA. As onsite employment is a key indices of sustainability:

	<p>2 Has the council assessed the financial viability of the development proposal for Snowdown Colliery? The land owner informs us their existing tenant has a substantial remediation liability and is unaware of any ongoing discussions about reassigning this not have they aware of any detailed financial backing that would fund the redevelopment of this site. Obviously a site needs to be deliverable. Has it passed deliverability benchmarking test to justify the site's continued inclusion in the LDP?</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>1 For the area bounded by A2, B2046, A256 and A257 which has significantly less robust traffic evidence, the LDP should provide effective mitigation enshrined in a Local Plan policy for the non-primary and secondary routes that - in accordance with Reg 19 TI2 10.7 - 'should not be subject to inappropriate levels of traffic generation or unsuitable traffic movements' rather than deferring this to an ineffectual S106 negotiation at the planning application stage.</p> <p>2 Use robust traffic evidence that is reliable, proportionate, objectively collected and recent, based on an understanding of the road network and identified contextual commuter and journey to work data of the A2, B2046, A256 and A257 plan area without relying on unjustified assumptions or unsupported assertions.</p> <p>3 Adopt detailed traffic benchmarks and thresholds for road types and junctions based on robust baseline data to provide the empirical basis against which to assess or define 'inappropriate', 'unsuitable', 'severe' or 'unacceptable' traffic impacts. With political pressures to deliver on housing targets and the budgetary incentives in the New Homes Bonus, checks and balances are required to prevent the current site by site approach and DDC's discretionary power over when Transport Assessments and Travel Plans are required, undermining the nominal protection of non-primary or secondary routes from the cumulative or inappropriate traffic impacts from proposed developments. Real world experience in Dover District - and nationally - does not show effective outcomes from a policy commitment (like Reg 19 Housing Policy 4.21) that requires the cumulative impact all sites allocated in this Plan on common road links must be considered. Our experience on Aylesham (DOV/07/01081 and DOV/13/0120), is typical in concluding that no impact could be attributed to the development because the identified increases were in line with ONS data showing road traffic increased by 29% from 1990 to 2018 while greenfield site developments (like that Aylesham, with unrealistic assumptions of self-containment were – in turn – identified as a key driver national car use increases.</p> <p>4 Recognising the scale of Canterbury's plans, initiate active ongoing constructive engagement with Canterbury City Council to maximise the effectiveness of local plan in the context of strategic cross boundary traffic planning to generate a coherent evidence-based strategy that will ensure a deliverable plan that is actually sustainable rather than ignoring the evidence of car dependency.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>Having raised concerns about the robustness, consistency and impartiality of the evidence base at Reg 18, our concerns have been ignored. In Feb 2021 DDC confirmed that more detailed traffic evidence would be collected prior to a Reg 19 submission. This hasn't happened. KCC now suggest an iterative data collection process that - we believe - doesn't comply MHCGL guidance on traffic evidence for LDP. Whilst the accusations of nimbyism may be levelled, we are not seeking to block all development. Just to ensure that the decisions are made on good data, with effective checks and balances that deliver good planning outcomes. Based on the outcome from our Reg 18 comments, we now believe vested interests mean that - it is only by engaging with the Planning Inspectorate directly that our voice - and the voices of the other villages in this largely rural area - will be given a fair hearing. The complexity of the LDP, the sheer volume of information and the byzantine balkanisation of the online comment portal are collectively a disincentive to public engagement. Disenfranchised and with trust in the system eroding, it is unsurprising that the idea of community consent is met with such scepticism.</p> <p>The C195 is badly impacted by the cumulative impact of traffic from Sandwich, Deal, Eastry, Woodnesborough, Sholden (via Drainless Road, Heronden Rd and Thornton Road), Elvington and Aylesham, with pre-pandemic baseline traffic of 90,800 vehicles a month. (MLM / K & M SURVEYS 2018 - 7 day total (East and West) = 20,888 traffic movements)</p> <p>KCC Highways confirm Holt Street, Easole Street and Sandwich Road route (Linking B2046 and Sandwich) is classified as the C195 and is "not a secondary route, as defined in our road hierarchy, and 'for reasons of various highway constraints along the corridor". It should, therefore, be protected from the cumulative or inappropriate traffic impacts. However, having failed to collect or consider any traffic impact evidence for this route, the Reg 19 proposes to rely on s106 funding on an application by application basis. Based on our experience on Aylesham (DOV/07/01081 and DOV/13/0120), Nonington Parish Council believe that the site-specific impact focus of S106 means it is not an effective framework for mitigating cumulative impacts from multiple spatially distributed developments on a rural road network. It is impossible to disaggregate traffic flow to attribute the increase to specific site.</p> <p>For the area bounded by A2, B2046, A256 and A257 which has significantly less robust traffic evidence, we believe the LDP should provide effective mitigation enshrined in a Local Plan policy for the non-primary and secondary routes that uses clear benchmarks and thresholds that</p>

	applications can be measured against so that - in accordance with Reg 19 TI2 10.7 - 'should not be subject to inappropriate levels of traffic generation or unsuitable traffic movements' rather than deferring this to an ineffectual S106 negotiation at the planning application stage.
Include files	Nonnington PC LDP Reg 19 Comments_Dec22_V1.0.pdf (2)
Local Plan Consultation Point	TI2 - Transport Statements, Assessments and Travel Plans
Rep ID	SDLP1038
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	TI2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Transport Assessments and Travel Plans must include consideration of the PRoW network and the ROWIP – this request should be reflected in this policy.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Transport Assessments and Travel Plans must include consideration of the PRoW network and the ROWIP – this request should be reflected in this policy.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	TI2 - Transport Statements, Assessments and Travel Plans
Rep ID	SDLP1649
Rep Status	Processed
Consultee ID	1252038
Consultee Full Name	Kerry Coltham
Consultee Company / Organisation	Wingham Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	TI2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The impact of developments in neighbouring settlements (and districts) directly on the parish of Wingham, namely traffic and transport. Wingham is a pinch point for traffic coming from the A2, A256 and A257 and suffers congestion daily at peak times. The Parish is and will continue to be directly affected by developments in neighbouring settlements in both the Dover and Canterbury districts, especially in Aylesham, Preston, Ash, Adisham and Littlebourne. The Council's primary concern relates to the provision of adequate traffic assessments and travel plans when considering new developments which do not currently recognise traffic impacts in Wingham and this needs to be addressed in the Local Plan to ensure decisions are based on accurate data. The Council is concerned that residential developments will be approved where highways issues have not been fully considered and the resulting impact on Wingham village. This situation has already arisen in the months and years preceding the Draft District Local Plan. One of the areas currently undergoing significant residential development is Aylesham. Given the piecemeal manner in which Aylesham has been developed, our view is that the cumulative impact of traffic on Wingham has never been fully, or adequately, assessed. Of particular concern is the junction of the B2046 (Adisham Road) and the A257 in Wingham, otherwise known as Red Lion Corner. This junction has for some time been unable to cope with traffic volume or LGV movements. Incidents relating to LGVs in this area are numerous and well documented and include the striking of listed buildings and inadequate width to prevent vehicles mounting the pavements when passing. In August 2020 the approach to Red Lion Corner and LGV incidents made national news. Councillors do not consider that the severity of impact of development of areas outside Wingham has been adequately considered to date and, as a result of DDC's continued proposal to decide what constitutes "severe impact" on a case-by-case basis, considers that the Draft District Local Plan does not adequately define when travel plans and traffic assessments should be undertaken. This will have severe safety implications in Wingham village if not addressed. In summary, Wingham Parish Council is generally supportive of the allocated sites for the parish, though not the number of dwellings

	allocated to SAP41 , and request that development includes suitable affordable housing to meet the local need. Councillors also seek assurance that adequate provision is made to prevent severe traffic impact in Wingham and that policies in relation to traffic assessments and travel plans will be clarified.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	TI2 - Transport Statements, Assessments and Travel Plans
Rep ID	SDLP1164
Rep Status	Processed
Consultee ID	1271448
Consultee Full Name	Kevin Bown
Consultee Company / Organisation	National Highways
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	TI2
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>We note that TI2 formed DM Policy 29 of the Regulation 18 consultation. We note that, following advice from KCC, the policy now includes further detail on the requirements for assessment to support planning applications. For example, it includes notes on what a robust Travel Plan should consist of and signposts readers to further guidance in the Kent Design Guide, and where a Transport Statement would be acceptable rather than a Transport Assessment. We welcome this clarification.</p> <p>Representation: National Highways are content with Policy TI2, subject to the further representations below</p> <p>With regards to Transport Assessments, we would suggest that wording is included in the Policy supporting text to note that, where a proposed development may impact the SRN, a Transport Assessment should be submitted and carried out in accordance with DfT Circular 02/2013. We would also suggest text is included to recommend that applicants engage with us at the earliest opportunity to agree the scope of Transport Assessment.</p> <p>Representation: Wording should be included in the policy supporting text to note that, where a proposed development may impact the SRN, a Transport Assessment should be submitted and carried out in accordance with DfT Circular 02/2013. The text should also recommend that applicants engage with us at the earliest opportunity to agree the scope of Transport Assessment</p> <p>With regards to Travel Plans, we support the continued use of Travel Plans as a way of promoting sustainable travel and we would expect the promoters of any development to put forward initiatives that reduce the traffic impact of their proposals by supporting the promotion of sustainable transport and the development of accessible sites. This is particularly necessary where the potential impact is on sections of the SRN that could experience capacity problems in the foreseeable future. We would recommend that wording is included in the Policy supporting text to note that the Travel Plan must include:</p> <ul style="list-style-type: none"> • Firm financial commitments with regards to funding for the measures proposed • Targets for vehicle trip generation, which should be the same as the vehicle trips assessed in the TA • Monitoring strategy to confirm that vehicle trip targets are being met • A plan should be provided detailing the proposals in the event that targets are not being met <p>Representation: Policy supporting text to include specific information which we would require to be included in Travel Plans as above.</p> <p><i>(Note - This is an extract of the Full National Highways representation which can be located at SDLP1152)</i></p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Wording should be included in the policy supporting text to note that, where a proposed development may impact the SRN, a Transport Assessment should be submitted and carried out in accordance with DfT Circular 02/2013. The text should also recommend that applicants engage with us at the earliest opportunity to agree the scope of Transport Assessment</p> <p>Policy supporting text to include specific information which we would require to be included in Travel Plans as above.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Not Applicable</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>TI2 - Transport Statements, Assessments and Travel Plans</p>
<p>Rep ID</p>	<p>SDLP1132</p>
<p>Rep Status</p>	<p>Processed</p>

Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	See below
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p><i>This DM would become more sound if the following wording replaces the final sentence in DM Policy 29, in order to clarify levels of significance or severity of increased traffic: "A Travel Plan or Transport Assessment will be required for all residential developments of more than 15 units, the requirements of which will be secured by planning conditions, Section 106 agreement or through the Community Infrastructure Levy as is appropriate."</i></p> <p>Road improvements (especially on the A2, A20 and A256) to separate local traffic from through freight traffic must be done to save lives, road improvements that central govt must pay for, especially as regards SAP 1 Whitfield Urban Expansion, SAP 24 & SAP 25 Aylesham and SAP 28 Elvington and Eythorne. The separation needed must include flyovers and underpasses for local traffic at the Whitfield Roundabout (fatality Oct 2021) and the Duke of York roundabout.</p> <p>Improvements to the highway network must also include underpasses for (electric) bikes and real dutch-style, protected cycle-paths so that cycling commuters from Whitfield can get safely to Kearsney rail station and Martin Mill Stns. There should be a safe, engineered, dedicated cyclepath from Aylesham to Elvington, and another from Elvington to Shepherds Well rail station. Safe kerbed pavements must be provided running from bus stops on A roads to any new development of 8 homes or more in rural village settlements to prevent old and young being trapped by car dependence up unsafe B-roads, which costs KCC money for taxis from schools, (see Kent active travel strategy). <i>Applicants must demonstrate that their plan includes the installation and cost of installation of the protected cycle-paths and kerbed pavements described above.</i> Dept for Transport consultation Feb 2021 on trends in innovation in rural transport is relevant.</p> <p>(cross referenced with NE 4 Air Quality) Air pollution is exacerbated in 2022 because KCC have stopped subsidising buses and some rural bus routes have disappeared or been reduced (e.g. Elvington). Level 1 councils and Kent Ass of Local Council are looking to have a stronger voice on Joint Transportation boards so that they are able to help residents with public transport and thus respect Kent and Medway Energy and Low Emissions Strategies. It would be sound if no new builds were allowed in villages without bus links to schools and workplaces, unless conditional on funding of bus services.</p>

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	TI2 - Transport Statements, Assessments and Travel Plans
Rep ID	SDLP1369
Rep Status	Processed
Consultee ID	1333128
Consultee Full Name	David Powell
Consultee Company / Organisation	
Agent Full Name	Klaire Lander
Agent Company / Organisation	Lander Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	TI2
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Lander Planning sent a PDF document which has been split across the relevant sections of the Plan. See Original Attachment on SDLP1346) Ensuring safe and effective access to development sites and that the highway impacts are acceptable is consistent with national policy and this policy is 'effective' and 'justified' and therefore supported.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	TI2 - Transport Statements, Assessments and Travel Plans
Rep ID	SDLP1634
Rep Status	Processed
Consultee ID	1252100
Consultee Full Name	Mrs Amandajayne Hollobon-Baxter
Consultee Company / Organisation	Sandwich Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	TI2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Would Council like to enter any comments or recommendation in consideration in recognition of any new proposed developments and how this will impact on Sandwich current highways and traffic management Consideration should be given to Sandwich's visitors arriving by coach. Consideration should also be given to limited parking provision within the town and feasibility and viability of a further car park is necessary.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness	Would Council like to enter any comments or recommendation in consideration in recognition of any new proposed developments and how this will impact on Sandwich current highways and traffic management Consideration should be given to Sandwich's visitors arriving by coach. Consideration should also be given to limited parking provision within the town and feasibility and viability of a further car park is necessary.

matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	TI2 - Transport Statements, Assessments and Travel Plans
Rep ID	SDLP1694
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	TI2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438. We have commented above on specific SAPs where the Highways Assessment is inadequate and the reality on the ground is different. This being the case, the Plan would not be sound or compliant with the Localism Act 2011 if local parish-wide public consultation on travel impact of all developments over 15 dwellings were not required. TI 2 Transport statements, Assessments and Travel Plans

Road improvements (especially on the A2, A20 and A256) to separate local traffic from through freight traffic must be done to save lives, road improvements that central govt must pay for, especially as regards SAP 1 Whitfield Urban Expansion, SAP 24 & SAP 25 Aylesham and SAP 28 Elvington and Eythorne. The separation needed must include flyovers and underpasses for local traffic at the Whitfield Roundabout (fatality Oct 2021) and the Duke of York roundabout.

Improvements to the highway network must also include underpasses for (electric) bikes and real Dutch-style, protected cycle-paths so that cycling commuters from Whitfield can get safely to Kearsney rail station and Martin Mill Stns.

There should be a safe, engineered, dedicated cycle path from Aylesham to Elvington, and another from Elvington to Shepherds Well rail station. Safe kerbed pavements must be provided running from bus stops on A roads to any new development of 8 homes or more in rural village settlements to prevent old and young being trapped by car dependence up unsafe B-roads, which costs KCC money for taxis from schools, (see Kent active travel strategy). Applicants must demonstrate that their plan includes the installation and cost of installation of the protected cycle-paths and kerbed pavements described above. Dept for Transport consultation Feb 2021 on trends in innovation in rural transport is relevant.

(Cross referenced with NE 4 Air Quality) Air pollution is exacerbated in 2022 because KCC have reduced its support in subsidising bus services and some rural bus routes have disappeared or been much reduced (e.g. Elvington). Level 1 councils and Kent Ass of Local Council are looking to have a stronger voice on Joint Transportation boards so that they can assist residents with public transport and thus respect Kent and Medway Energy and Low Emissions Strategies. It would be sound if no new builds were allowed in villages without bus links to schools and workplaces, unless conditional on funding of bus services.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

TI3 - Parking Provision on new Development

Local Plan Consultation Point	TI3 - Parking Provision on new Development
Rep ID	SDLP108
Rep Status	Processed
Consultee ID	1330859
Consultee Full Name	Mrs Jane Cook
Consultee Company / Organisation	St Margarets at Cliffe Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	page 301 para 10.24
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	N/A Edit: DDC copied the following from attachment <i>TI3 - Parking Provision on new Development Policy TI3 represents an opportunity missed. It retains the 2006 KCC parking standard which for rural areas is obsolete. (That is, 1.5 spaces for one and two bedroom dwellings). Car ownership in villages has increased substantially in the past 20 years and is leading to congestion and parking problems in many rural roads. The cause is the poor and reducing provision of rural public transport which is inadequate for commuting to work. For example, a young couple move into a 1 bedroom dwelling in the village but as they work in different towns and cannot get to and from work by public transport they need 2 cars. Larger families, where the grown up sons or daughters have to live at home, may require 3 or 4 cars to enable travel to work. The parking provision policy urgently needs updating to match demographic development and for rural areas should be 1 space per bedroom. Therefore we object to this policy.</i>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	Regulation 19 Plan Policy TI3 Parking Provision.pdf
Local Plan Consultation Point	TI3 - Parking Provision on new Development
Rep ID	SDLP173
Rep Status	Processed
Consultee ID	1329874
Consultee Full Name	Ms Nicola Purcell
Consultee Company / Organisation	Aylesham Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SP3 Housing growth
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Aylesham Parish Council agrees that there is a need to increase housing stock both nationally and within the Dover district. Over recent years, Aylesham has greatly assisted in helping to increase the numbers of homes within the local community (having delivered 917 homes so far with a further 443 to come). However, it is felt that any future development should be kept to a minimum.</p> <p>This relates to SP3 – Housing Growth.</p> <p>South Aylesham (SAP24) includes a large number of positives (such as inclusion of play parks, open spaces, cycle links and protecting and enhancing wildlife) but there is a lack of firm commitments to facilities. The development makes reference to “a new small convenience shop” which is wholly insufficient for the proposed number of new homes.</p> <p>Dover District Council is looking at updating its parking policy for future developments. Currently the Kent Design Guide and the Kent Design Guide Review: Interim Guidance Note 3 to apply planning constraints. It is welcome to see this referenced in the Draft Local Plan. It is important that future developments allow for independently accessible parking spaces (as opposed to tandem spaces) and that car ports or garages are not included as parking.</p> <p>This will greatly improve parking, especially in rural developments.</p> <p>More considerate parking will greatly improve access for pedestrians as well as safety for pedestrians and cyclists.</p>

	<p>Aylesham Parish Council believes that a new small convenience shop in any new development would be wholly insufficient. Dover District Council should also look to adopt more stringent parking policy reform.</p> <p>It has been noted on previous planning applications that the sewerage pipes in the village may be at their capacity, so any further developments could push them past their breaking point.</p> <p>This should be addressed before any further development can be considered.</p> <p>Current plans for housing development do not go far enough in providing homes that are suitable for disabled people or homes that can be easily adapted in the future to meet the needs of home owners. An increase in the number of dwellings built to an accessible standard would be welcomed</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	T13 - Parking Provision on new Development
Rep ID	SDLP295
Rep Status	Processed
Consultee ID	1331382
Consultee Full Name	Mr The Dover Society Graham Margery
Consultee Company / Organisation	The Dover Society
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	T13
2 - Do you consider this part of the Plan sound?	No

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Can't comment on legal compliance
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The draft sticks to the present (KCC) policy for new builds of supporting no parking provision in favour of "easy walking distance of a range of services and facilities". Whilst to allow developments with no parking provision may be environmentally attractive, it is simply not realistic in terms of people's behaviour and lifestyle.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	T13 - Parking Provision on new Development
Rep ID	SDLP572
Rep Status	Processed
Consultee ID	1267584
Consultee Full Name	Jason Ransley
Consultee Company / Organisation	Dover Harbour Board
Agent Full Name	John Bowles
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy T13 - Parking Provision on New Development

2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Dover Harbour Board supports Policy T13 – Parking Provision on new Development and its recognition that parking requirements should take account of local circumstances and that parking standards will be applied flexibly.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	N/A
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	N/A
Include files	
Local Plan Consultation Point	T13 - Parking Provision on new Development
Rep ID	SDLP1133
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	See below
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Addition needed; to comply with the Kent and Medway Energy and Low Emissions Strategy, <i>applicants should limit off-street parking to space for a maximum of 2 cars per dwelling, and in some congested coastal town sites, 1 car per dwelling.</i>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	TI3 - Parking Provision on new Development
Rep ID	SDLP1370
Rep Status	Processed
Consultee ID	1333128
Consultee Full Name	David Powell
Consultee Company / Organisation	

Agent Full Name	Klaire Lander
Agent Company / Organisation	Lander Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	TI3
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Lander Planning sent a PDF document which has been split across the relevant sections of the Plan. See Original Attachment on SDLP1346) Ensuring adequate parking provision on new development sites is consistent with national policy and this policy is 'effective' and 'justified' and therefore supported.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	TI3 - Parking Provision on new Development
Rep ID	SDLP1409
Rep Status	Processed
Consultee ID	1333152
Consultee Full Name	Mr P & Mrs S Laffin & Rubix Estates Ltd

Consultee Company / Organisation	
Agent Full Name	Mr Reece Lemon
Agent Company / Organisation	Lee Evans Partnership
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	TI3
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Representation submitted by Lee Evans On behalf of Mr and Mrs Lafin and Rubix Estates. Full Representation attached to SDLP1387. This document has been split across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1387.) POLICY TI3 – Parking on New Developments 3.35 As drafted, TI3 is supported by the Promoter and Landowners in seeking a viable and implementable balance of parking provision that reflects local character and site conditions. 3.36 It is agreed that – as drafted – TI3 is capable of satisfying the objectives of the Plan.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	TI3 - Parking Provision on new Development
Rep ID	SDLP1422
Rep Status	Processed

Consultee ID	1333243
Consultee Full Name	Mr and Mrs Tobin
Consultee Company / Organisation	
Agent Full Name	Mr Reece Lemon
Agent Company / Organisation	Lee Evans Partnership
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	TI3
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Parking on new development will be a product of a site-specific proposal. As drafted, TI3 is supported in seeking a viable and implementable balance of parking provision that reflects local character and site conditions.</p> <p>3.49 It is agreed that the basis for parking standards should be the adopted Parking Standards for Kent SPD and Kent Design Guide Review: Interim Guidance Note 3 (or any subsequent guidance).</p> <p>3.50 It is agreed that – as drafted – TI3 is capable of satisfying the objectives of the Plan. This policy is considered to meet the relevant tests of soundness.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

Local Plan Consultation Point	TI3 - Parking Provision on new Development
Rep ID	SDLP1695
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	TI3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438. TI 3 Parking provision on new Development Addition needed; to comply with the Kent and Medway Energy and Low Emissions Strategy, applicants should limit off-street parking to space for a maximum of 2 cars per dwelling, and in some congested coastal town sites, 1 car per dwelling.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	TI3 - Parking Provision on new Development
Rep ID	SDLP1670
Rep Status	Processed
Consultee ID	1333382
Consultee Full Name	Mr Colin and Linda Tearle
Consultee Company / Organisation	
Agent Full Name	Gurdev Moore
Agent Company / Organisation	Rubix Estates
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	TI3
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Representation submitted by Rubix Estates. Full Representation attached to SDLP1624. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1624.)</p> <p>Parking on new development will be a product of a site-specific proposal. It is important that this is better reflected in the policy wording itself. It must not prescribe unrealistic or broad brush assumptions to all sites, as to do so may inadvertently restrict the capacity of sites to delivery on contextually appropriate schemes. This is particularly important in the settlements atop the settlement hierarchy which benefit from range of sustainable travel options, such as those in Elvington and Eythorne.</p> <p>3.42 As drafted, TI3 is supported by the Promoter in seeking a viable and implementable balance of parking provision that reflects local character and site conditions.</p> <p>3.43 It is agreed that – as drafted – TI3 is capable of satisfying the objectives of the Plan.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

T14 - Overnight Lorry Parking Facilities

Local Plan Consultation Point	T14 - Overnight Lorry Parking Facilities
Rep ID	SDLP288
Rep Status	Processed
Consultee ID	1331383
Consultee Full Name	Mrs Katie Miller
Consultee Company / Organisation	Kent Downs AONB Unit
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	T14 – Overnight Lorry Parking Facilities
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Support, consider appropriate safeguards for the AONB and its setting are provided within criterion b of this policy.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	T14 - Overnight Lorry Parking Facilities
Rep ID	SDLP504
Rep Status	Processed
Consultee ID	1268017
Consultee Full Name	Ms Penelope James
Consultee Company / Organisation	Dover and Deal Liberal Democrats
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	T14
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	"A lighting strategy must be submitted with any application and suitable mitigation will be required to deal with artificial lighting, to restrict the impact of the development on neighbouring residential properties or vulnerable uses." We believe this to be of extreme importance, not just because of the impact for nearby residents but because of the impact artificial light is having on insect die-off.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	n/a
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	"A lighting strategy must be submitted with any application and suitable mitigation will be required to deal with artificial lighting, to restrict the impact of the development on neighbouring residential properties or vulnerable uses." We believe this to be of extreme importance, not just because of the impact for nearby residents but because of the impact artificial light is having on insect die-off.
Include files	
Local Plan Consultation Point	T14 - Overnight Lorry Parking Facilities
Rep ID	SDLP705
Rep Status	Processed
Consultee ID	1331838
Consultee Full Name	Christian Pryce
Consultee Company / Organisation	Dover Harbour Board
Agent Full Name	Paul Carnell
Agent Company / Organisation	Strutt and Parker
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	TIF - Overnight Lorry Parking Facilities
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>These representations to the Regulation 19 stage local plan consultation are made by Dover Harbour Board. The Harbour Board is responsible for the administration, maintenance and improvement of the harbour at the Port of Dover, which itself is the busiest international roll-on roll-off ferry port in the UK.</p> <p>The Port of Dover is one of the UK's most important strategic economic assets. The Port of Dover is the UK's busiest international ferry port, handling more lorries than all other UK ports. Its operation is capable of facilitating 120 ferry movements and 110 miles of freight per day. £144bn worth of UK trade and 33% of all trade with the EU is handled by the Port of Dover.</p> <p>Further, Dover is the UK's second busiest cruise port. Over 200,000 cruise passengers visit the Port of Dover, a number The Harbour Board is actively looking to grow. Embarkations on day trips and excursions directly boost the local and regional economy, with an average passenger spend equivalent to £322 pre-embarkation, and £84 during a port visit. The benefits to the local Dover economy are significant; it is estimated that this generates circa £47m of direct passenger spending annually in the local economy. The Port of Dover indirectly supports over 5,000 jobs, many of them in the local area, many of which would be affected by any reduction in cruise calls.</p> <p>The Port of Dover therefore is a significant stakeholder in Dover District with a large influence on the local economy, both directly in terms of visitors, passenger throughput and employment, and indirectly by its impact on the highway network. The Harbour Board considers that the emerging Dover Local Plan needs to appropriately consider and account for the aspirations of The Harbour Board to improve operations more widely and plan for a low carbon future.</p>

Port Operations

Port activity and operations can have a wide impact on the District and County. This is particularly the case in terms of highways given the volume of freight and passenger traffic experienced each year. This results in logistical challenges to ensure effective port operations which safeguard the economic benefits delivered by the Port, whilst also ensuring any adverse impacts on the locality are limited.

In recent years the Port of Dover has experienced more periods of travel disruption (outside of The Harbour Board's control) than has previously been the case, resulting in national and international media coverage. This has had an adverse impact on the Port itself and Dover District. The Harbour Board is therefore committed to reducing wider impacts on both the highway network and the amenity of local residents from future disruptions to channel crossings.

Draft Policy TI4 – Overnight Lorry Parking Facilities

Paragraph 109 of the National Planning Policy Framework (NPPF) notes that “*Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance.*”

A lack of overnight parking in Dover District has been identified by Kent County Council and Draft Policy TI4 seeks to address this issue through a criteria-based policy for a lorry park and associated facilities. The Harbour Board supports the principle of such provision to remove HGVs from the highway, but the provision of a truck stop alone deals with only part of the identified problem, especially at times of channel crossing disruption.

Dover District Council are aware of the Harbour Board's intention to deliver an Inland Terminal. This is considered a vital piece of Port infrastructure which will need to come online during the plan period (see below for further detail). Lorry parking facilities and the Inland Terminal are compatible and complementary land uses (as evidenced by the facilities provided at Sevington in Ashford) and The Harbour Board considers that there are significant benefits of co-joining these facilities.

Inland Terminal

Dover Harbour Board needs to deliver an Inland Terminal Facility. This is required to ease pressure on the Port of Dover by supplementing existing facilities or, in some cases, relocating them entirely to the inland site. There are a number of reasons why the Port needs this facility.

EU Entry/Exit System (EES)

The Council will be very aware of the Dover Traffic Assessment Project (TAP) and the associated Brexit Operations Across Kent, otherwise known as Operation Brock. These are measures put in place to deal with HGV traffic when Port operations have been disrupted, for example as a result of delays to channel crossings. The aim is to regulate the flow of HGVs into Dover along the A20 and M20 to ease congestion and allow residents and other users of the strategic road network to access Dover and go about their business.

The measures include left hand lane only use of the A20 by HGVs, queuing on the A20, contraflows on the M20, separation of traffic between Euro Tunnel and the Port, and the use of Manston Airport as a temporary lorry park.

TAP and Operation Brock are emergency measures to keep non-freight traffic moving and allow HGVs and their drivers to be safely located whilst the problems causing issues at the Port are dealt with, and until such time as crossings and travel return to normal. However, events in the past 12 months have demonstrated that significant disruption can still occur, particularly at times of prolonged delays. This results in an economic cost in terms of time lost by both freight business and other road users, and also a social cost given the number of lorry drivers held for long periods on motorway and trunk road verges with no welfare facilities.

The Harbour Board have been looking at more permanent solutions. However, the pending introduction of the EU Entry/Exit System (EES) is a further driver to pursue this goal. EES is a large-scale IT system that is being implemented as part of the European Union's 'Smart Borders Package', and is due to launch in May 2023. It will enable automatic monitoring of border crossings by 'third-country nationals' into and out of the EU. This includes UK nationals in addition to all members of non-EU states outside the Schengen Area.

The system will register a person's name, type of travel document, biometric data (fingerprints and captured facial images) and the date and place of entry and exit, and will fully replace the system of manually stamping passports. The Port of Dover has undertaken an assessment of the impacts of EES and has concluded it is very likely to have a profound effect on its operations if undertaken within the bounds of the Port itself. In a worst case scenario this would include excessive queues outside the Port for up to 365 days per year, necessitating the permanent operation of TAP and Operation Brock.

The provision of an appropriately located Inland Terminal facility would help to alleviate pressure on the Port and A20 given it would allow certain checks to be undertaken prior to entry to the main Port facility, speeding up operations whilst also removing large numbers of HGVs off the road and allowing drivers to rest and use welfare facilities.

Facilities/Welfare

An Inland Terminal facility would allow provision of significant improvements to HGV driver facilities in the District. This would enable the Port of Dover to contribute toward the wider government objective of improving conditions for HGV drivers and logistics workers more generally.

The Government's Road Freight Supply Chain Transport Committee¹ noted the difficulties the sector has had with recruitment and retention of staff, both of which contributed to the wider supply chain shocks experienced since the start of the pandemic. The committee heard evidence that one of the key reasons drivers do not stay in the sector is the lack of high-quality rest facilities, especially on key road freight routes.

Therefore improving the working conditions of HGV drivers is an important element of both retaining staff and encouraging others to choose transport logistics as a career.

This issue is also raised in the Department for Transport's publication "Future of Freight: a long-term plan" (June 2022)² which includes 'People and Skills' as one of its priority areas. One strategic goal is to ensure "*the freight and logistics sector will be seen as an industry of choice for a diverse group of talented and skilled people at all stages of their career and will have the people and skills that it needs to thrive*". Improving general working conditions through the provision of better facilities for drivers will be an important part of the wider strategy to improve the UK's freight and logistics sector.

Sustainability

The Inland Terminal would also be an important element of The Harbour Board plans to decarbonise Port of Dover activity and respond to wider changes in logistics such as the predicted increase in electric vehicles. This is explored more generally later in this representation, but the Inland Terminal would provide opportunities for on-site microgeneration of power and opportunities for electric vehicles to recharge where necessary before proceeding to the port.

Co-location of Inland Terminal and Overnight Lorry Park

An overnight lorry park and the Inland Terminal facility share a common set of site search criteria. They both require a large, level site which can be appropriately accessed from the Strategic Highway Network without causing disruption for other road users. They should also be located in close proximity to the Port, provide opportunities for landscaping to limit visual impact, be able to deliver biodiversity net gains and be located an appropriate distance from sensitive receptors such as residential properties.

There is a need to deliver the Inland Terminal and overnight Lorry Parking in Dover, but the very specific site criteria noted above reduces the amount of suitable sites in the District. The Local Plan should therefore seek to co-locate these facilities in order to increase the chances of delivery of both pieces of important infrastructure.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Recommended Policy

The Harbour Board proposes amendments to Policy T14 so that it includes an area of search for the co-joined Inland Terminal and Lorry Park.

The most appropriate location for an Inland Terminal would be to the east of the Roundhill Tunnels. This would ensure the facility is located wholly within Dover District and reduces the potential for conflict with Eurotunnel traffic and operations. It would also allow The Harbour Board to manage Port traffic more efficiently (through use of traffic cameras etc).

Land within the Kent Downs Area of Outstanding Natural Beauty (AONB) should not be excluded from the Area of Search. The NPPF provides a high degree of protection against inappropriate development in AONBs. Paragraph 177 notes applications for major development (such as an Inland Terminal/Lorry Park) should only be allowed in "*exceptional circumstances*" and where it can be demonstrated that "*the development is in the public interest*".

The need for the Inland Terminal within the area of search suggested by The Harbour Board is significant and could meet these tests, which set a high bar for development proposals. This should be tested at Planning Application stage rather than excluded by Local Plan Policy.

The Harbour Board is therefore proposing an area of search along the A20 corridor, east of the Roundhill Tunnels.

An amended criteria-based policy should then be applied to potential development sites which come forward. The following amended Policy text is recommended:

T14 – Inland Terminal and Overnight Lorry Parking Facilities

Inland Terminal Facilities to serve the Port of Dover to include overnight lorry parking facilities will be supported, subject to other policies in the Local Plan, within the following areas of search:

- *A20 corridor east of the Roundhill Tunnels*
- *A2/M2 Corridor*

Development will be subject to the following criteria:

- 1 The site must be accessed from the Strategic Road Network (A20);
- 2 Applications must be supported by a Landscape and Visual Impact Assessment which informs the site layout, capacity and mitigation requirements;
- 3 A comprehensive landscape scheme should be provided to conserve and enhance the AONB and/or its setting;
- 4 Proposals for the mitigation of noise and air quality impacts from lorry movements and any associated commercial, welfare and support services will need to be provided as part of any application;
- 5 A lighting strategy must be submitted with any application and suitable mitigation will be required to deal with artificial lighting, to restrict the impact of the development on neighbouring residential properties or vulnerable uses;
- 6 Adequate space for access, sight lines, turning and manoeuvring must be provided in addition to the required parking spaces

The inclusion of a Policy which seeks to deliver inland terminal facilities will ensure Dover District Council retains control over the provision and location of these facilities.

Summary

The NPPF sets out that the purpose of the planning system is to contribute to the achievement of sustainable development. Achieving sustainable development includes an economic objective – to help build a strong responsive competitive economy. Local planning policies and decisions are expected to help create the conditions in which businesses can invest, expand and adapt.

The NPPF makes clear that planning policies and decisions should recognise and address the specific locational requirements of different sectors and that planning policies should also provide for large scale transport facilities, located in areas of need, taking into account any local shortages.

The 'Future of Freight' document notes that *"In 2021, the Department for Transport made a Written Ministerial Statement with the Department for Levelling Up, Housing and Communities, which made clear that in preparing local plans and deciding planning applications, the specific locational requirements of different industrial sectors should be recognised and addressed by local planning authorities."*

The Inland Terminal will be needed by Dover Harbour Board during the life of the plan. It is a key piece of infrastructure required to support The Port of Dover and its continued substantial contribution to the local and national economy. There is a need to provide significantly improved driver welfare facilities as part of the wider government strategy to create attractive working conditions within the transport and logistics sector. Further, there is an identified local need for a facility to take HGVs off local roads.

Delivery of a site that can provide a co-located facility would represent a positively prepared, justified and effective strategy consistent with national policy. The plan would be unsound without these proposed amendments to the policy.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

The Port of Dover is a significant stakeholder within Dover District. Matters relating to its effective operation have a direct impact on the wider district with implications to the national economy. Therefore it would benefit the Inspector to have Dover Harbour Board present at the examination in public.

Include files

Local Plan Consultation Point

TI4 - Overnight Lorry Parking Facilities

Rep ID

SDLP866

Rep Status

Processed

Consultee ID

1331933

Consultee Full Name

Nigel
Snape

Consultee Company / Organisation

Agent Full Name	Paul Carnell
Agent Company / Organisation	Strutt and Parker
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	TIF - Overnight Lorry Parking Facilities
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Dear Sir/Madam,</p> <p>Dover District Council Local Plan Publication Stage (Regulation 19) Consultation</p> <p>Comments in relation to Policy T14</p> <p>Strutt and Parker's planning team has been instructed by HW Snape and son to make representations to the Regulation 19 Dover District Council Local Plan consultation. Our clients are farmers in the District with land holdings located to the west of Dover town.</p> <p>Our clients are aware that the Regulation 19 Stage Consultation is seeking comment on whether the Plan is 'Sound' in planning terms, meaning that it has been positively prepared, is justified, effective and consistent with national policy. We are instructed to respond to the consultation in relation to Draft Policy T14 in relation to two matters; firstly the soundness of the policy as written; and secondly as to how our clients could facilitate its delivery during the plan period.</p> <p>Draft Policy T14 – Overnight Lorry Parking Facilities</p> <p><u>Soundness</u></p> <p>Our clients have noted Draft Policy T14 – Overnight Lorry Parking Facilities with interest given their own experiences with HGV movements associated with the Port of Dover. There is no doubt that poorly parked HGVs causes problems in and around Dover. This issues worsens considerably when ferry crossings are delayed or cancelled (as has happened numerous times in the past 12 months). Problems with HGVs generally exacerbates when Operation Stack is implemented with HGVs backed up out of the town along all major routes into Dover.</p> <p>The supporting text for the Policy notes at Paragraph 10.31 that "<i>KCC surveys of overnight lorry parking have determined that the Dover area and A2/M2 corridor has significant numbers of HGVs parked inappropriately overnight, and that there are local shortages in parking provision to address this.</i>" Our clients are concerned that the A20 has not been specifically referenced in this work.</p> <p>Our clients land interests are to the west of Dover predominantly adjacent to and accessed by the A20 which also suffers from the same problems identified by Kent County Council surveys of the A2/M2 corridor. An appropriate site to deliver facilities which could offer HGVs a place to park overnight, or indeed to provide additional welfare for drivers as they approach Dover, should also be considered along the A20 corridor.</p> <p>Our clients consider that Policy T14 (a) should therefore be amended as follows in order to make it properly effective:</p> <p><i>"The site must be accessed from the Strategic Road Network (A2/M2 corridor or A20). Sites along the A2/M2 corridor should also be complimentary to the A2 Improvements.</i></p> <p>The A20 passes through the Kent Downs Area of Outstanding Natural Beauty (AONB) and our clients support policies which seek to protect its special character and landscape value. However, the problems associated with HGV movements along the A20 corridor are acute and have wider impacts than just within the boundaries of Dover District. The national and international news stories earlier this year in respect of HGV queues into the port, for example, resulted in significant reputational damage for Dover.</p> <p>Protection is offered to the AONB by way of the National Planning Policy Framework (NPPF) which states at Paragraph 177 that applications for major development should only be allowed in "<i>exceptional circumstances</i>" and where it can be demonstrated that "<i>the development is in the</i></p>

	<p><i>public interest'</i>. It is possible that the development of a facility for HGV parking could meet these tests provided a site could be delivered together with all appropriate measures to address and mitigate potential harm to the landscape.</p> <p>Our clients consider that the NPPF provides significant protection against harmful development in the AONB, and therefore the policy should not specifically exclude such sites from consideration.</p> <p>Our clients consider that Policy T14 (b) should therefore be amended as follows in order for it to align with National Policy related to major developments in the AONB:</p> <p><u><i>Planning applications must be supported by a Landscape and Visual Impact Assessment which in turn should support the proposed layout of the site and its capacity. Development with the AONB will be supported where it complies with the provisions of the NPPF relating to major development in the AONB.</i></u></p> <p>Our clients consider that the above proposed changes to Policy T14 are necessary in order to make it effective, justified and consistent with National Policy.</p> <p><u><i>Delivery</i></u></p> <p>As noted above, our clients have first-hand experience of the problems associated with HGV movements to and from the Port of Dover. They support the delivery of facilities which would help to alleviate these problems, subject to the amendments proposed in this representation.</p> <p>Our clients feel that they could contribute directly to delivering such a facility given their land ownership interests along the A20 corridor. Our client owns land within the area shown in the image attached:</p> <p>The land is located immediately adjacent to the A20 and, significantly, a short distance from the Court Wood Interchange. The location adjacent to the interchange means the Site is uniquely able to provide access to both east and westbound HGVs using the A20 via upgrades of the existing junction rather than the provision of new highways infrastructure. This would therefore significantly reduce the costs of developing a facility in this location.</p> <p>Furthermore, the site itself is relatively flat with screening provided by existing trees on its southern and western boundaries. The site topography provides opportunities for further landscaping which could appropriately screen the facility from longer range views. The site is not in close proximity with receptors who would be sensitive to noise impacts.</p> <p>Our clients are keen to put this site forward into the local plan process to help facilitate delivery of this important piece of infrastructure.</p> <p>Our client would be keen to take part in the oral examination of the plan if it would help the Inspector consider the deliverability of the facility.</p> <p>Yours sincerely,</p> <p>Paul Carnell BA (Hons) MA MRTPI Associate Director</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Our clients consider that Policy T14 (a) should therefore be amended as follows in order to make it properly effective:</p> <p><i>"The site must be accessed from the Strategic Road Network (A2/M2 corridor or A20). Sites along the A2/M2 corridor should also be complimentary to the A2 Improvements.</i></p> <p>Our clients consider that Policy T14 (b) should therefore be amended as follows in order for it to align with National Policy related to major developments in the AONB:</p> <p><u><i>Planning applications must be supported by a Landscape and Visual Impact Assessment which in turn should support the proposed layout of the site and its capacity. Development with the AONB will be supported where it complies with the provisions of the NPPF relating to major development in the AONB.</i></u></p> <p>Our clients consider that the above proposed changes to Policy T14 are necessary in order to make it effective, justified and consistent with National Policy.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Our client would be keen to take part in the oral examination of the plan if it would help the Inspector consider the deliverability of the facility
Include files	Dover rep.jpg
Local Plan Consultation Point	TI4 - Overnight Lorry Parking Facilities
Rep ID	SDLP1165
Rep Status	Processed
Consultee ID	1271448
Consultee Full Name	Kevin Bown
Consultee Company / Organisation	National Highways
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	TI4
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We previously requested that the NPPF 2021 be referenced in relation to this policy. We note that the accompanying policy wording for TI4 now notes that the NPPF requires that planning policies should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance. The accompanying wording also now sets out the need for private sector overnight lorry parking sites to complement the strategic transport objectives of the A2 Dover Access project (should this come forward).</p> <p>We also note that the policy wording itself states that lorry parking and associated facilities must be accessed from the SRN (A2/M2 corridor) and be complimentary to the A2 improvements. We support these updates.</p> <p>Representation: National Highways are content with Policy TI4</p> <p><i>(Note - This is an extract of the Full National Highways representation which can be located at SDLP1152)</i></p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	T14 - Overnight Lorry Parking Facilities
Rep ID	SDLP1135
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	See below
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness	This would become sound and compliant with legislation coming forward in parliament regarding Air Quality, with the addition (h) sites within 300 metres of a residential street or of a school or preschool will not be approved for Lorry Parking.

matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	TI4 - Overnight Lorry Parking Facilities
Rep ID	SDLP1696
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	TI4
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438. TI 4 Overnight Lorry Parking Facilities This would become sound and compliant with legislation coming forward in parliament regarding Air Quality, with the addition (h) sites within 300 metres of a residential street or of a school or preschool will not be approved for Lorry Parking.

<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	

T15 - Digital Technology

Local Plan Consultation Point	T15 - Digital Technology
Rep ID	SDLP803
Rep Status	Processed
Consultee ID	1259612
Consultee Full Name	Mr Chris Shaw
Consultee Company / Organisation	Langdon Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	T15 - Digital Technology - whole section
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	In the context of the aims of 'larger' villages to support viability of these settlements – include a requirement to invest in this infrastructure being made available more widely?
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Important for new and existing village service. Fast broadband for working at home economy.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	T15 - Digital Technology
Rep ID	SDLP1039
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	T15
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The County Council is supportive of this policy. We welcome the intention that all new residential, public and business premises development will have gigabit-capable connections.</p> <p>As required by paragraph 114 of the NPPF, KCC requests that all new residential, commercial and community buildings benefit from the installation of fixed telecommunication infrastructure and High-Speed Fibre Optic (minimal internal speed of 1000mbps) connections to multi point destinations. The infrastructure installed should be capable of connection to commercial broadband providers and maintained in accordance with approved details.</p> <p>The County Council would also draw attention to the proposed Building Regulation Changes in respect of digital technology which will come into effect shortly.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	TI5 - Digital Technology
Rep ID	SDLP1655
Rep Status	Processed
Consultee ID	1331868
Consultee Full Name	Ruth Marczin-Bundy (Parish Cllr)
Consultee Company / Organisation	Alkham Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	TI5
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DIGITAL TECHNOLOGY – TI15 (DDC Plan – 10.37-10.49) I believe that a key issue which has been omitted is the development of a WIRED District to support the business and housing growth required. At the current time broadband within Alkham Parish is insufficient to meet the demands upon it. Any successful growth economy whether urban or rural requires adequate digital infrastructure. Furthermore, although a form of high-speed internet connects to the terminal at Short Lane in Alkham, the rest of the valley receives a sub-functional broadband through a copper wire as far away as Whitfield. So, any attempt to install high-speed broadband will always be limited by this. We would need a new fibre optic installation with hubs along the length of the whole valley, at Chilton, Wolverton, Ewell Minis, South Alkham. <i>(DDC note - The full representation from Alkham PC is attached to representation SDLP1653. However, specific comments from the full representation document have been extracted into separate consultation points/policy areas, relevant to the comments made)</i>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness	

matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	TI5 - Digital Technology
Rep ID	SDLP1136
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Sound; viz our comments on co-working spaces above. (There are areas of the district where 'superfast broadband' connections are so slow that residents have been preventing from accessing the local plan consultation portal).

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	TI5 - Digital Technology
Rep ID	SDLP1780
Rep Status	Processed
Consultee ID	1331526
Consultee Full Name	Mrs Mairi Jones
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	TI5
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	DDC Note: Please see detailed representation (attached at 1770) which has been divided against numerous consultation points. The representation has images within the text. The text below is an extract from the detailed representation. 3 SECTION 1.46 of the DDC Plan - Key Issues and Objectives

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>3.1 In section 1.46 a number of key issues have been included for the District namely climate change, the move to carbon neutrality, flood management, sustainable development, the Whitfield Urban Expansion, combating the impact of Covid, economic growth, strategic transport growth, sustainable transport initiatives, appropriate infrastructure development, conservation, net gain biodiversity, achieving a balance between conservation and restoration. Wide ranging objectives have been set for each of these targets.</p> <p>I believe that a key issue which has been omitted is the development of a WIRED District to support the business and housing growth required . At the current time broadband within Alkham Parish is insufficient to meet the demands upon it. Any successful growth economy whether urban or rural requires adequate digital infrastructure.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Please see appended report
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I can speak to any of the points raised in the attached document
Include files	
Local Plan Consultation Point	TI5 - Digital Technology
Rep ID	SDLP1697
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	TI5
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified

	Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438. TI 5 Digital Technology Sound; viz our comments on co-working spaces above. (There are areas of the district where 'superfast broadband' connections are so slow that residents have been preventing from accessing the local plan consultation portal).
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

NE1 - Biodiversity Net Gain

Local Plan Consultation Point	NE1 - Biodiversity Net Gain
Rep ID	SDLP408
Rep Status	Processed
Consultee ID	1266669
Consultee Full Name	Mrs Susan Sullivan
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	NE1 Biodiversity Net Gain
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>. This is the Council's BNG aim:</p> <p>The implementation of these new initiatives will ensure that all new development contributes towards the delivery of net gains in biodiversity, so that the natural environment, across the District as a whole, is improved by the end of the Local Plan period</p> <p>. I believe that the Biodiversity Net Gain policy will be ineffective and undeliverable within the time scale of the plan. This view is based upon evidence from planning applications in the Dover District which have incorporated BNG into their plans.</p> <p>Firstly planning application 20/00419 at Betteshanger Grove. This application promised a BNG of 10% but only a 2.23% gain was eventually claimed. This BNG included trying to recreate Open Mosaic Habitat on Previously Developed Land at Betteshanger Country Park. As there is no evidence that this has been achieved before its success is doubtful. This recreated habitat was also meant to provide forage and nesting opportunities for Turtle Doves recorded at the Park. This was to compensate for the loss of Turtle Dove territory at Betteshanger Grove. The ecologists working for the developer claimed that the mitigation sites for Turtle Doves were in relatively undisturbed parts of the Park and therefore gave the Doves the best chance of thriving. However two planning applications for a Hotel (22/01152) and a Surfing Lagoon (22/01158) have now been submitted for Betteshanger Country Park. Both are immediately adjacent to the Turtle Dove mitigation sites and the noise, light and human disturbance, if the plans are passed, look likely to jeopardise the whole Turtle Dove mitigation scheme. This is significant especially as the scheme is the subject of condition 54 of the 20/00419 planning permission. It is also significant as Dover District Council is a supporter of the Kent Biodiversity Strategy and Turtle Doves are a target species of that Strategy.</p> <p>How can BNG possibly be counted as a success if sites set up to achieve it are then put at risk?</p> <p>The two applications for Betteshanger Country Park are claiming a BNG of 11%. This will be achieved at the expense of important biodiversity at the Park. The Surf Lagoon will involve the digging up of 800 nationally rare and protected Lizard Orchids to be translocated elsewhere in the Park. Orchid experts tell us this is unlikely to succeed because of the precise growing conditions that these plants demand. The Kent Plant Recorders for the BSBI believe the Park would qualify for SSSI status because of the colony of Lizard Orchids. Extensive areas of Open Mosaic Habitat will be removed along with its associated rare invertebrates. Red listed Skylarks will be impacted as their nest areas will be removed.</p>

	BNG of 11% will be claimed. If BNG is really going to improve the natural environment of the Dover District surely we cant keep allowing important habitat and species to be destroyed in order to claim a gain?
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	NE1 - Biodiversity Net Gain
Rep ID	SDLP292
Rep Status	Processed
Consultee ID	1331112
Consultee Full Name	Miss Emma Waller
Consultee Company / Organisation	Kent Wildlife Trust
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	NE1 - Biodiversity Net Gain
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>Kent Wildlife Trust are in full support of Policy NE1, however as stated in a previous comment, we are working as part of the Kent Nature Partnership (KNP), of which it is acknowledged that Dover is a member. The KNP is developing a countywide strategic approach to Biodiversity Net Gain and Local Nature Recovery Strategies, in anticipation of the requirements of the Environment Bill. As part of these strategies, we are promoting a countywide commitment to delivering 20% measurable biodiversity net gain and commitments that any offsite biodiversity net gain is delivered strategically in order to meet the priorities and targets of existing and future landscape scale biodiversity strategies.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Policy NE1 section d should be amended: "to be secured, managed and maintained for a minimum of 30 years after completion, and must achieve the distinctiveness and condition as intended".</p> <p>To align with KNP's BNG principles, in which Dover is a member of, Policy NE1 should:</p> <ol style="list-style-type: none"> 1 Specify of a minimum percentage, preferably 20%, but a minimum of 10% in accordance with future legislation 2 Provide detail on how this percentage should be measured, using the most up to date version of the Defra Biodiversity Metric 3 Specify how developers should present their calculations and details of how on and offsite compensation and net gain will be delivered 4 Require that on and offsite net gain should be delivered at location that meets strategic landscape scale priorities, including specific reference to future Local Nature Recovery Strategies 5 Specify that BNG provision should follow the mitigation hierarchy, providing offsite compensation where avoidance, mitigation and onsite compensation are not feasible or ecologically meaningful 6 Specify that offsite BNG should be provided if it cannot be meaningfully provided onsite in a way that contributes to meeting local landscape scale biodiversity priorities 7 A commitment to produce a Supplementary Planning Document that will provide further details on how developers should deliver biodiversity net gain in future 8 Commit to providing net gains for biodiversity in perpetuity <p>To ensure BNG is effectively delivered in the Borough, we recommend that wherever possible, net gain areas will be strategically located within, or provide a connection between areas of noted conservation value such as designated sites, priority habitats, Local Wildlife Site, Local Wildlife Reserves and irreplaceable habitats, to contribute to the Local Nature Recovery Strategy (which needs to be provided) for the borough and wider Kent.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Not Applicable</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>NE1 - Biodiversity Net Gain</p>
<p>Rep ID</p>	<p>SDLP694</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1221958</p>
<p>Consultee Full Name</p>	<p>Ms Bridget Fox</p>
<p>Consultee Company / Organisation</p>	<p>The Woodland Trust</p>
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	NE1 - Biodiversity Net Gain
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We welcome this policy, including in particular para b) that it should be informed by the Local Nature Recovery Strategy and related plans, and para f) that it should follow the mitigation hierarchy and that any compensation for habitat loss should not be included in net gain calculations.</p> <p>To strengthen the policy, we would encourage setting a greater than 10% target for net gain, noting that the Kent Local Nature Partnership has called for a 20% BNG target for the county, and that this has been referenced in the recent Kent Minerals and Waste Local Plan.</p> <p>By setting a more ambitious target, the Local Plan increases the chances that worthwhile amounts of net gain will be delivered, given the possibility that initiatives intended to deliver such gain may fall short in practice.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	NE1 - Biodiversity Net Gain
Rep ID	SDLP806
Rep Status	Processed
Consultee ID	1259612
Consultee Full Name	Mr Chris Shaw
Consultee Company / Organisation	Langdon Parish Council

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	NE1 - Biodiversity Net Gain Clause A.
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Category: Soundness: Effective There may be circumstances where net gain would be beneficial to deliver (partially off-site) – Natural England have supported such an approach. The policy could support the net gain provision off-site, where this takes place within the parish – and in line with the Biodiversity Gain Sites Register. Note the NDP being prepared by the Parish Council may include areas where biodiversity enhancements would be beneficial, so an amendment to end would make the policy more effective at the local level.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	There may be circumstances where net gain would be beneficial to deliver (partially off-site) – Natural England have supported such an approach. The policy could support the net gain provision off-site, where this takes place within the parish – and in line with the Biodiversity Gain Sites Register. Note the NDP being prepared by the Parish Council may include areas where biodiversity enhancements would be beneficial, so an amendment to end would make the policy more effective at the local level.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	NE1 - Biodiversity Net Gain
Rep ID	SDLP513
Rep Status	Processed
Consultee ID	1268017
Consultee Full Name	Ms Penelope James

Consultee Company / Organisation	Dover and Deal Liberal Democrats
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	NE1
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	n/a
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	n/a
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	What mitigations are being discussed to address the CO2 fumes emitted by HGVs/ Coaches entering Dover Port on the A20 - especially when Operation Stack / Operation Brock is in place? Air pollution in Dover is a serious problem, not just from the port but also the A20.
Include files	
Local Plan Consultation Point	NE1 - Biodiversity Net Gain
Rep ID	SDLP539
Rep Status	Processed
Consultee ID	1266351
Consultee Full Name	Dr Sharon

	Danby
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	NE1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I consider NE1 unsound and not effective as it gives developers too many get out clauses.a- Only if it can be demonstrated that ecologically meaningful biodiversity net gain cannot be achieved within the site boundary will the Council consider off-site alternatives this has been weak in the current plan and allowed developers to try and move wholesale, endangered species and habitats with no consideration for the delicate interconnection of ecosystems. This often results in failure. I consider the mitigation hierarchy approach to be flawed. Development should not be allowed that compromises biodiversity.e- suitably qualified professionals these must be chosen by the DDC biodiversity officer and NOT by the developer to ensure that the results are meaningful and sound.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	No development should be permitted that allows harm to biodiversity.Developers should not be allowed to choose a suitably qualified professional to survey for biodiversity - the DDC officer should decide this.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	NE1 - Biodiversity Net Gain
Rep ID	SDLP717
Rep Status	Processed
Consultee ID	1331831

Consultee Full Name	Catesby Estates
Consultee Company / Organisation	Catesby Estates
Agent Full Name	Lucy Wilford
Agent Company / Organisation	DHA Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Development Management Policies - The Natural Environment Policy NE1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	See attached supporting statement attached Policy NE1: Biodiversity Net Gain Text below (copied from attached statement) added by DDC <i>4.1.1 The requirement to deliver 10% BNG is already covered by other legislation and is pending the secondary legislation to determine how this will take effect. To avoid confusion and potential conflicts, the same approach should be adopted, as with Policy CC1 (Reducing Carbon Emissions), which notes that the standards it outlines only comes into effect if the Future Homes Standard is required to be delivered through the planning system. Policy NE1 should similarly be amended to acknowledge the Environment Act 2021 and that the 10% requirement should only come into effect should it be required by legislation.</i> <i>4.1.2 Criterion 1 a) of the policy advises that "...Only if it can be demonstrated that ecologically meaningful biodiversity net gain cannot be achieved within the site boundary will the Council consider off-site alternatives in line with the mitigation hierarchy approach". Whilst on-site provision is to remain the preference, for small to medium sized sites, this can be particularly challenging, especially where they do not have large areas of associated open space. The requirement to deliver BNG on site can therefore significantly reduce housing nos. on sustainable sites, which could undermine delivery and/or reduce community benefits such the provision of affordable housing. A more flexible approach must therefore be taken to ensure suitable and sustainable sites remain deliverable and to prevent their inefficient development, which could undermine wider housing delivering.</i>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	See attached supporting statement attached Text below (copied from attached statement) added by DDC <i>Criterion 1 a) must therefore be amended as follows: Only if it can be demonstrated that ecologically meaningful biodiversity net gain cannot be achieved within the site boundary or its provision on site is demonstrated to undermine the site's delivery and/or prevent its efficient development, then the will the Council will consider off-site alternatives in line with the mitigation hierarchy approach</i> <i>4.1.3 Criterion 2 must be removed. As currently drafted it suggests that the BNG calculation "must be in addition to any form of compensation". The need to provide compensation is already built into the BNG metric and therefore is already accounted for.</i> <i>4.1.4 The above changes are necessary to ensure the policy is "Consistent with National Policy" and to ensure the Plan is deliverable and therefore "Effective".</i>

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	In order to ensure that our case is properly put forward and understood, and to provide the opportunity to respond to any questions/points raised by the Council and Local Plan Inspector which might result outside the written representations made and following discussion at the EIP.
Include files	Catesby Final Dover District Council Reps .pdf (4)
Local Plan Consultation Point	NE1 - Biodiversity Net Gain
Rep ID	SDLP638
Rep Status	Processed
Consultee ID	1331790
Consultee Full Name	Julie Davies
Consultee Company / Organisation	CPRE Kent
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	NE1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The Council should be aiming for 20% biodiversity. The State of Nature in Kent report (July 2022) https://kentnature.org.uk/state-of-nature/ (funded by LWT, KCC and KPOG) sets out how we need to recognise that nature is vital for a happy, healthy society. How it reduces pollution and flooding and supports adaptation to climate change – including locking up carbon. How every effort needs to be taken to ensure no further loss or deterioration of key habitats. How bigger landscape-scale projects need to be delivered to join-up fragmented habitats and secure more land in conservation management - in order to help deliver an ambitious Nature Recovery Network, as enshrined in the new Environment Act.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will	

make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	CPRE Kent would wish to participate at the examination hearings to explore these issues further.
Include files	
Local Plan Consultation Point	NE1 - Biodiversity Net Gain
Rep ID	SDLP768
Rep Status	Processed
Consultee ID	1331834
Consultee Full Name	Kitewood
Consultee Company / Organisation	Kitewood
Agent Full Name	Lucy Wilford
Agent Company / Organisation	DHA Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Development Management Policies - Policy NE1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	See attached supporting statement attached Text below (copied from attached statement) added by DDC Policy NE1: Biodiversity Net Gain <i>4.1.1 The requirement to deliver 10% BNG is already covered by other legislation and is pending the secondary legislation to determine how this will take effect. To avoid confusion and potential conflicts, the same approach should be adopted, as with Policy CC1 (Reducing Carbon Emissions), which notes that the standards it outlines only comes into effect if the Future Homes Standard is required to be delivered through the planning system.</i>

<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>See attached supporting statement attached Text below (copied from attached statement) added by DDC Policy NE1: Biodiversity Net Gain <i>Policy NE1 should similarly be amended to acknowledge the Environment Act 2021 and that the 10% requirement should only come into effect should it be required by legislation.</i> 4.1.2 <i>Criterion 2 must be removed. As currently drafted it suggests that the BNG calculation “must be in addition to any form of compensation”. The need to provide compensation is already built into the BNG metric and therefore is already accounted for.</i> 4.1.3 <i>The above changes are necessary to ensure the policy is “Consistent with National Policy” and to ensure the Plan is deliverable and therefore “Effective”.</i></p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>In order to ensure that our case is properly put forward and understood, and to provide the opportunity to respond to any questions/points raised by the Council and Local Plan Inspector which might result outside the written representations made and following discussion at the EIP.</p>
<p>Include files</p>	<p>Kitewood Estates Limited Reg19 Dover Local Plan Reps.pdf (4)</p>
<p>Local Plan Consultation Point</p>	<p>NE1 - Biodiversity Net Gain</p>
<p>Rep ID</p>	<p>SDLP692</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331821</p>
<p>Consultee Full Name</p>	<p>Laura Marney</p>
<p>Consultee Company / Organisation</p>	<p>Deal Town Council</p>
<p>Agent Full Name</p>	<p>Laura Marney</p>
<p>Agent Company / Organisation</p>	<p></p>
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>NE1 Biodiversity Net Gain</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is ‘unsound’, on which grounds do you consider this to be? (select all that apply)</p>	<p>Not Applicable</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>No</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>No</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as</p>	<p>DTC considers NE 1 to be unsound (not justified) on the basis that a 10% Biodiversity Net Gain requirement is not the most appropriate target for the area given the particular pressures facing the county’s biodiversity. The Kent Nature Partnership (KNP) suggests a Biodiversity Net Gain requirement of 20% is ‘a proportionate response and one that illustrates the county’s commitment to tackling the ecological crisis that faces</p>

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Kent. Furthermore, the scale of previous biodiversity losses require aspirational levels of gain to make up for them.' The KNP also state that the 10% minimum gain set by the Environment Bill is the lowest level that Defra consider would actually deliver biodiversity gains. https://kentnature.org.uk/wp-content/uploads/2022/07/Justification-for-biodiversity-net-gain-in-Kent-Sept-2020.pdf
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<i>We recommend the following modification: The greater ambition of 20% should be set to provide greater confidence in genuine gains for biodiversity and ensure the successful recovery of nature in our part of Kent.</i>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	NE1 - Biodiversity Net Gain
Rep ID	SDLP1041
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	NE1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable

5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Biodiversity: The County Council requests clarity regarding paragraph 2 of the policy – “<i>Biodiversity net gain must be in addition to any form of compensation</i>” and whether this is referring to additionality or stacking, where a piece of land is being used for more than one purpose (for example, carbon capture or nutrient neutrality).</p> <p>Reference should also be made to the adherence to the most recent iteration of the Biodiversity Net Gain metric – which is currently 3.1.</p> <p>In respect of paragraph 11.11, Biodiversity Net Gain is also not intended to be used for nationally or internationally designated sites.</p> <p>The County Council would also draw attention to the work being undertaken by the Kent Nature Partnership in respect of the proposal to secure 20% Biodiversity Net Gain where it may be viable to do so.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Suggestions made in comment at 6.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	NE1 - Biodiversity Net Gain
Rep ID	SDLP1392
Rep Status	Processed
Consultee ID	1266669
Consultee Full Name	Mrs Susan Sullivan
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	NE1
2 - Do you consider this part of the Plan sound?	No

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>NE1 Biodiversity Net Gain</p> <p>Recent planning applications in the Dover District have highlighted problems with the way BNG is being used. Permission granted for planning application 20/00419 will involve the removal of Turtle Dove territory on the development site. Mitigation areas have been allocated at Betteshanger Country Park to maintain and increase the numbers of Turtle Doves there. These areas were in relatively undisturbed parts of the Park when allocated to give the birds the best chance of thriving. This scheme is now threatened by a further two planning applications at the Park for a Hotel and a Surf Lagoon. Both of these would be directly adjacent to the mitigation areas. The noise, light and human disturbance from very large numbers of visitors threatens to jeopardise the whole scheme. This view is shared by the RSPB, CPRE and Kent Wildlife Trust.</p> <p>This mitigation scheme, together with recreation and enhancement of Open Mosaic Habitat was part of the BNG for 20/00419. Achieving it now seems doubtful.</p> <p>With regards to the two planning applications at the Park, 22/01152 for a Hotel and 22/00158 for the Surf Lagoon, an 11% BNG is being claimed, despite the fact that the proposals involve the digging up of 800 Lizard Orchids from the second most important colony in the UK. Lizard Orchids are nationally rare and protected under the Wildlife and Countryside Act. It is also despite the removal of Skylark nesting habitat (Skylarks are Red Listed) and despite the removal of extensive areas of the priority habitat Open Mosaic Habitat and its associated invertebrates.</p> <p>To mitigate the effects of the proposals it is proposed to establish 2 offsite enhancement areas in other parts of the Park. These support, scrub, grassland and OMH. The biodiversity value of these sites has not been adequately established. For example scrub is known to be a very valuable habitat for a range of species such as birds, mammals, bats, invertebrates etc. but its specific value on this site has not been established and large amounts would be removed to create OMH.</p> <p>So if these applications are granted large amounts of priority habitat and habitat known to be of high biodiversity value would be destroyed. An attempt would be made to translocate 800 Lizard Orchids, but Orchid experts tell us that this is fraught with risk because of the very precise growing conditions they require. We may lose a large proportion of the colony.</p> <p>So much damage and destruction in order to claim a Biodiversity Net Gain.</p> <p>How can this possibly help with Nature's recovery and the stemming of species decline?</p> <p>PLEASE NOTE THE REPRESENTATION FORM HAS A FAULT SO THAT THE BOX FOR ALTERNATIVE WORDING CANNOT BE EASILY USED.</p> <p>I would like the following included in Policy N1.</p> <p>"Biodiversity Net Gain measures should not involve the destruction of priority habitat and habitat known to have high biodiversity value. Neither should it involve damage to or destruction of protected habitat or species."</p> <p>" Mitigation areas should be protected from future developments so that the aim of the mitigation scheme is secured."</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>I would like the following included in Policy N1. "Biodiversity Net Gain measures should not involve the destruction of priority habitat and habitat known to have high biodiversity value. Neither should it involve damage to or destruction of protected habitat or species." " Mitigation areas should be protected from future developments so that the aim of the mitigation scheme is secured."</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	Because if Biodiversity net gain is going to help with Natures recovery changes need to be made in the way it is used.
Include files	
Local Plan Consultation Point	NE1 - Biodiversity Net Gain
Rep ID	SDLP1473
Rep Status	Processed
Consultee ID	1330919
Consultee Full Name	Mrs Heather Twizell
Consultee Company / Organisation	Natural England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	NE1
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	NE1 – Biodiversity Net Gain As stated in our statutory Regulation 18 response we remain fully supportive of the inclusion of a standalone Biodiversity Net Gain (BNG) policy and also welcome your Authority's intention to produce a Dover District Biodiversity Net Gain Strategy as a Supplementary Planning Document (SPD). We hope to see this SPD provide further detail on key aspects of BNG provision including an illustrative map outlining the approach to BNG provision in the District and an overview of locations for habitat creation and enhancement. Some of this detail around targeting BNG is also likely to come as the Kent Local Nature Recovery Strategy (LNRS) progresses. Although we are still awaiting the detailed LNRS Regulations and Guidance we are pleased to see the hooks for this already included in this policy and supporting text. In particular we welcome the following policy commitments: • For development proposals to provide a minimum of 10% biodiversity net gain above the ecological baseline and in accordance with the Biodiversity Net Gain SPD – leaving the door open to the Kent-wide work led by the Kent Nature Partnership to investigate the viability of seeking 20% BNG. • Prioritisation of on-site provision over off-site to help avoid heavily developed areas potentially seeing a reduction in their overall biodiversity. • That development must still adhere to the mitigation hierarchy with net gain measures being delivered in addition to this. • Reference to use of "the applicable and most up-to-date DEFRA metric" – confirmed in the supporting text as currently being Metric 3.0 NE2 – Landscape Character and the Kent Downs AON
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	NE1 - Biodiversity Net Gain
Rep ID	SDLP1339
Rep Status	Processed
Consultee ID	1331659
Consultee Full Name	Ben Young
Consultee Company / Organisation	The Land Trust
Agent Full Name	Ben Young
Agent Company / Organisation	Bloomfields Chartered Town Planners
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP5 - Fort Burgoyne, Dover
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC EDIT: Detailed representation attached to SDLP0447 with figures and maps. Representation reproduced in box 7 below (as originally done by the agent).
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness	1. Introduction 1.1. Following the publication of the Dover District Council Local Plan (Regulation 18 Draft) and the Targeted Call for Sites on the 20th of January 2021, the Land Trust submitted representations in relation to the development of their own appropriate strategy for the possible future

matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

use and regeneration of **Fort Burgoyne, Fort Burgoyne Road, Guston, Dover, CT15 5LP**. These representations are included as **Appendix A** of this Statement, however, can be summarised as follows:

· The site at Fort Burgoyne extends across an area of approximately 42 hectares and includes a recreation ground, a substantial area of chalk grassland and the main buildings and immediate surrounding grounds (including the Parade Ground). Fort Burgoyne is also a designated Schedule Monument, confirming that the site is of national importance.

· Fort Burgoyne was built in the 1860s to protect Dover Castle and was used to defend the South Coast of England as one of the “Palmerston Forts” built to defend against invasion. The polygonal system on which the building is built was used to defend and watch from the highest strategic point in Dover. After the First World War, Fort Burgoyne was used a military depot/store for Connaught Barracks before it ceased to be used for military purposes in 2006. In 2014 the Land Trust, a national charity, acquired the site from Homes England and since then has been considering a variety of options for the future development of Fort Burgoyne. This includes the submission of two pre-application enquiries relating to the future use of the site to DDC in July 2019 (DDC Ref: PE/19/00127) and July 2020 (DDC Ref: PE/20/00234), which serve to demonstrate that the Land Trust has a clear commitment to bringing Fort Burgoyne back into use for public benefit at the earliest opportunity.

· DDC’s adopted Core Strategy 2010, recognised the importance of Fort Burgoyne within the criterion vii of “Strategic Allocation” policy CP10 (Former Connaught Barracks Complex), which stated that alongside the allocation for around 500 dwellinghouses, *“the condition of Fort Burgoyne is stabilised, if possible new uses are accommodated, a public access strategy is agreed and a management arrangement is incorporated that secures a sustainable future for the Fort”*. The Dover District Local Plan Regulation 18 Draft appeared to “down-grade” of the Former Connaught Barracks site from a “Strategic Allocation” to a “Non-Strategic Housing Allocation”. The Regulation 18 draft no longer made any specific reference to Fort Burgoyne with no strategic policy objective to deliver the future of the Fort, a Scheduled Monument of national historic interest that is included on the Historic England at risk register.

· The representation therefore sought to raise that the Draft Local Plan needed to provide clarification as to how the regeneration of the two separate elements (being the residential development of Connaught Barracks and the regeneration of Fort Burgoyne) will be delivered to allow for proposals for Fort Burgoyne to be brought forward under a set of key objectives, independent of the Connaught Barracks housing development. It was subsequently suggested within the representation that the Fort’s future is secured through other means within the new Local Plan, either through its own strategic policy in other sections of the plan (such as the Employment and the Local Economy section), or through the re-wording of Site GUS002 or through other Development Management policies.

· Finally, given that, in a “Strategic Futures” Report (included as part of **Appendix A**) prepared by WYG and commissioned by the Land Trust, it was identified that there is circa 3,000 square metres of floorspace within existing buildings at Fort Burgoyne that would be potentially suitable for a wide variety of uses. It was also suggested that in order to secure a long-term future use for Fort Burgoyne and secure its regeneration, it would be wholly appropriate for it to be allocated within Strategic Policy 9 for business and employment purposes, in order for more flexibility to be given to the types of uses that might be permissible at the site.

1.2. Dover District Council (DDC) has subsequently published the Regulation 19 Submission of the Dover District Council Local Plan which sets out the vision, strategic objectives and overarching development strategy for future growth in the district over the period to 2040. The Land Trust have therefore instructed Bloomfields Chartered Town Planners to prepare further representations in relation to the Regulation 19 submission and the regeneration and future use of the Scheduled Monument, Fort Burgoyne.

2. Regulation 19 Submission of the Dover District Council Local Plan

2.1. It is welcomed that the aforementioned representations have been taken into account within the Regulation 19 Submission of the Dover District Council Local Plan.

SAP5 - Fort Burgoyne, Dover

2.2. In particular, the Trust is pleased to see the inclusion of Fort Burgoyne for Mixed Employment Use in table 4.1 and a positive site-specific policy to support site regeneration at Fort Burgoyne within Chapter 4: Housing and Employment Site Allocations at Strategic Allocation Policy SAP5 which states the following:

Figure 1: SAP 5- Fort Burgoyne, Dover as of Regulation 19 Submission, DDC Local Plan

2.3. The Land Trust also notes the pre-amble to Policy SAP5 which, at 4.109, recognises that Fort Burgoyne has the potential to accommodate new uses, provided that they are compatible with its status as a scheduled monument. The Trust continues to explore suitable uses for the reuse of the Fort, as evidenced by the grant of planning permission 21/01000 on the 7th July 2022 for the change of use of 4no. casemates to Use Class E with associated ancillary works.

2.4. The Land Trust remains committed to attracting uses for the Fort that will fit in with the long-term sustainable vision for investment in its re-use, as required by the preamble to Policy SAP5. The uses being explored, as evidenced in the previous Regulation 18 representations, are all being considered with the aim of supporting local business growth and ensuring at the same time that any mixture of uses at the site are compatible in respect of access, servicing, general amenity and crucially with the aims of conserving the Scheduled Monument.

2.5. While the inclusion of this policy is largely supported, The Trust has a number of comments in respect of the criteria:

2.6. Criterion h sets out that a Surface Water Management strategy should be produced for the site. The Trust recognises the importance of surface water management; however, it is highlighted that the Fort already benefits from an existing surface water drainage system which was built in the 1860s as part of the construction of the site. This system has always discharged directly to the ditch of the Fort where it soaks into the ground.

2.7. Given the Scheduled Ancient Monument status of the site, establishing an alternative strategy for managing surface water may not be practical and could result in harm. As such it is suggested that this criterion should be removed.

2.8. Notwithstanding this, where relevant, any future planning applications for uses or development at the Fort can demonstrate if required how it would be compatible with the existing surface water drainage system and not require any alternative arrangements for its disposal.

2.9. In respect of criterion j which suggests that *“development within the boundary of Fort Burgoyne which would have a detrimental impact on the heritage significance, setting, views, biodiversity, character of coherence of the components and elements of the complex will not be permitted”*.

2.10. While the Trust acknowledges the need to avoid development which will have a detrimental impact on the range of criteria identified in this policy, any development within Fort Burgoyne would be restricted by the requirement for Scheduled Monument Consent approved by Historic England which is considered to negate the need for this criterion. Draft Local Plan policies in respect of landscape (NE2), ecological (SP13) and historic environment (HE1, SP15) further negate the need for this criterion.

2.11. It is therefore respectfully suggested that criteria h and j are removed from policy SAP 5.

Chapter 2 - Vision and Objectives

2.12. Chapter 2 sets out the overarching vision for Dover District, including that *“through careful stewardship of its world class landscapes, thriving natural environments and wealth of historic sites, Dover District will be a destination of choice for people of all ages to make their home, for businesses to invest in and for visitors to explore and experience.”*

2.13. It is appreciated that the vision highlights the *“Sensitive restoration of elements of its rich built heritage, will enhance the attractiveness of the town, while improved connections to its seafront will have been delivered by high quality design and investment in place making.”* Together with the strategic objective (echoed in Strategic Policy 15) to conserve and enhance heritage assets in the district *“in a manner appropriate to their significance, recognising their intrinsic value as a finite resource as well as their contribution to the character of the District and the positive role they can play in the regeneration of the District.”*

2.14. The Trust also welcomes the identification of Fort Burgoyne on the Local Plan key diagram (Figure 2 below) alongside other Regeneration Sites covered by policy SP6 as set out further over the page.

Figure 2: Figure 2.1, Local Plan Key Diagram

Chapter 3 - Strategic Policies

2.15. Chapter 3 sets out the districts strategic policies to achieve the aforementioned strategic objectives.

SP6 Economic Growth

2.16. Strategic Policy 6 seeks to grow and diversify the Dover District economy by providing additional employment floorspace through the regeneration of brownfield sites in key locations in the district, such as Fort Burgoyne, to deliver flexible employment uses, achieve a higher level of job growth, and help provide additional flexibility and choice to the market over the Plan period.

Figure 3: SP6- Economic Growth, Dover as of Regulation 19 Submission, DDC Local Plan

2.17. The Trust welcomes the inclusion of Fort Burgoyne at criterion 2 of policy SP6 as site where regeneration for a mix of uses to secure their future will be supported by Dover District Council.

2.18. It is noted that paragraph 3.117 sets out that no floorspace allowance has been included for Fort Burgoyne (and other sites allocated under criterion 2) as they are *“brownfield sites allocated for regeneration, and the mix of development and floorspace requirements will need to be determined through the planning application process in accordance with the policies in the Local Plan.”*

2.19. Given the complexities of the site we support this position but anticipate that employment floorspace will amount to circa 3,000 sqm.

Chapter 11 - The Natural Environment

Policy NE1 Biodiversity Net Gain

2.20. The Trust agrees with the requirements of Natural Environment Policy 1 for development proposals to provide a minimum of 10% biodiversity net gain above the ecological baseline within the development boundary. And notes criterion (a) which states that where it can

be demonstrated that ecologically meaningful biodiversity net gain cannot be achieved within the site boundary, the Council will consider off-site alternatives in line with the mitigation hierarchy approach.

2.21. Given that a large portion of the 42 hectares at Fort Burgoyne has the potential to provide for significant biodiversity offering, in responding to this consultation The Trust wishes to record interest in working with the Council in developing its Dover District Biodiversity Net Gain Strategy with a view to Coombe Hole providing opportunity for off-site net gain whilst maximising the value of this Local Wildlife Site.

Figure 4: NE1- Biodiversity Net Gain, Dover as of Regulation 19 Submission, DDC Local Plan

2.22. In a similar vein to the BNG potential at Fort Burgoyne, the Land Trust has extensive experience of working with developers to create and provide in perpetuity management of Suitable Alternative Natural Greenspace (SANG), areas of greenspace that are of a quality and type that are suitable to divert recreational activities associated with new residential development away from protected sites (such as Special Protection Areas or Special Areas of Conservation).

2.23. In noting the requirement of Draft Policy SAP1(I) (Whitfield Urban Expansion) which requires a need for SANG to mitigate potential impacts upon the Lydden and Temple Ewell SAC, the Trust wishes to express interest in discussions with the Council and/or the developers of this site with a potential view to assisting them with meeting the policy requirements.

3. Summary

3.1. The overall objective of the Trust remains to seek to deliver a strong, sustainable future for the Fort, that secures its long-term status as a nationally and locally important historic site that will make a vital contribution to the district. The Land Trust supports the Regulation 19 Submission Version of the Dover District Local Plan and welcomes the inclusion of Fort Burgoyne as a strategic allocation site for regeneration subject to the comments set out in this representation.

4. Appendices

Appendix A- Representations on the Regulation 18 Draft Dover District Local Plan 2021 and Targeted Call for Sites

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	NE1 - Biodiversity Net Gain
Rep ID	SDLP1138
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Experience has caused trust in the planning process to expire in the minds of many of the public. Without independent, robust auditing, and honesty, extracting promises from developers all too often results merely in employment for public relations practitioners. So, an addition to NE 1 is needed for it to become sound. 'Where permission is given subject to conditions regarding tree retention, tree planting and / or biodiversity enhancement, applicants will need to agree to abide by 'robust auditing' (as Wildlife Trusts insist that the Environmental Bill legislate for). This means that honest, objective-because-independent, before-and-after evaluations / baseline measurements must be used. DDC councillors on the planning cttee have recently pointed out how very inadequate and misleading the sketchy, google-map-based ecology reports paid for by developer applicants are.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness	<i>(see comments in SP14, and SP13 above)</i> To become sound, effective and legally compliant with 2021 Environment Act this addition is needed. <i>'Enhance biodiversity in line with Kent Nature Partnership commitment to 20% enhancement to restore Kent's depleted natural capital and mitigate 6th mass extinction.</i>

matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<i>Developers are ill-placed to self-certify their own work in this area, and DDC need a DM policy requiring Environmental Impact Assessments on all planning applications for developments of over 15 dwellings on greenfield or rewilded brownfield sites.'</i> 11.20 Tilmanstone Colliery Tip should be landscaped to become a local nature reserve and an amenity of Elvington and SAP 28.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	NE1 - Biodiversity Net Gain
Rep ID	SDLP1567
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	NE1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<i>DDC Note The text below is an extract from the original representation which is attached to SDLP1438.</i> SP14 Enhancing Green Infrastructure & Biodiversity The Environment Act of 2021 has a legally binding 2030 species abundance target, whose professed aim is to help reverse the drastic decline in wildlife and put the nation on track to protecting 30% of land and sea for nature by 2030; also, there is a new requirement for planning

applications to provide Biodiversity net gain and for Local Nature Recovery Strategies to create a framework for a national system of interconnected sites for nature.

In SP14 the words about Local Nature Recovery Strategy and the Kent Biodiversity Strategy are impressive and reassuring. But the very restricted BOAs (Biodiversity Opportunity Areas), to which they are applied, render them less than effective. Residents' local knowledge (members of Sandwich Bay Bird Observatory, Kent Wildlife Trust, local members British Trust for Ornithology, etc, etc), could increase DDC's awareness of more potential BOAs by approx. ten times at a conservative estimate.

Net Gain should be measured using the latest DEFRA measurement tool The Biodiversity Metric 3.1 - JP039 - GOV.UK and also an additional metric should also be used consisting of a list of all species to be established in consultation with Kent nature concerned NGOs, (Kent Wildlife Trusts and others). The DEFRA metric favour the developer as it only takes into consideration protected species and habitats. In the proposed Local Plan, the Appendices give an Evidence Base. This predominantly deals with species and habitats protected in Law and ignores all the other species in the district which are in decline. To be sound and effective, all Biodiversity net gain policies must join up the living dots.

The UK is one of the world's most nature-depleted countries, in the bottom 10% globally and last among the G7 group of nations, new data shows. It has an average of about half its biodiversity left, far below the global average of 75%, a study has found. In contrast, a figure of 90% is considered the "safe limit" to prevent the world from tipping into an "ecological meltdown", according to researchers.

Planning policies which single out building development for "improvement" and avoid the other causes of this dramatic biodiversity loss, are inadequate and need strengthening to become effective. In a report entitled "The state of nature: 41 percent of UK species have declined since 1970s" (NHM 2019) the main drivers of decline are as follows –

Changing agricultural management , Habitat fragmentation , Pollution , Urbanisation , Woodland management , Invasive non-native species , Fisheries degradation

All of these areas should be considered in any Plan including the DDC one.

SP 14 Under the Hunting Act 2004 foxhunting became illegal, DDC should include in its SP14 encouragement for the rural Police to uphold the law in this respect and discourage any drag-hunting which results in the 'accidental' tearing apart of wild animals.

Examples of wildlife needing protection from loss of habitat around the boundaries to the north, west and south of Deal (e.g. SAP 16 sites Ground Water source protection 2 or Flood Zone 3), which is itself representative of the larger district. Evidence (BTO Initial Sites Review recorded as accepted) shows: Much of the area is in Flood Zone 3, farmland and has an extensive biodiversity value – briefly, to name a few, breeding Mute Swan, Moorhen, Collared Dove, Cuckoo, Skylark, Meadow Pipit, Blackbird, Cetti's, Reed and Sedge Warblers, Wren, Linnet and Reed Bunting. It is also a partial feeding area for a number of species such as Heron, Little Grebe, Grey Partridge, Kestrel, Buzzard, Black-headed and Herring Gulls, Woodpigeon, Stock Dove, Barn Owl, Swift, Swallow, House Martin, Yellow Wagtail, Dunnock, Song Thrush, Carrion Crow, Rook, Starling, House Sparrow and Chaffinch. Historically Redshank, Lapwing, Snipe and Yellow Wagtail used to nest here. Many species of native plant and habitat for invertebrates, mammals such as bats, Hedgehogs, Harvest Mice and Water Voles will also be lost. Losing these species will be a considerable biodiversity loss and contrary to the requirement for a minimum of 10% biodiversity gain. How will this loss be calculated? There two other plots in this designation - Sholden to Betteshanger roundabout surrounding Cottington Court Farm and Betteshanger Country Park access road to Foulmead Cottages behind farm shop which are both deemed unsuitable, which is correct – they are both farmland and would create chaos on the A258 in addition to the loss of biodiversity, open space, increase in light pollution, disturbance, etc.

The statement SP14 b must be made real and effective, and rendered sound by robust auditing and independent baseline assessments and recruitment of a much larger planning enforcement team. Only then will 'Every development will be required to connect to and improve the wider ecological networks'. would become effective and sound instead of token.

SP14 3.290 Kent County Council requires 20% biodiversity net gain, and it is unsound for DDC to undermine this commitment. DDC local plan will only be sound if 20% biodiversity net gain replaces the 10% specified. The Kent Nature Partnership commits to 20% biodiversity enhancement. An addition to the Plan is therefore needed: 'Enhance biodiversity in line with Kent Nature Partnership's commitment to 20% enhancement to restore Kent's depleted natural capital and to mitigate 6th mass extinction. Natural Capital is the world's stocks of natural assets including soil, minerals, air, water and biodiversity. These provide a range of ecosystem services' that enable us all to survive and thrive. The most obvious services include the food we eat, the water we drink and timber we use for building. Less visible ecosystem services include climate regulation, carbon sequestration, natural flood defence, water filtration, species habitat, health and wellbeing. The Goodwin Sands nurture marine fauna and flora and provide a natural protection from coastal erosion. As such the Goodwin Sands are part of the district's natural capital and need protection too.

To become sound and effective and legally compliant bird boxes, bat boxes, swift bricks, street trees, garden trees should be required on all new builds.

If existing mature trees of a good size to capture carbon now, are replaced in 'urban expansion' areas (SAP 1, SAP 24, SAP 28) by young saplings that will not be able to capture a similar amount of carbon for 40 to 50 years, then the plan will not be legally compatible with Environment Act 2021. Therefore, to become sound and legally compliant SP14 should require that for every 10,000m2 (roughly 50 dwellings of 200m2 per dwelling) of housing, one open space of 150m2 and another woodland area of 150m2 should be provided, these allocations to be non-transferable between 10,000m2 sections. Moreover, development should only be permitted if 90% of existing trees are retained (These retained trees will account for the woodland areas referred to above, and will provide pockets of mature green infrastructure of amenity value to legally binding UK Net zero strategy 2019 and to new residents at little cost or inconvenience to the developer). Any new trees planted must be tended with a guarantee to ensure survival 4 years after development completed.

Moreover, to become more sound and effective, we recommend adding, Retain all trees on the perimeter of large developments and pockets of existing trees within developments. Work with Kent Nature Partnership to evaluate, and match protection of all-natural capital. Work to retain and enhance natural capital generally, mindful of the KCC commitment to establish the growth of 1.5 million new planted trees across the county. Similarly, this policy would become sounder if the recommendations of KCC report 'Natural Solutions to Climate Change in Kent' of March 2021 paid for from the public purse, on the need for our district's (chalk) grasslands, wetlands, and woodlands to be retained and enhanced were adopted as a planning guideline.

As with SP 13, to become sound and effective, SP 14 must be underpinned with a requirement for robust auditing, and honesty, otherwise extracting promises from developers all too often results merely in employment for public relations practitioners, and developers later apply for conditions to be removed. 'Where permission is given subject to conditions regarding tree retention, tree planting and / or biodiversity enhancement, applicants will need to agree to abide by 'robust auditing' (as Wildlife Trusts insisted was in Environmental Act 2021). This means that honest, objective because independent, before-and-after evaluations / baseline measurements must be used. Sketchy, google-map-based ecology reports paid for by developer applicants are deceptive. Developers are ill-placed to self-certify their own work in this area, and DDC need a policy requiring Environmental Impact Assessments on all planning applications for developments of over 15 dwellings on greenfield or rewilded brownfield sites.'

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Local Plan Consultation Point	NE1 - Biodiversity Net Gain
Rep ID	SDLP1222
Rep Status	Processed
Consultee ID	1332924

Consultee Full Name	Amy Aldridge
Consultee Company / Organisation	Gladman Developments Ltd
Agent Full Name	Amy Aldridge
Agent Company / Organisation	Gladman Developments Ltd
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	NE1
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Policy NE1 outlines the Council's aspiration for development proposals to provide a minimum of 10% biodiversity net gain above the ecological baseline. Gladman accept that whilst the Environment Act 2021 introduces a mandatory requirement for development to deliver a net gain for biodiversity of at least 10%, the secondary legislation to enact this is yet to come into force. Therefore, until such time as the mandatory provisions of the Environment Act come into force, the Council cannot require developments to achieve at least a 10% net gain, and certainly could not withhold planning permission if a proposal did not achieve a 10% gain. Gladman would therefore suggest that Policy NE1 should be tempered to make clear the 10% target is aspirational and not an absolute target. At criteria 3 there is a stated requirement for a dedicated BNG plan to be submitted for all applications and that the BNG plan will be subject to approval and secured through a condition or S106 as part of any application. Gladman note this aspiration however, as example an outline application may only seek to approve the principle of development, therefore such a requirement would be more relevant at reserved matters stage. We would therefore suggest greater flexibility based on the matters submitted for approval at outline stage and potentially use of planning conditions secure BNG at reserved matters stage.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

Local Plan Consultation Point	NE1 - Biodiversity Net Gain
Rep ID	SDLP1371
Rep Status	Processed
Consultee ID	1333128
Consultee Full Name	David Powell
Consultee Company / Organisation	
Agent Full Name	Klaire Lander
Agent Company / Organisation	Lander Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	NE1
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Lander Planning sent a PDF document which has been split across the relevant sections of the Plan. See Original Attachment on SDLP1346) Achieving biodiversity net gain is consistent with the governments' direction of travel and this policy is 'effective' and 'justified' and therefore supported
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	

Include files	
Local Plan Consultation Point	NE1 - Biodiversity Net Gain
Rep ID	SDLP1663
Rep Status	Processed
Consultee ID	1331868
Consultee Full Name	Ruth Marczin-Bundy (Parish Cllr)
Consultee Company / Organisation	Alkham Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	NE1
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Biodiversity Net Gain- (DDC Plan - NE1 -11.1-11.12)</p> <p>Several land owners and farmers (Chilton, Sladden Farm, Wolverton) along the valley already engage in organic and regenerative agriculture and Countryside Stewardship Schemes which work towards wildlife regeneration, building wildlife corridors and tree planting for habitat creation and greater plant and wildlife biodiversity for climate change resilience.</p> <p>Initiatives in the valley are underway with KCC's programme 'Kent Plan Bee', to raise awareness of the importance of pollinators and the need to safeguard these vital insects and improve their habitats. The nature-based educational activities at 'Chilton Magic Garden' in the Alkham Valley are popular not only with residents of the parish but also the children and families within Dover and the surrounding areas.</p> <p><i>(DDC note - The full representation from Alkham PC is attached to representation SDLP1653. However, specific comments from the full representation document have been extracted into separate consultation points/policy areas, relevant to the comments made)</i></p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	NE1 - Biodiversity Net Gain
Rep ID	SDLP1448
Rep Status	Processed
Consultee ID	1333263
Consultee Full Name	Mark Behrendt
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	NE1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Response by the Home Builders Federation to the consultation on the Dover District Local Plan.</p> <p>1. Thank you for consulting the Home Builders Federation (HBF) on the Dover District Local Plan that is being proposed for submission to the Secretary of State for examination. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.</p> <p>SP3 – Housing Growth</p> <p>The policy is unsound as it not effective and is not sufficiently justified by the evidence base</p> <p>Housing needs</p> <p>2. The housing requirement of 10,998 over the plan period 2022 to 2040 is consistent with the minimum number of homes the Council should plan for using the standard method. However, what is not clear from the Council's evidence is whether this level of growth will be sufficient to meet the growth aspirations of the Council. Strategic Policy 6 sets out the Council's aspiration to deliver a minimum of 117,290 sqm of additional employment floorspace over the plan period but we could not find evidence to indicate that this number of homes will be sufficient to support the level of economic growth the Council is aspiring to deliver. The NPPF sets out at paragraph 82c that the potential barriers to investment in an area, such as a lack of housing, needs to be addressed in the plan and the Council need to be certain that the housing requirement set out in SP3 is supportive of its aspirations around economic growth.</p> <p>Older people's housing needs</p>

3. The HBF is concerned with the limited references to the needs to provide special accommodation for older people. It is noted that the mix of homes on allocated

sites will need to take account of the need for such accommodation but there appears to be no indication of whether this will be sufficient to meet the needs identified in the 2019 SHMA update. It also completely ignores the potential to allocate standalone sites to deliver homes for older people and there is no specific policy setting out the need for such accommodation and how the Council will support such development to come forward outside of the strategic allocations. The HBF would recommend that a policy setting out the Council's support for older people's accommodation is include in the plan. In order to be effective, we would suggest that this policy sets out the need for such accommodation and that there a presumption in favour of such development where needs are not being met.

Housing supply

4. Table 3.1 in the Local Plan states that overall housing supply to meet needs is 11,924, leaving a contingency buffer of 924 homes between housing needs and supply - around 8% of needs. Whilst the HBF welcomes the provision of a buffer between needs and supply we do not consider 8% to be sufficiently large to ensure that needs are met in full over the plan period, especially given that around half of the homes will come from the Whitfield Urban Expansion. In order to ensure the Council's needs are met in full the HBF recommends that a buffer of around 20% is necessary. The additional buffer should be brought forward through the allocation of smaller sites which will deliver earlier in the plan period and provide a buffer in overall supply should there be delays in the delivery of the larger strategic sites in Dover.

Meeting affordable housing needs

5. The most recent Strategic Housing Market Assessment undertaken by the Council is the 2019 update to the 2017 SHMA. This sets out that there is a need for 3,387 new affordable homes between 2020 and 2040. No further assessments appear to have been undertaken since that period. However, the latest AMR indicates that 75 affordable homes were built in 2020/21 with permissions for a further 108 units which can be expected to come forward in 2021/22. As such if the SHMA update is used as the basis for affordable housing needs there remains a need for 3,204 homes over the plan period – around 30% of expected supply on sites that are likely to deliver affordable housing¹.

6. Whilst this would appear to show that on the basis of SP5 the need for affordable housing would be addressed we note that the delivery of affordable housing in the past has been well below what has been expected. The 2020/21 Authority Monitoring Report indicates on page 19 that delivery since 2010/11, the year the Core Strategy was adopted, has been at around 20% of housing completions. In addition, the viability study indicates that the strategic sites will find it challenging to deliver 30% affordable housing. This would suggest that in order to meet needs the Council will need to allocate additional sites.

1 Total supply of 11,924 less small site windfall allowance of 1,050

Conclusions on housing supply

7. To conclude on housing supply the HBF would recommend that further sites are allocated in this local plan. This would have the twin benefits of meeting the need for affordable housing in the district as well as providing an additional buffer between housing needs and supply.

SP5 – Affordable housing

The policy is unsound as it is not fully justified.

8. This policy requires residential development of 10 or more units to deliver 30% of the homes provided as affordable housing. The update notes on the viability study notes at paragraph 56 that this level of affordable housing requirement is deliverable in high and medium value areas alongside the other costs placed on development by the local plan. However, the study outlines that this level of provision will be challenging on the strategic sites and shows that it would not be viable in lower value areas and in the urban area of Dover. The Council recognises these concerns in part by removing the requirement to provide affordable housing in the urban area of Dover. However, no allowance is made with regard to the lower value areas or strategic sites.

9. Whilst the Council states that aside from the strategic allocation there is little planned development in the lower value area it is still necessary for the policy should reflect this evidence presented by the Council. Paragraph 58 of the NPPF recognises that decision makers should be able to assume that development that a policy compliant scheme is viable. This requires policies that place additional costs on development to reflect the evidence and in cases such as this set different requirements for different areas regardless of the development expectations in those areas. As such the HBF would recommend that the policy is amended to remove the requirement for affordable housing contributions in the lower value areas.

10. It is also notable in tables 10.17 and 10.18 of the Whole Plan Viability Study that the outside of greenfield sites at Deal extra care and sheltered housing for older people is not able to viably deliver affordable housing, Given that such development often comes forward on

sustainable PDL sites close to services such development should be specifically excluded within SP5 from providing affordable housing contributions.

CC1 – Reducing Carbon Emissions

The policy is unsound as not consistent with national policy, justified or effective.

11. Through policy CC1 the Council indicate that they expect development to meet the Future Homes Standard (FHS) if this becomes a requirement that is delivered

through local plans. However, the expectation from Government is clear that FHS will be delivered through amendments to the Building Regulations and will not be an optional standard adopted as part of a local plan. The improvements to energy efficiency standards in new buildings and the transition to FHS has already started with the improvements to part L of the Building Regulations that came into force in June of 2022. These will see a circa 30% improvement in CO2 emissions prior to the introduction of FHS which will ensure that new homes are zero carbon ready from 2025. As such it is not necessary to refer to the Future Homes Standard and the Council should remove reference to the standard in policy which will be delivered as part of changes to part L of the Building Regulations.

12. The HBF is also concerned that the Council do not appear to have tested the Future Homes Standard within the update note on the viability assessment. The update note sets out at paragraph 23 that the initial improvements to the energy efficiency introduced in June of 2022 were included but no additional costings have been made with regard to the Future Homes Standard. The Government expects this to cost the house building industry an extra £100 million per year though this fails to recognise that there is likely to be additional electricity connection costs with the move away from gas and that the assumed reduction in the cost of air source heat pumps is unlikely². Given the significant increase in costs from these new standards will come into force in 2025, not long after the expected adoption of this local plan, these costs should have been considered through the viability assessment.

NE1 – Biodiversity Net Gain

Policy is not needed as this will be delivered through the Environment Act and support regulations.

13. Given that the requirement to provide a 10% Biodiversity Net Gain is set out in legislation and supporting regulations and guidance and will be in force when the plan is adopted, the HBF would question whether it is necessary to include a detailed policy on BNG. Including a detailed policy could lead to inconsistency between policy and legislation should this change either prior to the introduction of BNG at the end of 2023, or if there be changes to regulation and guidance in future. As council notes in para 11.6 the policy is intended to reflect the requirements of the Act and as and we would suggest that it would be more appropriate to refer in policy SP14 to the need to deliver a 10% BNG in line with relevant legislation and guidance.

Conclusion

14. At present we do not consider the plan to be sound, as measured against the tests of soundness set out in paragraph 35 of the NPPF, in the following key areas:

Economic growth has not been take into account when considering the minimum number of homes to be planned for;

Greater flexibility required in the local plan to ensure needs are met in full;

No specific policy with regard to the needs of older people

Affordable housing policy does not reflect the full evidence on viability

References to Future Homes Standard in policy CC1 unnecessary and unjustified

No need to include detailed policy on BNG given that this is a requirement of legislation with associated regulations and guidance

15. We hope these representations are of assistance in taking the plan forward to the next stage of plan preparation and examination. I would also like to express my interest in attending any relevant hearing sessions at the Examination in Public. Should you require any further clarification on the issues raised in this representation please contact me.

² Building Homes in a changing business environment: an assessment of new and forthcoming additional costs of housing delivery. (HBF, 2022) [https://www.hbf.co.uk/documents/12117/HBF report - Building Homes in a Changing Business Environment.pdf](https://www.hbf.co.uk/documents/12117/HBF_report_-_Building_Homes_in_a_Changing_Business_Environment.pdf)

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance

To conclude on housing supply the HBF would recommend that further sites are allocated in this local plan. This would have the twin benefits of meeting the need for affordable housing in the district as well as providing an additional buffer between housing needs and supply.

It is also notable in tables 10.17 and 10.18 of the Whole Plan Viability Study that the outside of greenfield sites at Deal extra care and sheltered housing for older people is not able to viably deliver affordable housing. Given that such development often comes forward on sustainable PDL sites close to services such development should be specifically excluded within SP5 from providing affordable housing contributions.

with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The HBF is also concerned that the Council do not appear to have tested the Future Homes Standard within the update note on the viability assessment. Given that the requirement to provide a 10% Biodiversity Net Gain is set out in legislation and supporting regulations and guidance and will be in force when the plan is adopted, the HBF would question whether it is necessary to include a detailed policy on BNG. Including a detailed policy could lead to inconsistency between policy and legislation should this change either prior to the introduction of BNG at the end of 2023, or if there be changes to regulation and guidance in future. As council notes in para 11.6 the policy is intended to reflect the requirements of the Act and as and we would suggest that it would be more appropriate to refer in policy SP14 to the need to deliver a 10% BNG in line with relevant legislation and guidance.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	I would also like to express my interest in attending any relevant hearing sessions at the Examination in Public.
Include files	SDLP1431 Behrendt.pdf SDLP1431 Behrendt Em1.pdf
Local Plan Consultation Point	NE1 - Biodiversity Net Gain
Rep ID	SDLP1705
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	NE1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails	<i>DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438.</i>

<p>to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>(See comments in SP14, and SP13 above) To become sound, effective and legally compliant with 2021 Environment Act this addition is needed. <i>'Enhance biodiversity in line with Kent Nature Partnership commitment to 20% enhancement to restore Kent's depleted natural capital and mitigate 6th mass extinction</i></p> <p>Adverse experience of the planning process has reduced trust in that process in the minds of many of the public. Without independent, robust auditing, and honesty, extracting promises from developers all too often results merely in employment for public relations practitioners. So, an addition to NE 1 is needed for it to become sound. 'Where permission is given subject to conditions regarding tree retention, tree planting and / or biodiversity enhancement, applicants will need to agree to abide by 'robust auditing' (as Wildlife Trusts insist that the Environmental Bill legislate for). This means that honest, objective-because-independent, before-and-after evaluations / baseline measurements must be used. DDC councillors on the planning cttee have recently pointed out how very inadequate and misleading the sketchy, google-map-based ecology reports paid for by developer applicants are. Developers are ill-placed to self-certify their own work in this area, and DDC need a DM policy requiring Environmental Impact Assessments on all planning applications for developments of over 15 dwellings on greenfield or rewilded brownfield sites.'</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	

NE2 - Landscape Character and the Kent Downs AONB

Local Plan Consultation Point	NE2 - Landscape Character and the Kent Downs AONB
Rep ID	SDLP290
Rep Status	Processed
Consultee ID	1331383
Consultee Full Name	Mrs Katie Miller
Consultee Company / Organisation	Kent Downs AONB Unit
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	NE2 – Landscape Character and AONB
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Support. Request that reference to the AONB Management Plan is updated to reflect the actual dates of the current version (2021 to 2026).
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Reference to the AONB Management Plan is updated to reflect the actual dates of the current version (2021 to 2026).
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	NE2 - Landscape Character and the Kent Downs AONB
Rep ID	SDLP695
Rep Status	Processed
Consultee ID	1221958
Consultee Full Name	Ms Bridget Fox
Consultee Company / Organisation	The Woodland Trust
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	NE2 - Landscape Character and the Kent Downs AONB
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>We welcome the recognition of the value of trees and woodland in the local landscape, and policy that all proposals within the Kent Downs AONB should have regard to the purpose of conserving and enhancing its natural beauty.</p> <p>To quote the AONB management plan, "Woodlands and trees are a vital part of the Kent Downs' natural beauty, providing a green mantle to the upper slopes of the escarpments and valleys. They emphasise the undulating nature of the dip slopes and scarp, and frame the agricultural lower slopes and settlements. Individual, fine and ancient field trees are an important, characteristic and sometimes dramatic element of the landscape."</p> <p>We support the AONB's aim that irreplaceable fine tree and ancient woodland characteristics and qualities, cultural heritage and landscape character should be conserved, restored and managed.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	NE2 - Landscape Character and the Kent Downs AONB
Rep ID	SDLP545
Rep Status	Processed
Consultee ID	1266351
Consultee Full Name	Dr Sharon Danby
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	NE2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p><i>Major development proposals within the AONB will only be permitted in exceptional circumstances and where it is demonstrated they are in the public interest. I consider this to be unsound. It can never be in the public interest to degrade the AONB for future generations. This is unsustainable and contrary to NPPF 21 and the Kent Downs AONB Management Plan 2021-26.</i></p> <p>The Kent Downs AONB management plan 2021-26 says <i>the Kent Downs AONB, perhaps more than any other of Britain's protected landscapes – AONBs, Heritage Coasts or National Parks, has experienced and is experiencing severe development pressure.</i></p> <p>DEFRA evidence shows <i>'The Kent Downs AONB stands out as an area which has experienced major, but expected, change, showing a rate of urban growth of almost 10%.pa, with the urban area spreading by 14 ha over the decade'</i>. The AONB in Dover District has suffered development at a disproportionate rate which indicates that planning pressures on our district are unsustainable. It is considered an outlier in the amount of growth it has accommodated. In view of this DDC has a duty to double its efforts in protecting the AONB within its area.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness	<p><i>Major development proposals within the AONB will only be permitted in exceptional circumstances and where it is demonstrated they are in the public interest.</i></p> <p>This should be rewritten to include what is considered a major development eg more than 3 dwellings. In such cases major developments should then NOT be considered.</p>

matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Developments which renovate and rebuild existing dwellings along the same footprint and using prescribed local materials and methods with sustainability at the core ONLY should be encouraged. Clear landscape buffers should be maintained between the AONB boundaries and the built environment of settlements to protect the setting of the AONB. Landscape character areas abutting the AONB should be carefully managed.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	NE2 - Landscape Character and the Kent Downs AONB
Rep ID	SDLP566
Rep Status	Processed
Consultee ID	1331770
Consultee Full Name	Cathy Skinner (clerk)
Consultee Company / Organisation	Northbourne Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	NE2 - Landscape Character and the Kent Downs AONB
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The supporting paragraphs to NE2 emphasise the particular importance and quality of the District's landscape however we consider the proposed policy wording to provide inadequate protection to landscape character. There are two issues with NE2 as proposed (note these apply to the first section of the policy and not the second portion which relates specifically to proposals within AONBs): 1. The draft wording does not provide a sufficiently robust test. A development application could assert that "particular regard" for landscape character is made but could still fail to adequately address material arising harms. To prevent unacceptable harm to landscape character would require stronger, more conclusive policy wording. 2. The proposed policy wording links to the 2020 Landscape Character Assessment but indicates that particular emphasis be given to a list of generalised characteristics which mostly relate to landform attributes (items a. to g. in the policy wording). It can be interpreted that characteristics

	not listed are therefore secondary where in fact these may actually be of greater or greatest importance. Within the 2020 assessment of each landscape character area, the most valuable or sensitive characteristics vary considerably between areas, as does the development management guidance. The policy should require that development proposals respect the specific landscape character identified within the LCA, respecting the sensitivities and values, and the development guidance. It is important that this policy allows landscape character implications to be assessed against the specific context and attributes of the area rather than particularly against a generalised list of landform attributes which may not be of greatest importance.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>We propose that the list of general landscape attributes considered for particular regard should be removed to avoid these taking precedence over potentially more important characteristics and values in a given character area. Further, we propose that the policy should be made more robust and decisive to ensure that development management can adequately safeguard the District's highly valued landscape character</p> <p>The following is proposed to replace the first section of NE2:</p> <p>Proposals should demonstrate particular regard to the Landscape Character Area as defined by the Dover District Landscape Character Assessment 2020 and the Kent Downs AONB Landscape Character Assessment Review, in which they are located, respecting the identified sensitivities and values, and be in accordance with development management guidance. Proposals which would result in unacceptable harm to landscape character will be refused.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	NE2 - Landscape Character and the Kent Downs AONB
Rep ID	SDLP1066
Rep Status	Processed
Consultee ID	1331808
Consultee Full Name	Mr Robert Hogben
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	1 Introduction
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective

	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The plan is unsound as it does not comply with the legally binding commitment made by DDC when they declared a climate emergency in 2020 and prepared their climate change strategy. The plan will not do enough to meet the target of the district being net zero by 2050. DDC should be much more ambitious about the green credentials of new housing. If new homes generated their own power, were insulated to the highest standards, and collected rain water, it would greatly help stretched local services and go a long way towards making the housing stock fit for the coming decades.</p> <p>The regulation 19 stage of the consultation is not fit for purpose as it is overly complicated and very difficult to use. The process has left many members of the public including me and my wife feeling overwhelmed and confused as to how to make a representation. For those who are working full time this has been a task for which they do not have enough time. As a result those who may have wanted to make a submission have not been able to. The format of the submission form is also difficult to navigate. Without prior experience of planning law it is difficult to say whether a part of the plan is legal or not. As to the duty to cooperate it is impossible to know. The unsound plan needs updating after the government announcement on 5/12/22 that mandatory housing targets are not to be imposed. The figure of nearly 11,000 is unsustainable and should now be reviewed, particularly with respect to allocated land around Station Rd Walmer and proposed developments around villages.</p> <p>The character and landscape value of the district is being rapidly eroded under the current plan and this must not continue as it is contrary to NPPF 21. It is not sustainable to build on agricultural land which is in short supply as we are only 50% self sufficient in producing food in the UK. The CPRE has found that almost 14,500 hectares of farmland has been permanently lost to development since 2010. The contribution from the districts agricultural land is of vital importance. Much of the agricultural land is also vital for flood protection, and field margins are important for wildlife and biodiversity, forming corridors between habitats for vertebrates and nesting and roosting sites for birds. Dover District also has a wealth of character landscapes, AONB, heritage coast, nature reserves, internationally rare chalk grassland and rewilded areas such as Betteshanger Park. Overdevelopment under the last weak plan has meant that these areas are under pressure and being denuded as their boundaries are eroded and wildlife corridors between sites are cut off. The new plan does not do enough to protect these areas, wildlife and biodiversity. Developments should not be allowed to remove ancient woodlands and trees and biodiverse rich habitats even if it is argued that this is for the greater good. This is not sustainable as all nature is interconnected and if it fails then we all fail. The UK is one of the worst countries in the world for biodiversity loss, we have lost half of our biodiversity since the 1970's.</p> <p>Development has been at such a pace that infrastructure cannot keep up. Buses have been cut recently, cycle and pedestrian routes have not been upgraded sufficiently to connect some developments to main bus and train routes without car dependence. Aylesham has not had a secondary school which would mean children could walk to school. Many rural communities are entirely car dependent due to lack of buses and the roads not being safe to use their bikes. Not enough emphasis is put on renovating existing housing stock to provide greener, insulated, fuel efficient homes. Each new build generates around 56 tonnes of embedded carbon. The NPPF states that we should prioritise brownfield sites over greenfield but although there are many opportunities to develop brownfield sites in Dover, this has not been prioritised. Many developments have been for larger houses in villages and there is not enough provision for affordable housing.</p> <p>The wording of the local plan is not definitive, it leaves too many loop holes and vague preferences which enable large developers to argue and get what they want, to maximise profits, not what the people of the Dover area need.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>Better mapping and understanding of the Dover District, taking into account internationally rare areas of chalk grassland, woodland and trees wherever they occur.</p> <p>Large buffers around the AONB to protect its character from the built environment. Stronger protection for the AONB and the Ripple LCA F3.</p> <p>Tighter protections on our remaining biodiversity.</p> <p>Tighter definitions in the local plan so that developers have no room to argue what has been specified in the local plan.</p> <p>Hire several biodiversity officers to monitor closely and prevent loss of ancient woodland, chalk grassland, veteran trees, protected wildlife and rich habitats and to actively go out into the community, looking for ways to improve biodiversity by such things as accessing grants for hedge planting and the creation of ponds where ever possible in our district.</p>

	<p>Employ experts to liaise with farmers in our area to encourage the most environmentally friendly farming and land management practices which will encourage maximum biodiversity in the countryside and maximum sequestration of carbon in soils and biomass.</p> <p>Stop the use of agricultural land for development.</p> <p>Renovate and insulate rather than build new houses, brownfield not greenfield.</p> <p>Turn attention away from destroying village communities with unsustainable housing estates outside their village boundaries.</p> <p>Do not give developers the get out clause of financial mitigation for destruction of wildlife and habitat. No development should further deplete our critically low levels of biodiversity.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	NE2 - Landscape Character and the Kent Downs AONB
Rep ID	SDLP1475
Rep Status	Processed
Consultee ID	1330919
Consultee Full Name	Mrs Heather Twizell
Consultee Company / Organisation	Natural England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	NE2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as	NE2 – Landscape Character and the Kent Downs AONB Natural England provided extensive comments on this policy in our statutory Regulation 18 response. In summary we advised that: • The special qualities of the AONB should be acknowledged and included in the policy. • Specific mention and requirements of the two Heritage Coasts to be included. • That your Authority seek advice from the AONB Unit in developing the

<p>possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>policy further. • That the policy should be strengthened to provide more robust protection and reflect the great weight afforded to AONBs in the NPPF. We note from our review of your Authority's Regulation 22 Consultation Statement (Appendix E) that you have generally responded positively to the above points but would encourage you to consider whether the policy could be further strengthened, in line with the NPPF, by:</p> <ul style="list-style-type: none"> • Making clear that only 'limited' development (in terms of scale and extent) will be acceptable within the AONB. • Clearly defining what your Authority considers to be 'major' development within the AONB when applying the tests of exceptional circumstances and public interest. <p>Finally, we are slightly unclear as to why paragraph 11.20 in the supporting text makes reference to Dover District's three Regionally Important Geological Sites (RIGS) which then do not appear to be referenced in the policy at all. Natural England is supportive of policy protection being given to geodiversity as well as biodiversity (including protection of local sites) but we have more commonly seen this included within designated site / biodiversity policies. Given that NE2 doesn't currently appear to provide any actual policy protection to the sites we would suggest that they are included with other types of local site in Policy SP13 (requirement 'h') and that the supporting text is also moved to this policy.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>would encourage you to consider whether the policy could be further strengthened, in line with the NPPF, by:</p> <ul style="list-style-type: none"> • Making clear that only 'limited' development (in terms of scale and extent) will be acceptable within the AONB. • Clearly defining what your Authority considers to be 'major' development within the AONB when applying the tests of exceptional circumstances and public interest. <p>Finally, we are slightly unclear as to why paragraph 11.20 in the supporting text makes reference to Dover District's three Regionally Important Geological Sites (RIGS) which then do not appear to be referenced in the policy at all. Natural England is supportive of policy protection being given to geodiversity as well as biodiversity (including protection of local sites) but we have more commonly seen this included within designated site / biodiversity policies. Given that NE2 doesn't currently appear to provide any actual policy protection to the sites we would suggest that they are included with other types of local site in Policy SP13 (requirement 'h') and that the supporting text is also moved to this policy.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Not Applicable</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>NE2 - Landscape Character and the Kent Downs AONB</p>
<p>Rep ID</p>	<p>SDLP1140</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331762</p>
<p>Consultee Full Name</p>	<p>Ms Waite-Gleave Sarah Waite-Gleave</p>
<p>Consultee Company / Organisation</p>	<p>Dover and Deal Green Party</p>
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	For many in Dover, especially those living in harsh economic circumstances, being able to look up to our green hills, brings peace and assuages grief in dark times. The same applies throughout the district. Protecting landscape character, for those on all incomes, for those of all ages, across the district, is intrinsically linked to mental and physical wellbeing. Landscape character both within the Kent Downs Area of Outstanding Natural Beauty (AONB), and in all other places, also underpins our green tourism economy.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Losing landscape character to satisfy the demand for 30% profit margins of volume developers whose have the ear of London ministers, would be shooting ourselves in the East Kent foot, and cost us dear. This Local Plan would be unsound if it allows any development within the AONB, or allows any development over 5 dwellings within a mile of the boundaries of the Kent Downs AONB. Food security is a key concern in 2022 and the public expect food producing, carbon capturing soils and farmland to be protected.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	NE2 - Landscape Character and the Kent Downs AONB
Rep ID	SDLP1665
Rep Status	Processed
Consultee ID	1331868
Consultee Full Name	Ruth Marczin-Bundy (Parish Cllr)
Consultee Company / Organisation	Alkham Parish Council
Agent Full Name	
Agent Company / Organisation	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	NE2
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Landscape Character and the Kent Downs AONB – (DDC Plan - NE2 -11.17-11.22)</p> <p>The Alkham Valley community are striving to maintain and enhance the landscape character of the valley in this AONB and would value being part of the discussions and plans of DDC moving forward. The valley is also linking with the Rewilding network of Britain to maintain and encourage biodiversity and regeneration of nature towards climate resilience.</p> <p><i>(DDC note - The full representation from Alkham PC is attached to representation SDLP1653. However, specific comments from the full representation document have been extracted into separate consultation points/policy areas, relevant to the comments made)</i></p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	NE2 - Landscape Character and the Kent Downs AONB
Rep ID	SDLP1372
Rep Status	Processed
Consultee ID	1333128
Consultee Full Name	David Powell
Consultee Company / Organisation	

Agent Full Name	Klaire Lander
Agent Company / Organisation	Lander Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	NE2
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Lander Planning sent a PDF document which has been split across the relevant sections of the Plan. See Original Attachment on SDLP1346) Protecting the landscape character including the AONB is consistent with national policy and this policy is 'effective' and 'justified' and therefore supported.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	NE2 - Landscape Character and the Kent Downs AONB
Rep ID	SDLP1706
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale

Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	NE2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438.</p> <p>NE 2 Landscape Character and the Kent Downs AONB</p> <p>For many in Dover, especially those living in harsh economic circumstances, being able to look up to our green hills, brings peace and assuages grief in dark times. The same applies throughout the district. Protecting landscape character, for those on all incomes, for those of all ages, across the district, is intrinsically linked to mental and physical wellbeing. Landscape character both within the Kent Downs Area of Outstanding Natural Beauty (AONB), and in all other places, also underpins our green tourism economy. Losing landscape character to satisfy the demand for 30% profit margins of volume developers whose have the ear of London ministers, would be shooting ourselves in the East Kent foot, and cost us dear. This Local Plan would be unsound if it allows any development within the AONB, or allows any development over 5 dwellings within a mile of the boundaries of the Kent Downs AONB. Food security is a key concern in 2022 and the public expect food producing, carbon capturing soils and farmland to be protected.</p> <p>The Landscape Character Types (LCT) are a sound and helpful classification. Two amendments that would make Table 11.1 more sound and effective would be: for there to be a commitment to protect and expand Horticultural Belt LCT D in north of district, especially for pesticide-free, Nature-Friendly farming enterprises (see our comment SP 6) ; and for LCT F Open Arable Chalk Farmland with Woodland – F3 Ripple to be expanded to include all land west of Kingsdown village in a 3 mile band, to include Ringwould, Ripple, Sutton, Studdal, Little Mongeham to Northbourne and Tilmanstone.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

NE3 - Thanet Coast and Sandwich Bay SPA Mitigation and Monitoring Strategy

Local Plan Consultation Point	NE3 - Thanet Coast and Sandwich Bay SPA Mitigation and Monitoring Strategy
Rep ID	SDLP1637
Rep Status	Processed
Consultee ID	1252100
Consultee Full Name	Mrs Amandajayne Hollobon-Baxter
Consultee Company / Organisation	Sandwich Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	NE3
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	strongly commend NE3. To conserve conservation considering migratory birds and to carefully monitor including impact of recreational activities.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	NE3 - Thanet Coast and Sandwich Bay SPA Mitigation and Monitoring Strategy
Rep ID	SDLP1478
Rep Status	Processed
Consultee ID	1330919
Consultee Full Name	Mrs Heather Twizell
Consultee Company / Organisation	Natural England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	NE3
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	NE3 – Thanet Coast and Sandwich Bay SPA Mitigation and Monitoring Strategy Natural England considers the inclusion of this policy, setting out the overarching principles of this strategic mitigation approach, as an essential element supporting the conclusion of your Local Plan's HRA that the additional housing growth set out in the Plan will not result in an adverse effect on the integrity of the Thanet Coast and Sandwich Bay SPA. It is our view that removal of this policy could be considered to render the Plan unsound. Natural England will provide detailed advice on this policy in due course but this will first require further review of the Local Plan HRA and the Strategic Access Mitigation and Monitoring Strategy documents.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	NE3 - Thanet Coast and Sandwich Bay SPA Mitigation and Monitoring Strategy
Rep ID	SDLP1141
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The Plan is sound in including the aim ' <i>to deliver mitigation and monitoring contributions from new development within a Zone of Influence of 9km from the Thanet Coast and Sandwich Bay SPA is therefore considered appropriate to deliver the Council's legal responsibilities to protect this environmental site and its qualifying species and is set out</i> '
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The contribution rates specified are : per dwelling 1 bedroom unit £112, 2 bedroom unit £224, 3 bedroom unit £337, 4+ bedroom unit £449. To become genuinely effective we recommend at least double this and a greater increase for the additional persons likely to be found in a 4+ bedroom unit of, for example £1000. This money to be ring-fenced for direct projects to support the wildlife of the Thanet Coast and Sandwich Bay SPA.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	NE3 - Thanet Coast and Sandwich Bay SPA Mitigation and Monitoring Strategy
Rep ID	SDLP1373
Rep Status	Processed
Consultee ID	1333128
Consultee Full Name	David Powell
Consultee Company / Organisation	
Agent Full Name	Klaire Lander
Agent Company / Organisation	Lander Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	NE3
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Lander Planning sent a PDF document which has been split across the relevant sections of the Plan. See Original Attachment on SDLP1346) Providing a mitigation and monitoring strategy (and financial contributions thereof) towards the Thanet Coast and Sandwich Bay SPA is consistent with national policy and this policy is 'effective' and 'justified' and therefore supported.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	NE3 - Thanet Coast and Sandwich Bay SPA Mitigation and Monitoring Strategy
Rep ID	SDLP1707
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	NE3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438.</p> <p>The Plan is sound in including the aim 'to deliver mitigation and monitoring contributions from new development within a Zone of Influence of 9km from the Thanet Coast and Sandwich Bay SPA is therefore considered appropriate to deliver the Council's legal responsibilities to protect this environmental site and its qualifying species and is set out"</p> <p>The contribution rates specified are : per dwelling 1 bedroom unit £112, 2 bedroom units £224, 3 bedroom units £337, 4+ bedroom unit £449. To become genuinely effective, we recommend at least double this and a greater increase for the additional persons likely to be found in a 4+ bedroom unit of, for example £1000. This money to be ring-fenced for direct projects to support the wildlife of the Thanet Coast and Sandwich Bay SPA.</p>

<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	

NE4 - Air Quality

Local Plan Consultation Point	NE4 - Air Quality
Rep ID	SDLP1483
Rep Status	Processed
Consultee ID	1330919
Consultee Full Name	Mrs Heather Twizell
Consultee Company / Organisation	Natural England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	NE4
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	NE4 – Air Quality Given that air quality is a key consideration in your Local Plan's HRA we would encourage you to make reference, at least in the supporting text, to the potential non-human impacts of reduced air quality (i.e. on habitats and species)
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	NE4 – Air Quality Given that air quality is a key consideration in your Local Plan's HRA we would encourage you to make reference, at least in the supporting text, to the potential non-human impacts of reduced air quality (i.e. on habitats and species)
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	NE4 - Air Quality
Rep ID	SDLP1142
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Predicted traffic congestion during holiday periods, which at key holiday departure times becomes gridlock, is likely to increase not decrease, as EU Schengen area brings in biometric passport checks in 2023 for non-EU traffic. So we fear gridlock impacting well-being and livelihoods, not only in Dover town and Aycliffe but also on villages around A2, A20 roundabouts (Guston, Whitfield). This leads to slower HGV and car journeys and longer periods of emissions from queuing vehicles, Air pollution is exacerbated in 2022 because KCC have stopped subsidising buses and some rural bus routes have disappeared or been reduced (e.g. Elvington). Level 1 councils and Kent Ass of Local Council are looking to have a stronger voice on Joint Transportation boards so that they are able to help residents with public transport and thus respect Kent and Medway Energy and Low Emissions Strategies.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will	It would be sound if no new builds were allowed in villages without bus links to schools and workplaces, unless bus links were provided, so the statement re Initiatives which 'encourage' public transport needs strengthening to become sound. there is a need for an increase in Air Quality Monitoring Zones, Dover Town A256 Barton road by Barton School, DGGS & Charlton School, at Aycliffe, in Guston, on the Duke of Yorks roundabout near DYRMS school, on the Whitfield roundabout. There are Air Quality issues on both one-way A256 roads in Dover (London Rd and Barton Road / Maison Dieu Rd - see comments in SP 8 above) and there is an urgent need for vertical living walls, urban hedging to absorb air pollution for residents and school children along these

make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	road, especially in view of the Air Pollution laws coming through parliament now, in order for Plan to become legally compliant. These should be a requirement on any application for residential, non-residential development and for change of use, within Dover town.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	NE4 - Air Quality
Rep ID	SDLP1708
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	NE4
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438. NE 4 Air Quality Predicted traffic congestion during holiday periods, which at key holiday departure times becomes gridlock, is likely to increase not decrease, as EU Schengen area brings in biometric passport checks in 2023 for non-EU traffic. So, we fear gridlock impacting well-being and livelihoods, not only in Dover town and Aycliffe but also on villages around A2, A20 roundabouts (Guston, Whitfield). This leads to slower HGV and car journeys and longer periods of emissions from queuing vehicles, there is a need for an increase in Air Quality Monitoring Zones, Dover Town A256 Barton Road by Barton School, DGGS & Charlton School, at Aycliffe, in Guston, on the Duke of York's roundabout near DYRMS school, on the Whitfield roundabout.

	<p>There are Air Quality issues on both one-way A256 roads in Dover (London Rd and Barton Road / Maison Dieu Rd - see comments in SP 8 above) and there is an urgent need for vertical living walls, urban hedging to absorb air pollution for residents and school children along these roads, especially in view of the Air Pollution laws coming through parliament now, in order for Plan to become legally compliant. These should be a requirement on any application for residential, non-residential development and for change of use, within Dover town.</p> <p>Air pollution is exacerbated in 2022 because KCC have stopped subsidising buses and some rural bus routes have disappeared or been reduced (e.g., Elvington). Level 1 councils and Kent Ass of Local Council are looking to have a stronger voice on Joint Transportation boards so that they can help residents with public transport and thus respect Kent and Medway Energy and Low Emissions Strategies. It would be sound if no new builds were allowed in villages without bus links to schools and workplaces, unless bus links were provided, so the statement re Initiatives which 'encourage' public transport needs strengthening to become sound.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	

NE5 - Water Supply and Quality

Local Plan Consultation Point	NE5 - Water Supply and Quality
Rep ID	SDLP671
Rep Status	Processed
Consultee ID	1331287
Consultee Full Name	Mr Maxwell McDowall
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Appendix B Detailed Sustainability and policy Content. Habitats Regs. Assessment, chapter 5 appropriate Assessment.
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	This comment refers to the policy on water supply and quality. Appendix B , B192 to B202 plus the the contents of chapter 5, Appropriate Assessment, 5.136 to 146 all indicate that water is a serious problem for the district. Considering that Kent is the most driest county in England and Wales and that Dover District is classed as severely water stressed, yet housing development continues unabated. The aim of the Local Plan is to build 10,998 houses which more or less equates to a town the size of Walmer and Deal, population approximately 30,000. In view of the climate change emergency whereby we are expected to endure much wetter winters and drier summers, it appears that in the summer months there could be a prolonged and severe drought. Dover District is over-abstracting its resource of water just for the existing number of houses and population. New housing developments will exacerbate the problem of this water supply, despite the attempts to reduce consumption down from 154 litres per perso per day to 110 lpd.. That is a very large reduction.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	In view of the question of water resource and supply, a moratorium on further housing development should be sought from the Government until such time there is in place infrastructure to ensure there is a quantity of water available to cover a prolonged and severe drought.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	NE5 - Water Supply and Quality
Rep ID	SDLP1490
Rep Status	Processed
Consultee ID	1330919
Consultee Full Name	Mrs Heather Twizell
Consultee Company / Organisation	Natural England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	NE5
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	NE5 – Water Supply and Quality Natural England has no comment to make on this policy since we agreed in September 2022 that Dover District was no longer subject to nutrient neutrality requirements linked to the Stodmarsh Habitats Sites.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	NE5 - Water Supply and Quality
Rep ID	SDLP1144
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	There exists the danger that too much greenfield development / concrete will speed up runoff during wetter winters and lead to soil erosion. Since the Reg 18 Consultation in early 2021, the issue of river contamination at Stourmouth and Stodmarsh caused by inadequate sewage infrastructure upstream has peaked. Residents are very aware of the problems caused by Southern water failing to invest in either new water collection infrastructure or in adequate treatment infrastructure.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant	Conversely, to protect our production of food from suffering drought in more extreme summers, it is essential that rainwater and grey water harvesting be a prerequisite on new homes, and shade from existing retained trees be ensured.

and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	This DM will not be unless robust, stringent and measured enforcement of adequate water treatment for all new build sites are required, as well as rainwater harvesting. Moreover over-use of nitrates on farmland will reduce the supply of water that can be used by residents, and pollute streams, rivers, ponds and aquifers and endanger wildlife.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	NE5 - Water Supply and Quality
Rep ID	SDLP1504
Rep Status	Processed
Consultee ID	1333275
Consultee Full Name	Adam Harwood
Consultee Company / Organisation	Environment Agency
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	NE5 11.48
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Policy NE6 (DDC note assigned to NE5): Encouraging to see a policy dedicated to aspects of water quality. Instance 3 <i>11.48 In the areas of the district which are not on mains drainage, water treatment package plants can be installed, subject to the approval of the Environment Agency in the first instance.</i>

11.48 In the areas of the district which are not on mains drainage, water treatment package plants may potentially be installed if they can meet non mains drainage design criteria. If they cannot they should be consulted on with the Environment Agency in the first instance, as they may require a formal Environment Permit for any discharges.

Instance 4

11.51 For residential and commercial developments where there is no mains connection within a reasonable distance, applicants will be required to provide details of a water treatment package plant or equivalent that is compliant and has been approved by Environment Agency guidance, as part of a planning application. Applications for residential extensions will not be required to provide such details.

For residential and commercial developments where there is no mains connection within a reasonable distance, applicants will be required to provide details of a water treatment package plant or equivalent that is compliant with Non-mains drainage regulations as part of a planning application. Discharges to ground that do not meet relevant exemption criteria will also require an environment permit from the Environment Agency. Further guidance is on [.go.uk](http://www.environment-agency.gov.uk). Applications for residential extensions may not be required to provide such details under planning, but will still have to ensure that drainage systems comply with Non-mains drainage regulations and meet Building regulations.

Instance 5

11.51 For residential and commercial developments where there is no mains connection within reasonable distance, applicants will be required to provide details of a water treatment package plant or equivalent that is compliant with, and has been approved by Environment Agency guidance, as part of a planning application. Applications for residential extensions will not be required to provide such details.

11.51 For residential and commercial developments where there is no mains connection within reasonable distance, applicants will be required to provide details of a water treatment package plant or equivalent that is compliant with Non Mains Drainage regulations and aligns with Environment Agency risk assessment guidance, as part of a planning application. In some instances a separate Environmental Permit may be required from the EA. Applications for residential extensions will be required to provide details to show any risks are not exacerbated and current systems comply with NMD Regulations.

Aside from the aforementioned alterations, we approve of the importance placed on Groundwater protection in a number of policies, and explanatory text. The plan covers everything reasonably well from our view point. While there is no explicit policy on land affected by contamination, brownfield sites and other potentially pollution development is mentioned in various policies under water infrastructure and the like are mentioned adequately.

(DDC note - This is an extract from the full Environment Agency representation SDLP1458)

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Not Applicable

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Local Plan Consultation Point	NE5 - Water Supply and Quality
Rep ID	SDLP1709
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	NE5
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438. NE 5 Water supply and quality There exists the danger that too much greenfield development / concrete will speed up runoff during wetter winters and lead to soil erosion. Conversely, to protect our production of food from suffering drought in more extreme summers, it is essential that rainwater and grey water harvesting be a prerequisite on new homes, and shade from existing retained trees be ensured. Since the Reg 18 Consultation in early 2021, the issue of river contamination at Stourmouth and Stodmarsh caused by inadequate sewage infrastructure upstream has peaked. Residents are very aware of the problems caused by Southern water failing to invest in either new water collection infrastructure or in adequate treatment infrastructure. This DM will not be unless robust, stringent and measured enforcement of adequate water treatment for all new build sites are required, as well as rainwater harvesting. Moreover, over-use of nitrates on farmland will reduce the supply of water that can be used by residents, and pollute streams, rivers, ponds and aquifers and endanger wildlife.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

NE6 - The River Dour

Local Plan Consultation Point	NE6 - The River Dour
Rep ID	SDLP286
Rep Status	Processed
Consultee ID	1331382
Consultee Full Name	Mr The Dover Society Graham Margery
Consultee Company / Organisation	The Dover Society
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	NE6
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Can't comment on legal compliance
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>We feel that in these critical areas certain verbs should be strengthened for tighter regulation and control. We suggest all words in bold need addressing: all shoulds to be replaced with more enforceable wording eg will, have to, must; recommended replace with eg insist; need to be replaced by 'must to include details'; 'may be accepted' may to be replaced with must.</p> <p>Page 327 et seq we strongly support the aspirations for the river, but the wording needs to be strengthened to assist DDC planning staff. It is an important feature in the town of Dover. Public access to the river, however, is fragmented and many existing developments have turned their frontages away from it, rather than making it an integral feature. For example in the St James' area (a recent development)- the river has been canalised and locals wished it to be a feature. Unless anyone knows it is there, it can be easily ignored.</p> <p>The river poses flood risk issues which need to be addressed in development proposals. Water quality is also an issue for this river, with historic culverting over the river having a harmful effect on water quality and wildlife. As a result, there is a need to protect the fragile and important ecosystem of this river, improve its water quality, and to enable it to contribute to the enhancement of the green infrastructure and distinctive environment of Dover town.</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	NE6 - The River Dour
Rep ID	SDLP1635
Rep Status	Processed
Consultee ID	1252100
Consultee Full Name	Mrs Amandajayne Hollobon-Baxter
Consultee Company / Organisation	Sandwich Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	NE6
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	strongly commend NE6
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	NE6 - The River Dour
Rep ID	SDLP1145
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Sound now improvements added.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	NE6 - The River Dour
Rep ID	SDLP1491
Rep Status	Processed
Consultee ID	1330919
Consultee Full Name	Mrs Heather Twizell
Consultee Company / Organisation	Natural England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	NE6
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	NE6 – River Dour We support this policy's requirement for development within the corridor of the River Dour to avoid adverse impacts upon water quality, river flow and riparian habitats and species and to actively seek enhancements where possible. We also welcome the linked references in SP8 (Dover Town Centre) and relevant Site Allocation Policies
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance	

with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	NE6 - The River Dour
Rep ID	SDLP1711
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	NE6
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<i>DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438.</i> NE6 The River Dour Sound now improvements added.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	NE6 - The River Dour
Rep ID	SDLP1666
Rep Status	Processed
Consultee ID	1331868
Consultee Full Name	Ruth Marczin-Bundy (Parish Cllr)
Consultee Company / Organisation	Alkham Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	NE6
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails	RIVER DOUR The River Dour (DDC Plan – NE6 - 11.52-11.57)

<p>to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>The source of the River Dour springs from the Alkham Valley, so it is essential to ensure it is free from pollution and wastewater infiltration. At present this is not the case. There is substantial sewage weaking into the water course particularly when the ground water rises. Sewage trucks are regularly stationed in Alkham village, at Wolverton, Chilton Farm and the Kearsney Parks to clear the sewage spillages which pollutes the River Dour. Children and families are at risk of being contaminated and the Parks to have to prevent children and families from visiting or being in contact with the water due to human sewage pollution. These issues need to be urgently addressed and Alkham residents and council needs to be in the picture with respect to plans discussed with DDC. We are in continuous contact with Southern Water for cleanup, monitoring sewage levels and finding solutions to these ongoing problems.</p> <p><i>(DDC note - The full representation from Alkham PC is attached to representation SDLP1653. However, specific comments from the full representation document have been extracted into separate consultation points/policy areas, relevant to the comments made)</i></p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Not Applicable</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	

Policy HE1 - Designated and Non Designated Heritage Assets

Local Plan Consultation Point	Policy HE1 - Designated and Non Designated Heritage Assets
Rep ID	SDLP52
Rep Status	Processed
Consultee ID	1254085
Consultee Full Name	Mrs Sue Ward
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	HE1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	It is proposed to increase the size of the development for the Whitfield Urban expansion. The development proposed to the north west of Nursery Lane will include 3 Grade 11 listed buildings, about 3 ancient woodlands and also the Historic Park and Gardens of Waldershare. The land proposed for development is high grade arable land currently used for food production. The 3 Grade II buildings were ancient farmsteads, whose setting was always and should be retained as farmland. To surround these historic assets with a housing development will harm their setting contrary to Sections 20, 190 and 195 of the NPPF.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	To reduce the scale of the Whitfield Urban expansion to protect these historic assets and comply with the NPPF.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	It was agreed in Section 4.50 of the Core Strategy 2010 that the setting of listed buildings should not be harmed (in accordance with the requirements of Section 20 of the NPPF) and the current plan countermands this. This has to be challenged at every level.
Include files	
Local Plan Consultation Point	Policy HE1 - Designated and Non Designated Heritage Assets
Rep ID	SDLP325
Rep Status	Processed
Consultee ID	1331382
Consultee Full Name	Mr The Dover Society Graham Margery
Consultee Company / Organisation	The Dover Society
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	HE1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Can't comment on legal compliance
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	There is no mention of Section 215 enforcement anywhere in the plan. This is an enforcement tool available to remedy the problem of existing properties, which was raised in our earlier response, but the Local Plan re buildings (H1 TO H7) concentrates upon requirements etc for new builds. This we feel needs to be remedied in connection with eg attractiveness of the public realm for locals and visitors, maintenance of conservation areas. We urge increased use of Article 4 Directions in conservation areas and extension to deprived wards in Dover where necessary.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Policy HE1 - Designated and Non Designated Heritage Assets
Rep ID	SDLP574
Rep Status	Processed
Consultee ID	1267584
Consultee Full Name	Jason Ransley
Consultee Company / Organisation	Dover Harbour Board
Agent Full Name	John Bowles
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy HE1 - Designated and Non Designated Heritage Assets
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Dover Harbour Board welcomes the support provided under Policy HE1 - Designated and Non-designated Heritage Assets to proposals that bring redundant or under-used buildings and areas, including those on the Heritage at Risk Register, into appropriate and viable use consistent with their conservation. In particular, Dover Harbour Board welcomes the recognition of the need for viability and the benefits of bringing properties back into use.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	N/A

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	N/A
Include files	
Local Plan Consultation Point	Policy HE1 - Designated and Non Designated Heritage Assets
Rep ID	SDLP639
Rep Status	Processed
Consultee ID	1331790
Consultee Full Name	Julie Davies
Consultee Company / Organisation	CPRE Kent
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	HE1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	It is important that retro-fitting of insulation at older properties does not compromise their appearance or weather resistant properties. It would be helpful for the fourth paragraph of Policy HE1 which commences "For development that ..." to include reference that any installation of energy efficiency improvements do not compromise their appearance.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance	It would be helpful for the fourth paragraph of Policy HE1 which commences "For development that ..." to include reference that any installation of energy efficiency improvements do not compromise their appearance.

with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Policy HE1 - Designated and Non Designated Heritage Assets
Rep ID	SDLP1042
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	HE1 12.7-12.8
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The County Council welcomes the clear description of the purpose and need for a good Heritage Statement to accompany relevant applications. In paragraph 12.8, though, KCC would suggest that in addition to the Heritage Strategy, reference is made to consulting relevant Conservation Area Appraisals (CAA) and to the Dover Archaeological Characterisation for applications in Dover town centre. Both CAAs and the Characterisation should contribute directly to helping applicants reach the understanding necessary to write an effective Heritage Statement.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance	In paragraph 12.8, though, KCC would suggest that in addition to the Heritage Strategy, reference is made to consulting relevant Conservation Area Appraisals (CAA) and to the Dover Archaeological Characterisation for applications in Dover town centre.

with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Policy HE1 - Designated and Non Designated Heritage Assets
Rep ID	SDLP1196
Rep Status	Processed
Consultee ID	1271293
Consultee Full Name	Mr Alan Byrne
Consultee Company / Organisation	Historic England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	HE1
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Historic Environment Policies</p> <ul style="list-style-type: none"> • HE1 - Designated and Non Designated Heritage Assets • HE2 - Conservation Areas • HE3 - Archaeology • HE4 - Historic Parks and Gardens <p>We Support these Policies.</p> <p><i>(DDC Note - This is an extract of the full Historic England representation which can be located at SDLP1169)</i></p>

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Policy HE1 - Designated and Non Designated Heritage Assets
Rep ID	SDLP1146
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No

<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>To note: the 2022 cuts in Kent Police funding of £30million and the cuts to PCSOs is likely to result in an increase in crime affecting all assets including heritage assets.</p> <p>The Wantsum Channel is generally assumed to have been an open channel between the mainland of Kent and the Isle of Thanet, but how that channel arose in the first place is unknown. Given recent research into the creation of the English Channel, it may well be that the Wantsum Channel was created by the same tsunami, caused by the Storrega underwater rock slide, that obliterated Doggerland and carved out the present English Channel around 8,000 BC. The area potentially has immense national and international importance for understanding the late Palaeolithic and Mesolithic periods as well the development and use of the landscape in more recent periods.</p> <p>The inclusion of a specific statement and policy for the Lydden Valley/Wantsum Channel and its margins would appear appropriate, matching that for the Dover Western Heights and the Dover Town Centre SPD.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>1 We recommend adding the following : Dover Western Heights Fortifications Scheduled Ancient Monument and Conservation Area rightly emphasises the importance of the intervisibility of features both within the monument and with the wider landscape in order to fully understand the historic significance of the monument.</p> <p>2 The DM policy would be more sound if strengthened by explicitly requiring conservation of an asset by recording. A suggested addendum to this policy would be at the end of the third paragraph: "... securing the optimum viable use of the heritage asset or ensuring its preservation through appropriate recording." affected. The whole building approach to developments involving energy conservation improvements sound.</p> <p>3 We recommend adding the following : The Lydden Valley/former Wantsum Channel is identified in Chapter 11 as forming a group of Landscape Character Types ((LCTs A, B and C) paragraph 11.42 and Table 11.1). Elsewhere in Chapter 11 (Fig. 11.1) the concentration of National Nature reserves, SSSIs and Special Protection Areas where the Wantsum meets the English Channel is demonstrated in map form. Historically, it is known that the Wantsum Channel provided a route for water borne traffic avoiding the more difficult waters around the North Foreland. Little is known of the evolution of this Channel and its silting up. As an area of more or less open water at different periods in the past various historic artefacts might be expected, such as fish traps, landing stages, salt working sites, temporary or permanent settlements taking advantage of the varied environments, and perhaps water craft. Ground disturbance along the line of the Wantsum Channel and its edges are likely to produce organic palaeo-environmental evidence which will add to the limited inorganic palaeo-environmental evidence from sites on chalk downland. This material could include timber structures and artefacts, vertebrate and invertebrate fauna, pollen, and aSedDNA.</p> <p>It is suggested that the following statement is inserted after paragraph 12.29:</p> <p>The Lydden Valley/Wantsum Channel provided a water route south of the Isle of Thanet avoiding the more difficult waters around the North Foreland at various times in the historic past. The origin of the Wantsum is unknown but may be linked to the formation, around 8,000 BC, of the English Channel as we know it today. Ground disturbance within the Wantsum and along its ancient shore line is likely to reveal evidence of the origin and development of this important landscape feature as well as evidence of its use from the Mesolithic through to the present day.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.</p>
<p>Include files</p>	<p>v4 D&D Greens response 2022 Reg 19 new Local Plan .docx</p>
<p>Local Plan Consultation Point</p>	<p>Policy HE1 - Designated and Non Designated Heritage Assets</p>
<p>Rep ID</p>	<p>SDLP1401</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1333224</p>
<p>Consultee Full Name</p>	<p>Jeremy Cope</p>

Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	HE1,HE2,HE3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Comments on Local Plan</p> <p>My concern for the future and plea to DDC is safeguarding of and maximising Dover Town's historic assets. Dover's history is rich but not fully appreciated with some developments since the war showing a disregard for that past and its worth.</p> <p>The objects within the proposed plan HE1, HE2 and HE3 look fine but do have let outs for the overriding of conservation of historic and architectural assets. If these assets and their settings are to be preserved it does depend on the attitude and approach of DDC – something appearing absent on occasions in the past. It is hoped that the restoration of the Maison Dieu is a signal that for Dover Town things are looking up. At the very least DDC should recognise the value of Dover's history for promoting tourism. It also requires Council staff resources to be sufficient to manage the implementation of standards.</p> <p>I understand that the following sites are on Historic England's risk register: Fort Burgoyne, The Western Heights Fortifications and the Heights and The London Road Conservation Area.</p> <p>The way in which these sites/ areas are restored and brought back into use will be a test of the Plan and the Council's integrity. A further test will be the development of Bench Street, a site with a history ranging from Bronze age, Roman and Medieval times to the present</p> <p>A town that looks after its conservation areas and historic assets is also a much more attractive and interesting place to live in and visit</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Policy HE1 - Designated and Non Designated Heritage Assets
Rep ID	SDLP1638
Rep Status	Processed
Consultee ID	1252100
Consultee Full Name	Mrs Amandajayne Hollobon-Baxter
Consultee Company / Organisation	Sandwich Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	HE1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	As a medieval town the District and Town Councils must support the conservation and restoration of Sandwich unique town centre. Sandwich has a huge number of listed buildings which will at some stage require restoration and conservation and the District Council should be considerate in funding and realistic achievements to ensure future preservation of buildings.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Policy HE1 - Designated and Non Designated Heritage Assets
Rep ID	SDLP1712
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	HE1
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438.</p> <p>To note: the 2022 cuts in Kent Police funding of £30million and the cuts to PCSOs is likely to result in an increase in crime affecting all assets including heritage assets.</p> <p>1 We recommend adding the following : Dover Western Heights Fortifications Scheduled Ancient Monument and Conservation Area rightly emphasises the importance of the intervisibility of features both within the monument and with the wider landscape in order to fully understand the historic significance of the monument.</p> <p>2 The DM policy would be more sound if strengthened by explicitly requiring conservation of an asset by recording. A suggested addendum to this policy would be at the end of the third paragraph: "... securing the optimum viable use of the heritage asset or ensuring its preservation through appropriate recording." affected. The whole building approach to developments involving energy conservation improvements sound.</p> <p>3 We recommend adding the following : The Lydden Valley/former Wantsum Channel is identified in Chapter 11 as forming a group of Landscape Character Types ((LCTs A, B and C) paragraph 11.42 and Table 11.1). Elsewhere in Chapter 11 (Fig. 11.1) the concentration of National Nature</p>

reserves, SSSIs and Special Protection Areas where the Wantsum meets the English Channel is demonstrated in map form. Historically, it is known that the Wantsum Channel provided a route for water borne traffic avoiding the more difficult waters around the North Foreland. Little is known of the evolution of this Channel and its silting up. As an area of more or less open water at different periods in the past various historic artefacts might be expected, such as fish traps, landing stages, salt working sites, temporary or permanent settlements taking advantage of the varied environments, and perhaps water craft. Ground disturbance along the line of the Wantsum Channel and its edges are likely to produce organic palaeo-environmental evidence which will add to the limited inorganic palaeo-environmental evidence from sites on chalk downland. This material could include timber structures and artefacts, vertebrate and invertebrate fauna, pollen, and aSedDNA. The Wantsum Channel is generally assumed to have been an open channel between the mainland of Kent and the Isle of Thanet, but how that channel arose in the first place is unknown. Given recent research into the creation of the English Channel, it may well be that the Wantsum Channel was created by the same tsunami, caused by the Storrega underwater rock slide, that obliterated Doggerland and carved out the present English Channel around 8,000 BC. The area potentially has immense national and international importance for understanding the late Palaeolithic and Mesolithic periods as well the development and use of the landscape in more recent periods.

The inclusion of a specific statement and policy for the Lydden Valley/Wantsum Channel and its margins would appear appropriate, matching that for the Dover Western Heights and the Dover Town Centre SPD.

It is suggested that the following statement is inserted after paragraph 12.29:

The Lydden Valley/Wantsum Channel provided a water route south of the Isle of Thanet avoiding the more difficult waters around the North Foreland at various times in the historic past. The origin of the Wantsum is unknown but may be linked to the formation, around 8,000 BC, of the English Channel as we know it today. Ground disturbance within the Wantsum and along its ancient shore line is likely to reveal evidence of the origin and development of this important landscape feature as well as evidence of its use from the Mesolithic through to the present day

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Local Plan Consultation Point

Policy HE1 - Designated and Non Designated Heritage Assets

Rep ID

SDLP1854

Rep Status

Processed

Consultee ID

1333792

Consultee Full Name

James
Hambling

Consultee Company / Organisation

RAMAC Holdings Limited

Agent Full Name	Megan King
Agent Company / Organisation	Nexus Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	HE1
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Full Representation attached to SDLP1851. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1851.)</p> <p>Against the heritage policies in the LP, the objectives of Policy HE1 (Designated and Non-Designated Heritage Assets) including to encourage an appropriate and viable use of redundant or under-used buildings or areas, and Policy HE3 (Archaeology) to protect and where possible enhance the integrity of scheduled monuments, are noted. Allocation Policy SAP17 is consistent with this positive approach to preserving the district's heritage whilst recognising the policy and legislative protection afforded to the Stonar Site.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

Policy HE2 - Conservation Areas

Local Plan Consultation Point	Policy HE2 - Conservation Areas
Rep ID	SDLP326
Rep Status	Processed
Consultee ID	1331382
Consultee Full Name	Mr The Dover Society Graham Margery
Consultee Company / Organisation	The Dover Society
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	HE2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Can't comment on legal compliance
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	There is no mention of Section 215 enforcement anywhere in the plan. This is an enforcement tool available to remedy the problem of existing properties, which was raised in our earlier response, but the Local Plan re buildings (H1 TO H7) concentrates upon requirements etc for new builds. This we feel needs to be remedied in connection with eg attractiveness of the public realm for locals and visitors, maintenance of conservation areas. We urge increased use of Article 4 Directions in conservation areas and extension to deprived wards in Dover where necessary.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Policy HE2 - Conservation Areas
Rep ID	SDLP978
Rep Status	Processed
Consultee ID	1259612
Consultee Full Name	Mr Chris Shaw
Consultee Company / Organisation	Langdon Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy HE2: Conservation Areas
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Applications should be guided by and make reference to the appropriate Conservation Area Character Appraisal where one is in operation: Category: Soundness: Effective: A Conservation Area Character Appraisal has not been prepared for East Langdon Green Conservation Area. It would therefore be helpful for relevant neighbourhood plans to be referenced here.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Policy HE2 - Conservation Areas
Rep ID	SDLP557
Rep Status	Processed
Consultee ID	1331770
Consultee Full Name	Cathy Skinner (clerk)
Consultee Company / Organisation	Northbourne Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	HE2 - Conservation Areas
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	HE2 seeks to enhance and conserve conservation areas, and to protect their significance. To meet this objective the policy should apply to development within the conservation area and within its setting. The setting of a conservation area can be very material to its significance, development within the setting could therefore give rise to harm. The policy has been revised since the regulation 18 draft and we note the reference to the setting has been removed. We believe the policy is now considerably weaker and is unsound in meeting its objective. The reference to development within the setting should be restored so that development which would otherwise materially harm the setting and the significance of conservation areas can be controlled by this policy.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	We propose that the first sentence of the policy be re-worded "Applications for development or redevelopment in Conservations Areas and their settings...."

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Policy HE2 - Conservation Areas
Rep ID	SDLP1043
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	HE2
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The County Council supports this policy and the commitment in the preamble to the development of further Conservation Area Appraisals. This was also a recommendation of the Dover Heritage Strategy (R10).
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Policy HE2 - Conservation Areas
Rep ID	SDLP1197
Rep Status	Processed
Consultee ID	1271293
Consultee Full Name	Mr Alan Byrne
Consultee Company / Organisation	Historic England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	HE2
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Historic Environment Policies</p> <ul style="list-style-type: none"> • HE1 - Designated and Non Designated Heritage Assets • HE2 - Conservation Areas • HE3 - Archaeology • HE4 - Historic Parks and Gardens <p>We Support these Policies.</p> <p><i>(DDC Note - This is an extract of the full Historic England representation which can be located at SDLP1169)</i></p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance	

with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Policy HE2 - Conservation Areas
Rep ID	SDLP1148
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	See below

<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The wording would be more sound if strengthened thus : Conservation Areas is generally welcome though the introductory sentence should be strengthened to read: "Applications for development or redevelopment in Conservation Areas will only be supported provided that such proposals preserve or enhance the special architectural or historic character and appearance of the Area and its setting."</p> <p>Within this Policy, however, consideration should be given to reducing heat and energy loss and to sensitive solutions to providing energy efficient heating systems by adding a suitable further bullet point along the lines of: "Employ sustainable heating systems, such as ground source heating, and means of reducing energy and water consumption as are compatible with securing the sustainable future of the Area and its setting."</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.</p>
<p>Include files</p>	<p>v4 D&D Greens response 2022 Reg 19 new Local Plan .docx</p>
<p>Local Plan Consultation Point</p>	<p>Policy HE2 - Conservation Areas</p>
<p>Rep ID</p>	<p>SDLP1429</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1333224</p>
<p>Consultee Full Name</p>	<p>Jeremy Cope</p>
<p>Consultee Company / Organisation</p>	<p></p>
<p>Agent Full Name</p>	<p></p>
<p>Agent Company / Organisation</p>	<p></p>
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>HE1,HE2,HE3</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified Effective Consistent with National Policy</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Not Applicable</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Not Applicable</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails</p>	<p>Comments on Local Plan</p>

<p>to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>My concern for the future and plea to DDC is safeguarding of and maximising Dover Town's historic assets. Dover's history is rich but not fully appreciated with some developments since the war showing a disregard for that past and its worth.</p> <p>The objects within the proposed plan HE1, HE2 and HE3 look fine but do have let outs for the overriding of conservation of historic and architectural assets. If these assets and their settings are to be preserved it does depend on the attitude and approach of DDC – something appearing absent on occasions in the past. It is hoped that the restoration of the Maison Dieu is a signal that for Dover Town things are looking up. At the very least DDC should recognise the value of Dover's history for promoting tourism. It also requires Council staff resources to be sufficient to manage the implementation of standards.</p> <p>I understand that the following sites are on Historic England's risk register: Fort Burgoyne, The Western Heights Fortifications and the Heights and The London Road Conservation Area.</p> <p>The way in which these sites/ areas are restored and brought back into use will be a test of the Plan and the Council's integrity. A further test will be the development of Bench Street, a site with a history ranging from Bronze age, Roman and Medieval times to the present</p> <p>A town that looks after its conservation areas and historic assets is also a much more attractive and interesting place to live in and visit</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>Policy HE2 - Conservation Areas</p>
<p>Rep ID</p>	<p>SDLP1556</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1333333</p>
<p>Consultee Full Name</p>	<p>Mr Colin Tearle</p>
<p>Consultee Company / Organisation</p>	<p>Shepherdswell-with-Coldred Parish Council</p>
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	HE2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	SAP51 is within a conservation area which seems a contradiction to DDC's own conservation objectives and would negatively impact the landscape and historic environment that the Conservation Area is intended to protect.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Policy HE2 - Conservation Areas
Rep ID	SDLP1713
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	

Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	HE2
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438. HE 2 Conservation Areas : The wording would be more sound if strengthened thus : Conservation Areas is generally welcome though the introductory sentence should be strengthened to read: "Applications for development or redevelopment in Conservation Areas will only be supported provided that such proposals preserve or enhance the special architectural or historic character and appearance of the Area and its setting." Within this Policy, however, consideration should be given to reducing heat and energy loss and to sensitive solutions to providing energy efficient heating systems by adding a suitable further bullet point along the lines of: " Employ sustainable heating systems, such as ground source heating, and means of reducing energy and water consumption as are compatible with securing the sustainable future of the Area and its setting. "
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

Policy HE3 - Archaeology

Local Plan Consultation Point	Policy HE3 - Archaeology
Rep ID	SDLP1044
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	HE3 12.32
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The County Council welcomes the commitment to a Dover Town Archaeology SPD. This will help ensure that the outputs of the Dover UAD Project are fully integrated into Local Plan policy and thereby support the protection and enhancement of Dover's internationally important archaeological remains. It will also help disseminate the understanding of Dover's archaeology reached in the project, in particular via the Dover Archaeological Characterisation. The SPD should also provide an important toolkit for developers preparing their proposals, planners who need to assess them, and the community wishing to comment on them. This should underpin the management of Dover's archaeology for many years.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Policy HE3 - Archaeology
Rep ID	SDLP1198
Rep Status	Processed
Consultee ID	1271293
Consultee Full Name	Mr Alan Byrne
Consultee Company / Organisation	Historic England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	HE3
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Historic Environment Policies</p> <ul style="list-style-type: none"> • HE1 - Designated and Non Designated Heritage Assets • HE2 - Conservation Areas • HE3 - Archaeology • HE4 - Historic Parks and Gardens <p>We Support these Policies.</p> <p><i>(DDC Note - This is an extract of the full Historic England representation which can be located at SDLP1169)</i></p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Policy HE3 - Archaeology
Rep ID	SDLP1149
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	See below
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	We suggest this section needs the addition of: "Proposals for development within the Lydden Valley/Wantsum Channel which make provision of appropriate archaeological and palaeo-environmental investigation prior to development will be supported. For the purposes of clarity the limits of the Lydden Valley/Wantsum Channel's archaeological and palaeo-environmental area of interest will be co-terminous with the limits of the Environment Agency's Flood Risk Map."

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	Policy HE3 - Archaeology
Rep ID	SDLP1374
Rep Status	Processed
Consultee ID	1333128
Consultee Full Name	David Powell
Consultee Company / Organisation	
Agent Full Name	Klaire Lander
Agent Company / Organisation	Lander Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	HE3
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Archaeological assessment and protection is consistent with national policy and this policy is 'effective' and 'justified' and therefore supported (DDC Note - Lander Planning sent a PDF document which has been split across the relevant sections of the Plan. See Original Attachment on SDLP1346)
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance	

with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Policy HE3 - Archaeology
Rep ID	SDLP1430
Rep Status	Processed
Consultee ID	1333224
Consultee Full Name	Jeremy Cope
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	HE1,HE2,HE3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Comments on Local Plan</p> <p>My concern for the future and plea to DDC is safeguarding of and maximising Dover Town's historic assets. Dover's history is rich but not fully appreciated with some developments since the war showing a disregard for that past and its worth.</p> <p>The objects within the proposed plan HE1, HE2 and HE3 look fine but do have let outs for the overriding of conservation of historic and architectural assets. If these assets and their settings are to be preserved it does depend on the attitude and approach of DDC – something appearing absent on occasions in the past. It is hoped that the restoration of the Maison Dieu is a signal that for Dover Town things are looking</p>

	<p>up. At the very least DDC should recognise the value of Dover's history for promoting tourism. It also requires Council staff resources to be sufficient to manage the implementation of standards.</p> <p>I understand that the following sites are on Historic England's risk register: Fort Burgoyne, The Western Heights Fortifications and the Heights and The London Road Conservation Area.</p> <p>The way in which these sites/ areas are restored and brought back into use will be a test of the Plan and the Council's integrity. A further test will be the development of Bench Street, a site with a history ranging from Bronze age, Roman and Medieval times to the present</p> <p>A town that looks after its conservation areas and historic assets is also a much more attractive and interesting place to live in and visit</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Policy HE3 - Archaeology
Rep ID	SDLP1714
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	HE3
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified

	Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<i>DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438.</i> HE 3 Archeology We suggest this section needs the addition of: Proposals for development within the Lydden Valley/Wantsum Channel which make provision of appropriate archaeological and palaeo-environmental investigation prior to development will be supported. For the purposes of clarity the limits of the Lydden Valley/Wantsum Channel's archaeological and paleo-environmental area of interest will be co-terminus with the limits of the Environment Agency's Flood Risk Map."
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Policy HE3 - Archaeology
Rep ID	SDLP1855
Rep Status	Processed
Consultee ID	1333792
Consultee Full Name	James Hambling
Consultee Company / Organisation	RAMAC Holdings Limited
Agent Full Name	Megan King
Agent Company / Organisation	Nexus Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	HE3

2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Full Representation attached to SDLP1851. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1851.)</p> <p>Against the heritage policies in the LP, the objectives of Policy HE1 (Designated and Non-Designated Heritage Assets) including to encourage an appropriate and viable use of redundant or under-used buildings or areas, and Policy HE3 (Archaeology) to protect and where possible enhance the integrity of scheduled monuments, are noted. Allocation Policy SAP17 is consistent with this positive approach to preserving the district's heritage whilst recognising the policy and legislative protection afforded to the Stonar Site.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

Policy HE4 - Historic Parks and Gardens

Local Plan Consultation Point	Policy HE4 - Historic Parks and Gardens
Rep ID	SDLP54
Rep Status	Processed
Consultee ID	1254085
Consultee Full Name	Mrs Sue Ward
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	HE4
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The plan proposes development right to the boundary of the historic park and gardens of Waldershare and in fact will build on arable land which was once part of the Waldershare estate. This is contrary to 190 and 195 of the NPPF which requires the historic environment to be conserved and enhanced.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	To scale back the development in order to preserve the setting of the historic park and gardens of Waldershare.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Policy HE4 - Historic Parks and Gardens
Rep ID	SDLP1045
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	HE4
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The County Council is supportive of this policy.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Policy HE4 - Historic Parks and Gardens
Rep ID	SDLP1199
Rep Status	Processed
Consultee ID	1271293
Consultee Full Name	Mr Alan Byrne
Consultee Company / Organisation	Historic England
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	HE4
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Historic Environment Policies</p> <ul style="list-style-type: none"> • HE1 - Designated and Non Designated Heritage Assets • HE2 - Conservation Areas • HE3 - Archaeology • HE4 - Historic Parks and Gardens <p>We Support these Policies.</p> <p><i>(DDC Note - This is an extract of the full Historic England representation which can be located at SDLP1169)</i></p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Policy HE4 - Historic Parks and Gardens
Rep ID	SDLP1151
Rep Status	Processed
Consultee ID	1331762
Consultee Full Name	Ms Waite-Gleave Sarah Waite-Gleave
Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	HE sound
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will	So, additions to SP13, SP14 and DM policies NE is needed for it to become sound. 'Where permission is given subject to conditions regarding tree retention, tree planting and / or biodiversity enhancement, applicants will need to agree to abide by 'robust auditing' (as Wildlife Trusts insisted that the Environmental Bill legislate for). This means that honest, objective-because-independent, before-and-after evaluations / baseline measurements must be used. DDC councillors on the planning cttee have recently pointed out how very inadequate and misleading the sketchy, google-map-based ecology reports paid for by developer applicants are. Developers are ill-placed to self-certify their own work in this area, and DDC need a DM policy requiring Environmental Impact Assessments on all planning applications for developments of over 15 dwellings on greenfield or rewilded brownfield sites.'

make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	Policy HE4 - Historic Parks and Gardens
Rep ID	SDLP1375
Rep Status	Processed
Consultee ID	1333128
Consultee Full Name	David Powell
Consultee Company / Organisation	
Agent Full Name	Klaire Lander
Agent Company / Organisation	Lander Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	HE4
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Lander Planning sent a PDF document which has been split across the relevant sections of the Plan. See Original Attachment on SDLP1346) The protection and enhancement of historic parks and gardens is consistent with national policy and this policy is 'effective' and 'justified' and therefore supported.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Policy HE4 - Historic Parks and Gardens
Rep ID	SDLP1715
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	HE4
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<i>DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438.</i> Sound.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s)	

you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Policy HE4 - Historic Parks and Gardens
Rep ID	SDLP1644
Rep Status	Processed
Consultee ID	1333394
Consultee Full Name	Shelley Miller (Clerk)
Consultee Company / Organisation	Tilmanstone Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	HE4
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The Parish council welcome the proposals to protect and enhance the character, fabric, features, setting or views into and from Historic Parks and Gardens, especially in relation to Waldershare Park, a significant portion of which falls within our parish. <i>(DDC note - this is an extract from full representation SDLP1639)</i>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s)	

you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Not Applicable

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Evidence Base

Local Plan Consultation Point	Evidence Base
Rep ID	SDLP133
Rep Status	Processed
Consultee ID	1274452
Consultee Full Name	Mr Peter Marriott
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Evidence Base, Appendix 2a TC4S Initial Assessment Housing Sites - TC4S072 Hare & Hounds Pub
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The Appendix is unsound as it refers to the site TC4S072 as 'isolated' and is rejected as it is 'isolated in the countryside'. The site is brownfield, a car park where there used to be houses. It is within the settlement, it is not isolated, it is on the main street of the village & is close to a main line bus stop withing 100m.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	'proportionate' as there were originally houses on the site 'accepted' as it meets all the original criteria for a windfall site & is 'Within settlement confine'.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	Northbourne map & pic.pdf
Local Plan Consultation Point	Evidence Base
Rep ID	SDLP132
Rep Status	Processed
Consultee ID	1274452
Consultee Full Name	Mr Peter Marriott
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Evidence Base, Appendix 2d TC4S Housing Sites Highways assessment & Appendix 1a HELAA 2022 Housing Site Assessments - TC4S038 Canton
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Not justified as we were not contacted about the ownership of the land as 'it would appear that the required sightlines for an access onto the highway could not be achieved within land that the site promotor has control over'. In Appendix 1a HELAA 2022 it says ' Unsuitable site: - Unacceptable access visibility preventing on site parking' There is plenty of onsite parking which is controlled by the site promotor. These changes were approved by Highways under Dover plans 18/00157 & 19/01584
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Highway access is achievable Highways concerns have been identified in relation to access and/or highway impact and further assessment is required to demonstrate whether this can be mitigated.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	SDLP132 Marriott - Att 2 Highways_Redacted.pdf SDLP132 Marriott - Att 3 Officers Report_Redacted.pdf SDLP132 Marriott - Att 1 Block Plan Redacted.pdf
Local Plan Consultation Point	Evidence Base
Rep ID	SDLP188
Rep Status	Processed
Consultee ID	1330945
Consultee Full Name	Miss Nicola Clear
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Evidence Base - Level 2 SFRA
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I believe the proposal for development at SAP 50 is unsound due to flood risk that has not been properly evaluated. The site in question is lower than the surrounding roads and fields. Hence there is an increased risk of flooding to some properties due to the site being a run off for surface water from the road and surrounding fields. Station Road frequently floods and the surface water runs off into the development site. If the site was built on, the surface water would by necessity have no other run off, except into neighbouring properties off Short Street: (Yew Tree Barn, The Grange, West Barn, The Stables, The Bothy). Worryingly, the flood risk mitigations suggested within the Flood Risk Assessment were aimed solely at minimising risk to the proposed new development. There were no proposed mitigations to prevent flood risk to neighbouring properties. Also it should be noted that the only other point in the village at such a low elevation opposite the farm, there is a purpose built pond which acts as a soak away, proving the point about water volume accumulation. The pond itself has also been known to flood in the past due to the volume of water that runs down into the village from both the east and west during storms.</p> <p>There is also incorrect information stated as facts in the Local Plan Flood Risk Assessment document (pp127-128). The document states incorrectly that there has been no history of flooding in the area – there has been flooding in June 2022 affecting The Grange and flooding in June 2017 affecting West Barn and Yew Tree Barn, as well as numerous other occasions prior to this date.</p> <p>In addition any use of the current entrance will involve construction vehicles crossing over private land to access the site – this issue has not been addressed.</p>

	<p>Also even if an new access point is created in the hedge along the short street road this access point will be dangerous access to the site from an extremely narrow road off a shared junction with no visibility. I currently walk around the village at least twice a day and – this has not been addressed. It will also further destroy valuable habitat for wildlife in this area. The whole area is a natural habitat for bats who of a spring / summer evening at dusk can be seen flying around station road / short street area, roosting in The Grange and nearby trees.</p> <p>Development of the whole site would significantly harm the character and appearance of the area including the local landscape and setting of the village within the countryside. Any large scale removal of existing boundary trees or hedgerows would significantly erode existing landscape character of the area The development of this site would have a detrimental landscape impact that cannot be mitigated</p> <p>Development of the site would cause harm to the setting of listed buildings and the character of the CA. Site assessed as having a heritage impact that would cause significant detrimental harm to identified heritage assets</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Evidence Base
Rep ID	SDLP424
Rep Status	Processed
Consultee ID	1331010
Consultee Full Name	Mr Kevin Holyer
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Appendix A Evidence Base. Housing and Economic Land Availability Assessment 2022 (HELAA)
2 - Do you consider this part of the Plan sound?	No

<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified Effective Consistent with National Policy</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>No</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Not Applicable</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>DOVER DISTRICT COUNCIL LOCAL PLAN CONSULTATION: REGULATION 19 REPRESENTATION TO REVIEW SITE TC4S067 THE GLEBE PLOT, STATION ROAD (OFF SHORT STREET) CHILLENDEEN, CT3 1PR AND INCLUDE IN THE LOCAL PLAN</p> <p>Representation</p> <p>I am making a representation against the Dover District Council (DDC) Local Plan, which is currently subject to Regulation 19 Local Plan Consultation. I believe it is unsound and that The Glebe Plot Station Road (off Short Street) Chillenden (TC4S067) has been wrongly omitted from the Local Plan. I believe the site TC4S067 has been omitted from the Local Plan when it should have been included as an allocation, this is because I believe the HELAA assessment carried out by DDC is incorrect. I would ask that during your examination process you consider my representation, confirm the failings of the HELAA assessment and add site TC4S067 to the Dover District Council Local Plan.</p> <p>I also want to confirm that should this be included under the Examination process that I would like to attend the examination process and, if it is felt necessary, to support this representation.</p> <p>Background to Representation</p> <p>The Glebe Plot, Station Road (off Short Street) Chillenden (TC4S067) submission was made to DDC, following its Call for Sites in 2021. The submission was sent to the DDC Local Plans team and receipt acknowledged on 15th March 2021.</p> <p>When the Regulation 19 Local Plan Consultation was released in October 2022, by DDC, the Glebe Plot (TC4S067) was referenced by inclusion on the list of eliminated sites. The reason for the elimination is set out in the Evidence Base as having been eliminated at the Stage 1 Assessment, which is the initial desktop study, the reason stated is that the site is "isolated in the Countryside". This meant that there was no further consideration of the site and its suitability, availability and achievability to bring forward much needed housing in a sustainable and sympathetic location for the local community.</p> <p>My representation is that the Stage 1 assessment is wrong, and that The Glebe Plot (TC4S067) is clearly within the boundaries and confines of Chillenden Village and represents an opportunity for the development of an infill site for the village.</p> <p>To support this view, in addition to the absolute fact that The Glebe Plot is within the village and is not "isolated in the Countryside" I present the evidence of DDCs own information. Four sites were submitted for consideration from Chillenden village. These are set out on the Settlement maps for Goodnestone and Chillenden sites which were included at Stage 1 Assessment. This map is shown below.</p> <p>This shows clearly that The Glebe Plot (TC4S067) sits between two sites that were not eliminated at stage 1, if these plots were not eliminated for being "isolated in the countryside" it cannot be correct that The Glebe Plot was eliminated for that reason, and it should have been carried forward for further assessment.</p> <p>This first stage assessment also considered the following criteria and sites could have been eliminated if they were:</p> <ul style="list-style-type: none"> • Too small • Covered by National designations <p>and/or</p> <ul style="list-style-type: none"> • Contrary to policy.

None of these criteria were identified as the reason for the elimination of The Glebe Plot, and I can confirm that the plot could not be eliminated for these reasons because:

- The site area extends to 0.38 hectares (3,800 metres squared). As part of the targeted call for sites 2021, the evidence base states that Housing sites would be considered between 0.25 and 1 hectare in size and therefore, The Glebe Plot, TC4S067 meets these criteria.
- The Glebe Plot TC4S067 is not covered by any National designations.
- Following discussions and e mail correspondence with DDC Local Plans team in November 2022, I understand that the reason The Glebe Plot TC4S067 was rejected is that it was considered that the site was “Isolated in the countryside”. This is the reason given and why the Glebe Plot, TC4S067 was included in the HELAA document Appendix 2a (Initial assessment housing sites eliminated on page 3. Please see the link below.

<https://www.doverdistrictlocalplan.co.uk/uploads/pdfs/appendix-2a-tc4s-initial-assessment-housing-sites-eliminated.pdf>

In preparing to make this representation, on 21st November 2022, I asked the DDC Local Plan team to confirm the definition they had used of “Isolated in the Countryside”. On 1st December 2022, DDC Local Plans team responded stating that the term “Isolated in the countryside” is explained in Paragraph 3.73 of the Local Plan (Page 39) and is also set out within National Guidance - See NPPF National Planning Policy Framework - 5. Delivering a sufficient supply of homes - Guidance - GOV.UK (www.gov.uk) Paragraphs 78 onwards. I have also researched numerous legal cases around the interpretation of the term ‘isolated’ in the NPPF.

I have read the explanation on Strategic Policy 4 (SP4) on page 39 Paragraph 3.73. The Local Plan states “National Policy is clear that new isolated dwellings in the countryside, outside of settlement boundaries are only permissible in exceptional circumstances”

The Local plan identifies in SP4 2, Chillenden “as a settlement suitable for minor residential development or infilling of a scale that is commensurate with that of the existing settlement and that “residential development or infilling will be permitted within the settlement boundaries, as shown on the Policies Map of the settlements” and which includes the settlement of Chillenden subject to criteria a) to k) being met (reference SP4 page 39 of the Local Plan).

With the above in mind, I would request that the Planning Inspector reviews the conclusion reached by the Stage 1 assessment that the Glebe Plot TC4S067 is “Isolated in the Countryside” for the following reasons:

- As can be seen from the map, The Glebe Plot TC4067 site is quite clearly within the well-defined settlement confines and boundary of the settlement of Chillenden.
- The TC4S067 site meets NPPF and SP4 policy subject to criteria 2a-k) being met.
- The Glebe Plot Site TC4S067 is just 50m from the GOO006 site, (Land adjacent to short street, Chillenden) which has been included in the Consultation Local plan Regulation 19 submission on page 211.
- From further research, I understand that the definition of “isolated in the countryside” is a dwelling that is physically separate or remote from a settlement (Court of appeal judgement Lord Justice Lindblom). The Glebe Plot TC4S067 is neither physically separate nor remote from the settlement of Chillenden.

In summary, I believe it to be absolutely clear that The Glebe Plot site (TC4S067) should not have been eliminated from consideration for inclusion in the DDC HELAA at stage 1 desk top assessment, because it is not “isolated and in the countryside”. Further to this, I consider that the site would not have been excluded at the Site, Suitability, Availability and Achievability assessments as it meets the same standards as the site, GOO006, that has been included in the Local Plan on page 212, but with the added advantage of not being a site which is subject to flooding.

In summary The Glebe Plot TC4S067 site is:

- Highly accessible to Chillenden Village, being centrally located.
- Not affected by Flood Risk
- Suitably accessed from an existing access point off Station Road with the ability to improve the access further.
- Visually contained by surrounding topography and existing mature hedgerow and trees and will be seen against the backdrop of the existing neighbouring dwellings.
- Not affected by any recognised landscape designations.
- Adjacent to a sole Heritage asset, with significant screening between them and the ability to further mitigate the impacts.
- Not subject to any ecological constraint.

We have engaged fully with Goodnestone Parish Council (GPC) regarding the proposal to include, The Glebe Plot site, as part of the HELAA process and we are sympathetic to the comments made in the GPC letter dated 11th March 2021 as part of their response to the District Plan consultation. Due to its unique location in the middle of the settlement of Chillenden, The Glebe Plot site will not impact adversely on the

	<p>surrounding landscape. It does not suffer from surface water flooding. The site is well screened by mature trees, hedgerows and bushes and a preliminary study has been undertaken by a heritage expert, to ensure that any heritage concerns of the nearby Grade 2 listed building can be mitigated. Importantly, The Glebe Plot site benefits from its own access off Station Road with no other shared properties or driveways.</p> <p>In addition to the documents submitted on 15th March 2021 as part of the targeted call for sites 2021, I would request that the details of the site's suitability, achievability and availability appended to this representation to be considered (Appendix 1).</p> <p>In conclusion, my representation is that the Glebe Plot was wrongly excluded at the first stage assessment, because it is not "isolated in the Countryside" as it is within the confines and boundary of the village of Chillenden, and it should have been considered suitable for inclusion in the Local Plan, as at least equal to the site that has been included (GOO006), if not better given the lack of impact of flooding, and should be added to Dover District Council Local Plan.</p> <p>Thank you for your attention to this and I look forward to receiving confirmation that you have accepted my formal representation and will consider the matters during your Examination process.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>I am making a representation against the Dover District Council (DDC) Local Plan, which is currently subject to Regulation 19 Local Plan Consultation. I believe it is unsound and that The Glebe Plot Station Road (off Short Street) Chillenden (TC4S067) has been wrongly omitted from the Local Plan. I believe the site TC4S067 has been omitted from the Local Plan when it should have been included as an allocation, this is because I believe the HELAA assessment carried out by DDC is incorrect. I would ask that during your examination process you consider my representation, confirm the failings of the HELAA assessment and add site TC4S067 to the Dover District Council Local Plan.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>I also want to confirm that should this be included under the Examination process that I would like to attend the examination process and, if it is felt necessary, to support this representation.</p>
<p>Include files</p>	<p>Picture1.png (2) The Glebe V3.docx (2) SDLP0424 Holyer Att3.pdf SDLP0424 Holyer Att4.pdf SDLP0424 Holyer Att5.pdf SDLP0424 Holyer Att6.pdf</p>
<p>Local Plan Consultation Point</p>	<p>Evidence Base</p>
<p>Rep ID</p>	<p>SDLP952</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1252163</p>
<p>Consultee Full Name</p>	<p>Mr Robert Botwright</p>
<p>Consultee Company / Organisation</p>	

Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP53(RIN004 & RIN002)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I oppose what I believe to be the unsound selection of SAP53(incorporating RIN002 & RIN004) chiefly as it conflicts with DDC Policy SP3 and SP4. I would also take issue regarding the inclusion of RIN002 as its selection appears to conflict with stated objectives of the District Plan itself.</p> <p>SP3 states:</p> <p>"Minor residential development or infilling of a scale that is commensurate with that of the existing settlement will be permitted within the settlement boundaries, as shown on the Proposals Map, of the following settlements:</p> <p>Ashley, Barnsole, Betteshanger, Chillenden, Coldred, Denton, East Studdal, Elmstone, Finglesham, Martin, Martin Mill, Nonington, Ringwould, Staple, Stourmouth, Sutton, Tilmanstone, West Hougham, West Langdon, Wingham Green, Woodnesborough and Wootton."</p> <p>However, Strategic Policy 3 also makes it clear that, with regard to residential windfall developments:</p> <p>"They tend to be small in scale and can offer a significant contribution to the supply of homes using previously developed land and vacant areas within settlement boundaries."</p> <p>In the document:</p> <p>The Selection of Site Allocations for the Regulation 19 Submission Local Plan September 2022.</p> <p>On P57. RIN004 is shown as selected for the following reasons:</p> <p>"Ringwould is identified in the small villages and hamlets category in the settlement hierarchy where windfall infill development would be acceptable in principle.</p> <p>To allocate all the sites identified as suitable in Ringwould would be in conflict with the position of the settlement in the settlement hierarchy and would not lead to sustainable development.</p> <p>It was therefore considered that RIN004 was the least constrained of the sites and the best related to the settlement, compared to RIN002 and RIN003. These sites were therefore discounted.</p> <p>A number of key considerations have been identified in relation to the proposed site allocation here and these will need to be addressed by the land owner as part of the planning process.</p> <p>Furthermore, there is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA on the site here."</p>

However, as this site clearly lies outside the Ringwoud settlement boundary, any suggestion that “windfall infill development would be acceptable in principle” is incorrect as windfall infill development must be within the settlement boundary.

The reason for selection of RIN004 incorporates the reason why RIN002 and RIN003 were discounted, and therefore included in the ‘list of discounted sites’ on P68.

It is therefore unclear why RIN002 has been resurrected for inclusion, with RIN004, in SAP53?

The landowners have, for obvious financial reasons, suggested in their comments of support that RIN004 and RIN002 are both brownfield/pdl sites, despite DDC identifying them as greenfield. The landowners have also incorrectly suggested that failure to include RIN002 would render it ‘landlocked’, a statement which is also incorrect since any development of RIN004 could easily include access

I submit SAP53 is neither previously developed land nor within the settlement boundary and therefore, by definition, cannot be considered a ‘windfall development’.

I submit it is clear from this statement that SAP53, which is outside the Ringwoud settlement boundary, should not be considered as suitable for housing development.

The ‘Evidence Base’ is incomplete with regard to Landscape Sensitivity and Character Assessments.

33 sites were selected in the district, some being within AONB and some without. The former Ringwoud Alpines site, SAP53, was not included in the sites selected for assessment for reasons unknown. The selection criteria for those sites which were assessed has not been made known either.

In the case of SAP53, DDC have relied on a ‘specialist assessment’ by the Kent Downs, AONB Unit

“who agreed with the DDC Officer assessment that impacts on the landscape and AONB from the development of these two sites could be suitably mitigated with a sensitive landscaping scheme to the south and by the retention of the existing hedgerow to the eastern boundary.”

However, in all probability the AONB Units assessment would have been desk based and only addresses issues relating to daytime views from within the AONB.

There has been no comment relating to the northern boundary ‘street view’ of the site, as viewed from the A258, which has specifically been a bone of contention for previous DDC Planning Officers, creating serious issues with regard to providing appropriate levels of access to any proposed development. (E.g. Ref DDC Planning 16/00626). This relates to the existing, long established, dense hedging along the roadside boundary to the site, within the AONB, which is currently accessed via a wooden gate and single vehicle track. In the event of a housing development, this hedgerow screening would need to be, at least partially but substantially removed to accommodate a suitable road access. It should also be noted that current activities within the front (RIN004) part of the site are not visible above the hedge line, whereas 2 storey houses would be.

I have appended a current image of the northern boundary street view to emphasise my comment.

Issues relating to inevitable sound and light pollution within the AONB appear to have been completely ignored. The impact on existing neighbouring residents would be significant as the SAP53 site is currently a ‘dark skies’ area which also currently benefits from peace and solitude.

Indeed, the impact upon neighbouring residents was one of the 2 reasons upon which the Planning Inspectorates’ decision was based to dismiss the appeal with regard to the current landowners previous planning application for this site (DDC16/00626).

	<p>I believe it is important to mention that in recent times the landowner has failed to responsibly steward the land, particularly with regard to RIN002 as a result of which it has become seriously degraded and is currently the subject of DDC Planning Enforcement action.</p> <p>I have appended 2 further images, the first showing the condition of the land adjacent to my property and the second, as it appears today.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>In accordance with my comments, I ask that SAP53(RIN004 & RIN002) be removed from the Local Plan.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>1B402FA1-D832-4F22-B2C1-792FCDDDD826D.jpeg 58621CFA-6210-4888-9593-409189F7BAA2.jpeg 464D30DF-0E8A-489A-AD78-BF4DF34F2C94.jpeg</p>
<p>Local Plan Consultation Point</p>	<p>Evidence Base</p>
<p>Rep ID</p>	<p>SDLP308</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331395</p>
<p>Consultee Full Name</p>	<p>Ms Jo Edwards</p>
<p>Consultee Company / Organisation</p>	<p>Sport England</p>
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>Evidence Base - Playing Pitch Strategy</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>

3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Sport England broadly supports this section however, in accordance with our guidance for the preparation of the PPS and keeping it up to date, and also in accordance with paragraph 98 of the NPPF, we would strongly recommend that the Council reviews the PPS (stage E of the PPS assessment method) as the data on which the recommendations are made is becoming out of date. The PPS data should be reviewed in consultation with the playing pitch NGBs who report significant additional sports participation and demand locally that should be considered, and with Sport England.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	No changes to the DLP are required at present however the evidence base needs to be brought up to date.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Evidence Base
Rep ID	SDLP832
Rep Status	Processed
Consultee ID	1259612
Consultee Full Name	Mr Chris Shaw
Consultee Company / Organisation	Langdon Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy HE2: Conservation Areas

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Applications should be guided by and make reference to the appropriate Conservation Area Character Appraisal where one is in operation: Category: Soundness: Effective: A Conservation Area Character Appraisal has not been prepared for East Langdon Green Conservation Area. It would therefore be helpful for relevant neighbourhood plans to be referenced here.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Evidence Base
Rep ID	SDLP957
Rep Status	Processed
Consultee ID	1266351
Consultee Full Name	Dr Sharon Danby
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	

<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP53 Ringwoud Alpines (RIN002 RIN004)</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified Effective Consistent with National Policy</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>No</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Yes</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>The site selection is unsound as it is not positively prepared as per the NPPF requirement to achieve sustainable development. The site is outside the village boundary, is greenfield and within the AONB. It is not justified as per NPPF as the site allocation has been changed since regulation 18 consultation and so this has skewed the responses. The scale of opposition to RIN002 is not reflected in the summary of responses because they were raised under the heading of the only site proposed in regulation 18 ie RIN004. There has also been confusion throughout this process that the site is brownfield when in fact it is greenfield. There is no justification for the addition of RIN002 to RIN004 and this late stage of the consultation process. I submit that this renders the Reg 18 consultation and reg 19 proposals to mitigate issues to be based on disproportionate evidence and therefore unsound.</p> <p>The evidence base is incomplete. RIN002 and RIN004 have not been included as part of the LSA or LCA assessments which renders the evidence base incomplete and unsound.</p> <p>Residents consulted in Reg 18 on a 0.21 ha site with a capacity for 5 dwellings between the existing 2 dwellings that are part of the ribbon development fronting Dover rd. In Reg 19 they are now faced with a 1.41 ha site with a proposal for 10 houses intruding into the AONB on which they have not been previously consulted. This is not consistent with NE2 Landscape character and the Kent Downs; states in section 11.13 that DDC aims: <i>To ensure that all development coming forward over the plan period respects and reflects the character of the landscape in which it is located.</i> SP13 states that <i>the NPPF 2021 requires local plan policies to conserve and enhance the natural environment, to recognise the intrinsic character and beauty of the countryside and the wider benefits from natural capital and ecosystems.</i> It is unsound to include SAP53 in the LDP as it would detract from the beauty of the countryside particularly the adjacent AONB. The Kent Downs AONB management plan 2021-26 says <i>the Kent Downs AONB, perhaps more than any other of Britain's protected landscapes – AONBs, Heritage Coasts or National Parks, has experienced and is experiencing severe development pressure.</i> DEFRA evidence shows <i>'The Kent Downs AONB stands out as an area which has experienced major, but expected, change, showing a rate of urban growth of almost 10%.pa, with the urban area spreading by 14 ha over the decade'</i>. The AONB in Dover District has suffered development at a disproportionate rate which indicates that planning pressures on our district are unsustainable. This current proposal of Reg19 differs considerably in scale and the impact it would have on the AONB is unacceptable for a greenfield site. Due to its topography the site is also highly visible from the AONB. Any ribbon development along Dover Road would require heavy screening to ensure that it did not impact on the AONB.</p> <p>No consideration has been given to the legal right of neighbouring residents to enjoy their homes peacefully. The proposed development in Reg 19 would be considerably more intrusive than a ribbon development along Dover Rd.</p> <p>The site is currently the subject of unresolved planning enforcement action due to activities which have angered residents and resulted in considerable degradation of the site. The site should be cleared and returned to its original agricultural state.</p> <p>For all the above reasons I conclude that the inclusion of SAP53 in its current form is unsound.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance</p>	<p>The SAP53 site proposal should be limited to a ribbon development along the Dover Road commensurate with the scale of existing dwellings and should have sufficient screening to prevent the dwellings being seen from the AONB. Hedges and trees on site should be retained and full independent study of biodiversity carried out.</p> <p>The site should be cleared and renovated as per any planning enforcement action.</p>

with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Evidence Base
Rep ID	SDLP951
Rep Status	Processed
Consultee ID	1330769
Consultee Full Name	Mr Beat Hochstrasser
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	P. 260, para 6.81: "...facility which demonstrably provides a net benefit to the community"
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	To allow a small loss of Open Space as outlined below will provide a greater net benefit to the community as it will enable a larger area of Open Space to be restored and improved. The Evidence Base does not justify the current designation which will prevent recommended site improvements (see DDC Evidence Base OPEN SPACE AND PLAY STANDARDS PAPER Dec. 2019 p.17 Table 4.1.4: Rural Analysis Area Quality Summary). The site Off Mill Lane Eastry (site ref 393) is quite large at 0.53 ha and is designated as Amenity Greenspace but with the exception of several trees towards the north of the site. Visually (see pictures attached) this former builders yard and tile manufacturing site is more akin to a brown field site. The site is overgrown by brambles and covered with roof tiles and slag heaps of several tons of building rubble. We argue that while the trees must be protected, the rest of the site has been wrongly classified. This position is also supported by the DDC Evidence Reports: out of all the 120 Open Space sites assessed in the 2019 Open Space Assessment Report, this site is identified as the very lowest scoring amenity green-space in terms of quality (34.4%) and second lowest in terms of value (28.0%).

	<p>Additional text insert by DDC from comment SDLP468</p> <p>This comment is an amendment to my previous comment in relation to PM5:</p> <p>If the proposed amendment to the Local Plan is approved and subsequent planning application to Dover district Council for a single dwelling is also authorised, provisions will be made to alleviate the current congestion on Mill Lane traffic by providing a car parking space for the adjacent property to the site's East access road, Bushley house. This will result in a further measurable and concrete net benefit to the community.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>This representation seeks to remove a small area from the open space designation of that site. This would enable a single dwelling unit to come forward (self build) under Strategic Policy 3 and taking account of all other Development Management Policies at the time of making the application. Living on site would enable us to restore, improve and manage the remaining open space, improve the quality of the overall site, including both access roads belonging to the site and tree maintenance, resulting in a measured enhancement to Eastry's open space provision and in a net benefit to the community.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>The Open Space and Play Standards Paper (2019, page 17, table 4.1.4) rates 10 Amenity Greenspace sites, including the site "Off Mill Lane Eastry" as being "below quality" and recommends "Enhancing site quality should be explored where possible (e.g. exploring options for improved maintenance, drainage and enhancement of general appearance)."</p> <p>We wish to participate in the oral part of the examination to present how this amendment to the Plan will enhance the site quality and appearance of the area.</p>
<p>Include files</p>	<p>Eastry.docx (5) Pics for Land off Mill Lane Eastry.docx</p>
<p>Local Plan Consultation Point</p>	<p>Evidence Base</p>
<p>Rep ID</p>	<p>SDLP804</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331884</p>
<p>Consultee Full Name</p>	<p>Mr Andy Tee</p>
<p>Consultee Company / Organisation</p>	<p>Nonington Parish Council</p>
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>Evidence Base</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>

<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified Effective Consistent with National Policy</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>No</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>No</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>1.0 Summary Top down housing targets, geography and an historic underinvestment in the strategic road network have created genuine constraints in the Dover District. Nevertheless, an LDP where 76% of all proposed housing is on greenfield sites is inherently unsustainable. From the loss of irreplaceable agricultural land and habitat, to reinforcing the district's car dependency by creating greenfield sprawl that will significantly change the rural character of the north west of Dover District, DDC's Reg 19 LDP DDC's will deliver the wrong houses in the wrong locations. It won't improve the environment or mitigate climate change. If the purpose of the planning system is (as set out in the NPPF) to ensure that sustainable development is pursued in a positive way, we believe this plan cannot be considered to be justified and it will not enable the delivery of sustainable development.</p> <p>1.1 Objective Overarching concerns about the sustainability of the adopted land allocation strategy were raised in our Reg 18 comments (see attached). Our Reg 19 response is focuses on mitigating the traffic impacts from the proposed development that (as a small village located on one of the 2 main rural routes between the A256 / 7 and the A2) will have a direct, severe and devastating impact on our community. These impacts are outlines in Section 2.0 below. Based on our experience on Aylesham (DOV/07/01081 and DOV/13/0120), Nonington Parish Council believe that the site-specific impact focus of S106 means it is not an effective framework for mitigating cumulative impacts from multiple spatially distributed developments on a rural road network. It is impossible to disaggregate traffic flow to attribute the increase to specific site. We note that Reg 19 Housing Policy 4.21 states that cumulative impact all sites allocated in this Plan on common road links must be considered. However, in judging how this might work in practice, we reviewed how the cumulative traffic impacts from the current plan period developments (in Aylesham, Sholden, Woodnesborough, Sandwich, Sholden, Eastry, Betteshanger, Discovery Park) have been considered in relation to the C195 route on which the village is located. To date only Aylesham has been required to measure traffic impacts (DOV/13/0120 – Variation of Conditions 76 of Planning Permission DOV/07/01081) to identify the traffic impact arising from the cumulative occupation'. Conducted in April 2018 with 380 of 447 units occupied, the traffic consultants, MLM, concluded that no impact could be attributed to the development because the identified increases were in line with ONS data showing road traffic increased by 29% from 1990 to 2018. It is noteworthy that greenfield housing, like that Aylesham, with unrealistic assumptions of self- containment were – in turn – identified as a key driver national car use increases. Combined with our concerns about the robustness of the employment, sustainability and traffic baseline evidence (outlined below), we are seeking effective mitigation enshrined in a Local Plan policy rather than deferring this to a S106 negotiation at the planning application stage.</p> <p>1.2 Basis for Objecting 1.2.1 Inconsistent and Insufficient Traffic Evidence undermining Plan Soundness and Sustainability MHCLG's guidance states that an LDP should be based on robust transport evidence base collected in advance that should encompass: the cumulative impacts of existing and proposed development on transport networks, a review journey purpose and accident records as well contextual data such as travel to work areas in order to measure the impact on the locality in economic, social and environmental terms. I. Detailed traffic evidence has been collected for the DDTM area in the REGULATION 19 TRANSPORT MODELLING FORECASTING REPORT but the strategic housing and employment sites outside the DDTM area have only been modelled 'in significantly less detail'. The result is that the area bounded by A2, B2046, A256 and A257 has significantly less robust traffic evidence, undermining the scope for an effective analysis of cumulative impacts of existing and proposed development on transport networks in this area. This area includes Sandwich, Aylesham, Elvington, Eythorne, Eastry, Wingham, Shepherdsweil and Ash and has 1554 of the Reg 19 plan new dwellings allocated within it(Source: Distribution of Housing Site Allocations by Settlement). This accounts for 78% of all Dover District's Reg 19 housing allocations outside</p>

Dover and Whitfield. This area also encompasses the strategic employment sites at Discovery Park and the Aylesham Development Area. Detailed Analysis of Traffic Evidence is set out in Section 4.1

II. The sustainability evidence base uses 'unrealistic assumptions about self-containment' and unfounded onsite employment assumptions that are not supported by contextual travel and commuting pattern data. For example in SA 7.51 LUC incorrectly include Snowdown Colliery as a strategic site inflating site employment sustainability and under estimating outbound commuting from Aylesham.

III. There are inconsistencies in the sustainability evidence base. For example SA Section 6.207 states that Eythorne (and Elvington) has 'relatively good access to existing local rail...services'. Eythorne railway station closed to passenger traffic in 1948.

IV. The Office of Road and Rail passenger data for Aylesham between 01/01/2016 – 01/01/2020 show rail journeys per head of population in Aylesham fell as the first phases of the 'garden village' were occupied. Transport in Aylesham has actually become less, not more sustainable.

1.2.2 The Duty to Co-operate

DDC were only made aware of Canterbury City Council's (CCC's) Reg 18 plan for 3200 houses north of B2046 and the 420 dwellings on land contiguous to SW Aylesham in September 2022, shortly before the publication of their Reg 19 plan.

We haven't seen a statement of common ground or any evidence of the active ongoing constructive engagement and co-operation required to maximise the effectiveness of local plan in the context of strategic cross boundary matters or of any coherent strategy based on agreements between them.

As all authorities are required to reach agreement on strategic matters before submission we expect this is under review but – based on the absence of co-operation evident to date –we questions whether the legal duty to co-operate can be complied with in a meaningful way.

1.2.3 Scale of Cross Boundary Development Impact on DDC Reg 19 Evidence Base and Plan Soundness

Although DOV/07/01081 and DOV/13/0120 promoted Aylesham as a 'Garden Village', in their Reg 19 plan Dover District Council propose that Aylesham becomes a small Garden Town of 15,000 (LDP 4.196 and 4.199). Canterbury City Council propose another 3,620 dwelling adjoining Aylesham to create a single 'new town' or Freestanding Garden City with a population of 25-30,000 people. A development of this scale requires realistic assumptions about self-containment, a strong foundation of employment and appropriate infrastructure to avoid creating an unacceptable severe cumulative impact on adjacent road network.

The consideration and mitigation of transport impacts is an essential part of Government's wider policy objectives for sustainable development. The objectives set out in NPPF para 111, DDC's Reg 19 Policy T12 10.8 can only be effectively delivered against a robust evidence base that provides the clear benchmarks and thresholds that a planning application can be measured against.

Canterbury City Council's stated Reg 18 position is that the traffic impacts of their proposed new town joining Adisham to Aylesham are mitigated by the planned south Canterbury bypass which, they claim, will reduce traffic impacts as measured across their district. No evidence has been provided to establish how this will mitigate the impact of 3,620 additional dwellings on the rural road network in Dover District.

As highlighted in 1.2.1 (i) above, in relation to DDC's Reg 19 plan, we have existing concerns regarding the absence of a robust transport evidence base for the area bounded by A2, B2046, A256 and A257, collected in advance and benchmarking existing traffic levels so the cumulative impacts of proposed developments on transport networks can be subsequently measured.

The additional scale of Canterbury's proposed development and proximity to Aylesham and the District's boundary, means that DDC's Reg 19 plans is not positively prepared as it is not informed by agreements with other authorities or consistent with achieving sustainable development.

It is not justified as it is clearly not based on proportionate traffic or sustainability evidence.

We would argue that this also compromises plan efficacy given the absence of effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.

2.0 Location - Background

Nonington is set along a 1.2 mile stretch of a rural road with constrained widths, a number of single lane pinch points and long stretches (including in the heart of the Easole Conservation area) with no pavements. This route connects Sandwich and the A257 to the A2. A 'rat run', the C195 is badly impacted by the cumulative impact of traffic from Sandwich, Deal, Eastry, Woodnesborough, Sholden (via Drainless Road, Heronden Rd and Thornton Road), Elvington and Aylesham, with pre-pandemic baseline traffic of 90,800 vehicles a month. (MLM / K & M SURVEYS 2018 - 7 day total (East and West) = 20,888 traffic movements)

KCC Highways confirm Holt Street, Easole Street and Sandwich Road route (Linking B2046 and Sandwich) is classified as the C195 and is "not a secondary route, as defined in our road hierarchy, and "for reasons of various highway constraints along the corridor". It should, therefore,

be protected from the cumulative or inappropriate traffic impacts. However, as detailed in item 1.1 above, in the current plan period no actual measures have been put in place to mitigate development traffic impacts on the C195 route.

We have had several accidents, 6 road accident deaths on the C195 since 2014 and multiple crashes in the village mostly unrecorded by the police.

Multiple single lane pinch points with no pavements. On street parking and private driveways used as passing points

We have a problem with speeding in excess of the speed limit of 30mph. MLM's s106 surveys 2014 and 2018 showed Holt Street Nonington speeds heading SE 38 mph and NW 37 mph.

Applications directly increasing C195 local traffic in the current LDP:

Aylesham 1320 dwellings (DOV/07/01081), Sholden 230 residential dwellings (DOV/10/01065), Sandwich 120 residential dwellings (DOV/19/00243), Hammil 29 residential dwellings (DOV/16/01026). Woodnesborough 24 residential dwellings (DOV/11/00965) with a number of application to be decided including a 120 bedroom hotel and 210 residential dwellings in Betteshanger Country Park.

3.0 TI1 - Sustainable Transport and Travel

Item 10.1 seeks to 'facilitate a shift away from petrol and diesel powered vehicles over the lifetime of the Plan and promote sustainable forms of transport and travel'.

The evidence doesn't support the deliverability of this goal on a Reg 19 housing allocation with over 76% of all new dwellings on greenfield sites. These are known to have significantly higher car dependency than brownfield sites. If we take Aylesham as an example, DOV/07/01081 and DOV/13/0120 committed to the expansion of Aylesham Garden Village and promoting sustainable transport predicated on the rail service. Yet, the Office of Road and Rail passenger data show rail journeys per head of population in Aylesham dropped between 01/01/2016 – 01/01/2020. Despite the 'garden village' aspirations, transport in Aylesham has actually become less, not more sustainable.

Public transport, cycling and walking uptake is highest in metropolitan and dense urban areas where use of public transport is typically 35%-50%. This falls dramatically in greenfield developments in ex-urban and rural sites. Research also shows significant sustainable transport adoption variations exist within settlement types driven by socio-economic and topographical factors. (Source - Bennett Institute for Public Policy at the University of Cambridge 2020.) None of this appears to be considered.

KEY FACTS

Elvington and Whitfield don't have rail connections. Stagecoach have cancelled the 38 bus service.

ONS Travel to Work Census data for Elvington showing 95.8% of journeys were made in cars, vans and motorbikes while only 2.7% were by bus.

ONS Travel to Work Census data for Whitfield, Elvington and Aylesham combined: 82.5% of all journeys were in a Car. Only 5.8% on public transport.

The 'Dover Fast Track' represents the largest infrastructural investment in the district. At £50-£70 million, is it an effective use of scarce capital investment or a white elephant?

ORR Passenger entries and exits for Aylesham data shows passenger numbers per head of population dropping Jan 2016- Dec 2020.

- Passenger entries and exits increased by 19.6%. 2016-17 to 2019-20.

- Aylesham Population increased by 30% over the same period.

NOTE _ 20-21 data discounted because of Covid. 2016 Population=4,980. By March 2018, 493 new dwellings had been completed. Estimated mean new dwelling occupied by 2019- 2020 = 500. Estimated population increase = 1,500.

Aylesham Elvington Whitfield Combined

Train 74 (4.1%) 60 (3.06%) 29 (1.4%) 2.3%

Bus 66 (3.6) 49 (2.5) 86 (4.3) 3.5%

Car/Van 1130 (62.0) 1544 (84.9) 1411 (69.7) 72.2%

Passenger in car/van 163 (8.9) 141 (7.8) 182 (9.0) 8.6%

Motorcycle 18 (1.0) 45 (2.5) 30 (1.5) 1.7%

Bicycle 29 (1.6) 19 (1.0) 34 (1.7) 1.4%

Taxi 0 (0) 9 (0.5) 6 (0.3) 0.26%

On foot 201 (11.0) 89 (4.9) 110 (5.4) 7.1%

Source ONS Census Data Travel to Work 2001

Conclusion

This policy cannot be said to be 'positively prepared' when the evidence shows it is not consistent with achieving sustainable development; This policy cannot be said to be 'justified' as it is not based on proportionate evidence if we accept the PAS definition as 'evidence obtained with an understanding of the way in which issues arise within a plan area to enable an understanding of the issue/topic in question thereby leading to clear analysis and a consequential strategic or policy position within the plan'.

As non-planners, we are struck by the fact that plan making appears to focus on assigning 'sustainability' labels to plan policies without evaluating the evidence for how well these deliver in the real world. What is the local evidence that garden villages or towns actually deliver improvements in sustainable travel? Has the 900 house garden village expansion of Aylesham delivered the expected uptake of cycling and public transport use? Has the provision of employment space delivered the expected expansion in the local employment base, in shops, services, and local business employment (within new office space) capable of accommodating supporting 40% of the population? Or does the evidence show that it is a dormitory commuter suburbs – the antithesis of the Garden City idea.

Failure to assess the performance of policies risk creating confirmation bias and recycle poor policies that deliver poor outcomes. So is this plan policy 'consistent with national policy'? Does it enable 'the delivery of sustainable development in accordance with the policies in this Framework? Based on the evidence and judged against the policies set out in NPPF para 7, 8, 9 and 10 then the answer is no.

The absence of evidence is not evidence of absence. PAS state good evidence should contain reliable, objectively collected recent data and will not contain unjustified assumptions. If the evidence shows assumptions about 'self-containment' are unrealistic and that the offer of plentiful land for industry has not delivered the expected employment, then these are unjustified assumptions.

4.0 Reg 19 T12 - Transport Statements, Assessments and Travel Plans

In item 10.7 set out their goal of 'promoting the delivery of sustainable development' stating that 'Traffic generated by development should normally be targeted towards the primary and secondary route network in the District. Other routes should not be subject to inappropriate levels of traffic generation or unsuitable traffic movements'.

Although KCC Highways consulted with DDC on policy (T12) they haven't published benchmark traffic levels or defined 'inappropriate' or 'unsuitable' traffic impacts because 'baseline conditions vary considerably from location to location'. Nor does NPPF para 111 provide a definition of 'severe' or 'unacceptable'. DDC also seek discretionary power over:

- When or whether Transport Assessments and Travel Plans are required.

- And to decide what constitutes a severe residual cumulative impact on the local highway on a case by case basis.

Without the robust benchmark data on existing traffic (as required by MHCLG and DDC's Sustainability Appraisal of Growth Options), it unclear how this will work in practice. Especially given the pressure to deliver on housing targets and the local government financial incentives to facilitate housing inherent the New Homes Bonus which we understand paid £1,728,587 to DDC in 2019.

- The Reg 19 proposed Aylesham South and Snowdown sites are accessed directly from the C195 / Holt Street, which is also the direct route to the A2 from Elvington. This will increase our traffic issues.

- While recognising the 'porosity' of the contiguous rural road network the traffic impacts from the proposed Aylesham site on to Holt Street, WSP data and modelling is restricted to the observation that 'Holt Street is not modelled but anticipated trips for Aylesham Development will leave the network here'.

- No ACT data has been collected or for traffic heading North on Adelaide Road from Elvington to the A2 or from Aylesham heading south east to Sandwich, Discovery Park and South Thanet

PAS state good evidence should contain reliable, objectively collected recent data and will not contain unjustified assumptions. For the area bounded by the A2, B2046, A256 and A257, we believe the patchy 2018 ACT traffic evidence fails this test as it does not include:

1. Disaggregated SERTM data.
2. Node Impedance Calculation (ICA)
3. VISUM Network Map of existing and proposed roads
4. Detailed benchmark capacity PCU per Lane per lane data for Links types including for Rural Roads and Minor Road Rural Village (30mph).
5. Education Cat Trips prior matrices .

In assessing whether the Reg 19 sites in Aylesham and Elvington likely to result in inappropriate levels of traffic generation or unsuitable traffic movements' on the C195 route, we reviewed the following data to establish the likely impact:

- 2011 ONS Census data,

- ONS - Nomos data, labor market statistics and DataShine ESRC BODMAS conclusions in the Sustainability Assessment,

- WSP's DDTM and Reg 19 traffic data,
- the Office of Rail and Road Estimates of station usage and
- Onsite employment assumptions
- Education commuting data.
- AA Route Planner

The key findings are itemised in Section 4.1 below.

Reg 19 T12 - Conclusions

Reg 19 SA Appendix B confirms the District's residents 'rely heavily on cars to...access employment, education, amenities and services' and predicts an increase of commuting from Aylesham to Sandwich (the district's 2nd commuting hub) as well as to Thanet and Deal. In addition to reduced onsite employment at Aylesham (reduced in WSP modelling from 1013 in Reg 18 to 263 in Reg 19) and the absence of any direct public transport links to Discovery Park, Deal or Thanet; the absence of Secondary education facilities and the primary education capacity issues in Aylesham will also continue to drive increases in commuting road traffic on the C195.

The conclusions are clear, Aylesham will increase traffic on the surrounding rural road network but what is not clear is how DDC propose to deliver their goal of 'promoting the delivery of sustainable development' or ensure 'Other routes should not be subject to inappropriate levels of traffic generation or unsuitable traffic movements'.

DDC have failed to engage with the conclusions from existing evidence base or commission a sufficiently robust traffic data for the area bounded by A2, B2046, A256 and A257 containing >78% of all Dover Districts Reg 19 housing allocations outside Dover and Whitfield. Consequently there are no clear thresholds against which future applications can be measured. If, as a result, unsound policies are included in the LDP, then no subsequent s106 developer contribution led mitigation will be achievable.

Therefore, we conclude the policy is unsound because:

1. This plan is not consistent with achieving sustainable development and therefore cannot be called positively prepared.
2. Ignoring the area-specific evidence itemized in 4.0 and below, this policy cannot claim to be based on proportionate evidence and, so, cannot be considered justified.

4.1 Traffic Evidence Summary

1. Despite the Ministry of Housing, Communities & Local Government 2020 LDP guidance stressing the importance of contextual data such as travel to work areas (and that evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively). Although referenced at a District level in the Sustainability Assessment, none of this contextual or empirical evidence has been considered in the LDP strategic site allocation process in relation to the impact of Aylesham and Elvington on the road network.
2. From ONS data to SA commuter patterns and to SHMA 2017 all highlight a strong trend of out-commuting. ONS data shows high car reliance in all major strategic site locations.
3. WSP's DDTM (Reg 18 Traffic Plan Assessment 2020 / Regulation 19 Transport Modelling Forecast Main Report or Appendices) report conducted detailed modelling of the Dover and Deal traffic. Other areas were 'modelled in significantly less detail'.
4. Despite recognising the LDP will 'lead to large increases in flow' in Aylesham, WSP's analysis is limited to a handful of ATC's (automatic traffic counters) on the B2046 1n 2019. WSP's report offered no conclusions on the area north of the A256 as it was outside the DDTM area. Although concerns were raised at Reg 18 no new traffic data or modelling has been introduced at Reg19.

We understand KCC Highways have 'requested projected development flows leaving the currently modelled areas in that direction to sense check on any need to extend the models'. However, given the site-specific impact focus of S106 means it is not an effective framework for mitigating cumulative impacts from multiple spatially distributed developments on a rural road network, we believe a specific LDP policy is required.

5. 'Critical locations on the road network with poor accident records should be identified in order to determine if the proposed land allocations will exacerbate existing problems and whether highway mitigation works or traffic management measures will be required to alleviate such problems. The accident records should be compared with accident rates on similar local roads'. (MHCGL guidance on traffic evidence for LDP)

There have been 4 deaths on Holt / Easole Street within 1.5 miles of the Aylesham Road junction. How many deaths are required in order for Holt Street to qualify as having a poor accident record and to be included in the detailed traffic modelling?

6. The Elvington data consists of ATC and manual data counts. By citing proximity to A256, the implicit study assumption is that the A256 is the primary route used. No empirical data collected on the traffic heading to the A2 / M2 / M26 or M25 from Elvington.
7. WSP recognised the porosity between the B2046 and the adjacent rural road network, yet provided no analysis of (1) the rural road capacity restrictions or (2) of baseline cumulative traffic from development to date or (3) the projected increase on the road network from the LDP.
8. According to WSP, Highways England approved matrix information from the South East Regional Transport Model (SERTM) used by WSP in Deal was only disaggregated using the 2011 Census data for the DDTM area. As noted in 2.2.13 of WSP's 2018 DDTM the SERTM data is very coarse and with no disaggregation would provide little insight into Elvington and Aylesham commuting patterns via the rural road network
9. There is an extensive resource of rural road network ATC data from Aylesham's s106 TA's (2007/ 2014/2018 etc.) that could have been consulted. KCC Highways confirm the ACT data used for Phase 2b of the Aylesham Village Expansion has not been considered.
10. WSP's observation on likely traffic impacts of proposed Aylesham Development on the rural road network is restricted to 'Holt Street is not modelled but anticipated trips for Aylesham Development will leave the network here'. WSP implicitly assumed all traffic for Aylesham will access and leave the site form Dorman Ave North. ATC and modelling evidence shows this assumption to be unsound.
11. In their Reg 18 comments on Aylesham KCC raised concerns over 'the impact of the development on the highway network, particularly as Aylesham has no secondary education provision so the need for travel by private vehicle for secondary school age children may be higher than in other areas of the district'. No modelling of the associated traffic impacts has been provided.
- Note - During the development of the 2015 DTM and 2018 DDTM car trips which are made to schools were modelled by WSP. Despite the absence of a Secondary School no similar exercise has been conducted on
12. By highlighting the need to expand St Joseph's primary, KCC's Reg 19 comment identify the shortfall of primary places in Aylesham. Unlike in the DDTM area WSP has not modelled car trips which are made to schools for Aylesham or Elvington. There are 378 primary places in Aylesham for a current population of 6,000 with a further 630 houses proposed in this LDP. This is below the national average. As a result the pupils attend schools across the area. For example at Goodnestone & Nonington CE Primary School 43% of pupils come from Aylesham and 30% Elvington creating up to 4 car trips of 1-3 miles each per day.
13. KCC Highways informs us that education commuting will be dealt in a Transport Assessment. We have been unable to locate any education commuting evidence in the Transport Assessment evidence for (App no 07/01081) for either Phase 1 or 2 in Aylesham or a School Travel Plan as recommended in Managing Our Roads (DfT, 2003) and The Future of Transport – a Network for 2030 (DfT) White Paper, 2004.
14. In Reg 18 comments, KCC raised concerns regarding the additional flow anticipated on Shepherdswell Road due to the narrow, rural nature of the road. Holt Street / Easole St / Sandwich Rd are similar in terms of their physical constraints and traffic levels. Both are 'rat runs' between the A2 A256 and significant coastal settlements. In relation to application 19/00381, Richard Smith (Senior Development Planner - KCC Highways) accepted a reduced vision splay from 45m to 25 metres on Easole Street based on an independent highways report describing Easole Street as being a narrow road, 'in a rural location with a tight bend to the west and a junction to the east. The road has no footways, with high hedges bordering each side of the road, creating an extremely constrained environment. There is evidence of vehicles crossing the centre line; the markings are very worn and hardly visible'.
15. ORR Passenger entries and exits for Aylesham data shows passenger numbers per head of population dropping Jan 2016- Dec 2020.
 o Passenger entries and exits increased by 19.6%. 2016-17 to 2019-20.
 o Aylesham Population increased by 30% over the same period.
 NOTE _ 20-21 data discounted because of Covid. 2016 Population=4,980. By March 2018, 493 new dwellings had been completed. Estimated mean new dwelling occupied by 2019- 2020 = 500. Estimated population increase = 1,500.
16. WSP's Reg 19 Traffic Report is based on the 2018 DDTM study which undertook a detailed analysis of the rural road network the other (western) side of the A256 using disaggregated SERTM data, Node Impedance Calculation (ICA), mapped out on a VISUM Network map. This established benchmark capacity PCU per Lane data for a range of defined link types including 'Rural Roads' and 'Minor Road Rural Village (30mph)'.
17. In their Sustainability Appraisal of Growth Options in the Dover District Council Local Plan Topic Paper: Overarching Strategy (Part 1) point 1.5. DDC undertook to 'assess growth options in terms its likely effects on environmental...using available evidence including commuting patterns, transport infrastructure, traffic congestion (and related air quality and carbon emissions issues)'. Although some data was considered, the detailed data was not considered when evaluating the impact of the Aylesham or Elvington sites
18. In the SA LUC use ONS - Nomos data, labor market statistics and DataShine ESRC BODMAS (using 2011 ONS Census data) to establish commuter patterns. Based on this the Reg 19 SA Appendix B confirms the District's residents 'rely heavily on cars to...access employment,

education, amenities and services' and predicts an increase of commuting from Aylesham to Sandwich (the district's 2nd commuting hub) as well as Thanet and Deal.

19. DDC's LDP Sustainability Appraisal identifies Sandwich as the District's key centre for inbound commuting. The Reg 19 provision of employment sites in Aylesham have been reduced by 85% from 1013 jobs in Reg 18 to 263 jobs in Reg 19. (source WSP main Report (i) Reg 18 and (ii) Reg 19. Reduced onsite employment will increase site generated commuting traffic.

(NOTE The Reg 19 Sustainability Assessment has not been revised to reflect the 85% reduction of onsite jobs, calling its conclusion about Aylesham site sustainability into question).

20. The Local Plan (Reg 18 and Reg 19) Sustainability Appraisal for the proposed sites in Aylesham and Elvington is – for traffic purposes - limited to recording the proximity of proposed dwellings to a bus stop and / or train station. The ONS - Nomos data, labor market statistics and DataShine ESRC BODMAS conclusions in the Sustainability Assessment, analysis of car dependency and commuting patterns or journey to work data was considered on the site assessments. This appears to limit real world applicability.

21. None of the evidence base on car dependency in Greenfield ex-urban developments nor car-dependency and the commuting pattern evidence appears to have been considered.

22. SA Section 6.207 states that Eythorne and Elvington already have 'relatively good access to existing local rail and bus services'. However Eythorne railway station closed to passenger traffic in 1948. In response to our Reg 18 RFI DDC stated that the SA did not claim Elvington 'already have relatively good access to existing local rail and bus services'. However, this is a direct quote from the SA - 6.207. This claim is factually false but is a base assumption used to justify Aylesham and Elvington's compliance with SA 4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles.

23. MHCGL guidance on traffic evidence for LDP states 'Critical locations on the road network with poor accident records should be identified in order to determine if the proposed land allocations will exacerbate existing problems and whether highway mitigation works or traffic management measures will be required to alleviate such problems. The accident records should be compared with accident rates on similar local roads'. There have been 4 deaths on Holt / Easole Street within 1.5 miles of the Aylesham Road junction. How many deaths are required in order for Holt Street to qualify as having a poor accident record?

4.2 Base Data Availability

One problem we encountered is availability of the granular base data that forms the building blocks for the LDP traffic and commuting evidence. We can't find base data. For example

The Dover Transport Model (DTM) Local Model Validation Report November 2016 is not available. So we have to rely on DDTM for the base modelling data for additional trips zonal distribution.

In the SA LUC use ONS - Nomis data, labour market statistics and DataShine ESRC BODMAS (using 2011 ONS Census data) to establish commuter patterns. However, this data set is not available for review.

The SA conclusions suggest a data granularity (e.g. the availability of Aylesham to Deal commuting numbers), that is absent from the methodology employed in LUC's site-specific sustainability assessments. This would matter less were LUC's Reg 19 report not used inflated employment assumptions for Aylesham creating unsound sustainability conclusions.

4.3 Employment Evidence Driving Commuting

1. The Reg 19 SA 7.51 (Reg 19 Strategic employment allocation policies) and Table 7.6 include former Snowdown Colliery as a strategic site. This incorrect. Aylesham site employment has been reduced from 1,013 onsite jobs in Reg 18 to 267. The sustainability conclusions have not been reassessed. This clearly undermines the deliverability NPPF para 72 b.

2. DDC provided site employment estimates to both LUC and WSP for SA and Traffic modelling purposes. Aylesham's employment modelling conclusions in the 2022 SA are contradictory and misleading. They don't align with the WSP's modelling numbers, which reduced by 84% from 1,013 onsite jobs in Reg 18 to 267 on site jobs in Reg 19.

3. In the Reg 19 SA main report (3: 4.75, SA 3 - 7.160 and table Table 7.6) still cite Aylesham as a 2nd largest employment hub with Land off Holt Street identified as ++ positive effect against. Also true for Reg 19 Appendix B growth and spatial options findings by SA objective, which offer conclusions based on inflated on site employment numbers numbers In Appendix F Snowdown employment drops to a 'Minor positive (+)'. This looks like a revised assessment that hasn't then been added into the main report.

4. Trip generation for employment sites (approach agreed with NH and KCC) the potential jobs were calculated using the SQM area of the site and dependant on the land use type an employment number was provided have not been used in the SA. As onsite employment is a key indices of sustainability:

- a. Why is the discrepancy in Aylesham employment number in the SA?
 - b. Has the South Aylesham site's sustainability been reassessed by LUC to reflect the reduction in onsite employment?
 - c. Why is WSP using a different employment assumption to LUC?
5. Has the council assessed the financial viability of the development proposal for Snowdown Colliery? The land owner informs us their existing tenant has a substantial remediation liability and is unaware of any ongoing discussions about reassigning this not have they aware of any detailed financial backing that would fund the redevelopment of this site. Obviously a site needs to be deliverable. Has it passed deliverability benchmarking test to justify the site's continued inclusion in the LDP?

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

- 1 For the area bounded by A2, B2046, A256 and A257 has significantly less robust traffic evidence, **effective mitigation enshrined in a Local Plan policy** rather than deferring this to a S106 negotiation at the planning application stage.
- 2 **Use robust evidence** that is reliable, objectively collected recent data based on an understanding of the data collected and the characteristics of the plan area without relying on unjustified assumptions or unsupported assertions. Engage with the significant body of evidence that clearly shows that an LDP with **76%** of all proposed housing is on Greenfield sites is inherently unsustainable. From the loss of irreplaceable agricultural land and habitat, to reinforcing the district's car dependency by creating greenfield sprawl that will significantly change the rural character of the north west of Dover District. DDC's Reg 19 LDP DDC's will deliver the wrong houses in the wrong locations. It won't improve the environment or mitigate climate change.
If the purpose of the planning system is (as set out in the NPPF) to ensure that sustainable development is pursued in a positive way, we believe this plan cannot be considered to be justified and it will not enable the delivery of sustainable development.
- 3 Initiate active ongoing constructive engagement with Canterbury City Council to maximise the effectiveness of local plan in the context of strategic cross boundary matters and generate a coherent evidence-based strategy that deliverable plan that is not predicated on nebulous or unsupported claims of sustainability enabled by a failure to engage with a robust, impartial and objective evidence base.

As this section is supposed to be about the evidence base, listed below (and in our Comments Report attached) are key issues identified with the evidence base used highlighting inconsistencies, a failure to consider sufficiently detailed traffic data, identifying unjustified assumptions and unsupported assertions that underpin the Reg 19 LDP, undermining plan soundness.

Traffic Evidence Summary

- 1 Despite the Ministry of Housing, Communities & Local Government 2020 LDP guidance stressing the importance of contextual data such as travel to work areas (and that evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively). Although referenced at a District level in the Sustainability Assessment, none of this contextual or empirical evidence has been considered in the LDP strategic site allocation process in relation to the impact of Aylesham and Elvington on the road network.
- 2 From ONS data to SA commuter patterns and to SHMA 2017 all highlight a strong trend of out-commuting. ONS data shows high car reliance in all major strategic site locations.
 - 1 WSP's DDTM (Reg 18 Traffic Plan Assessment 2020 / Regulation 19 Transport Modelling Forecast Main Report or Appendices) report conducted detailed modelling of the Dover and Deal traffic. Other areas were '**modelled in significantly less detail**'.
 - 2 Despite recognising the LDP will 'lead to large increases in flow' in Aylesham, WSP's analysis is limited to a handful of ATC's (automatic traffic counters) on the B2046 1n 2019. WSP's report offered no conclusions on the area north of the A256 as it was outside the DDTM area. Although concerns were raised at Reg 18 no new traffic data or modelling has been introduced at Reg19.
We understand KCC Highways have 'requested projected development flows leaving the currently modelled areas in that direction to sense check on any need to extend the models'. However, given the site-specific impact focus of S106 means it is not an effective framework for mitigating cumulative impacts from multiple spatially distributed developments on a rural road network, we believe an specific LDP policy is required.
- 3 '*Critical locations on the road network with poor accident records should be identified in order to determine if the proposed land allocations will exacerbate existing problems and whether highway mitigation works or traffic management measures will be required to alleviate such problems. The accident records should be compared with accident rates on similar local roads*'. (MHCGL guidance on traffic evidence for LDP)
There have been 4 deaths on Holt / Easole Street within 1.5 miles of the Aylesham Road junction. How many deaths are required in order for Holt Street to qualify as having a poor accident record and to be included in the detailed traffic modelling?
- 1 The Elvington data consists of ATC and manual data counts. By citing proximity to A256, the implicit study assumption is that the A256 is the primary route used. No empirical data collected on the traffic heading to the A2 / M2 / M26 or M25 from Elvington.

- 1 WSP recognised the porosity between the B2046 and the adjacent rural road network, yet provided no analysis of (1) the rural road capacity restrictions or (2) of baseline cumulative traffic from development to date or (3) the projected increase on the road network from the LDP.
- 2 According to WSP, Highways England approved matrix information from the South East Regional Transport Model (SERTM) used by WSP in Deal was only disaggregated using the 2011 Census data for the DDTM area. As noted in 2.2.13 of WSP's 2018 DDTM the SERTM data is very coarse and with no disaggregation would provide little insight into Elvington and Aylesham commuting patterns via the rural road network
- 3 There is an extensive resource of rural road network ATC data from Aylesham's s106 TA's (2007/ 2014/2018 etc.) that could have been consulted. KCC Highways confirm the ACT data used for Phase 2b of the Aylesham Village Expansion has not been considered.
- 4 WSP's observation on likely traffic impacts of proposed Aylesham Development on the rural road network is restricted to '*Holt Street is not modelled but anticipated trips for Aylesham Development will leave the network here*'. WSP implicitly assumed all traffic for Aylesham will access and leave the site form Dorman Ave North. ATC and modelling evidence shows this assumption to be unsound.
- 1 In their Reg 18 comments on Aylesham KCC raised concerns over '*the impact of the development on the highway network, particularly as Aylesham has no secondary education provision so the need for travel by private vehicle for secondary school age children may be higher than in other areas of the district*'. No modelling of the associated traffic impacts has been provided.
Note - During the development of the 2015 DTM and 2018 DDTM car trips which are made to schools were modelled by WSP. Despite the absence of a Secondary School no similar exercise has been conducted on
- 2 By highlighting the need to expand St Joseph's primary, KCC's Reg 19 comment identify the shortfall of primary places in Aylesham. Unlike in the DDTM area WSP has not modelled car trips which are made to schools for Aylesham or Elvington. There are 378 primary places in Aylesham for a current population of 6,000 with a further 630 houses proposed in this LDP. This is below the national average. As a result the pupils attend schools across the area. For example at Goodnestone & Nonington CE Primary School 43% of pupils come from Aylesham and 30% Elvington creating up to 4 car trips of 1-3 miles each per day.
- 3 KCC Highways informs us that education commuting will be dealt in a Transport Assessment. We have been unable to locate any education commuting evidence in the Transport Assessment evidence for (App no 07/01081) for either Phase 1 or 2 in Aylesham or a School Travel Plan as recommended in Managing Our Roads (DfT, 2003) and The Future of Transport – a Network for 2030 (DfT) White Paper, 2004.
- 1 In Reg 18 comments, KCC raised concerns regarding the additional flow anticipated on Shepherdswell Road due to the narrow, rural nature of the road. Holt Street / Easole St / Sandwich Rd are similar in terms of their physical constraints and traffic levels. Both are 'rat runs' between the A2 A256 and significant coastal settlements. In relation to application 19/00381, Richard Smith (Senior Development Planner - KCC Highways) accepted a reduced vision splay from 45m to 25 metres on Easole Street based on an independent highways report describing Easole Street as being a narrow road, '*in a rural location with a tight bend to the west and a junction to the east. The road has no footways, with high hedges bordering each side of the road, creating an extremely constrained environment. There is evidence of vehicles crossing the centre line; the markings are very worn and hardly visible*'.
- 1 ORR Passenger entries and exits for Aylesham data shows passenger numbers per head of population dropping Jan 2016- Dec 2020.
 - Passenger entries and exits increased by 19.6%. 2016-17 to 2019-20.
 - Aylesham Population increased by 30% over the same period.

NOTE _ 20-21 data discounted because of Covid. 2016 Population=4,980. By March 2018, 493 new dwellings had been completed. Estimated mean new dwelling occupied by 2019- 2020 = 500. Estimated population increase = 1,500.

- 1 WSP's Reg 19 Traffic Report is based on the 2018 DDTM study which undertook a detailed analysis of the rural road network the other (western) side of the A256 using disaggregated SERTM data, Node Impedance Calculation (ICA), mapped out on a VISUM Network map. This established benchmark capacity PCU per Lane data for a range of defined link types including 'Rural Roads' and 'Minor Road Rural Village (30mph)'.
- 1 In their Sustainability Appraisal of Growth Options in the Dover District Council Local Plan Topic Paper: Overarching Strategy (Part 1) point 1.5. DDC undertook to '*assess growth options in terms its likely effects on environmental...using available evidence including commuting patterns, transport infrastructure, traffic congestion (and related air quality and carbon emissions issues)*'. Although some data was considered, the detailed data was not considered when evaluating the impact of the Aylesham or Elvington sites.
- 1 In the SA LUC use ONS - Nomos data, labor market statistics and DataShine ESRC BODMAS (using 2011 ONS Census data) to establish commuter patterns. Based on this the Reg 19 SA Appendix B confirms the District's residents '*rely heavily on cars to...access employment, education, amenities and services*' and predicts an increase of commuting from Aylesham to Sandwich (the district's 2nd commuting hub) as well as Thanet and Deal.

- 1 DDC's LDP Sustainability Appraisal identifies Sandwich as the District's key centre for inbound commuting. The Reg 19 provision of employment sites in Aylesham have been reduced by 85% from 1013 jobs in Reg 18 to 263 jobs in Reg 19. (source WSP main Report (i) Reg 18 and (ii) Reg 19. Reduced onsite employment will increase site generated commuting traffic. (NOTE The Reg 19 Sustainability Assessment has not been revised to reflect the 85% reduction of onsite jobs, calling its conclusion about Aylesham site sustainability into question).
- 1 The Local Plan (Reg 18 and Reg 19) Sustainability Appraisal for the proposed sites in Aylesham and Elvington is – for traffic purposes - limited to recording the proximity of proposed dwellings to a bus stop and / or train station. The ONS - Nomos data, labor market statistics and DataShine ESRC BODMAS conclusions in the Sustainability Assessment, analysis of car dependency and commuting patterns or journey to work data was considered on the site assessments. This appears to limit real world applicability.
- 1 None of the evidence base on car dependency in Greenfield ex-urban developments nor car-dependency and the commuting pattern evidence appears to have been considered.
- 2 SA Section 6.207 states that Eythorne and Elvington already have 'relatively good access to existing local rail and bus services'. However Eythorne railway station closed to passenger traffic in 1948. In response to our Reg 18 RFI DDC stated that the SA did not claim Elvington 'already have relatively good access to existing local rail and bus services'. However, this is a direct quote from the SA - 6.207. This claim is factually false but is a base assumption used to justify Aylesham and Elvington's compliance with SA 4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles.
- 1 MHCGL guidance on traffic evidence for LDP states 'Critical locations on the road network with poor accident records should be identified in order to determine if the proposed land allocations will exacerbate existing problems and whether highway mitigation works or traffic management measures will be required to alleviate such problems. The accident records should be compared with accident rates on similar local roads'. There have been 4 deaths on Holt / Easole Street within 1.5 miles of the Aylesham Road junction. How many deaths are required in order for Holt Street to qualify as having a poor accident record?

Base Data Availability

One problem we encountered is availability of the granular base data that forms the building blocks for the LDP traffic and commuting evidence. We can't find base data. For example

- The Dover Transport Model (DTM) Local Model Validation Report November 2016 is not available. So we have to rely on DDTM for the base modelling data for additional trips zonal distribution.
- In the SA LUC use ONS - Nomis data, labour market statistics and DataShine ESRC BODMAS (using 2011 ONS Census data) to establish commuter patterns. However, this data set is not available for review.

The SA conclusions suggest a data granularity (e.g. the availability of Aylesham to Deal commuting numbers), that is absent from the methodology employed in LUC's site-specific sustainability assessments. This would matter less were LUC's Reg 19 report not used inflated employment assumptions for Aylesham creating unsound sustainability conclusions.

Employment Evidence Driving Commuting

- 1 The Reg 19 SA 51 (Reg 19 Strategic employment allocation policies) and Table 7.6 include former Snowdown Colliery as a strategic site. This incorrect. Aylesham site employment has been reduced from 1,013 onsite jobs in Reg 18 to 267. The sustainability conclusions have not been reassessed. This clearly undermines the deliverability NPPF para 72 b.
- 1 DDC provided site employment estimates to both LUC and WSP for SA and Traffic modelling purposes. Aylesham's employment modelling conclusions in the 2022 SA are contradictory and misleading. They don't align with the WSP's modelling numbers, which **reduced by 84%** from **1,013** onsite jobs in Reg 18 to **267** on site jobs in Reg 19.
- 2 In the Reg 19 SA main report (3: 4.75, SA 3 - 7.160 and table Table 7.6) still cite Aylesham as a 2nd largest employment hub with Land off Holt Street identified as ++ positive effect against. Also true for Reg 19 Appendix B growth and spatial options findings by SA objective, which offer conclusions based on inflated on site employment numbers numbers. In Appendix F Snowdown employment drops to a 'Minor positive (+)'. This looks like a revised assessment that hasn't then been added into the main report.

	<p>1 Trip generation for employment sites (approach agreed with NH and KCC) the potential jobs were calculated using the SQM area of the site and dependant on the land use type an employment number was provided have not been used in the SA. As onsite employment is a key indices of sustainability:</p> <ol style="list-style-type: none"> 1 Why is the discrepancy in Aylesham employment number in the SA? 2 Has the South Aylesham site's sustainability been reassessed by LUC to reflect the reduction in onsite employment? 3 Why is WSP using a different employment assumption to LUC? <p>2 Has the council assessed the financial viability of the development proposal for Snowdown Colliery? The land owner informs us their existing tenant has a substantial remediation liability and is unaware of any ongoing discussions about reassigning this not have they aware of any detailed financial backing that would fund the redevelopment of this site. Obviously a site needs to be deliverable. Has it passed deliverability benchmarking test to justify the site's continued inclusion in the LDP?</p>
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	<p>Having raised concerns about the robustness, consistency and impartiality of the evidence base at Reg 18, our concerns have been ignored. In Feb 2021 DDC confirmed that more detailed traffic evidence would be collected prior to a Reg 19 submission. This hasn't happened. KCC now suggest an iterative data collection process that - we believe - doesn't comply MHCGL guidance on traffic evidence for LDP.</p> <p>The C195 is badly impacted by the cumulative impact of traffic from Sandwich, Deal, Eastry, Woodnesborough, Sholden (via Drainless Road, Heronden Rd and Thornton Road), Elvington and Aylesham, with pre-pandemic baseline traffic of 90,800 vehicles a month. (MLM / K & M SURVEYS 2018 - 7 day total (East and West) = 20,888 traffic movements)</p> <p>KCC Highways confirm Holt Street, Easole Street and Sandwich Road route (Linking B2046 and Sandwich) is classified as the C195 and is "not a secondary route, as defined in our road hierarchy, and 'for reasons of various highway constraints along the corridor". It should, therefore, be protected from the cumulative or inappropriate traffic impacts. However, having failed to collect or consider any traffic impact evidence for this route, the Reg 19 proposes to rely on s106 funding on an application by application basis. Based on our experience on Aylesham (DOV/07/01081 and DOV/13/0120), Nonington Parish Council believe that the site-specific impact focus of S106 means it is not an effective framework for mitigating cumulative impacts from multiple spatially distributed developments on a rural road network. It is impossible to disaggregate traffic flow to attribute the increase to specific site.</p> <p>We note that Reg 19 Housing Policy 4.21 states that cumulative impact all sites allocated in this Plan on common road links must be considered. However, in judging how this might work in practice, we reviewed how the cumulative traffic impacts from the current plan period developments . The ourcome of this is set out in the attached report.</p>
Include files	Nonington PC LDP Reg 19 Comments_Dec22_V1.0.pdf
Local Plan Consultation Point	Evidence Base
Rep ID	SDLP1046
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Dover and Deal Transport Model Local Plan Forecasting Report

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p><u>Highways and Transportation</u>: The general methodology for the forecasting work has been agreed with the Local Highway Authority. This report provides the high-level impact assessment of the Local Plan growth on the existing highway network in focussed locations. However, it does not at this stage explore potential mitigation measures, which will need to be resolved before a full steer can be provided in relation to the acceptability of the proposed sites.</p> <p>It is noted that the Dover VISUM model does not include coverage of the entire geographical area of Dover and as such some of the proposed allocation sites are located outside of the area of coverage are subsequently assessed using a spreadsheet model approach. Whilst from a consistency basis, ideally, the VISUM model would have been extended to encompass the entire district, in this case a hybrid modelling methodology is an acceptable form of assessment as most of the Local Plan growth is located within the VISUM simulation area and the routing through the network outside of the can be identified relatively efficiently.</p> <p>The Local Highway Authority has the following comments to make on the contents of the report: -</p> <p><i>Executive Summary</i></p> <p>The current methodology of focussing on capacity improvements at Whitfield Roundabout and the Duke of York Roundabout is necessary so that the resulting redistribution of traffic can be considered in full before the scope of further assessment on other parts of the network can be fully scoped and explored. Therefore, the Local Highway Authority would like to reserve the right to review the required scope of further highway assessment.</p> <p>It is understood that Local Junction Modelling was also to include the A258/Deal Rd junction.</p> <p>KCC requires an outline of the strategy for each of the junctions listed in Table 5.</p> <p><i>1 - Introduction</i></p> <p>1.5.1 Manston Airport – It is relevant to highlight the recent DCO decision to reopen and develop Manston Airport in Thanet into a dedicated air freight facility able to handle at least 10,000 air cargo movements per year. The examination process for this development has highlighted that this will generate a material level of additional traffic within the Dover District (particularly on the A256 corridor), although the forecast report is currently silent on this point. Consequently, further sensitivity testing for the airport may now be required to enhance the robustness of this assessment.</p> <p>Consideration should also be given to the impacts of bifurcation of HGV traffic arising from the Lower Thames Crossing and with the potential reassignment of traffic how this could impact Dover's network and create a need for further junction modelling.</p> <p><i>2 - Forecasting Approach</i></p> <p>2.2.1 – The inclusion of just a single forecast year (2040) is noted at this stage, however as the process continues and any further highway mitigation is identified, it may be necessary for interim year assessment to be provided to assist in the identification of necessary infrastructure triggers.</p> <p>2.4.7 – This methodology has been agreed, however it is important to consider the cumulative impact of settlements where there are numerous smaller development sites (less than 100 dwellings) are within close proximity, as this could have a disproportionate impact on certain junctions within a polygon zone. This may include clusters of smaller sites in Wingham, Sandwich, Eastry, Walmer/Kingsdown and St Margaret's-at-Cliffe, which could respectively have unseen impacts on the A257, A256 and A258 corridors.</p> <p><i>3 - Forecast Transport Infrastructure</i></p> <p>3.2.6 – The wording should be updated to reflect that Albert Road link scheme (Court Marsh Road, Deal) has been completed and may need to be included in the forecast scenarios.</p>

4 - Forecasting Demand

Table 4-2 – Whitfield Phase 1 (planning reference 10/01010) appears to be missing from this list – Whilst the position stated in section 3.3.6 & 3.3.7 is understood clarification is required as to why the balance of housing up to 800 dwellings is not included in this table. E_1004 (planning reference 10/01011) also requires clarification as the table suggests that this includes new access road on the A256 and link to Archers Court Road, whereas the highway authority understands that this was secured under planning reference 10/01010. Furthermore, S_104 and S_129 have been dropped from the DM scenario whereas they were included previously in the Reg. 18 DM.

4.4.7 – 4.4.10 – The proposed growth factors for HGV's are noted and agreed for the purpose of the forecasting report, however it is evident that the longer-term impacts of Brexit and the potential arrangements for associated infrastructure such as the DEFRA Border Control Post may have a bearing on future distribution of HGV traffic on the strategic and local highway network, especially at the Whitfield and Duke of York Roundabouts. Therefore, port-based growth forecasts may need to be reviewed.

5 - Local Plan Assessment

5.2.19 - 5.2.23 – The diagram shows areas of the WUE under the potential control of the land promotor, however, does not outline how the remaining sections of the allocation will be accessed. It is recommended that a full access plan is produced to clarify exactly how the entire allocation will come forward. It is essential that access agreements are reached between local plan stakeholders. It is also relevant to point out that no technical drawings have been submitted to ascertain whether the new junction onto A256 is achievable. The stopping up of the existing A256/Sandwich Road priority junction should also be included within this scenario.

6 - Results

Figures 6-56 and 6-84 – The DS1 and DS2 assessments indicated that mitigation at the Whitfield Roundabout will lead to the transfer of trips onto less congested routes through Lydden in the AM peaks. Whilst this route is theoretically capable of accommodating some additional traffic flow at a link level, there is a concern that this could lead to strategic port bound HGV traffic rerouting through this part of the road network, which would not be appropriate.

8 – Local Junction Models

8.1.1 - It is understood that Local Junction Modelling was also to include the A258/Deal Rd junction.

8.1.55 – The proposal for signalling the London Road/Alkham Valley Road would be subject to further technical approval by KCC Highways, although further consideration should be given to the implications of a left-turn ban from Alkham Valley to fully address the departures from design guidance. This would include potential delay, geometry at the London Road/Whitfield Hill roundabout and any foreseen impacts on capacity from U-turns.

8.1.76 – The proposal for signalling the Dover Road/Station Road junction would again be subject to further technical approval by KCC Highways.

8.2.7 and 8.2.8 – Noted that further discussion is required between DDC and KCC Highways to determine potential improvements at these junctions, we would anticipate that mitigation is agreed prior to publishing the IDP.

9 - External Local Plan Sites

Cluster 1 (Aylesham and Wingham)

The Junction of Staple Road/B2046 is not included within the network diagram. This junction is subject to peak hour traffic queueing and there are two allocations proposed that access the B2046 via this junction, as such this should be included within the assessment.

KCC maintains that the A257/B2046 junction, although limited in what can be achieved in the way of mitigation, should be modelled to inform KCC's position on the allocations within this cluster. All options for mitigation should be considered and discounted with appropriate commentary. An important factor in the consideration of these sites is the significant amount of growth proposed in the Draft Canterbury Local Plan, and we would recommend that Dover District Council works with Canterbury City Council and KCC as Local Highways Authority to fully scope the cumulative impact of both Local Plans on local network, along with the additional options this may present for effective mitigation at Wingham.

KCC would recommend that the cluster also incorporates the A257/Preston Hill junction, and that trips leaving/joining the network at Holt Street should be quantified to assess impact on this route to Sandwich.

Cluster 2 (Sandwich North & Ash)

KCC has concerns that provision of just one point of access in Ash means that turning movements at the Sandwich Road/A257 junction are underestimated.

Cluster 3 (Sandwich South)

	<p>It would seem prudent to extend the model network into Sandwich to assess the cumulative impact of proposed developments in the town. The increase of flows at the A258/Deal Road junction in the PM peak would in my view warrant further modelling to test the capacity of this junction with Local Plan growth.</p> <p>Cluster 5 (Elvington)</p> <p>The increase of flows at the Shooters Hill junction would in my view warrant further modelling to test the capacity of this junction with Local Plan growth.</p> <p>KCC would also recommend that traffic routing from the Elvington and Shepherdsweil allocations via the Sandwich Road/Mill Lane junction is quantified to assess the impact of this route into Sandwich.</p> <p>Cluster 6 (Alkham Valley Road/Hawkinge)</p> <p>Dover Local Plan impacts at the A260/Spitfire Way junction (outside of the Dover District) should warrant proportionate contributions from the sites identified to be adding the most traffic to the Alkham Valley corridor.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Evidence Base
Rep ID	SDLP1047
Rep Status	Processed
Consultee ID	1331999
Consultee Full Name	Claire Pamberi
Consultee Company / Organisation	Kent County Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Archaeological characterisation for Dover (DDC/KCC 2020)

2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The County Council welcomes the inclusion of this document in the evidence base for the Local Plan. The archaeological characterisation represents the most up-to-date attempt to tell the story of Dover's development over time and assess the significance of this story and the heritage assets that underpin it. It will serve as a very useful tool for developers trying to assess the impact of their proposals and for planners who will draw upon it to inform their decision-making. It will also be of great interest to the community who may wish to learn more about the history of the town and the archaeological remains both beneath their feet and in some cases still visible in front of them. This is a once in a generation document of great importance.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Evidence Base
Rep ID	SDLP1129
Rep Status	Processed
Consultee ID	1331281
Consultee Full Name	Mr MAURICE WEBB
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	

<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>SAP53</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Positively prepared Justified Effective Consistent with National Policy</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>No</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Yes</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>I oppose the Unsound Selection of SAP53(RIN002/RIN004) as being Non-compliant with the NPPF Sustainability and Proportionate Evidence requirements and with DDC Policies SP3 and/or SP4</p> <p>Site History.</p> <p>I consider the Site History to be a material fact for consideration.</p> <p>Ringwould Alpines Plant Centre was a privately owned aprox.2.3 ha Horticultural Nursery situated in the Kent North Downs AONB with a vehicular access onto the A258 Dover road. The nursery activity serving commercial, corporate and public customers was centred around 10 Polytunnels on what is now referred to as RIN002 and 2 Polytunnels on RIN004. RIN004 housed a timber potting shed ,several raised timber beds for display of shrubs and bedding plants and a block built toilet/storeroom. There was also a small gravelled parking area adjacent to the Entrance on the A258 Dover Road. There was no external lighting so public access was limited to daylight hours and the site was closed to the Public throughout the Winter.</p> <p>The Plant Centre holding includes that section of Footpath ER14 which forms the boundary with my property, (DDC note: redacted), and a small strip of woodland the other side of Footpath ER14 lying between Landway and Popples Field.</p> <p>The whole site was purchased by the current owners Kingsdown Water in 2016/17 while they were seeking a Change of Use Planning Permission for the erection of a bottling plant with supporting infrastructure on the parts of the site now identified as RIN002 and RIN004.</p> <p>This PP Application was refused on Appeal and the site remains a Greenfield Agricultural site for Planning Purposes.</p> <p>Kingsdown Water have no Agricultural/Horticultural Interest in the site and have not put the site on the open market as a horticultural holding.</p> <p>The RIN002 and RIN004 parts of the site have been leased and apparently sub-leased to a succession of non Agricultural tenants carrying out a variety of non Agricultural Activities none of which have had the benefit of Planning Permission. The remainder of the site has been left unattended to and is becoming overgrown and untidy, including Footpath ER14.</p> <p>This has resulted in complaints from local residents and the site is now the subject of Enforcement Action which has yet to be resolved.</p> <p>Planning Contravention Notices completed by the owner and tenant(s) have revealed that various small businesses have been renting the land for builder's yard type purposes and that the mobile home on the site is for the night watchman.</p> <p>The activities on the site have resulted in considerable degradation and contamination of the land which would require considerable restitution measures to return it to it's original state. See attached photos</p> <p>In the first HELAA three parts of Ringwould Alpines identified as RIN002, RIN004 and RIN006 were put forward by Ringwould Alpines's Agent for inclusion as development sites in this Dover Local Plan.</p> <p>In that HELAA RIN002 was put forward as a 1.19ha PDL site development site for 30 houses but this was considered to be unsuitable for development, RIN004 as a 0.22ha PDL site for 5 houses but was considered to be suitable RIN006 as a 0.7ha Greenfield site was considered to be unsuitable for development.</p> <p>Only RIN004 was taken forward as a Reg 18 Consultation Proposal but RIN002 was added to RIN004 to form SAP53 in the Sect19 Consultation Proposal</p>

RIN002 and RI004 are now described in the HELAA2022 as being greenfield after representations were made about it's earlier incorrect HELAA description as PDL.

Two remaining parts of Ringwoud Alpines also owned by Kingsdown Water but not put forward for inclusion in the Local Plan proposals are a section of the Public Footpath ER14 running from Dover Road to Popples Field between Ringwoud Alpines and my property (**DDC note: redacted**), and a small approx 0.1ha strip of woodland located on the other side of the footpath between Landway and grazing land known as Popples Field.

The only vehicular access to these parcels of land is through the rest of the Ringwoud Alpines holding so these parcels of land will be landlocked unless vehicular access provisions are made over RIN002 and RIN004.

My property, (**DDC note: redacted**), is a 1.6ha Residential/Equine property the other side of the footpath which forms my boundary with Ringwoud Alpines.

My reasons for opposing the selection of SAP53 follow below.

Unsound Site Selection

I consider the Site Selection of SAP53(RIN002/RIN004) to be **unsound** for the following reasons:

1.Non-compliant being not positively prepared as per the NPPF sustainable development and proportionate evidence requirements and non-compliant with either of DDC policies SP3 and P4.

The Settlement Hierarchy was reviewed to ensure that all Local plan development sites proposals were **sustainable**.

In the Settlement Hierarchy Ringwoud is one of the small villages where only development **inside** the Village Settlement Boundary could be accepted but SAP53 is **outside** the Ringwoud Settlement Boundary. See attached Ringwoud Settlement Boundary Map

In SP3 and SP4 the overarching Sustainable Site Allocation Selection criteria is that " The distribution of housing and economic growth in the District will therefore primarily be based on the Settlement Hierarchy, and influenced by site availability, environmental constraints and factors of delivery"

I submit because SAP53 does not comply with the primary Settlement Hierarchy Selection criteria that this rendered the Influencing factors criteria on which the SP53 proposal appears to be based irrelevant.

I submit that ,because of non-compliance with the Sustainability Requirements of the NPPF and policies SP3 and SP4, the SAP53 proposal is **Unsustainable and Unsound**

1 Not justifiable as per the NPPF requirement for it to be based on proportionate evidence.

Inadequate Consideration of Representations made relating to RIN004 and RIN002 has resulted in unbalanced Council Responses and Reg19 Proposals because 21 respondents opposed the RIN004 proposal on issues also relevant to RIN002 and of these 6 directly referred also to RIN002 which was not a Reg 18 proposed site.

The scale of opposition to development of RIN002 is not reflected in the Council's summary of responses in respect of omitted sites because they were raised under the heading of the only Ringwoud site proposed in the Reg18 proposal i.e. RIN004.

3 respondents supported the RIN004 proposal of whom 2 including the owner(s) of the site requested the addition of RIN002.

The Council's responses to all the proposed Sect 18 proposal representations is generic not site specific and are not set out alongside the individual Site Allocations proposals.

This " one size fits all" approach does not address site specific issues and results in generalised non-site specific Mitigation measures .

There were 21 opposing representations mainly from local residents and only 3 supporting representation of which 1 was factually incorrect from a local District Councillor claiming the existing site access was adequate for a large development on RIN002, RIN004 and RIN006 and the other was from the site owner, Messrs Bomer a.k.a. Kingsdown Water, seeking to have RIN002 added to RIN004 to maximise the potential housing capacity of his site asking for 41 dwellings and claiming incorrectly that the site was a brownfield site..

In the Reg 19 proposals. said to have taken into account all of the representations together with all other relevant factors, RIN002 has been added to RIN004 to form SAP53(RIN002/RIN004). It can only be concluded that the Council attach little value to the representations made by local residents but great importance to those from the site owner which does nothing to promote public confidence and participation in such Consultation exercises.

I consider the above constitutes **disproportionate** consideration being given to Reg 18 supporting comments resulting in the **unsustainable and unsound** SAP53(RIN002/RIN004) **Reg19 proposal** .

No new evidence emerged in the Regn 18 submissions to justify the addition of RIN002 to RIN004 at this final Reg19 stage of the Local Plan HELAA stage and the proposal itself contains no reason for the addition of RIN2 to SAP53.

Whatever evidence exists to justify the inclusion of RIN002 into the Local Plan at this final late stage must have existed and have been discounted right from the early HELAA stages.

Including RIN002 now at this last final stage of the Local Plan consultation stage makes submitting representations more difficult because of the discouraging, complicated and, to some residents, incomprehensible Reg19 Representation procedure format.

The site promoter now claims that selecting only RIN004 would landlock RIN002.

This potential landlocking issue has been apparent all the time and could be easily resolved..

What is different is that local residents have now discovered that, after being consulted at the Reg18 stage on RIN004 a 0.21 ha AONB site with a proposed indicative total of 5 houses and a capacity to accommodate 7 houses situated between 2 dwellings fronting onto the Dover Road, they are now faced with SAP53(RIN002/RIN004) a 1.41 ha AONB site with an indicative proposal for 10 houses but a capacity of 37 houses situated immediately between and behind several houses and intruding deep into the rest of the AONB on which they were not consulted.

Although there are common issues affecting both RIN002 and RIN004 the SAP53 proposal differs considerable in scale, character and impact on the AONB and neighbouring AONB properties than the earlier RIN004 proposal.

The site currently enjoys "dark skies" but the proposals would create a built up suburban street scene complete with power and telephone poles and wiring infrastructure together with street lighting where none exists which is inappropriate for the AONB setting.

The Site is in an area where >25% of the land is at least Grade 3 Agricultural Land.

The site would require construction of a new side turning serving the 10 new dwellings onto the busy A258 almost immediately opposite the existing Queens Rise side turning on the other side of this road causing increased risk of delays and accidents on this particular section of the A258.

RIN002 extends the SAP53 site further into the AONB making it visible from a popular Footpath ER14 see photos which is part of the Ringwold Alpines holding

and also from my property, (DDC note: redacted),. RIN002 extends behind four Dover Road AONB properties and also has a boundary with my AONB property,(DDC note: redacted),.

No account has been taken of the effects of RIN002 combined with RIN004 on these neighbouring properties.

Local residents who thought it was not necessary to make representations about RIN002 or those who made passing reference to RIN002 can now comment but to do so is rendered more difficult because of the **discouraging, complicated and, to some residents, incomprehensible Reg19 Consultation format** .

I submit the Council's RIN004 Reg 18 Consultation responses and the Reg 19 SAP53(RIN002/ RIN004) Representations format make this latest REG19 Proposal and Consultation **disproportionate, unsustainable and unsound and non-compliant with the Proportionate Evidence of the NPPF and Policies SP3 and SP4**..

3,The Evidence Base is Incomplete.

There are significant omissions in the Evidence Base covering the Landscape Sensitivity Assessment (LSA) 2021 and Landscape Character Assessment (LCA) Sections .

None of the Ringwold Alpines AONB sites are included in either of these Sections of the Evidence Base.

DDC Landscape Character Assessment (LCA) does not include the AONB which is said to be covered by the North Kent Downs AONB Management Unit's own LCA 2020 but this LCA is being updated and has not yet been published on the AONB Unit's website..

The DDC commissioned Landscape Sensitivity Assessment(LSA) report does not include the Ringwold Alpines AOB sites but because the selection criteria have not been published it has not been possible to identify why.

Many of the 33 Local Plan sites selected for a LSA are in neighbouring settlements and they include AONB and non AONB sites.

The Council claim that the AONB Management Unit were consulted and were satisfied with the proposed mitigation measures but this does not explain why RIN002 and RIN004 were not selected. .

	<p>These mitigation measures only address the Local Visual Impact (LVI) aspect of the Ringwould Alpines sites whereas the LCA and LSA would have addressed not just the LVI impact but also a wide array of other factors affecting not just the AONB but also the wider surrounding landscape inside and outside the AONB.</p> <p>Issues such as dark skies, ambient noise levels, built environment and the effect on the lives of neighbouring householders, properties etc.</p> <p>I submit that, because the RIN002 and RIN004 evidence does not include an LCA or an LSA, the SAP53(RIN002/RIN004) element of the Evidence Base is incomplete and makes the SAP53 proposal unsound and non-compliant with with NPPF Sustainability and Proportionate Evidence Requirements and with DDC policies SP3 and SP4</p> <p>4. The Ringwould Alpines Plant Centre holding is currently the subject of Unresolved Planning Enforcement action.</p> <p>This is in respect of non agricultural activities being carried out there without the benefit of Planning Permission. Various small businesses have been renting the land for builders yard type purposes and there is a mobile home on the site for a night watchman.</p> <p>These activities have resulted in considerable degradation and contamination of the site. See attached photos.</p> <p>The Availability and Deliverability of the Site would be affected by resolution of the Enforcement Action requiring a Planning Application and/or enforced reinstatement of the site to it's previous Agricultural/Horticultural state.</p> <p>I understand the Enforcement Officer is seeking advice on this at the moment.</p> <p>In these circumstances I submit that the RIN002 and RIN004 site should not have been included in the Dover Local Plan SAP53(RIN002/RIN004) proposal because all Local Plan sites should be Available and Deliverable and that this selection is unsound because of reasonable doubt over the Site's Availability and Deliverability.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>I ask that Reg19 Proposal SAP53(RIN004/RIN004) be removed in it's entirety.</p> <p>The removal of SAP53 which is unsound because it does not comply with requirements of the NPPF nor with SP3 and SP4 will remove a proposal that is not legally compliant and sound from the Local Plan</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>Photo 4.jpg P1040520.JPG Ringwould Settlement Map.png</p>
<p>Local Plan Consultation Point</p>	<p>Evidence Base</p>
<p>Rep ID</p>	<p>SDLP1332</p>
<p>Rep Status</p>	<p>Processed</p>

Consultee ID	1252620
Consultee Full Name	Mr William Hickson
Consultee Company / Organisation	
Agent Full Name	Emily Harris
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	HELAA - GTM003
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Housing and Economic Land Availability Assessment (October 2022)</p> <p>4.12. The Housing and Economic Land Availability Assessment (HELAA) (October 2022) identifies a future supply of land in the District which is suitable, available and achievable for housing and economic development uses over the Plan period to 2040. Whilst our Client supports the HELAA's proposed housing allocation at the Land at Northbourne Road, it is considered that there is justification to allocate the wider site for approximately 30 dwellings.</p> <p>4.13. The Suitability Assessment within the HELAA identifies the Site within ref. GTM003 justifies the allocation of the smaller site area, stating that the development of the entire site would have an unacceptable impact on the landscape and character of the settlement and that there are highways concerns regarding accessibility that would need to be overcome. The Sustainability Assessment identifies that the Site is within 55m of a conservation Area and adjacent to a Grade II Listed Building and therefore a Heritage Assessment would be required.</p> <p>4.14. The HELAA is generally supportive of the low density frontage development following the grain of those properties to the west could be accommodated without significant wider landscape impact. However it is stated that the development of the entire site at Northbourne Road, Great Mongeham would however have an unacceptable impact on the landscape and character of the settlement. The risk of surface water flooding is also identified as a reason as to why development is partly inappropriate on the Site. This is not an issue which was picked up within the 2020 HELAA (Appendix 3a HELAA 2020 Housing Sites Landscape Assessment). Furthermore, the Surface Water assessment on the Environment Agency website states that extent of flooding from surface water for the area is proposed to be very low on the Site. It is therefore unclear why the risk of surface water flooding has been raised as a concern.</p> <p>(DDC Note: Image removed - see attachment)</p> <p>The Landscape Appraisal states that as a greenfield site, any development would result in an inherent loss of rural landscape resource (as would be the case for other greenfield development). However, as the Site lies outside of any landscape designation, it is likely that the larger proposal can be accommodated within</p>

	<p>a sensitive scheme. In addition, the Landscape Appraisal states that whilst the remainder of the Site is considered 'unsuitable', given the high-level nature of the HELAA appraisal, there is scope for different assessment rankings to be concluded.</p> <p>4.16. Pertinently, the appended Sketch Design Document highlights that the development of approximately 30 dwellings can be accommodated across the wider site at an appropriate density without causing unacceptable impacts on the landscape and character of Great Mongeham.</p> <p>4.17. With regards to the transport, the appended Access Appraisal highlights that the Site has been assessed to ensure that the level of development can be accommodated via a single point of access, in the form of a priority junction.</p> <p>Comment: It is unclear why the risk of surface water flooding has been raised on the Site when this was not identified as an issue previously. It is recommended that this is removed as a reason as to why the Site is unsuitable.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	Evidence Base
<p>Rep ID</p>	SDLP1283
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1271353
<p>Consultee Full Name</p>	Church Commissioners
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	Mr Andrew Watson
<p>Agent Company / Organisation</p>	Savills
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	Level 2 Strategic Flood Risk Assessment

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	(DDC Note - Text Extracted from Document sent from Savills on Behalf of the Church Commissioners. Representation has been split across relevant areas of the Local Plan. Full attachment and introduction to Policy comments can be found under reference SDLP1265 for Shepherdswell Site and SDLP1266 for Eastry Site.) Page 92 of the Strategic Flood Risk Assessment uses the EA's 'Risk of Flooding from Surface Water' map to conclude that sections of the site are a 'high risk scenario'. Technical flooding and drainage work conducted on the site suggests that the EA may have over-estimated the risk of the flooding on this site. As discussed in paragraph 2.11 of this representation, due to the geology of the area, the site is likely to be only a low to medium risk of flooding. Recommendation: Amend the Level 2 Strategic Flood Risk Assessment so that the Land west of Coxhill Road has only a medium and low risk scenario of surface water flooding.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Evidence Base
Rep ID	SDLP1166
Rep Status	Processed
Consultee ID	1271448
Consultee Full Name	Kevin Bown
Consultee Company / Organisation	National Highways
Agent Full Name	

Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Regulation 19 Transport Modelling Forecasting Main Report
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Importantly, we would firstly note that we are unable to access the Appendices on the DDC website. We note that Appendix A, B, C and M contain relevant information to us. We would request that this information is supplied to us at the earliest opportunity to enable us to review and provide further response. Nonetheless, we have provided comments on the information that is available in the main report.</p> <p>Representation: DDC to supply copies of Appendices to National Highways for review</p> <p>We recognise that we have already agreed the future year model development, including trip generation, trip distribution, growth and committed development, as well as the forecasting approach as part of the Regulation 18 consultation.</p> <p>We see that Chapter 7 presents the results of the forecast 2040 Dover District Travel Model assignments, providing network statistics, impacted junctions and links and convergence of the forecast scenarios, with and without the Local Plan allocations, in the forecast year (2040).</p> <p>Representation: National Highways have reviewed the strategic results and are content that these are acceptable.</p> <p>We acknowledge that there are elements of the detailed modelling analysis at specific junctions where we requested additional detail but we note that, in general, these have been actioned within separate responses and will be resolved going forwards. The results presented are sufficient to make comments on the expected implication of highway changes on the SRN in relation to the delivery of the Local Plan</p> <p>It is identified in the report that the strategic model calculates the following SRN network junctions would exceed 85% volume to capacity in at least one scenario or time period. • A2 Whitfield roundabout • A2 Duke of York roundabout • A2 Whitfield interchange • A20 / Union Street • A20 / A256 York Street</p> <p>Following ongoing work between all parties, including outside of that reported in the Modelling Forecasting Report, the summary below outlines our current understanding and position with regards to mitigation requirements and ongoing work at each of these junctions.</p> <p><u>A2 Whitfield roundabout and A2 Duke of York roundabout</u></p> <p>The mitigation associated with these junctions has been agreed as per the above, with the design being reported in the Regulation 19 Transport Forecasting Main Report. As above, all parties are working together to further develop a delivery plan for the implementation of these mitigation measures and any further schemes which are be required to mitigate the Local Plan growth. DDC has committed to producing a detailed guidance note on developer contributions, which we have requested to be consulted on at the earliest opportunity above.</p> <p>Representation: National highways are content to proceed as per the process set out above</p> <p><u>New A2 junction – West of Whitfield</u></p> <p>The mitigation associated with this junction has been agreed as per the above, with the design being reported in the Regulation 19 Transport Forecasting Main Report. It is understood that this scheme is to be delivered by the Whitfield extension development. As noted above, this scheme should be referenced in the Infrastructure Delivery Report and Delivery Schedule.</p> <p>Representation: National highways are content to proceed as per the process set out above</p> <p><u>A2 Whitfield Interchange</u></p> <p>No mitigation is required at this junction in relation to the safe operation of the SRN, however we would note that the local highway network approaches to this junction operate over capacity. We would request to be consulted on any proposed mitigation requested by DDC/KCC</p> <p>Representation: National Highways be consulted on any proposed mitigation requested by DDC/KCC at the A2 Whitfield Interchange</p> <p><u>A20 Union Street</u></p>

It is not envisaged that significant mitigation will be required at this junction, however we would note that the strategic model assessments do not offer a level of consideration to demonstrate detailed signal operation. As per the section outlining other ongoing work below, we are awaiting information from WSP relating to the potential for the right turn movements from the A20 into Union Street to block the A20 mainline.

We would suggest that developments that are shown to impact this junction will require detailed junction analysis with particular consideration given to the likelihood of right turn movements from the A20 into Union Street, which have the potential to block back to the mainline.

Representation: Developments that are shown to impact this junction will require detailed junction analysis with particular consideration given to the likelihood of right turn movements from the A20 into Union Street.

A20 / A256 York Street

It is not envisaged that significant mitigation will be required at this junction, however we would note that the strategic model assessments do not offer a level of consideration to demonstrate detailed signal operation. Therefore, developments that are shown to impact this junction will require detailed junction analysis and potential mitigation.

Representation: Developments that are shown to impact this junction will require detailed junction analysis and potential mitigation

Other ongoing work

We have previously been consulted on Technical Note 1 (TN1), undertaken by WSP, which sought to address comments we raised in response to the Regulation 18 consultation. We responded to this consultation on 16 September 2022 and noted that it directly responds to questions previously raised by us and raises the need for further investigation into transport impacts of the Local Plan proposals on a number of key A2 and A20 junctions, namely: • The A2 Geddinge Lane / Coxhill and Lydden Hill signalised junctions • The A20 / A256 Woolcomber Street • The A20 / Union Street

We note that both the Infrastructure Delivery Plan and the Delivery Schedule make reference to the A2 Geddinge Lane/ Coxhill and Lydden Hill signalised junctions. The documents note how further discussions are required with us in relation to the A2 Lydden Hill and Coxhill Road junctions on the A2 to determine whether the ongoing transport modelling identifies mitigation being required at these junctions. We would request similar wording is included in the Infrastructure Delivery Plan and the Delivery Schedule in relation to the other two SRN junctions identified above where work is ongoing between all parties.

Representation: Infrastructure Delivery Plan and the Delivery Schedule should also reference that further discussions are required with us in relation to the A20 / A256 Woolcomber Street junction and the A20 / Union Street junction to determine whether mitigation is required at these junctions.

It is noted that more recently, there has been ongoing discussion in relation to these junctions and this was covered in both email responses and meetings. We issued a response with “action” points for WSP to resolve in relation to the above three junctions and these “actions” remain outstanding.

Representation: WSP should update the Forecasting Report in line with previous action points outlined by us in relation to the A2 Whitfield interchange, the A20 / A256 Woolcomber Street junction and the A20 / Union Street junction

(Note - This is an extract of the Full National Highways representation which can be located at SDLP1152)

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Evidence Base
Rep ID	SDLP1278
Rep Status	Processed
Consultee ID	1271353
Consultee Full Name	Church Commissioners
Consultee Company / Organisation	
Agent Full Name	Mr Andrew Watson
Agent Company / Organisation	Savills
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	HELAA
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Text Extracted from Document sent from Savills on Behalf of the Church Commissioners. Representation has been split across relevant areas of the Local Plan. Full attachment and introduction to Policy comments can be found under reference SDLP1265 for Shepherdswell Site and SDLP1266 for Eastry Site.)</p> <p>Housing and Economic Land Availability Assessment – SUPPORT WITH COMMENTS</p> <p>The Housing and Economic Land Availability Assessment (HELAA) (October 2022) identifies a future supply of land in the district which is suitable, available and achievable for housing and economic development uses over the Plan period to 2040. The assessment of the site (SHE006) makes the following comments in which Savills has provided a response to provide the Council that the site is suitable:</p> <p>Site is relatively well contained</p> <p>It is agreed that the site is well contained with defensible boundaries to the south-west, north-east and south-east. A new landscape buffer is proposed on the north-west boundary as per the attached Vision Document.</p> <p>Soft landscaping required to mitigate impact</p> <p>As shown within the attached Vision Document, a natural landscape buffer already exists on site. There is opportunity to reinforce the existing hedgerow and incorporate new tree and hedge planting to soften the development edges.</p> <p>Suitable access and connectivity will need to be demonstrated for the site to be taken forward as the track from Westcourt Lane is private and therefore access may not be achievable. Appears suitable visibility available for access off Coxhill. Road would need widening at access point. A Transport Technical note and drawings are attached to this representation. This confirms that suitable access can be achieved from Coxhill.</p> <p>No footway serving site.</p>

	<p>An existing footway ends on Coxhill at the north-eastern corner of the site. It is proposed that a footpath within the proposed development connects to this existing footway as set out within the attached Vision Document.</p> <p>A Transport Assessment will be required.</p> <p>It is agreed that a Transport Assessment will be required with any application that is submitted in accordance with NPPF paragraph 113. Included with this representation is a Transport Technical Note that demonstrates that the proposed development is achievable in transport terms.</p> <p>Access arrangements have since been clarified but there is still concern over footway provision. Concern also over cumulative impact on the road network</p> <p>See comments above.</p> <p>Our Client supports the HELAA's proposed housing allocation for site SHE006 (Land West of Coxhill Road, Shepherdswell). The technical work has been completed to create suitable flooding mitigation solutions to allow a higher capacity of dwellings on site. It is considered that there is justification to allocate site SHE006 for 25 dwellings if the additional land is also allocated. It is also recommended that the names of the sites in the HELAA should be consistent with the Local Plan policies.</p> <p>Recommendation: Increase the capacity of site SHE006 to 25 dwellings and update the name of the site to 'Land at Botolph Street Farm'.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	Evidence Base
<p>Rep ID</p>	SDLP1130
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1331290
<p>Consultee Full Name</p>	Mrs Helen Williams
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP15
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>SAP15. Rays bottom</p> <p><u>Sustainability Concerns.</u> Transport. This site is on a bus route into Deal. But this site is not well served by public transport into and from Deal. The service is limited, infrequent, does not operate throughout the day, and Stagecoach recently threatened to cut the service completely, as it is not profitable, but then has ended up reducing the service, and may reduce it further. It is a slow service as well, visiting many roads around Deal.</p> <p>There is a poor bus service for children going to secondary schools, and many parents from this area drive their children there, adding to the road congestion in the narrow country lanes. E.g. to get to Walmer station, to catch a train to Sandwich schools, have to cross the busy junction at station road/A258, which is currently undergoing road works to improve access. No traffic lights there, so there will be long waits to cross the road. The nearest secondary school, Goodwin Academy, is likely to be full as there are many hundreds of houses being planned in this and the Mill Hill area. If it is full, what then? There is a general lack of infrastructure., with local schools being nearly full, and GP surgeries with closed waiting lists, and no local NHS dentists.</p> <p>The Kingsdown primary school is fairly nearby, but it is far too dangerous to walk along the single lane Glen road to get to the school. No footpath. Glen road is very busy at school start and end. (I happened to go along here at school close times and had to wait for 23 cars and mini vans coming away from Kingsdown on the road) . If SAP 34 is permitted and built on, it is likely that this primary school will get full, and children living at Rays Bottom would have a longer journey to school, also by car, as the next nearest primary school (if there is room) is over 1,200 m away.</p> <p>The site is not within 1,200 m of an NHS GP surgery The site is not within 2,000 m of a further/higher education facility The site is not within 2,000 m of a strategic employment site. The site is not within 1,200 m of a town centre.</p> <p>The site has been judged by council officers to have the potential to moderately affect the district's historic environment. (a WW1 Site of an airfield)</p> <p>The site is very near, and overlooks the Hawks Hill free down. An area managed for its biodiversity by Walmer Town council and is surrounded on 2 sides by trees. The trees are full of birds, some migratory, and many bats can be seen there. It is an area with low level of light disturbance at night, which would be disturbed by the light coming from an estate of 75 houses, affecting bats roosting and feeding. (bats are a protected species).</p> <p><u>Highways Concerns</u> The highways assessment says that concerns have been identified in relation to access and/or highway impact and further assessment is required to demonstrate whether this can be mitigated. (Hella Appendix 3b Highways Assessments).</p> <p>The main problem is that it would increase the traffic along the narrow Liverpool road, Grams Road, and single lane Glen road. , which the irregular bus service uses. As already mentioned, Glen road has no space or accommodation for people on foot. Any access to the site would need localised road widening , and a reduction in the speed limit from Liverpool rd. .</p>

The residents of these proposed houses will need to have cars, (2 per family, so an extra 150 cars on local roads and they would join the stream of traffic on the overcrowded Deal to Dover road, which has problems at the Duke of York's Roundabout.

Landscape Concerns

Quoting from HELLA Appendix 2d Landscape Assessments. The development of this site would have an impact on the landscape and further assessment is required to demonstrate whether this can be mitigated.

The valley that the site is in at the bottom is subject to flooding. It drains in a northerly direction to an area north of Walmer Castle, which also floods in wet weather.

As mentioned already, the site is opposite Hawks Hill, an area of Priority habitat. The site is directly open to the neighbouring agricultural field on one side. One concern is the separation of Walmer from Kingsdown, as building here would reduce the separation of these settlements contrary to the SP4 policy.

This site is also in the LCA F3 Ripple area defined in the district *Landscape Character Assessment 2020* which defines on page 118 under Development Management that (developments should) **Conserve the rural character of the landscape ensuring that it continues to play a role in providing a rural separation between Deal and Kingsdown as well as a rural setting for the Kent Downs AONB.**

Environmental Concerns

The Environmental Assessment notes that "on site environmental constraints are present, which would need to be suitably mitigated to enable development. See HELLA Appendix 3d Environmental Assessments

This assessment mentions it is a brownfield site and has contaminated land. Not sure why it is being used for agricultural purposes with this. Risk of surface water flooding... already mentioned above.

Overall, I consider this site unsuitable for building on, for the reasons above.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Local Plan Consultation Point

Evidence Base

Rep ID

SDLP1128

Rep Status

Processed

Consultee ID

1331281

Consultee Full Name	Mr MAURICE WEBB
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP53
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I oppose the Unsound Selection of SAP53(RIN002/RIN004) as being Non-compliant with the NPPF Sustainability and Proportionate Evidence requirements and with DDC Policies SP3 and/or SP4</p> <p>Site History.</p> <p>I consider the Site History to be a material fact for consideration.</p> <p>Ringwould Alpines Plant Centre was a privately owned aprox.2.3 ha Horticultural Nursery situated in the Kent North Downs AONB with a vehicular access onto the A258 Dover road. The nursery activity serving commercial, corporate and public customers was centred around 10 Poly tunnels on what is now referred to as RIN002 and 2 Poly tunnels on RIN004. RIN004 housed a timber potting shed ,several raised timber beds for display of shrubs and bedding plants and a block built toilet/storeroom. There was also a small gravelled parking area adjacent to the Entrance on the A258 Dover Road. There was no external lighting so public access was limited to daylight hours and the site was closed to the Public throughout the Winter.</p> <p>The Plant Centre holding includes that section of Footpath ER14 which forms the boundary with my property, (DDC note: redacted), and a small strip of woodland the other side of Footpath ER14 lying between Landway and Popples Field.</p> <p>The whole site was purchased by the current owners Kingsdown Water in 2016/17 while they were seeking a Change of Use Planning Permission for the erection of a bottling plant with supporting infrastructure on the parts of the site now identified as RIN002 and RIN004.</p> <p>This PP Application was refused on Appeal and the site remains a Greenfield Agricultural site for Planning Purposes.</p> <p>Kingsdown Water have no Agricultural/Horticultural Interest in the site and have not put the site on the open market as a horticultural holding.</p> <p>The RIN002 and RIN004 parts of the site have been leased and apparently sub-leased to a succession of non Agricultural tenants carrying out a variety of non Agricultural Activities none of which have had the benefit of Planning Permission. The remainder of the site has been left unattended to and is becoming overgrown and untidy, including Footpath ER14.</p> <p>This has resulted in complaints from local residents and the site is now the subject of Enforcement Action which has yet to be resolved.</p> <p>Planning Contravention Notices completed by the owner and tenant(s) have revealed that various small businesses have been renting the land for builder's yard type purposes and that the mobile home on the site is for the night watchman.</p> <p>The activities on the site have resulted in considerable degradation and contamination of the land which would require considerable restitution measures to return it to it's original state. See attached photos</p>

In the first HELAA three parts of Ringwoud Alpines identified as RIN002, RIN004 and RIN006 were put forward by Ringwoud Alpines's Agent for inclusion as development sites in this Dover Local Plan.

In that HELAA RIN002 was put forward as a 1.19ha PDL site development site for 30 houses but this was considered to be unsuitable for development, RIN004 as a 0.22ha PDL site for 5 houses but was considered to be suitable RIN006 as a 0.7ha Greenfield site was considered to be unsuitable for development.

Only RIN004 was taken forward as a Reg 18 Consultation Proposal but RIN002 was added to RIN004 to form SAP53 in the Sect19 Consultation Proposal

RIN002 and RIN004 are now described in the HELAA2022 as being greenfield after representations were made about it's earlier incorrect HELAA description as PDL.

Two remaining parts of Ringwoud Alpines also owned by Kingsdown Water but not put forward for inclusion in the Local Plan proposals are a section of the Public Footpath ER14 running from Dover Road to Popples Field between Ringwoud Alpines and my property (**DDC note: redacted**), and a small approx 0.1ha strip of woodland located on the other side of the footpath between Landway and grazing land known as Popples Field.

The only vehicular access to these parcels of land is through the rest of the Ringwoud Alpines holding so these parcels of land will be landlocked unless vehicular access provisions are made over RIN002 and RIN004.

My property, (**DDC note: redacted**), is a 1.6ha Residential/Equine property the other side of the footpath which forms my boundary with Ringwoud Alpines.

My reasons for opposing the selection of SAP53 follow below.

Unsound Site Selection

I consider the Site Selection of SAP53(RIN002/RIN004) to be **unsound** for the following reasons:

1. Non-compliant being not positively prepared as per the NPPF sustainable development and proportionate evidence requirements and non-compliant with either of DDC policies SP3 and P4.

The Settlement Hierarchy was reviewed to ensure that all Local plan development sites proposals were **sustainable**.

In the Settlement Hierarchy Ringwoud is one of the small villages where only development **inside** the Village Settlement Boundary could be accepted but SAP53 is **outside** the Ringwoud Settlement Boundary. See attached Ringwoud Settlement Boundary Map

In SP3 and SP4 the overarching Sustainable Site Allocation Selection criteria is that " The distribution of housing and economic growth in the District will therefore primarily be based on the Settlement Hierarchy, and influenced by site availability, environmental constraints and factors of delivery"

I submit because SAP53 does not comply with the primary Settlement Hierarchy Selection criteria that this rendered the Influencing factors criteria on which the SP53 proposal appears to be based irrelevant.

I submit that ,because of non-compliance with the Sustainability Requirements of the NPPF and policies SP3 and SP4, the SAP53 proposal is **Unsustainable and Unsound**

1 Not justifiable as per the NPPF requirement for it to be based on proportionate evidence.

Inadequate Consideration of Representations made relating to RIN004 and RIN002 has resulted in unbalanced Council Responses and Reg19 Proposals because 21 respondents opposed the RIN004 proposal on issues also relevant to RIN002 and of these 6 directly referred also to RIN002 which was not a Reg 18 proposed site.

The scale of opposition to development of RIN002 is not reflected in the Council's summary of responses in respect of omitted sites because they were raised under the heading of the only Ringwoud site proposed in the Reg18 proposal i.e. RIN004.

3 respondents supported the RIN004 proposal of whom 2 including the owner(s) of the site requested the addition of RIN002.

The Council's responses to all the proposed Sect 18 proposal representations is generic not site specific and are not set out alongside the individual Site Allocations proposals.

This " one size fits all" approach does not address site specific issues and results in generalised non-site specific Mitigation measures .

There were 21 opposing representations mainly from local residents and only 3 supporting representation of which 1 was factually incorrect from a local District Councillor claiming the existing site access was adequate for a large development on RIN002, RIN004 and RIN006 and

the other was from the site owner, Messrs Bomer a.k.a. Kingsdown Water, seeking to have RIN002 added to RIN004 to maximise the potential housing capacity of his site asking for 41 dwellings and claiming incorrectly that the site was a brownfield site..

In the Reg 19 proposals. said to have taken into account all of the representations together with all other relevant factors, RIN002 has been added to RIN004 to form SAP53(RIN002/RIN004). It can only be concluded that the Council attach little value to the representations made by local residents but great importance to those from the site owner which does nothing to promote public confidence and participation in such Consultation exercises.

I consider the above constitutes **disproportionate** consideration being given to Reg 18 supporting comments resulting in the **unsustainable and unsound** SAP53(RIN002/RIN004) **Reg19 proposal** .

No new evidence emerged in the Regn 18 submissions to justify the addition of RIN002 to RIN004 at this final Reg19 stage of the Local Plan HELAA stage and the proposal itself contains no reason for the addition of RIN2 to SAP53.

Whatever evidence exists to justify the inclusion of RIN002 into the Local Plan at this final late stage must have existed and have been discounted right from the early HELAA stages.

Including RIN002 now at this last final stage of the Local Plan consultation stage makes submitting representations more difficult because of the discouraging, complicated and, to some residents, incomprehensible Reg19 Representation procedure format.

The site promoter now claims that selecting only RIN004 would landlock RIN002.

This potential landlocking issue has been apparent all the time and could be easily resolved..

What is different is that local residents have now discovered that, after being consulted at the Reg18 stage on RIN004 a 0.21 ha AONB site with a proposed indicative total of 5 houses and a capacity to accommodate 7 houses situated between 2 dwellings fronting onto the Dover Road, they are now faced with SAP53(RIN002/RIN004) a 1.41 ha AONB site with an indicative proposal for 10 houses but a capacity of 37 houses situated immediately between and behind several houses and intruding deep into the rest of the AONB on which they were not consulted.

Although there are common issues affecting both RIN002 and RIN004 the SAP53 proposal differs considerable in scale, character and impact on the AONB and neighbouring AONB properties than the earlier RIN004 proposal.

The site currently enjoys "dark skies" but the proposals would create a built up suburban street scene complete with power and telephone poles and wiring infrastructure together with street lighting where none exists which is inappropriate for the AONB setting.

The Site is in an area where >25% of the land is at least Grade 3 Agricultural Land.

The site would require construction of a new side turning serving the 10 new dwellings onto the busy A258 almost immediately opposite the existing Queens Rise side turning on the other side of this road causing increased risk of delays and accidents on this particular section of the A258.

RIN002 extends the SAP53 site further into the AONB making it visible from a popular Footpath ER14 see photos which is part of the Ringwold Alpines holding

and also from my property, **(DDC note: redacted)**,. RIN002 extends behind four Dover Road AONB properties and also has a boundary with my AONB property,**(DDC note: redacted)**..

No account has been taken of the effects of RIN002 combined with RIN004 on these neighbouring properties.

Local residents who thought it was not necessary to make representations about RIN002 or those who made passing reference to RIN002 can now comment but to do so is rendered more difficult because of the **discouraging, complicated and, to some residents, incomprehensible Reg19 Consultation format** .

I submit the Council's RIN004 Reg 18 Consultation responses and the Reg 19 SAP53(RIN002/ RIN004) Representations format make this latest REG19 Proposal and Consultation **disproportionate, unsustainable and unsound and non-compliant with the Proportionate Evidence of the NPPF and Policies SP3 and SP4..**

3,The Evidence Base is Incomplete.

There are significant omissions in the Evidence Base covering the **Landscape Sensitivity Assessment (LSA) 2021 and Landscape Character Assessment (LCA) Sections** .

None of the Ringwold Alpines AONB sites are included in either of these Sections of the Evidence Base.

	<p>DDC Landscape Character Assessment (LCA) does not include the AONB which is said to be covered by the North Kent Downs AONB Management Unit's own LCA 2020 but this LCA is being updated and has not yet been published on the AONB Unit's website..</p> <p>The DDC commissioned Landscape Sensitivity Assessment(LSA) report does not include the Ringwoud Alpines AOB sites but because the selection criteria have not been published it has not been possible to identify why.</p> <p>Many of the 33 Local Plan sites selected for a LSA are in neighbouring settlements and they include AONB and non AONB sites.</p> <p>The Council claim that the AONB Management Unit were consulted and were satisfied with the proposed mitigation measures but this does not explain why RIN002 and RIN004 were not selected. .</p> <p>These mitigation measures only address the Local Visual Impact (LVI) aspect of the Ringwoud Alpines sites whereas the LCA and LSA would have addressed not just the LVI impact but also a wide array of other factors affecting not just the AONB but also the wider surrounding landscape inside and outside the AONB.</p> <p>Issues such as dark skies, ambient noise levels, built environment and the effect on the lives of neighbouring householders, properties etc.</p> <p>I submit that, because the RIN002 and RIN004 evidence does not include an LCA or an LSA, the SAP53(RIN002/RIN004) element of the Evidence Base is incomplete and makes the SAP53 proposal unsound and non-compliant with with NPPF Sustainability and Proportionate Evidence Requirements and with DDC policies SP3 and SP4</p> <p>4. The Ringwoud Alpines Plant Centre holding is currently the subject of Unresolved Planning Enforcement action.</p> <p>This is in respect of non agricultural activities being carried out there without the benefit of Planning Permission. Various small businesses have been renting the land for builders yard type purposes and there is a mobile home on the site for a night watchman.</p> <p>These activities have resulted in considerable degradation and contamination of the site. See attached photos.</p> <p>The Availability and Deliverability of the Site would be affected by resolution of the Enforcement Action requiring a Planning Application and/or enforced reinstatement of the site to it's previous Agricultural/Horticultural state.</p> <p>I understand the Enforcement Officer is seeking advice on this at the moment.</p> <p>In these circumstances I submit that the RIN002 and RIN004 site should not have been included in the Dover Local Plan SAP53(RIN002/RIN004) proposal because all Local Plan sites should be Available and Deliverable and that this selection is unsound because of reasonable doubt over the Site's Availability and Deliverability.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>I ask that Reg19 Proposal SAP53(RIN004/RIN004) be removed in it's entirety.</p> <p>The removal of SAP53 which is unsound because it does not comply with requirements of the NPPF nor with SP3 and SP4 will remove a proposal that is not legally compliant and sound from the Local Plan</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>P1040520.JPG Photo 4.jpg</p>

	Ringwould Settlement Map.png
Local Plan Consultation Point	Evidence Base
Rep ID	SDLP1279
Rep Status	Processed
Consultee ID	1331281
Consultee Full Name	Mr MAURICE WEBB
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I consider the SAP34 proposal is non-compliant with the NPPF requirement to objectively assess the positive and negative impacts of the proposal for the following reasons:</p> <p>1. The SAP34 proposal is non-compliant with the NPPF requirement to objectively assess the positive and negative impacts effect of a proposal.</p> <p>There are no identifiable benefits for local residents, the only benefits would be for house buyers seeking a new property in a suburban type development with a prestigious address.</p> <p>There are many negative impacts on local residents particularly for Glen Road residents. Local shops will not benefit significantly because the site is remote form their location. Pedestrian access to the village proper is via Kingsdown Road which is the main access to Kingsdown for the A258. The route is narrow and unsafe with no pavements at any point. Vehicular access is similarly constrained and exacerbated by lack of parking and there is no Public Transport. The new residents will be house buyers looking for a house in a suburban style new development with a prestigious Postal Address and reasonably close to nearby Deal and Dover shopping centres and Railway stations. Local residents will experience more traffic on Kingsdown Road and other minor local roads and congestion in the village centre as newcomers try to navigate their way through the narrow village streets.</p> <p>I consider the SAP34 Proposal does not comply with the NPPF requirement that the positive and negative impacts of a site should be objectively assessed.</p> <p>2. The SAP34 Proposal is non-compliant with the NPPF requirements for development proposals in, or in the settings of, an AONB.</p> <p>DDC Commissioned a Landscape Character Assessment (LCA)survey . This showed SAP34 was a site in the Ripple Landscape Area which is identified as an Area of Open Chalk Arable Farming. As such the site provided a Buffer between the built Lanscape of Kingsdown village and</p>

the surrounding farmland and AONB. This proposal would substantially lessen this buffer with particular impact on the adjacent AONB. **DDC also commissioned a Landscape Sensitivity Assessment (LSA) which was a site specific assessment covering a much wider range factors than an LCA and covered the impact on both the the immediate Landscape around a site but also the impact of the wider landscape. DDC selected only 33 sites and for some reason none of the sites in Kingsdown or the neighbouring village Ringwould were selected. The Ringwould site SAP53 was inside the AONB and the Kingsdown site SAP34 was adjacent to the AONB. The selection criteria is unexplained.**

There has therefore been no site specific assessment of the Landscape Sensitivity of SAP 34.

I consider the SAP34 Proposal is non-compliant with the NPPF requirements for sites in or adjacent to an AONB.

3. I consider the SAP 34 Proposal is non-compliant with the Requirements of DDC Site Selection Policies SP3 and/or SP4.

DDC have not indicated under which of the above policies SP3 and SP4 they have selected SAP 34. This omission is not limited to this proposal and appears to be general for all proposals.

This omission makes representations against the selection of sites such as SAP34 because both policies could have been used, However SP4 proposals have to comply with SP3 requirements.

Any development under either SP policy should be compatible in scale, design and appearance of the Settlement in or next to which it is situated. A new build housing estate in this particular location is not compatible with any of these.

The scale is disproportionate to the existing adjacent properties and the village as whole, the design would be quite unlike any of the neighbouring houses or the general range of mixed styles and ages of property in this village with its conservation area and appearance would be incompatible with its location in open arable farmland adjacent to an AONB.

I consider that the SAP34 Proposal is non-compliant with DDC Site Selection Policies.

For all the above reasons I consider the SAP34 Proposal to be **UN SOUND**.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I request the removal of the SAP34 proposal from the Local Plan.
I consider this will help to make the Local Plan less **unsafe**.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Local Plan Consultation Point	Evidence Base
Rep ID	SDLP1391
Rep Status	Processed
Consultee ID	1331698
Consultee Full Name	Mr G Virtue
Consultee Company / Organisation	
Agent Full Name	Danielle Dunn
Agent Company / Organisation	Goldstone Planning
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	4. Housing and Employment Site Allocations
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	Please find enclosed details of an omission site for consideration in the Local Plan.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>RE: Omission Site- Land on the South West side of Hillside Road, Dover Proposed for residential development - Indicative capacity 10-15 units.</p> <p>Previous Reference Numbers: DOV011; TC4S100</p> <p>I've been instructed by my client, Mr Virtue, to provide representation against the non-inclusion of a site in his ownership in the final Local Plan Regulation 19 document.</p> <p>I did not act as agent in the previous submissions of the site but following correspondence with the Planning Policy Team at Dover District Council, it is my understanding that the site was originally put forward for housing development and assessed as part of the Housing and Employment Land Availability Assessment (HELAA) under site reference DOV011. The site was also submitted for potential employment use, my client thought this to be a care home, during the 2021 Call for Sites. At this stage, the site was given the reference number TC4S100. Despite the submission of the site to the Council, the site was not included as an allocation in the Regulation 19 Local Plan or a 'reasonable alternative', and therefore, the site has not undergone a Sustainability Appraisal.</p> <p>On the basis of lack of sustainability assessment and in accurate HELAA assessment, we object to the non-inclusion of the site and request that the site is reconsidered as an omission site. It is the intention of this submission to reduce the size of the site and the housing numbers proposed to an indicative capacity of 10-15 units. The site is no longer promoted for employment use.</p> <p>1.Sustainability of the Site:</p> <p>The site should be reconsidered for inclusion in the Local Plan as it is sustainable.</p>

Firstly, the site is in one of the most sustainable locations in the built-up area of Dover. It has access to sustainable transport links, health services and community and shopping facilities all within walking distance.

Further to this, and reflecting its sustainable location, the site previously had outline planning permission for 28 dwellings approved under application 87/00081. This scheme was for outline consent and included 8 x semi-detached, 19 x terraced and one detached dwelling with associated.

This submission would reduce the number of proposed dwellings to an indicative number of 10-15. Any future scheme would be low-density and provide green links and access for people to enjoy the wider green spaces and the setting of the AONB and the neighbouring local wildlife site.

2. Inaccuracies in the DDC Assessments:

The site was dismissed as 'unsuitable' in the HELAA. This assessment has inaccuracies which should be reconsidered.

The reasons for being deemed unsuitable are summarised below:

- **The site is dense wood and scrubland. This includes the access point to the site in the northeast. Any development of the site would require the removal of this dense woodland.**
- **Unacceptable impact on biodiversity.**
- **The site is on a slope that raises away from the access point to the highway.**
- **The raised position of the site would create development at a higher elevation than the existing residential to the east and would likely impact on the AONB immediately adjacent to the west AONB setting.**
- **Potentially development of the scale proposed could have an impact on nearby roads in terms of vehicular traffic.**

The above assessment is inaccurate as the site is only self-seeded woodland, with the historic use of the site being allotment gardens, which served the properties on Hillside Road. Discussions with long-standing residents of these properties, and historic photography, has identified that the site was still being utilised as allotment gardens as late as in the 1980s. On this basis the woodland identified on site is self-seeded with many saplings and very few mature specimens. By virtue of the habitat created in this nature, the site does not have any biodiversity of ecological designations.

The site being on a slope should not have been a reason for non-inclusion. The town of Dover, including large areas of development, is built on a slope and the design of any future scheme could reflect the topography of the land and take into consideration the existing development on Hillside Road. For example, future design proposals could ensure that there is no impact on the residential amenity, by designing layout and the massing and scale of any new dwellings to acknowledge and respect the existing development.

Any concern raised regarding the potential of the scheme impacting on neighbouring roads will be rectified by reducing the number of dwellings proposed on the site.

3. Deliverability of the site:

In accordance with the definition of the National Planning Policy Framework, the site is available for immediate delivery and would be a positive contribution to Dover District Council's Housing Land Supply, it could be delivered in the first 1-5 years of the Dover District Local Plan period. In consideration of this, the NPPF acknowledges the positive contributions that smaller sites can make to the supply of housing in the local area.

It is for the above reasons that the site should be reconsidered for inclusion in the Local Plan. Should you require any further information do not hesitate to contact me.

<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>I wish to attend any future hearings relating to omission sites. Specifically regarding the potential for their inclusion in the Local Plan.</p>
<p>Include files</p>	<p>Hillside Road red boundary.pdf</p>

Local Plan Consultation Point	Evidence Base
Rep ID	SDLP1127
Rep Status	Processed
Consultee ID	1331290
Consultee Full Name	Mrs Helen Williams
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP35
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>SAP 35- Courtlands</p> <p>The Courtlands site was only introduced to the local plan after reg 18, and was poorly advertised , so few people knew about it.</p> <p><u>Highways considerations.</u></p> <p>These need mitigation.</p> <p>The road into Courtlands is now adopted by KCC, but there is no footpath at the side.</p> <p>The likely residents of these proposed houses are likely to have cars, and would join the stream of traffic going through the single lane narrow roads of Kingsdown , onto the Ringwould road, and join the overcrowded Deal to Dover road, which has problems at the Duke of York's Roundabout. There is also a problem returning to Kingsdown from the main Dover Deal road, as at the turn off at Ringwould, the road is only 2 lanes wide , so when a car turns right to go to Kingsdown, all the traffic behind has to wait. This part of the road needs to be made 3 lanes wide.</p> <p><u>Sustainability considerations.</u></p> <p>Sustainability is poor because:</p> <p>Kingsdown is not well served by public buses. There is no direct bus to Dover, and the Ringwould road up to the A258 does not have a path, and is only just 2 lanes wide, so it is a dangerous road for pedestrians, or bikes. There is a service into and from Deal. The service is limited, infrequent, does not operate throughout the day, and Kent County council recently threatened to cut the funding for Stagecoach, who run the service. as it is not profitable, Th end result has reduced the service, and may reduce it further. From Deal there is a bus connection to Dover, but the times of arrival and departure from the bus station do not coincide.</p> <p>There is a poor bus service for children going to secondary schools, and many parents from the village drive their children at least part way, adding to the road congestion in the narrow country lanes. E.g. to get to Walmer station, to catch a train to Sandwich schools , they drive along the single lane Glen road.</p> <ul style="list-style-type: none"> • The site is not within 1,200m of an NHS GP Surgery.

- The site is within 200m of a Public Right of Way/Cycle Path, but the cycle path is not lit at night .
- The site is not within 2,000m of a secondary school.
- The site is not within 2,000m of further/higher education facilities.
- The site is not within 2,000m of Strategic Employment Sites/Enterprise Zones.
- The site is not within 1,200m of a town centre.

Landscape

The proposal does not take account of how the building of these five houses and the loss of this part of the field contravenes Section 15 of the National Planning Policy Framework in terms of the following paragraphs

Para 174. Planning policies and decisions should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan) - the assessment makes a light mention of biodiversity when locals know the field is visited by nesting skylarks in the summer and the field edge across the Channel that is widely enjoyed by locals and tourists who walk between Walmer and Kingsdown over the free down contains the burrows of bumble bees. There are many bats which flit about and can be seen at dusk here (low levels of lighting here favours this). The field is also regarded as a valued landscape with open views

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services –including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland- building over a quarter or more of the field will make it less sustainable for agriculture. The field is regularly used for arable crops. There is very little confidence that there will not be pressure of build over the rest of the field despite the plan. It is likely that the old hedge, (at edge of the old estate), at one side of the property would be removed. It needs to be protected, as it is full of wildlife. .

c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate - the building of these five homes further develops the coast, as it is up a bit higher. Given how other parts of the south coast have been ruined by dense coastal developments this development doesn't comply at all. The homes will be viewable from Kingsdown beach and the sea.

In addition , This site is in the LCA F3 Ripple area defined in the district *Landscape Character Assessment 2020* which defines on page 118 under Development Management that (developments should) *Conserve the rural character of the landscape ensuring that it continues to play a role in providing a rural separation between Deal and Kingsdown as well as a rural setting for the Kent Downs AONB.*

In the HELLA Appendix 2c Landscape Assessments it says "Any development of the site would have to mitigate the impact on the hilly countryside and due to this hilly nature it is difficult to see how the impact can be mitigated.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

SAP 35- Courtlands

The Courtlands site was only introduced to the local plan after reg 18, and was poorly advertised , so few people knew about it.

Highways considerations

The road into Courtlands is now adopted by KCC, but there is no footpath at the side.

The likely residents of these proposed houses are likely to have cars, and would join the stream of traffic going through the single lane narrow roads of Kingsdown, onto the Ringwould Road, and join the overcrowded Deal to Dover road, which has problems at the Duke of York's Roundabout. There is also a problem returning back to Kingsdown from the main Dover Deal road, as at the turn off at Ringwould, the road is only 2 lanes wide , so when a car turns right to go to Kingsdown, all the traffic behind has to wait. This part of the road needs to be made 3 lanes wide.

Sustainability

Kingsdown is not well served by public transport into and from Deal. The service is limited, infrequent, does not operate throughout the day, and Kent County council recently threatened to cut the service completely, as it is not profitable, but then has ended up reducing the service, and may reduce it further. From Deal there is a bus connection to Dover, but the times of arrival and departure from the bus station do not coincide.

There is a poor bus service for children going to secondary schools, and many parents from the village drive their children there, adding to the road congestion in the narrow country lanes. E.g. to get to Walmer station, to catch a train to Sandwich schools , drive along the single lane Glen road.

- The site is not within 1,200m of an NHS GP Surgery.
- The site is within 200m of a Public Right of Way/Cycle Path, but the cycle path is not lit at night .
- The site is not within 2,000m of a secondary school.

- The site is not within 2,000m of further/higher education facilities.
- The site is not within 2,000m of Strategic Employment Sites/Enterprise Zones.
- The site is not within 1,200m of a town centre.

Landscape

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Para 174. Planning policies and decisions should contribute to and enhance the natural and local environment by:

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b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services –including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland- building over a quarter or more of the field will make it less sustainable for agriculture. The field is regularly used for arable crops. There is little confidence that there will not be pressure of build over the rest of the field despite the plan

c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate - the building of these five homes further develops the coast. Given how other parts of the south coast have been ruined by dense coastal developments this development doesn't comply at all. The homes will be viewable from Kingsdown beach and the sea.

In addition, this site is in the LCA F3 Ripple area defined in the district *Landscape Character Assessment 2020* which defines on page 118 under Development Management that (developments should) *Conserve the rural character of the landscape ensuring that it continues to play a role in providing a rural separation between Deal and Kingsdown as well as a rural setting for the Kent Downs AONB.*

In the HELLA Appendix 2c Landscape Assessments it says *The development of this site would have an impact on the landscape and further assessment is required to demonstrate whether this can be mitigated.*

A general point about this site being suitable for 5 houses. This site is 0.71 hectares. There is a site opposite, over the Kingsdown Road called Beach Mews, which has been built on fairly recently. It is 0.265 hectares and has 7 luxury 3 & 4 bed houses built on it. My suspicion is, that the owner of site SAP 35 will not be content with just 5 houses in a large area, but will apply for more houses in due course, badly affecting the landscape. Any houses built on SAP 35 will be luxury houses to fit into the area. Finally, this area does not need more luxury houses, but it badly needs houses for young families at an affordable price. This will not happen here

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

No

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Local Plan Consultation Point

Evidence Base

Rep ID

SDLP1139

Rep Status

Processed

Consultee ID

1331762

Consultee Full Name

Ms Waite-Gleave
Sarah
Waite-Gleave

Consultee Company / Organisation	Dover and Deal Green Party
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	All SPs (Strategic Policies), most DMs (Development Management policies) some SAPs
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	See below
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Landscape Character Types, 17 identified. To become sound there should be an addition. The area inland from Kingsdown, west to Ringwould, Ripple, Sutton, Studdal and Little Mongeham should all be included as LFT F Open Arable Chalk Farmland with Woodland, as an extension to F3 Ripple. The Landscape Character Types (LCT) are a sound and helpful classification. Two amendments that would make Table 11.1 more sound and effective would be: for there to be a commitment to protect and expand Horticultural Belt LCT D in north of district, especially for pesticide-free, Nature-Friendly farming enterprises (see our comment SP 6) ; and for LCT F Open Arable Chalk Farmland with Woodland – F3 Ripple to be expanded to include all land west of Kingsdown village in a 3 mile band, to include Ringwould, Ripple, Sutton, Studdal, Little Mongeham to Northbourne and Tilmanstone.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	We are making detailed suggestions (using examples from recently adopted Local Plans in other parts of England) on why DDC Local Plan Reg 19 version is unsound, and some is not legally compliant and how it ought to have been more positively prepared. These can be summed up as 'Less fuel poverty, more honesty, more action for nature and climate: transform Dover homes into zero carbon homes'.
Include files	v4 D&D Greens response 2022 Reg 19 new Local Plan .docx
Local Plan Consultation Point	Evidence Base
Rep ID	SDLP1286
Rep Status	Processed
Consultee ID	1331808

Consultee Full Name	Mr Robert Hogben
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>I object to KIN002 (SAP 34) being included in the draft LDP for the following reasons:</p> <p>The inclusion of SAP 34 is not legally compliant with NPPF 2021 item 11. (b)ii '<i>SPs should provide for objectively assessed needs for housing & other uses, . . . unless (ii) any adverse impacts of doing so would significantly & demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole</i>'.</p> <p>The following arguments show why this development would have more adverse impacts than benefits and would not be sustainable.</p> <p>Kingsdown is a quiet village which has not developed into a larger settlement because it is isolated by its geography (see my later comments on local centres). Allocated money from developers would not 'improve' the infrastructure of the village as there is no space to provide parking or for widening roads or for improving any other physical infrastructure. The narrow single track roads through the village which are an inherent part of the character and charm of the village are also a limiting factor for the village in terms of further development. The roads in the village are already adorned with parked cars wherever possible, and there are very limited pavements in the village, this means pedestrians are often forced to walk in the middle of the roads and duck in-between cars when traffic approaches. Some parts of the roads have high walls and no pavements which, with current traffic levels, make walking perilous. Any increase in cars trying to park to use services or passing through the village, would be very dangerous. Residents of KIN002 would have to use their cars for almost all of their journeys, creating pollution and congestion.</p> <p>Furthermore, as the UK government have decided on 5/12/22 to stop putting pressure on local authorities to authorise unsustainable housing targets the LDP now needs reviewing in light of the new directives. The Dover District Area has, in recent years, been subject to considerable housing development, higher than that allowed for by the current local plan, and this development has been unsustainably concentrated into certain specific areas, because much of our district is either already overdeveloped, or not suitable for large scale development as it is either designated as an area of outstanding natural beauty (AONB), or it is heritage coast, or it is very low lying and liable to flooding or needed as floodplain.</p> <p>The continued inclusion of SAP34/ KIN002 land at Woodhill Farm, Kingsdown in the LDP is unsound, because, despite many concerns and reasoned arguments from residents the only concession seems to have been to reduce the housing numbers from 90 to 50; Due to the weak wording of the local plan that only suggests what would be 'preferred' by the district council, it is highly likely that the final number of houses would be in excess of 50 and possibly in excess of 90, if the proposal were to go ahead.</p>

The site has now been given a green allocation in the HELAA report despite its many issues and the fact that an adequate highways assessment has not yet been carried out and the HELAA highways assessment remains amber. The latest HELAA report states that the many failings can be mitigated for within the LDP. I argue that this is unsound and not justified nor consistent with National Policy NPPF 21. The evidence from DDC has not been used correctly. NE2 Landscape character and the Kent Downs; states in section 11.13 that DDC aims: *To ensure that all development coming forward over the plan period respects and reflects the character of the landscape in which it is located.* The DDC landscape character assessment of 2020 (LCA) shows that SAP34 / KIN002 falls within Ripple F3, *open chalk farmland and woodland.* **NE2** states; *the classification identifies 17 LCAs and defines issues of landscape management and development management which should be delivered over the plan period.*

Development Management guidelines include:

- Conserve the rural character of the landscape ensuring that it continues to play a role in providing a rural separation between Deal and Kingsdown as well as a rural setting for the Kent Downs AONB.-Seek to reduce lighting and noise impacts on this landscape and in longer views through sensitive highway design/management. Conserve the distinctive narrow winding lanes and grassy verges.

SAP 34 would not *'conserve the rural character of the landscape'*

SAP 34 would be right next to the AONB so would clearly not *'provide a rural setting for the Kent Downs AONB'*.

SAP 34 would, in direct contravention of the guidelines, increase *'lighting and noise impacts on this landscape'*.

SAP 34 would, in direct contravention of the guidelines, due to the raised setting of the site, negatively affect the rural setting of the AONB on *'longer views'* of this landscape, both looking into and out from the AONB.

SAP 34 would also, according to the HELLA Highways assessment, require the alteration of and therefore not *'conserve the narrow winding lane and grassy verges'* which form the main entrance to and help to define the character of, the quiet village of Kingsdown.

The Development Management guidelines also include:

- Conserve the open skyline, avoiding the introduction of vertical elements such as pylons, telecommunications masts etc.- Protect and enhance views from more elevated areas and from the coast out to sea and towards landmark features such as Walmer Castle.

SAP 34 is in an elevated position so it would not *'Conserve the open skyline'* of this landscape area of open chalk fields with woodland.

SAP 34 is in an elevated position so it would not *'Protect and enhance views from more elevated areas'* of this special landscape area of Ripple F3.

SAP 34 is clearly visible from many viewpoints within both the AONB and the Ripple F3 special landscape area, from along the A258 and the network of footpaths, and from the locally renowned 'Nelsons seat viewpoint'. I contend that it would therefore not *'protect and enhance the views of this landscape'*.

SAP 34 can, as I have mentioned be seen from within the Ripple F3 landscape area, and from certain directions it would be in the foreground of views out to sea, it would therefore not *'Protect and enhance views out to sea'*

SAP 34 has views out to the picturesque Ripple windmill, which I contend is a *'landmark feature'*, therefore this development would contravene the development guidelines, by not protecting nor enhancing views towards *'landmark features'*, which would be lost.

The development of SAP34 would result in the loss of an important buffer between the built environment of Kingsdown and the AONB. Ringwould Rd would lose part of its character and the main entrance to the village would be deprived of its character. Part of the AONB would be lost as would part of the character of the AONB. From within The Ripple F3, views across to Kingsdown and the sea would be negatively impacted and the open character of the landscape would be lost and pollution from light and traffic would increase. The HELAA sustainability appraisal states; *The site has been judged by Council officers to have the potential to moderately affect the District's landscapes, townscapes or seascapes.* I argue that this is not supported by the facts, and is not a fair appraisal of the probable impact of this development, especially when considered in the light of the site forming part of the LCA F3, the proximity to the nationally important AONB and the suggested necessary alterations to the *'distinctive narrow winding lane and verges'* which lead into what is at present a quiet rural village.

NE2 11.19 states *'The setting of the AONB comprises land adjacent to or within close proximity of its boundary, including but not limited to land which is visible from the AONB and from which the AONB can be seen.....Within the setting of the AONBs, priority will be given over other planning considerations to the conservation or enhancement of natural beauty, including landscape, wildlife habitats, tranquillity, dark skies, and geological features'*.

NE2 11.19 clearly and accurately describes the proposed site for SAP34. It is adjacent to and within close proximity of the AONB, it is visible from the AONB and the AONB can be seen from it. By allowing this development to go ahead, *'conservation of natural beauty, including*

landscape, wildlife habitats, tranquillity and dark skies' would not have been given 'priority over other planning considerations' I therefore contend that the development is not sound.

SP13 states that *the NPPF 2021 requires local plan policies to conserve and enhance the natural environment, to recognise the intrinsic character and beauty of the countryside and the wider benefits from natural capital and ecosystems.* Including SAP34 in the LDP is therefore in direct contravention of the NPPF, which means it is unsound as it would detract from the beauty of the countryside particularly the adjacent AONB. The Kent Downs AONB management plan 2021-26 says *the Kent Downs AONB, perhaps more than any other of Britain's protected landscapes – AONBs, Heritage Coasts or National Parks, has experienced and is experiencing severe development pressure.* DEFRA evidence shows *'The Kent Downs AONB stands out as an area which has experienced major change, showing a rate of urban growth of almost 10%.pa, with the urban area spreading by 14 ha over the decade'*. The AONB in Dover District has suffered development at a disproportionate rate which indicates that planning pressures on our district are unsustainable as they are overflowing into this nationally important landscape area. National Planning Practice Guidance (NPPG) confirms that the Duty of Regard is *'relevant in considering development proposals that are situated outside National Park or Area of Outstanding Natural Beauty boundaries, but which might have an impact on the setting of, and implementation of, the statutory purposes of these protected areas'*. I would argue that because the entrance onto Ringwould Rd requires widening and changing of the road which will encroach into the AONB, to mitigate for it being unsafe, this will be detrimental to the setting and directly upon the AONB.

NPPF 2021 11 – making effective use of land - Planning policies and decisions should: 120 b *recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production.* As food security is such a national issue, including SAP34 for development is unsound and unsustainable as good agricultural land would be better served in producing food. I would add that the local plan talks about sustainability for future generations, but as the UK only produces around half of the food we need domestically, and the world population is growing and with global warming crops around the world are beginning to fail, it is highly likely that in the future we will need all the agricultural land we have to feed ourselves. Developing agricultural land is not sustainable.

Allocated money from the developers would not improve things as there is no space to provide parking in the village or for widening roads or for improving infrastructure. The narrow single track roads through the village which are an inherent part of the character and charm of the village are also a limiting factor for the village in terms of further development. The roads in the village are already adorned with parked cars wherever possible, and there are very limited pavements in the village, this means pedestrians are often forced to walk in the middle of the roads and duck in-between cars when traffic approaches. Any increase in cars trying to park to use services or passing through the village would be very dangerous. Residents of KIN002 would therefore have to use their cars for everything, creating pollution and congestion

Local Centres:

I would argue that the designation of Kingsdown as a local centre is unsound. Due to the nature of its location, with the undeveloped AONB, heritage coast and cliffs to the south, with no roads for access from this direction, the Sea to the east, with no villages, inhabitants nor roads, only Walmer to the north, which is closer to the town of Deal than to Kingsdown, but in any case, itself has better facilities than Kingsdown. To the west there are several small villages, such as East and West Langdon, but they are closer to and have better links to Dover, to the north west are Studdle, Ripple and Mongeham, but they are closer to and have better links to Deal. This leaves the small settlement of Ringwould, which is close to Kingsdown, but is cut off by the Arterial A258. Ringwould Road, which joins the two settlements, is steep and narrow in parts and not suitable for occasional cyclists or walkers, so most people would tend to drive between the two villages, however, there is very limited parking and limited facilities in Kingsdown, so even people from Ringwould are much more likely to frequent Dover, Walmer or Deal for everyday needs or services. All of this probably goes a long way to explain why Kingsdown has never developed wide roads and modern infrastructure.

The high proportion of second homes and Air b and bs in the village demonstrates that dwellings outnumber homes required, so there is not an *'objectively assessed need for housing within the Parish'*. If largescale development were to take place in Kingsdown, it is highly likely that, many of them would become second homes or Air b and bs. Unless houses used for these purposes are owned by local people who already live in the village, which is unlikely, such houses would bring very little to the village. To include SAP34 /KIN002 is therefore unsound and not consistent with NPPF 21.

NPPF 2021, Paragraph 73. b) states that suitable land for development should; *'ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;* However SAP34 is unsound because there are extremely limited opportunities for employment within Kingsdown and there is not *'good access'* to larger towns. There is no rail link, the bus service is very limited and reduced since Reg 18, and the roads are narrow and already at certain times, dangerously busy.

NPPF 2021 Paragraph 79, states; *To promote sustainable development in rural areas, 'housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby'*.

Because as I have outlined, Kingsdown is not at the heart of other rural settlement, the development of SAP34 will not *'enhance or maintain the vitality of rural communities'*.

The HELLA highways assessment commented that the scale of KIN002 was too small to create enough new footfall to improve the bus service, I suggest it would also be insufficient to warrant any other new services either.

I have mentioned that Kingsdown is isolated by distance and due to poor public transport, due to the position of the A258 and due to the narrow roads leading to and from the village. For these reasons, it cannot be said to be part of a *'group of smaller settlements'*, where *'development in one village may support services in a village nearby'*. New residents at KIN002 would mostly have to use their cars to visit Dover, Deal or Walmer for services, contributing to Carbon emissions and making the roads more congested and dangerous. For these reasons I believe the KIN002 is unsound and unsustainable.

For all of the above reasons I contend that classifying Kingsdown as a 'village centre' is not justified by the facts. It should be reclassified as a 'larger village', which would mean the only development permitted would be windfall development within the village boundary.

If Kingsdown were to be classified as a larger village, which I have shown is demonstrably appropriate, then there would be strict criteria limiting developments such as KIN002, which would not be allowed to proceed as it is outside the village boundary.

When using the criteria of the draft local plan SAP34 is not sustainable and unsound for the following reasons:

T11 Development should, in so far as its size, characteristic and location -Give priority to the needs of pedestrians, cyclists, users of public transport, car sharers and users of low and ultra-low emission vehicles.

The location and size of SAP34 means it will give priority to car drivers only so it will not be in line with T11. The HELLA appraisal said it will not be large enough to warrant improvement of public transport. It is not on a train route. There are poor footpath routes to the village and only narrow and winding lanes to the village and to local towns. There is a cycle route to Deal along the seafront, but this joins Kingsdown at the other side of the village and the route would probably be too far for most casual cyclists. It is probably too far for people to walk to Deal or Dover in order to use the facilities at these towns. Any attempt to improve the cycling and walking routes to the village would result in loss of the distinctive character of the winding lanes which the 2020 LCA F3 Ripple seeks to preserve.

T12 New accesses and intensified use of existing accesses onto the road network will not be permitted if it would result in a clear risk of crashes or traffic delays unless the proposals can incorporate measures that provide sufficient mitigation. I consider this site to be unsound as there would be an increase in crashes and traffic delays. Widening the junction at the exit would not do anything to improve the narrow dangerous access through Kingsdown village. It would also not improve the access from Ringwoud Road onto the very busy A258 at Ringwoud. Widening the road at the access point on Ringwoud Road, would mean losing part of the Kent Downs AONB and would also effect the character of the winding lane entering the village, which as I have mentioned the 2020 LCA F3 Ripple seeks to preserve. Land either side of Ringwoud Road is not owned by the same party as KIN002 and so cannot make up part of this development. Furthermore, any attempt to alter Ringwoud Road at any point would also result in the loss of the charming character of the road. The access is also complicated. It is used by visitors to the play area and the landowner to the left as you enter the field from the road. No mention is made in the HELAA highways assessment of the landowner needing access. ER5 also crosses the entrance which would therefore be dangerous to pedestrians crossing from the field back to the village. ER5 is a very busy path used by dog walkers on a daily basis. The sight lines onto Ringwoud Road in both directions are poor. Ringwoud Rd is very narrow in places and in places, 2 vehicles cannot pass each other. Turning left out of the site would be onto a narrow road going into a 20mph zone. Turning right is in a 50mph zone with a bridleway and footpath crossing with poor visibility and slow tractors turning out onto the road. There has already been an RTC resulting in a fatality and serious injury on Ringwoud Rd. I would argue that issues with access alone mean that this site is not suitable and unsound for development. A medium pressure gas main crosses KIN002 diagonally and crosses the road at this access point which would require careful consideration when changing the access. This would cause a lot of disruption to the villagers as this is the only classified road in and out of the village and as poor as it is, is the main route to the A258. If traffic had to divert via Deal this would create extra pollution and congestion for a protracted period of time which would be contrary to SP1 and the climate emergency declaration by DDC.

T13 Applicants must demonstrate that traffic movements to and from the development can be accommodated, resolved, or mitigated to avoid severe cumulative residual impacts.

As I have already pointed out, traffic movements to and from the site would be on to Ringwoud Road. This road is narrow, in places steep, in places it has high banks and hedgerows which preclude views along it, it sometimes floods in the dip before the hill towards Ringwoud and I have known many winters when it has been impassable because of snow. If cars from the proposed development SAP34 were to turn left onto Ringwoud Road they would soon enter the narrow streets of Kingsdown where there are many parked cars and very little pavement for pedestrians. If they were to turn right they would find themselves on the narrow, twisting, steep, liable to flooding and with poor sight lines, high banks and hedges, Ringwoud Road. After this they would have to try to get onto the busy, at times extremely busy A258 at Ringwoud.

	<p>Ringwould Road is crossed by an official footpaths, and an official footpath/bridalway, both are on bends where it is difficult for pedestrians and horse riders to see what traffic is coming or to be seen by drivers. Pedestrians also use Ringwould Road to access the special needs school and Ringwould Village Hall which are both situated on the road close to the junction with the A258.</p> <p>Any increase in traffic on this Road would be impossible to mitigate for without damaging the character of the 'distinctive winding narrow lane' which the 2020 LCA F3 Ripple seeks to preserve.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>SAP34 should not be included in the LDP.</p> <p>DDC should now reconsider the housing allocation targets in light of the government announcement of 5/12/22, particularly with respect to rural settlements.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	No
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
Include files	
Local Plan Consultation Point	Evidence Base
Rep ID	SDLP1470
Rep Status	Processed
Consultee ID	1333277
Consultee Full Name	Mr George Jenkins
Consultee Company / Organisation	
Agent Full Name	Grace Martin
Agent Company / Organisation	Hume Planning Consultancy Ltd
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	HELAA - (TC4S099)
<p>2 - Do you consider this part of the Plan sound?</p>	No
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	Positively prepared Justified

	Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Representation submitted by Hume Planning. Full Representation attached to SDLP1460. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1460.)</p> <p>HELAA Rating The site was submitted to the Council during the 'targeted' call for sites process in March 2021, which sought additional small & medium housing sites between 0.25 and 1 hectare in size, but had not been promoted prior to this. The published HELAA assesses the site as follows (please refer to reference: TC4S099): Estimated housing number: 19 dwellings Potentially Suitable Summary of Suitability Assessment: o Site would form a logical extension to the settlement area o Access is achievable o Pedestrian safeguarding issues o Site is contained with good screening o Archaeological assessment required o Heritage assessment required</p> <p>Available Achievable Medium Delivery</p> <p>Despite this positive HELAA rating, the site has not been carried forward as a housing allocation for Preston.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Evidence Base

Rep ID	SDLP1508
Rep Status	Processed
Consultee ID	1333275
Consultee Full Name	Adam Harwood
Consultee Company / Organisation	Environment Agency
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Water Cycle Study
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p><i>(DDC note - This is an extract from the full Environment Agency representation SDLP1458)</i></p> <p>Water Cycle Study: Although the water cycle study has been updated, not all information contained in this report is the most recent available. There is a reference to the SE River Basin Management Plan (2016). This is currently being updated with more recent information now available at the following links:</p> <p>Updated RBMP 2022 https://www.gov.uk/guidance/south-east-river-basin-district-river-basin-management-planupdated-2022</p> <p>River basin management plans, updated 2022: challenges for the water environment https://www.gov.uk/government/publications/river-basin-management-plans-updated-2022- challenges-for-the-water-environment</p> <p>The link on challenges for the water environment includes important information on the climate emergency and the biodiversity crisis. It would be useful to consider this latest information in the Local Plan and Water Cycle Study and include links in the documents. Even though many of the items have been covered in the Local Plan and associated documents, it would add value to the plan by including links to the latest information.</p> <p>Water Cycle Study, Point 6.5 Nutrient Neutrality - <i>As a result of the mitigation measures for demonstrating this being difficult to deliver it has effectively resulted in an embargo on the granting of permissions for new housing in the areas affected, since the advice was issued nearly two years ago.</i></p> <p>This statement possibly gives the wrong message about nutrient neutrality and may not show the importance to protecting European sites such as Stodmarsh. Although it might be difficult in some cases to achieve nutrient neutrality for developments, the concept of nutrient neutrality is to protect the environment so that future generation will be able to enjoy the benefits. The intention of nutrient neutrality is not to stop development, but rather to allow for sustainable development.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful	

if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Evidence Base
Rep ID	SDLP1936
Rep Status	Processed
Consultee ID	1271717
Consultee Full Name	Quinn Estates
Consultee Company / Organisation	Quinn Estates Ltd
Agent Full Name	Sarah Willson
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Evidence Base - HELAA
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Iceni Projects, on behalf of Quinn Estates, welcomes the opportunity to submit representations to the Dover District Council Local Plan Regulation 19 Consultation in respect of land to the north-east of Southwall Road, Deal (the 'Site'). This representation should be considered alongside and with regard to the following appended documents which comprise:</p> <ul style="list-style-type: none"> • Appendix 1 – Site Location Plan <p>The vision for the Draft Local Plan reflects the growing importance of new challenges facing local communities in regard to climate and ecological emergency, and greater emphasis on the protection and enhancement of retail, leisure, cultural and commercial development across the district area, and promoting the health and social wellbeing of communities. The corresponding objectives strive for a more prosperous economy, as well as vibrant new communities. Quinn Estates considers that there is much to welcome in the new Plan, however, the company considers the opportunity to deliver an appropriate and badly needed quantum of growth at Deal has not been positively planned for, and that the Plan would be strengthened by promoting additional growth at Deal.</p>

Quinn Estates considers that the proposal at Southwall Road presents a suitable site for locating employment growth for Deal adjacent to an existing and successful employment site, which would be easily accessible by public transport and be commensurate with the size of the settlement. Given the unique characteristics of the site, it is considered that it would logically lend itself to development of approximately 130,000 sq. ft. of employment uses compatible with those alongside. As such, the site would in particular suit smaller light industrial occupiers (Use Class E(g)) benefiting from the sustainable town centre location. This would provide logical and tempered expansion of the town's employment provision thereby helping address the district's needs, at a location where demand for such uses is proven.

Quinn Estates has a proven track record of providing purpose-built employment space for wide range of end users, from smaller artisanal start-ups to larger established operators; and it is considered that this site would provide opportunities for end users from across that range.

a. The site and surroundings

The Site comprises approximately 3.3 acres of land lying to the north-east of Southwall Road, Deal. The Site is bound to the south-east by Minters Industrial Estate and Deal Business Park on Court Marsh Road and to the south-west by residential properties. The Southwall Industrial Estate encloses the Site to the north-west, separated by an open field; and to the north-east, Hutchings Timber lies beyond a wooded field. The land adjoins the Deal settlement boundary along its southern edge and is located on the north-western edge of the town.

The Site does not contain any Public Right of Ways (PRoWs). Existing access to the Site is via a gate on Southwall Road. Deal train station is located approximately 0.6 miles walking/cycling distance to the east within Deal town centre.

The Site is neither within or near a designated Conservation Area, nor are there any listed buildings or other heritage assets nearby. The land is classified as Flood Zone 2/3. The Kent Habitat Survey 2012 identifies the entirety of the Site as Neutral grassland. There are no significant ecological designations affecting the Site or in the vicinity which would restrict development at this location.

The Site has an uncertain history with regard to assessment under previous Local Plan work. The HELAA 2020 Appendix 1 'Housing Long list' references the site; however, it does not state whether it was proposed for housing or employment as it does with other sites. Appendix 3b 'Housing Sites Highways Assessment' references the DEA049 code as the previous code for another site in Walmer. Appendix 3e 'Initial Assessment Housing Sites Eliminated' notes the site, however, states it is for employment and will be assessed separately. Appendix 3f 'Initial Assessment – Employment Sites Eliminated' has no reference to the site under the DEA049 code, the postcode, or any of the site addresses.

b. Objection to Tables 4.2 of the Draft Local Plan

Quinn Estates considers that the economic growth strategy for Dover, as detailed in Table 3.5 of the Regulation 19 Submission Version of the Draft Local Plan cannot be considered sound plan-making. In its current form, the Plan fails to positively plan for economic growth in Deal under Policies SP6 and E1. Quinn Estates considers that the Plan should proactively support employment growth in Deal through the allocation of additional sites.

Sustainable patterns of growth

Sustainability lies at the heart of good strategic planning and is a core tenet of the National Planning Policy Framework at Paragraph 8. When determining the spatial strategy for employment growth, the Council should direct employment land to the most sustainable locations, namely those which reduce the need for access via private vehicle and are near key population centres.

Deal is the second largest town within the District and is home to approximately 30,000 people. Deal is recognised in the Draft Local Plan as the second largest settlement in the District, benefitting from a vibrant town centre, which benefits from a good level of accessibility and an attractive environment. It's well used by residents and visitors and has a low vacancy rate, as a result of the diverse retail offer. In addition, the town is highly sustainable in regard to public transport accessibility, being served by mainline rail, the high-speed train service to London and numerous bus routes.

Quinn Estates posit that the amount of employment land allocated to Deal within the draft Local Plan is wholly inconsistent with relation to its position as the second most sustainable location in the District for future growth. No new employment land is allocated to the town. The Deal Business Park is offered policy protection through draft Policy E2. Employment allocations have instead been directed to Dover, Aylesham and Eastry, a principal town, rural service centre and local centre within the Settlement Hierarchy, respectively. Table 3.1 of 2021 EDNA update (copied below) succinctly summarises the spatial distribution of employment land across the district, and outlines the strange situation the District faces, where rural areas and smaller settlements hold more employment space than the second largest settlement within the District.

[See attachment]

Evidently, successive Local Plans have failed to plan proactively for employment in Deal, resulting in the picture painted above. Similar to the spatial approach to housing within the Draft Local Plan, the Council's proposed strategy looks to further cement this position, skewing economic growth away from one of the most sustainable locations in the District to areas that are far less sustainable and would require employees to

largely arrive by private vehicle to work. The justification for channelling so little growth to Deal is not considered to be justified by evidence, when all the evidence points to the settlement being such a logical and sustainable location to channel growth to. The principles of sustainability and sound plan making appear to have been absent in key decision taking over spatial choices at the heart of the spatial strategy presented in the Draft Plan.

Ensuring the delivery of employment land

For a plan to be considered effective, the objectives and identified requirements must be deliverable and achievable. It is considered that, in its current form, the plan fails to accord with this part of the soundness test, in part due to over reliance on the White Cliffs Business Park to provide the majority of the District's employment land requirement across the Plan period. Therefore, to ensure the balanced and steady delivery of employment floorspace, further Sites should be allocated to meet the needs of the District, and in particular, the previously identified need of Deal.

The EDNA 2017, and the 2022 update, both highlight how the District has not been able to deliver, to date, the level of growth identified in the 2010 Core Strategy and there is a great deal of 'catching up' to do over the next ten years if there is any prospect that the overall job growth target of 6,500 is to be reached.

Policy CP2 of the existing Core Strategy (2010) seeks to provide approximately 200,000 sqm of employment floorspace and 35,000 sqm of retail floorspace between 2006-2026. The Authority Monitoring Report 2020-21 scores progress against Policy CP2 as amber – where 'progress has been made towards meeting the target however further work is required'. Over the monitoring period (2020- 21), the following net-gains in employment floorspace are found:

[See attachment]

To address this difficulty with delivery of employment land, the Draft Local Plan proposed the White Cliffs Business Park to deliver the bulk of the employment floorspace requirement in the plan and is expected to deliver a total of 120,000 sqm across four phases. However, there is uncertainty regarding the availability of part of Phase 2 and Phase 3 of White Cliffs Business Park which was proposed to be used as an Inland Border Facility, subject to a Special Development Order which is in place. In addition, the Council's own EDNA 2017 assesses the issues with the site, stating that 'the site has struggled to come forward for new B class development over recent years, in part due to viability issues limiting interest by investors to promote B class uses within the site. Retail development has started to erode the longer-term employment potential of parts of the site.' Given the uncertain nature of this site, the Council should seek to broaden the employment base through additional allocations across the District where there is an identified need, in the most sustainable settlements i.e., Deal.

Addressing Flood Zone constraint

The site lies within Flood Zone 3, as shown on the Environment Agency's flood zone map and as such, has the potential to be at risk of flooding from the sea. In partnership with the Environment Agency, the Council completed the Deal Coastal Defence Scheme, which provides a 1 in 300-year (0.33%) standard of protection to this area from coastal flooding and only at risk in the extremely unlikely event that the flood defence infrastructure was to fail (i.e. a breach).

Notwithstanding the unlikelihood of a breach, the NPPF requires a site-specific FRA to be submitted for all development located within Flood Zone 3. The NPPF states that development in areas at risk of flooding should be avoided by directing it in the first instance away from areas of highest risk. Where development within areas at risk of flooding is proposed, Para 161 of the NPPF requires that the Sequential Test is applied and, if necessary, that the Exception Test is applied (Para 163-165).

The Council's Strategic-Flood-Risk-Assessment (2019) provides an up-to-date appraisal of the flood risk in Deal, prepared in conjunction with the Environment Agency, Lead Local Flood Authority, Internal Drainage Board and Southern Water. One of the aims of this report is to provide sufficient data and information to enable the Council to apply the Sequential Test to land use allocations and to identify whether the application of the Exception Test is likely to be necessary. It is significant to note that the Site proposes to develop employment floorspace, which is considered to be a less vulnerable use.

A live application (ref: 22/00916) on an adjacent site 64-66 Southwall Road) is currently seeking permission in principle for up to 7 dwellings, along with a replacement place of worship with a community hub and nursery. The application site also lies within Flood Zone 3 and therefore faces the same constraint as the Site subject to these representations. As of 24th November 2022, the Environment Agency have responded to consultation with no objection to the scheme following clarification of residual flood risk on site. This demonstrates that the designation of land as Flood Zone 3 should not be considered as an absolute constraint affecting the principle of development in this location, and that suitable growth for Deal can be supported subject to the necessary technical work being undertaken through site specific FRA's, and the Sequential and Exception Tests in accordance with NPPF guidance.

c. Conclusion

Quinn Estates wishes to support Dover in bringing forward a successful, effective and sound Local Plan that can serve the District across the Plan period. However, Quinn Estates considers that the current approach to the spatial strategy in the Draft Local Plan requires amendment to address a significant soundness issue concerning the level of growth identified for Deal, the District's second largest settlement. It is considered that the Plan currently fails to positively plan for a commensurate level of housing and employment at the settlement, as expressed in Policy SP3 and that the available evidence does not support or justify this approach. Moreover, the evidence does support channelling a greater quantum of growth to Deal.

The Council has struggled with delivery of employment floorspace across the District within the last plan period, and there is a recognised need for additional employment in Deal within the evidence base for the Draft Local Plan. To combat the current over reliance on the White Cliffs Business Park, which is facing delivery issues, the Council should seek to explore additional avenues for employment growth, through identifying suitable sites in Deal, such as the Site subject to this representation.

We trust that the above amendments is acceptable to the Council and that these representations will be taken into account in consideration of the current consultation. We also confirm that Quinn Estates would welcome the opportunity to be involved in the forthcoming Examination-in-Public and contribute to the debate to ensure that the best strategy for the District is found.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

[SDLP1934 Willson Att1 Site Location Plan.pdf](#)

Local Plan Consultation Point

Evidence Base

Rep ID

SDLP1710

Rep Status

Processed

Consultee ID

1333265

Consultee Full Name

Cllr
John
Lonsdale

Consultee Company / Organisation

Walmer Town Council

Agent Full Name

Agent Company / Organisation

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Evidence base: Landscape character assessment
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438. (See our comments on SP13 and SP 14 above; we note improvements since Reg 18 consultation) Landscape Character Types, 17 identified. To become sound there should be an addition. The area inland from Kingsdown, west to Ringwould, Ripple, Sutton, Studdal and Little Mongeham should all be included as LFT F Open Arable Chalk Farmland with Woodland, as an extension to F3 Ripple.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Evidence Base
Rep ID	SDLP1745
Rep Status	Processed
Consultee ID	1287651
Consultee Full Name	Lynn Davis
Consultee Company / Organisation	Club Sandwich

Agent Full Name	Lynn Davis
Agent Company / Organisation	Lynn Davis Architects
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	App A
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note: This representation was extracted from main representation (SDLP1744). See that representation for the complete representation</p> <p>8. Promoting healthy and safe communities</p> <p>92. a), b) and c) Club Sandwich would aim to promote health and inclusivity. Today, community sport and recreation facilities are becoming outdated and 'do not provide the range of amenities that attract and sustain women and girls throughout their life'* vic.gov.au 93.</p> <p>Club Sandwich would seek to provide 'social, recreational services for community needs' as above. As noted in the International Working Group on Women and Sport 'women's participation in sports is influenced by the extent, variety and accessibility of facilities. The planning, design and management of these should appropriately and equitably meet the needs of the women in the community. This aspect is not appreciated in Dover Sports and Leisure Facility Study. Similar lack of inclusivity of minorities such as the elderly and disabled has been ignored in other sports facilities in the area such as Tides in Deal and the Sports Centre in Dover. Other facilities such as multi-sensory installations to aid mental health and a dedicated martial arts studio would be incorporated to serve minority needs.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Reinstatement of the use of the land for community sports and leisure as set out in DDC Local Plan 2010
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

Local Plan Consultation Point	Evidence Base
Rep ID	SDLP1739
Rep Status	Processed
Consultee ID	1333497
Consultee Full Name	Cllr John Bulaitis
Consultee Company / Organisation	Shepherdswell Against The Development
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	App A
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p><i>DDC Note: The text below was extracted from the attachment. Names and addresses redacted. Will be made available to the Inspector on request. Group rep 111 Shepherdswell residents</i></p> <p>6.4 To be sound, the proposal must comply with the Council's Sustainability Assessment objectives. SA 10 is to 'conserve or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment'. SA 11 is to 'conserve and enhance the special qualities, accessibility, local character and distinctiveness of the District's settlements, coastline and countryside'. In relation to SA10, the Draft Plan recognises 'minor negative effects' (7.207). 3 In relation to SA11, the Draft Plan concedes that the proposed site has 'potential to moderately affect the District's landscapes, townscapes and seascapes'. It is our contention that these desk-top surveys underestimate the negative effects of SA10 and the 'potential' damage in relation to SA11. They ignore evidence provided from local residents during the Regulation 18 consultation.</p> <p>6.5 Definitions of 'historic environment' include not only historic buildings, but a sense of location, of space and of past historical events. The proposed site contains these qualities. It is one of the few remaining spots in the Dover district granting residents easy access to view the eastern and northern Kentish coastline (See figure 1). The historical record shows the significance of this – or nearby now inaccessible vantage points – for Kentish history – some examples going back ten centuries. More recently, in 2012 the site was the assembly point for many local residents to view the demolition of the Richborough Power Station towers. The inclusion of the site would obliterate this historical viewpoint for the community, at best turning it into a private place for particular residents.</p> <p>6.6 The site, as the Draft Plan notes, opens onto 'open rural countryside'. In so doing, it enables a sense of space that provides character and distinctiveness, as well as a sense of well-being. These qualities have previously been recognised by planners and Her Majesty's Inspectorate. Rejecting a proposal for building on the site in 1991, the Inspector noted: From my visit to the site and its surroundings and from the representations made, I consider the principal issue to be the impact of the development on the character and appearance of the countryside around Shepherdswell</p>

	<p>[...] If the development were permitted, it would expand the confines of the village into the open surrounding downland. [...] In my view, the scheme would create a harmful, visual intrusion into this attractive area, spoiling its character and appearance. (D.G. Hayes, Planning Inspectorate, Department of the Environment, 31 October 1991)</p> <p>An earlier assessment noted: The development of this site would involve the sacrifice of considerable assets in respect of landscape. From a distance such development would be plainly seen occupying what is now open hillside upon which only very limited skyline building impinges, and the development on the site would also add to this to a limited degree, but the more serious loss would be in respect of the magnificent outward views now enjoyed from the 2 public footpaths which cross the site one of which is of national importance. S. M. J. Wallis, Department of the Environment, 22 May 1974, DDC CH/6/72/195.</p> <p>Despite changes in planning laws, these assessments remain relevant. They are not 'outdated'. The inclusion of site SAP36 would be an inappropriate development that would have – not a moderate – but a serious effect on local character, distinctiveness and the landscape. The photos in the Appendix taken from the site are testimony to this fact. 4</p> <p>See attachment for photographs</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The changes proposed to make the Plan sound and legally compliant are to delete SAP36, which allocates land for 50 houses to the north and east of St Andrews Gardens and adjacent to Mill House, and all other references to this site from the Plan.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>SDLP1739 Shepherdswell AD Att1_Redacted.pdf</p>
<p>Local Plan Consultation Point</p>	<p>Evidence Base</p>
<p>Rep ID</p>	<p>SDLP1888</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1333840</p>
<p>Consultee Full Name</p>	<p>Jon Alldis</p>
<p>Consultee Company / Organisation</p>	<p>Barrat David Wilson Homes</p>
<p>Agent Full Name</p>	<p>Emily Harris</p>
<p>Agent Company / Organisation</p>	<p>Savills</p>

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	HELAA
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Full Representation attached to SDLP1883. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1883.)</p> <p>Housing and Economic Land Availability Assessment (HELAA) (2022) The Housing and Economic Land Availability Assessment (HELAA) (October 2022) identifies a future supply of land in the District which is suitable, available and achievable for housing and economic development uses over the Plan period to 2040. The HELAA (2022) document does not identify the site (Land North of Sandwich Road, Ash) within its assessment. It had previously been assessed in the 2020 HELAA under Reference ASH006. Appendix 4 of the HELAA 2022 assesses sites that were submitted in the initial Call for Sites and then again in the Targeted Call for Sites. The assessment of the Land North of Sandwich Road within Appendix 4 sets out that the initial assessment of the site within the HELAA 2020 was still valid. The 2020 HELAA states that the development of the site would project a spur of intensive development into the countryside and would be disconnected from the existing settlement, therefore compromising the rural character of the north of Ash.</p> <p>The HELAA (2020) therefore states that this would have an impact on the landscape and further assessment is required to demonstrate whether this can be mitigated or not. SLR Consulting Limited (SLR) was instructed by BDW to carry out a high level landscape and visual appraisal of the above site and to provide landscape and visual advice. SLR considered that developments in the area are beginning to infill parts of the settlement to account for the Housing Land Supply (HLS) requirements, and the setting will change over time. It is likely that this infill development, along with any other developments which come along via site allocations, will result in setting of the site changing over time. This would therefore mean that the impact of the proposed development at Land North of Sandwich Road would not result in a detrimental impact on the character of the area. The Housing Site Assessments (2022) document states that the site would be unsuitable for the following reasons:</p> <p>Development of this site would urbanise the northern part of Ash which is predominantly characterised by open countryside and acts as an undeveloped arc and a buffer for the A257 Ash Bypass and would encourage the urbanisation of neighbouring undeveloped parcels. As per comments above, the context of the site is changing due to recently approved developments to the 'Land north of Orchard View. Thus this area of Ash is already becoming more urbanised. Furthermore, the Council's Landscape Sensitivity Assessment 2021 explains that "to the south of the site, development would relate quite well to the form of the village" and "although development would extend to the north of Sandwich Road, it would relate quite well to adjacent urban edges". It is also noted that the assessment of the site notes that the open rural setting is not particularly distinctive and the separation between the village and the bypass is screened from view by continuous roadside woodland. The A257 provides a defensible boundary to the development separating the village from the wider agricultural land in the parish. As such, the development in the area would not encourage development outside this boundary. Given the above context, it is considered that the site should not be considered unsuitable on these grounds.</p> <p>Low – medium landscape sensitivity</p> <p>The Council's Landscape Sensitivity Assessment 2021 explains that a low- medium landscape sensitivity does not prohibit development. In fact, the summary of the assessment of the site concludes:</p> <p>"The site is able to accommodate residential development in some situations without significant landscape/ visual change. Many aspects of development (with appropriate design and mitigation) could potentially relate to the area."</p> <p>Furthermore, it is also noted that on page 2 of Appendix 1a HELAA 2022 – Housing Sites Assessment Document, that Land to the south of Spinney Lane, Aylesham (HELAA ref. AYL003) is found to have a high landscape sensitivity, however the site is still considered suitable subject to mitigation and screening. The same can be said for the site at Land known as the former Archway Filling Station, New Dover Road,</p>

Capel-Le-Ferne (HELAA ref. CAP011) which was also found to have a medium-high landscape sensitivity, whilst also being suitable for development. It is therefore unclear as to why the same cannot be said for Land North of Sandwich Road. With this in mind, the site should be considered suitable for development.

No access concerns

Details submitted with this representation demonstrate that suitable access can be achieved. As the HELAA also considers that there are no access concerns. Therefore, this should not be a reason to find the site unsuitable. PPG Paragraph 010 (ref: 3-010-20190722), explains that plan-makers need to be:

“proactive in identifying as wide a range of sites and broad locations for development as possible (including those existing sites that could be improved, intensified or changed)”. Moreover, this paragraph sets out that it is important to identify sites and their constraints rather than simply rule out sites which are known to have constraints. It is considered that the assessment of the Land North of Sandwich Road has not been thorough and instead dismissed immediately. The information provided for the Site is much shorter and in less detail than most other sites examined through the HELAA. As set out within these Representations, BDW consider that the key constraints that resulted in the refusal of a planning application and the dismissal of the Appeal can be overcome through sensitive landscape-led design. Therefore, the assessment of the Site should be assessed again, considering the potential for improvements, intensification and change.

Recommendations:

1. The Land North of Sandwich Road is reconsidered to take account of potential improvements, intensification and change that could result in a widely benefiting development for the Local Area.
2. The Site is put forward for allocation subject to landscape mitigation and screening techniques.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Local Plan Monitoring Indicators

Local Plan Consultation Point	Local Plan Monitoring Indicators
Rep ID	SDLP1716
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	HE4
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438.</p> <p>• Response to Appendix C Local Plan monitoring indicators & Appendix F Local Plan Policies; Supporting Documentary requirements for planning applications</p> <p>Experience has caused trust in the planning process to expire in the minds of many of the public. Without independent, robust auditing, and honesty, extracting promises from developers all too often results merely in employment for public relations practitioners. So, additions to SP13, SP14 and DM policies NE is needed for it to become sound. 'Where permission is given subject to conditions regarding tree retention, tree planting and / or biodiversity enhancement, applicants will need to agree to abide by 'robust auditing' (as Wildlife Trusts insisted that the Environmental Bill legislate for). This means that honest, objective-because-independent, before-and-after evaluations / baseline measurements must be used. DDC councillors on the planning ctee have recently pointed out how very inadequate and misleading the sketchy, google-map-based ecology reports paid for by developer applicants are. Developers are ill-placed to self-certify their own work in this area, and DDC need a DM policy requiring Environmental Impact Assessments on all planning applications for developments of over 15 dwellings on greenfield or rewilded brownfield sites.'</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

Include files

Housing Trajectory

Local Plan Consultation Point	Housing Trajectory
Rep ID	SDLP394
Rep Status	Processed
Consultee ID	1330307
Consultee Full Name	Messrs Upton
Consultee Company / Organisation	J.Scott, Finn's
Agent Full Name	Jane Scott
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Appendix D Housing Trajectory
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	It is considered the Plan is Sound, legally compliant and meets the Duty to Cooperate. However the trajectory for this site in Appendix D does not match the trajectory put forward in representations as reasonable delivery timeframe. Edit to read: WIN003
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	It is recommended the trajectory for this site be brought forward to deliverable between 2024-2026 with 12 completions per year in both 2025 and 2026.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note	

the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Housing Trajectory
Rep ID	SDLP1005
Rep Status	Processed
Consultee ID	1331879
Consultee Full Name	Northbourne Estate c/o Agent
Consultee Company / Organisation	
Agent Full Name	Rory Baker
Agent Company / Organisation	Frazer Halls Associates
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Housing Trajectory
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Please refer to accompanying representations.</p> <p>Text below (copied from attached statement) added by DDC. See attachment for full representation.</p> <p>Housing Trajectory The Council have calculated a housing land supply of 6.16 years, including 10% buffer to reflect the preparation of a Local Plan and account for any market fluctuations. This is reflected in the first five years of the housing trajectory, with most new homes delivered during this period a result of extant planning permissions across the district and the Whitfield Urban Expansion. We have raised concerns about the over-reliance of extant consents and strategic allocations to deliver a robust housing supply in the early years of the plan period, and these concerns carry across to the housing trajectory.</p> <p>Throughout years 1 to 5 (2022/23 – 2026/27), 3,424 new dwellings will be provided through extant permissions which equates to c.85% of the total supply across all vehicles of delivery in the strategy. As noted previously, there are a wide array of reasons causing planning permissions to not be built out in their entirety, or in a timely manner including commercial viability, lapse of consents and shift in market trends. We are concerned that there is too much reliance on extant permissions to deliver homes in the early years of the plan period. The supply of housing through site allocations doesn't kick in until year 4 of the trajectory. If there are any delays to the delivery of the consented units, the district may see a serious shortfall in housing delivery in the first five years of the plan period.</p> <p>This is an alarming and unsound approach to the housing trajectory, and we urge the Council to bring forward smaller sites in the immediate years of the plan period to ensure delivery doesn't stall, and much needed housing is provided locally in the short term. Smaller sites such as Land at Jubilee Road can help make the Plan sound by ensuring an appropriate strategy is implemented, and the housing strategy is able to deliver small amounts of housing to rapidly respond to any challenges with the delivery of extant permissions in the first five years of the plan period.</p>

<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Please refer to accompanying representations. Text below (copied from attached statement) added by DDC. See attachment for full representation. <i>This is an alarming and unsound approach to the housing trajectory, and we urge the Council to bring forward smaller sites in the immediate years of the plan period to ensure delivery doesn't stall, and much needed housing is provided locally in the short term. Smaller sites such as Land at Jubilee Road can help make the Plan sound by ensuring an appropriate strategy is implemented, and the housing strategy is able to deliver small amounts of housing to rapidly respond to any challenges with the delivery of extant permissions in the first five years of the plan period.</i></p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>To provide representations on the housing trajectory, and ensure there is a great distribution and delivery of smaller sites in the first five years of the plan period, with less reliance on extant supply and larger sites.</p>
<p>Include files</p>	<p>SDLP1005 Northbourne Estate - Att 1 .pdf SDLP1005 Northbourne Estate - Att 2.pdf</p>
<p>Local Plan Consultation Point</p>	<p>Housing Trajectory</p>
<p>Rep ID</p>	<p>SDLP882</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1331879</p>
<p>Consultee Full Name</p>	<p>Northbourne Estate c/o Agent</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	<p>Rory Baker</p>
<p>Agent Company / Organisation</p>	<p>Frazer Halls Associates</p>
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	<p>Housing Trajectory</p>
<p>2 - Do you consider this part of the Plan sound?</p>	<p>No</p>
<p>3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)</p>	<p>Effective</p>
<p>4 - Do you consider the Local Plan is Legally Compliant?*</p>	<p>Yes</p>
<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Not Applicable</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as</p>	<p>Please refer to accompanying representations. Text below (copied from attached statement) added by DDC. See attachment for full representation. Housing Trajectory</p>

possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.

The Council have calculated a housing land supply of 6.16 years, including 10% buffer to reflect the preparation of a Local Plan and account for any market fluctuations. This is reflected in the first five years of the housing trajectory, with most new homes delivered during this period a result of extant planning permissions across the district and the Whitfield Urban Expansion. We have raised concerns about the over-reliance of extant consents and strategic allocations to deliver a robust housing supply in the early years of the plan period, and these concerns carry across to the housing trajectory.

Throughout years 1 to 5 (2022/23 – 2026/27), 3,424 new dwellings will be provided through extant permissions which equates to c.85% of the total supply across all vehicles of delivery in the strategy. As noted previously, there are a wide array of reasons causing planning permissions to not be built out in their entirety, or in a timely manner including commercial viability, lapse of consents and shift in market trends. We are concerned that there is too much reliance on extant permissions to deliver homes in the early years of the plan period. The supply of housing through site 4 | P a g e allocations doesn't kick in until year 4 of the trajectory. If there are any delays to the delivery of the consented units, the district may see a serious shortfall in housing delivery in the first five years of the plan period.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to accompanying representations.

Text below (copied from attached statement) added by DDC. See attachment for full representation.

This is an alarming and unsound approach to the housing trajectory, and we urge the Council to bring forward smaller sites in the immediate years of the plan period to ensure delivery doesn't stall, and much needed housing is provided locally in the short term. Smaller sites such as The Former Packhouse can help make the Plan sound by ensuring an appropriate strategy is implemented, and the housing strategy is able to deliver small amounts of housing to rapidly respond to any challenges with the delivery of extant permissions in the first five years of the plan period.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?

Yes

9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.

To provide representations on the housing trajectory, and ensure there is a great distribution and delivery of smaller sites in the first five years of the plan period, with less reliance on extant supply and larger sites.

Include files

[SDLP0882 Northbourne Estate - Att 1.pdf](#)
[SDLP0882 Northbourne Estate - Att 2.pdf](#)

Local Plan Consultation Point	Housing Trajectory
Rep ID	SDLP1019
Rep Status	Processed
Consultee ID	1331955
Consultee Full Name	Matthew Porter
Consultee Company / Organisation	Danescroft Land Ltd and Pentland Homes Ltd
Agent Full Name	Matt Porter
Agent Company / Organisation	DHA Planning

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Policy SAP1 - Whitfield Urban Extension Policy SP3 - Housing Growth Policy SP4 - Windfall Development Policy SP11 - Infrastructure and Developer Contributions Policy SP12 - Strategic Transport Infrastructure
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	We consider that the plan is sound, for the reasons set out in the consultation response submitted on behalf of Danescroft Land Ltd and Pentland Homes Ltd (ref DHA/30242).
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	For the reasons set out in the consultation response submitted on behalf of Danescroft Land Ltd and Pentland Homes Ltd ref DHA/302 42, no modifications are proposed.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	On account of the scale of the allocation proposed at Whitfield, we consider it necessary for our clients to participate in the oral part of the examination. Please refer to the consultation response submitted on behalf of Danescroft Land Ltd and Pentland Homes Ltd (ref DHA/30242).
Include files	DHA_30242_DDC Regulation 19 Consultation Response.pdf
Local Plan Consultation Point	Housing Trajectory
Rep ID	SDLP1528
Rep Status	Processed
Consultee ID	1252440
Consultee Full Name	Martin Leggatt
Consultee Company / Organisation	Dover District Council
Agent Full Name	Grace Martin

Agent Company / Organisation	Hume Planning Consultancy Ltd
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Housing Trajectory
2 - Do you consider this part of the Plan sound?	Yes
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Representation submitted by Hume Planning. Full Representation attached to SDLP1525. This document has been split / duplicated across the relevant locations within the Plan. This representation may include maps and images which have not been copied across and can be seen in the attachment on SDLP1525.)</p> <p>Housing Trajectory We confirm that DDC Estates will be looking to deliver this site, along with the adjoining landowner, early on in the Plan period. Work being undertaken to develop a more detailed masterplan will be undertaken in conjunction with the Council's Planning Department, which will allow for an early stage of pre-application discussions so a planning application can be submitted upon receipt of an Inspector's letter or upon adoption of the Plan. In broad terms it is anticipated development could commence within 2 years following adoption, and first units delivered 6-9 months later. For example, if the Plan is adopted in December 2023, the first units could be delivered Autumn 2026. It is anticipated this site could deliver 50-60 units a year.</p> <p>The proposed rewording or reinforcement of the policy wording of Policy SAP28 is set out below. It is also noteworthy that this omits the referencing of the undergrounding of the pylons across the site which has been investigated, but the cost would make this option unviable and on this basis the masterplan shows a generous 20m buffer on either side of the line of pylons.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

Settlement Hierarchy

Local Plan Consultation Point	Settlement Hierarchy
Rep ID	SDLP155
Rep Status	Processed
Consultee ID	1329874
Consultee Full Name	Ms Nicola Purcell
Consultee Company / Organisation	Aylesham Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Settlement Hierarchy. (SP3 and SP10)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Aylesham is designated as a "Rural Service Centre" on par with the town of Sandwich. Although Sandwich and Aylesham have equal weighting in the settlement hierarchy, they are not getting an equal weighting in housing development or in terms of investment. The Site Allocations refer to the district's "existing larger settlements of Dover, Deal and Sandwich" but in reality Aylesham is now likely to have a larger population than Sandwich.</p> <p>Aylesham is receiving 649 new homes (SAP24 and SAP27), whilst Sandwich has a proposed development of just over 200 homes.</p> <p>The Draft Local Plan proposes investment in Sandwich to improve the town and protect its historic environment. In addition, it will see investment in culture. This is not the same for Aylesham.</p> <p>This relates to SP3 – Housing Growth and SP10 – Sandwich Town Centre.</p> <p>The residents of Aylesham should also see their cultural capital widened and enriched in such an extensive Draft Local Plan. Other than house building, there seems to be little else on offer. Funding should be provided for organisations such as cinemas, museums, galleries etc that will help to enrich people's lives.</p> <p>For a rural settlement, a further 640 houses, on top of a recent development of 1,360 seems to be somewhat excessive.</p> <p>Aylesham Parish Council believes that Aylesham is being left behind. Aylesham must receive equal investment in comparison to other Rural Service centres to ensure the village thrives.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at	

examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Settlement Hierarchy
Rep ID	SDLP93
Rep Status	Processed
Consultee ID	1330782
Consultee Full Name	Karen Griffiths
Consultee Company / Organisation	Ripple Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Evidence Base E Settlement Hierarchy
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Ripple Parish Council objects to the Rural Settlement Hierarchy allocating Ripple village a score of 11 and so classifying the village as having "Tertiary focus for development in the rural area; suitable for a scale of development that would reinforce its role as a provider of services to essentially its home village".</p> <p>The premise for this Hierarchy score is, in the view of Ripple Parish Council, flawed as it is based on inaccurate information used to achieve a score of 11 for the village.</p> <p>There is a very limited bus service visiting the village 6 days a week, serving different destinations – one bus out and back 3 days a week and two buses out and one bus returning on the other 3 days. Such an irregular service cannot be relied on for day to day travel to and from work, nor does the timing of the service support leisure travel.</p> <p>The inclusion of a score of 2 for "other shop" requires clarification as there is no retail outlet in Ripple serving groceries and vital provisions to the residents.</p>

	<p>Similarly the inclusion and score of 2 for “<i>other community facilities</i>” requires clarification. Given that the village hall and the land around it have been separately scored it is not clear what these “<i>other community facilities</i>” actually are. The caravan park is not a community facility.</p> <p>The inclusion of the Church is also questionable as most services are now held in other, more populated areas of the diocese.</p> <p>A score in the Hierarchy of 7 or 6 placing Ripple in the category of “<i>Smaller Villages and Hamlets</i>” would be much more appropriate.</p> <p>Such a change is significant in that whilst development decisions are not taken solely on the Rural Settlement Hierarchy the lower score would mean that Ripple “<i>is not suitable for further development unless it functionally requires a rural location</i>”. The population figures used from the 2011 population census and included in the draft Rural Settlement Hierarchy would appear to support this suggested position for Ripple, with the village being the second smallest local population in the Dover district (at 372) after Stourmouth parish (268 residents). Such a debate is very important in the discussion around the appropriateness and viability of sites and their inclusion in the Housing and Economic Land Availability Assessment (HELAA). In the current draft Ripple has no such land availability for housing and nor did it in the 2015 Land Allocation Local Plan.</p> <p>Ripple Parish Council therefore submits that a correct definition of Ripple as a small village or hamlet based on population and community facilities would mean that they are “<i>not deemed suitable for further development unless such development functionally requires a rural location</i>”.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Reassess and/or substantiate the Settlement Hierarchy score allocated to Ripple.</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>Settlement Hierarchy</p>
<p>Rep ID</p>	<p>SDLP805</p>
<p>Rep Status</p>	<p>Processed</p>
<p>Consultee ID</p>	<p>1261008</p>
<p>Consultee Full Name</p>	<p>Dr John Garcia-Rodriguez</p>
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	

1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	E Settlement Hierarchy
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	The settlement hierarchy is important in deciding where development is best placed. Aylesham, an isolated village with very few facilities is placed alongside Sandwich a historic centre with many facilities and is also a local transport hub. Sandwich is much more desirable to live in because of these facilities - cinema, art galleries, good library, schools, many societies etc. St Margarets at Cliffe has more facilities including theatre productions, and other cultural activities. Eastry too has more about the place than Aylesham. Aylesham is misclassified. Therefore the plan is not sound as it is unjustified and so ineffective and not based on reality - not positively prepared.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The plan would need to reclassify Aylesham and accept that development there has already gone too far in relation to the facilities there. The plan would concentrate not on housing there but on improving facilities and the quality of life there.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Settlement Hierarchy
Rep ID	SDLP970
Rep Status	Processed
Consultee ID	1331287
Consultee Full Name	Mr Maxwell

	McDowall
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Chapter 4 SAP34, Land at Woodhill Farm, Kingsdown (KIN002)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The inclusion of SAP34bis not legally compliant with NPPF 2021 item 11,(b11 '<i>SP should provide for objectivity assessed needs for housing & other uses...unless(11)any adverse impacts of doing so would significantly & demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole</i>'</p> <p>the following arguments show why this development would not be sustainable as is a requirement of the NPPF and would have more adverse impacts then benefits.</p> <p>NE2 Landscape Character and The kent Downs sections states in section11.13 that DDC aims: 'To ensure that all development coming forward over the plan period respects and reflects the character of the landscape in which it is located. The LCA(2020) from DDC LCA F3 Ripple map shows that KIN002 is within the area of Open Arable Chalk Farmland with Woodland. Proximity of this site to the boundary of the AONB means that it must be kept as an important buffer between the village built enviroment and open countryside in order that the special character of the area is maintained.</p> <p>Kingsdown should not be designated as a local centre. It is unsound and ineffective to a damaging extent. ' a village providing services for a local area and a secondary focus for development in the rural area' - it does not serve other settlements and is confined by the sea and AONB, is small and has lots of character and has a rural setting.</p> <p>SP4 Windfall Development. a)- The scale must be appropriate to the size of the settlement and existing facilities. -the village has lots of character, conservation area, narrow roads, small svhoo;, no doctors, much reduced bus service,no access to rail, and is car dependence.</p> <p>b)- development must be compatible with the layout, density, fabric, and appearance of the existing settlement and would not result in merging separate settlements.. this would set the tone as you drive in the village, impacts the AONB, need buffer between village boundary and AONB. Widening the road here to make it suitable for highways would ruin the entrance to the village.</p> <p>c & d)- There must not be harm to important green spaces. - the site is directly opposite the AONB which is highlighted throughout the Draft LDP(NE2) as being an important constraint to development, important to village for health and happiness, dog walking, amenity value,. There is Footpath ER5 round the field.</p> <p>f & g) - It would not result in the loss of best and most vesatile agricultural land currently used for agriculture and - it includes an appropriately sized and designed landscape buffer to the open countryside;</p> <p>NE2 states that proposals affecting the setting of the AONB will only be supported where the development is sensitively located and designed to avoid or minimise adverse impacts on the AONB and its setting and the development would enhance the special qualities, distinctive character and tranquility of the AONB.</p>

	<p>This development would impact the AONB due to entrance needing to use some of AONB to widen the road, houses seen from the AONB. The site is better put to use in growing food. We need all the agricultural land we have to grow food for future generations. All development must be sustainable NPPF 21 states. To use growing land is not.</p> <p>h) - it would not have a significant adverse impact on the living condition of existing adjoining residents - but Glen Road is affected.</p> <p>i) - Where development would result in the loss of active employment, open space, sport or community facilities within the settlement that such development is consistent with the requirements of policies EN2, PM5, and PM6 of the plan; visitors are less likely to want to come to Kingsdown if the entrance is blighted by this development and roads are gridlocked.</p> <p>j) - Traffic movements generated from the development do not result in severe impacts to the highway network that cannot be mitigated. - Ringwould Road is very dangerous - fatality recorded near Pumping Station. Large tractorsturn out into the road, a bridleway and fottpaths cross in two points. Ringwould Road has a 7.5 tonne weight limit. There is dangerous gridlock in village during busy periods, namely school run etc.. Ringwould Road would have to be closed for long periods to facilitate work being carried out tomake entrance to development safe.</p> <p>T11 - Development should , in so far as its size, characteristic and location , give priority to the needs of pedestrians, cyclists, users of public transport, car sharers, and users of ultra-low emission vehicles. This site is outsidethe village boundary and not well served by footpaths or cycle paths. The site is crossed by a footpath ER5 which connects to the village along a dirt track with no lighting. Bus services have been reduced and this development is said by HELAA hghways assessment to be unlikely to lead to more buses being laid on.</p> <p>T12. - New accesses and intensified use of existing accesses onto the road network will not be permitted if it would result in a clear risk of crashes or traffic delays unless proposals can incorporate mearsures that provide sufficient mitigation. It is considered this site to be unsound as there would be an increase in crashes and traffic delays. Shared access - poor park users, ER5 footpath, land owner to the left, gas main under the entrance and poor sight lines in both directions.</p> <p>T12 - Applicants must demonstrate that traffic movements to and from the development can be accommodated, resolved, or mitigated to avoid severe cumulative residual impacts. - Kingsdown village has narrow roads few footpaths in main streets. Lorries passing through or delivering/collecting cause long hold-ups beside adding to chaos and doing damage.</p> <p>Kigsdown settlement already has a significant number of 2nd homes and airb&b's, plus the holiday camp. This development of some 50 dwellings could increase this number which would negate the purpose of this development.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Delete site for development KIN002 (50 houses) from the Local Plan. The field needs to be kept as agricultural land as there too many factors against any development</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>No</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>Settlement Hierarchy</p>
<p>Rep ID</p>	<p>SDLP1002</p>
<p>Rep Status</p>	<p>Processed</p>

Consultee ID	1331844
Consultee Full Name	Miss Irene Bowie
Consultee Company / Organisation	Alkham Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	4.267 SAP43 - Land at Short Lane, Alkham (ALK003)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Alkham Parish Council challenges the classification as a “Larger Village” as defined in the Local Plan. “Each of these villages has a good range of services and facilities which serve their own residents and those of nearby hamlets. Capel-le-Ferne, Lydden, Preston, Worth and East Langdon have primary schools and Capel-le-Ferne, Lydden, Worth, Alkham are served by frequent regular bus routes. Retail facilities are not as available however as at the Local Centres, with only Preston and Capel-le-Ferne having a village shop, and only East Langdon having Post Office facilities”</p> <p>Alkham does not have a frequent or regular bus service, there are no shops, no school, no GP surgery therefore we do not have a good range of facilities which serve our own residents and those of nearby hamlets. The parish council requests that Alkham is reclassified as a smaller village.</p> <p>The parish council again raises concerns with Dover District Council's wanton disregard for the protection of the AONB. We note with interest that none of the other Non Strategic Housing Allocation sites are within the AONB. We consider it a fundamental duty of DDC to protect the AONB , not to encourage and actively promote its erosion.</p> <p>The parish council are astonished to see this site included in the local plan when in January 2017 outline planning permissions for six homes on this site was refused by DDC. The grounds given were:</p> <p><i>TAKE NOTICE that Dover District Council, the Local Planning Authority, HAS REFUSED Outline Planning Permission for the proposal in accordance with the application and accompanying plans received on 21/10/2016</i></p> <p><i>The reasoning underlying such refusal is as follows:-</i></p> <p><i>1 The proposed development would result in an obtrusive urban form of development in the open countryside, beyond the settlement confines, which would detract from the unspoiled rural character of the area and the setting of the village of Alkham and the character and appearance of the Area of Outstanding Natural Beauty within which the site lies. In particular, the proposal would be contrary to Dover District Core Strategy Policies DM1, DM15 and DM16, paragraphs 109 and 115 of the National Planning Policy Framework and Policies SD1, SD2 and SD03 of the Kent Downs Area of Outstanding Natural Beauty Management Plan</i></p> <p><i>2014-2019</i></p> <p><i>In accordance with paragraphs 186 and 187 of the NPPF, Dover District Council (DDC) takes a positive and proactive approach to development proposals focused on solutions.</i></p> <p><i>DDC works with applicants/agents in a positive and proactive manner by: Offering a pre-application advice service; where possible, suggesting solutions to secure a successful outcome; and, as appropriate, updating applicants/agents of any issues that may arise in the processing of their application. In this instance:</i></p>

1 The application does not accord with the development plan and no material considerations are apparent to outweigh these matters.

Alkham parish council asserts that the AONB remains unchanged and that this 'development' of 10 houses would result in an obtrusive urban form of development in the open countryside, beyond the settlement confines, which would detract from the unspoiled rural character of the area and the setting of the village of Alkham and the character and appearance of the Area of Outstanding Natural Beauty within which the site lies. In particular, the proposal would be contrary to Dover District Core Strategy Policies DM1, DM15 and DM16, paragraphs 109 and 115 of the National Planning Policy Framework and Policies SD1, SD2 and SD03 of the Kent Downs Area of Outstanding Natural Beauty Management Plan 2014-2019

A subsequent appeal to the Planning Inspectorate was unsuccessful.

Appeal Decision

Site visit made on 21 November 2017

by Grahame Gould BA MPhil MRTPI

an Inspector appointed by the Secretary of State for Communities and Local Government

Decision date: 11th December 2017

Appeal Ref: APP/X2220/W/17/3180321 Land at Short Lane, Alkham CT15 7BZ

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.*
- The appeal is made by Mr S Barnes against the decision of Dover District Council.*
- The application Ref DOV/16/01216, dated 20 October 2016, was refused by notice dated 25 January 2017.*
- The development proposed is the erection of up to 6 dwellings with garaging.*

1 The appeal is

1 The application was made in outline form and sought permission for up to six dwellings, with matters relating to access, appearance, landscaping, layout and scale all being reserved for future consideration.

1 The main issue is the effect of the development on the character and appearance of the Kent Downs Area of Outstanding Natural Beauty (the AONB).

1 The dwellings would occupy part of a field, currently used as grazing land, which slopes gently from north to south. To the west, on the opposite side of Short Lane, there is housing, while to the east and south there are gently rolling open fields. Immediately to the north of the site there are four pairs of semi-detached houses, 1 to 8 Short Lane (Nos 1 to 8) granted planning permission in 1993. A little to the south of the site there is a public right of way (PROW) extending eastwards from Short Alkham is a small village mainly characterised by housing, with very few local services and facilities being available within it.

2 Given that the site is situated in the AONB there is a general duty to have regard to the purpose of conserving and enhancing the AONB's natural beauty¹.

Alkham parish council asserts that none of the above reasons for refusal have changed. Further that Policy DM16 of the Core Strategy states that development that would harm the character of the landscape will only be permitted if: it accords with a development plan allocation and incorporates any necessary avoidance or mitigation measures; or it can be sited to avoid or reduce the harm and/or its design would incorporate measures to mitigate the impact to an acceptable level. The parish council asserts that this development does not incorporate any necessary avoidance of mitigation measures and its siting will harm the nature of the AONB.

We would refer you to point 10 of the Inspectors response:

1 While the site's roadside boundary is marked by an established hedgerow it would only provide limited screening for the development, not least because an opening or openings would be needed for access purposes. I recognise that there would be scope to undertake soft landscaping along the eastern boundary and immediately to the south of the site. However, it would take a considerable period of time before any new planting would provide any meaningful mitigation for the development when it was viewed from Short Lane or the PROW.

Alkham parish council asserts that the observations of the Inspector are still valid and there will not be suitable screening of this development.

The parish council concurs and supports the inspectors decisions point 12:

	<p>1 <i>I consider that the development would neither conserve nor enhance the AONB's natural beauty and I therefore conclude that it would be harmful to the character and appearance of the AONB. There would therefore unacceptable conflict with Policies DM1, DM15 and DM16 of the Core Strategy and paragraphs 109 and 115 of the Framework. In relation to Policy DM15 I consider that the development would not come within any of this policy's stated exceptions. I also consider that the Kent Downs Area of Outstanding Natural Beauty Management Plan 2014 to 2019 does not provide support for this development.</i></p> <p>Alkham parish council fully supports all reason given by the Inspector in his refusal of the appeal for six houses on the site in November 2017. We are therefore astounded that Dover District Council has completely ignored not only the Planning Inspectorates Decision (November 2017) but its own refusal (December 2017)for six properties and now suggests that ten houses on the same site would be acceptable.</p> <p>Further DDC have identified that the site is liable to flood and that a flood risk assessment is required. The constraints of the existing infrastructure with regards sewage and flooding is insufficient for a development of this size.</p> <p>The parish council would urge Dover District Council to reconsider this site and act in a manner that is both consistent and to protect the AONB.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Yes
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	This development will have a significant impact on the residents of Alkham and is damaging to the AONB. The Parish Council would wish to make the voice of our residents known to the Inspector. The Parish Council is passionate in its resolve to maintain the character of the AONB.
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	Settlement Hierarchy
<p>Rep ID</p>	SDLP1287
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1263106
<p>Consultee Full Name</p>	Mr Mark Norcliffe
<p>Consultee Company / Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Company / Organisation</p>	
<p>1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.</p>	1) Local Centres : Paragraph 4.209 and following, with specific reference to Shepherdswell and 2) Housing Site Allocations : paragraph 4.242 and following, with reference to site SAP36

2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>1) LOCAL CENTRES</p> <p>Shepherdswell is designated as a local centre [para 4.209], alongside Eythorne & Elvington, Eastry, Ash, Wingham, St Margaret's and Kingsdown. This paragraph contains a particularly egregious error in stating that "<i>Shepherdswell is located to the north of Dover just to the west of the A2.</i>" Shepherdswell, in fact, lies to the east of the A2, and it is distressing that a Local Plan could be so geographically inaccurate.</p> <p>Unfortunately, this is not the only inaccuracy in assessing Shepherdswell as a "local Centre." When this exercise was first presented under the Regulation 18 consultation, various mistakes in the scoring of Shepherdswell were identified and reported by consultees. It appears that only some have these have been corrected in the latest draft. The following errors and inconsistencies remain :</p> <ul style="list-style-type: none"> • The local bus service is described as "infrequent" in para 5.1 of the Rural Settlement Hierarchy Supporting Document, but has been strangely up-graded to "regular daily" in the scores table presented in para 5.2. There is also no acknowledgement that two services have subsequently been withdrawn • The "pop-up" Post Office which visits the village briefly on two days per week is accorded the same score as permanent Post Offices in other villages • Two points are "awarded" for unspecified services, without further explanation • There is no recognition that neither the local pub nor café serve food in the evening <p>In para 4.4 of the document, it is acknowledged that the village survey data is taken from the Council's Authority Monitoring Report of 2018/2019, which was not up-dated due to Covid restrictions, and they have relied on Parish Council input for any up-dates and corrections. Such an ad-hoc approach to data collection and verification is neither reliable nor sound.</p> <p>The Settlement Hierarchy scoring system only records the "advantages" of the different communities ; there is no consideration of the negatives. In that context, the road infrastructure for Shepherdswell and Eythorne/Elvington is markedly inferior that of the other "local centres." The other centres are either directly crossed by main "A" roads, or have such roads in close proximity and running parallel to the main axis of the community – thereby providing easy access.</p> <p>All access to Shepherdswell and Eythorne/Elvington is by small rural lanes, particularly the narrow, tortuous and congested road known variously along its course as Coxhill, Eythorne Road, Shepherdswell Road, Wigmore Lane and Barville Road. The problems with this route are well known, but are almost wholly ignored in the draft Local Plan. Indeed, the silence of the Plan on the critical subject of the area's rural road network is another example of why it is "unsound."</p> <p>2) HOUSING SITE ALLOCATIONS</p> <p>In the previous version of the draft Local Plan, submitted for Regulation 18 consultation, two large sites (then designated SHE003 and SHE004) were ear-marked for housing development. Whilst it is pleasing to see that SHE003 has now been dropped, it is illogical and unsound to that the other site (now renamed SAP36) has been retained, and, indeed, quietly enlarged, even though it was opposed on the same grounds as SHE003.</p> <p>SAP36 has, in fact, been considered – and rejected – for housing development in the past, with previous DoE inspectors highlighting the potential damage to the landscape and environment, and the problems with the transport infrastructure. Over the years, the environmental issues have not changed, but the transport problems have got worse.</p> <p>The proposed access to SAP36 would be via St Andrew's Gardens. St Andrew's Gardens can only be accessed from Mill Lane. Mill Lane itself, at its north-eastern end, is a narrow single track lane, whilst, at its south-western extremity, it connects, at the village green, with the narrow and congested Church Hill and the small back road from Coldred. It is, therefore, impossible to access St Andrew's Gardens other than by single-lane, constricted roads that are inadequate for existing levels of traffic. St Andrew's Gardens currently contains approximately 50 dwellings, meaning that the planned development would double the volume of traffic needing to use this route. An on-site traffic survey conducted on 11 November 2022 suggested that, based on current volumes, an extra 250 vehicles would enter/leave St Andrew's Garden's during peak times.</p>

	<p>In rejecting a previous planning application, a DoE inspector wrote that “the layout of St Andrew’s Gardens is too constricted and too tortuous to provide free and safe access to any considerable number of dwellings.” Nothing has changed since that comment was made.</p> <p>It has also become clear that the actual carriageway within St Andrew’s Gardens itself was constructed to a very basic standard, and, as a result, the tarmac surface is noticeable pitted and pot-holed, and in need of regular repair. It is inadequate for current levels of usage, and would not be capable of supporting a doubling of traffic volumes, nor, indeed, the passage of the heavy machinery that would inevitably be part of any construction project.</p> <p>The draft Local Plan, in its existing form, makes no attempt to address these issues, although they have been extensively explained in the past.</p> <p>The traffic problems are not confined to the immediate vicinity of the proposed development site. Vehicular access to Shepherdswell is, with the exception of a couple of small country lanes, confined to the road running from the A2, just west of the Lydden junction, through the villages of Shepherdswell and Eythorne to the A256, south of Tilmanstone, and known variously along its course as Coxhill / Eythorne Road / Shepherdswell Road / Wigmore Lane / Barville Road. This road is itself a minor route – narrow, frequently tortuous, beset by poor sight lines, and, in many places, unable to accommodate two lines of traffic at the same time. It is deemed unsuitable for heavy goods vehicles. The road is already over-used and heavily congested, with daily instances of traffic queuing at the various bottlenecks, and the occasional “confrontation.” The local topography and the proximity of existing dwellings to the road’s edge excludes any possibility of a significant up-grade.</p> <p>This is the same route that would have to serve the 300 new houses proposed for Eythorne and Elvington (SAP28 and SAP29).</p> <p>The draft plan blandly suggests that “a review of the impact on the surrounding rural road network” should be undertaken as part of any planning application. Surely, any review should be conducted before the sites are accepted for possible development.</p> <p>Similarly, alongside the transport infrastructure problems, any substantial housing development in Shepherdswell would put extra strain on a sewerage and waste water system that is already unable to cope, a local primary school that is currently over-subscribed, and a doctor’s surgery that is having to send patients to Dover for treatment. Again, the draft local plan is silent on how such problems can be handled.</p> <p>It is again necessary to draw attention to inaccuracies and misinformation contained on the Plan’s evidence base. For example, the Sustainability Appraisal Appendix contains – in more than one place – the assertion that site SAP36 is within 500 metres of the local railway station. It is not. GPS data clearly shows that it is almost one kilometre from the site to the station utilising the most direct road and footpaths.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<ul style="list-style-type: none"> - Correction of persisting errors in the Local Centre scoring system, and correction of errors in the evidence base - Recognition of not only the advantages, but also the negatives, in assessing whether a community qualifies as a Local Centre (e.g. deficiencies in the local infrastructure) - The removal from the Plan of site SAP36 as a suitable location for future housing development.
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>In the responses to the Regulation 18 consultation of the draft Local Plan, numerous inaccuracies and mistakes were reported to DDC. These were not matters of opinion, but matters of fact. It has become apparent that not all of these have been corrected in the document now under consultation. I am not, therefore, confident that the Council can be relied upon to present to the Inspector a document that is 100% accurate, and that members of the local community must have the opportunity to challenge such failings in a public forum.</p>
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>Settlement Hierarchy</p>
<p>Rep ID</p>	<p>SDLP1293</p>
<p>Rep Status</p>	<p>Processed</p>

Consultee ID	1331589
Consultee Full Name	Ms Joanne Pannell
Consultee Company / Organisation	Eythorne Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Eythorne Parish Council's attached representation relates to Strategic Policy SAP29 on page 170.
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Edit - Text extracted from attachment to SDLP484 and 486. See that attachment for full text</p> <p>2.4 To explore the sustainable aspects further, the following table is a comparison of the facilities and amenities which actually exist within Eythorne and Elvington to those which the local plan site allocations policies of SAP28 and SAP29 state and on which the sustainability assessment was based.</p> <p>DDC Edit: See attachment for table which compares 'actual' and 'local plan' amenities / facilities</p> <p>It can therefore be seen that the statement of facilities/amenities within the local plan is somewhat inaccurate given that, of the 17 categories identified, 7 were quoted incorrectly, i.e. 41%. Significantly the overstatement in the local plan accounts for 24% of the total number of categories and therefore results in a negative outcome when judging how sustainable the new developments can be.</p> <p>2.5 Although the local plan emphasises the local amenities which exist within Eythorne and Elvington what it doesn't do is identify the services and facilities which do not exist nor are available in close proximity thus adding a significant negative outcome on the sustainability, and indeed suitability, of SAP28 and SAP29. For example there is no GP surgery, no conveniently located secondary education or higher education, no nearby supermarket outlet and no public transport provision. Consequently, the major services required by families e.g. education, health and food shopping, and in particular those of any new developments, all will need to be accessed using non sustainable forms of transport. Crucially at the end of October 2022 the bus service for Elvington and Eythorne to Dover was withdrawn removing all public transport provision from the two villages. This only serves to exacerbate the need for motor vehicle usage and strengthens the traffic predictions noted in 3.2 below.</p> <p>2.6 Since the withdrawal of the bus service at the end of October 2022, there are already signs of this having a devastating impact on the local community. The service was relied upon by some to get to work, travel to university, visit Dover leisure centre to utilise a membership, access medical services and visiting family and friends. All these activities have been curtailed with no other safe and viable travelling alternatives available. Under such circumstances it is impossible to imagine how any new developments in the area can be regarded as sustainable growth and not have significant detrimental impacts on the existing community and its infrastructure.</p> <p>2.7 To suggest the sites are within 200m of a Public Right of Way or cycle path in the sustainability assessment is a misleading metric as not only does this not consider if the PROW/Cycle path is suitable for the destination required, the actual number of PROW's and cycle paths are limited and indeed some PROW's prohibit cycling thus resulting in very limiting value to new development.</p> <p>2.8 Given also that the Eythorne Elvington CP School is already over subscribed in school places, this will promote the need to travel well beyond the village settlements to gain primary education and only serves to highlight how absurd it is to promote new development on the scale suggested.</p>

	2.9 The proximity of the Pike Road Industrial Estate does provide some opportunity for local employment however there has not been any new development, and hence increased employment opportunity, at the site since the 2002 local plan. In fact a granted planning application in 2013 for new development has not to this day been implemented
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	EPC Reg 19 Submission FINAL.pdf (1)
Local Plan Consultation Point	Settlement Hierarchy
Rep ID	SDLP1285
Rep Status	Processed
Consultee ID	1331808
Consultee Full Name	Mr Robert Hogben
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No

<p>5 - Do you consider the Local Plan complies with the Duty to Co-operate?</p>	<p>Yes</p>
<p>6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.</p>	<p>I object to KIN002 (SAP 34) being included in the draft LDP for the following reasons:</p> <p>The inclusion of SAP 34 is not legally compliant with NPPF 2021 item 11. (b)ii <i>'SPs should provide for objectively assessed needs for housing & other uses, . . unless (ii) any adverse impacts of doing so would significantly & demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole'</i>.</p> <p>The following arguments show why this development would have more adverse impacts than benefits and would not be sustainable.</p> <p>Kingsdown is a quiet village which has not developed into a larger settlement because it is isolated by its geography (see my later comments on local centres). Allocated money from developers would not 'improve' the infrastructure of the village as there is no space to provide parking or for widening roads or for improving any other physical infrastructure. The narrow single track roads through the village which are an inherent part of the character and charm of the village are also a limiting factor for the village in terms of further development. The roads in the village are already adorned with parked cars wherever possible, and there are very limited pavements in the village, this means pedestrians are often forced to walk in the middle of the roads and duck in-between cars when traffic approaches. Some parts of the roads have high walls and no pavements which, with current traffic levels, make walking perilous. Any increase in cars trying to park to use services or passing through the village, would be very dangerous. Residents of KIN002 would have to use their cars for almost all of their journeys, creating pollution and congestion.</p> <p>Furthermore, as the UK government have decided on 5/12/22 to stop putting pressure on local authorities to authorise unsustainable housing targets the LDP now needs reviewing in light of the new directives. The Dover District Area has, in recent years, been subject to considerable housing development, higher than that allowed for by the current local plan, and this development has been unsustainably concentrated into certain specific areas, because much of our district is either already overdeveloped, or not suitable for large scale development as it is either designated as an area of outstanding natural beauty (AONB), or it is heritage coast, or it is very low lying and liable to flooding or needed as floodplain.</p> <p>The continued inclusion of SAP34/ KIN002 land at Woodhill Farm, Kingsdown in the LDP is unsound, because, despite many concerns and reasoned arguments from residents the only concession seems to have been to reduce the housing numbers from 90 to 50; Due to the weak wording of the local plan that only suggests what would be 'preferred' by the district council, it is highly likely that the final number of houses would be in excess of 50 and possibly in excess of 90, if the proposal were to go ahead.</p> <p>The site has now been given a green allocation in the HELAA report despite its many issues and the fact that an adequate highways assessment has not yet been carried out and the HELAA highways assessment remains amber. The latest HELAA report states that the many failings can be mitigated for within the LDP. I argue that this is unsound and not justified nor consistent with National Policy NPPF 21. The evidence from DDC has not been used correctly. NE2 Landscape character and the Kent Downs; states in section 11.13 that DDC aims: <i>To ensure that all development coming forward over the plan period respects and reflects the character of the landscape in which it is located.</i> The DDC landscape character assessment of 2020 (LCA) shows that SAP34 / KIN002 falls within Ripple F3, <i>open chalk farmland and woodland.</i> NE2 states; <i>the classification identifies 17 LCAs and defines issues of landscape management and development management which should be delivered over the plan period.</i></p> <p>Development Management guidelines include:</p> <ul style="list-style-type: none"> - <i>Conserve the rural character of the landscape ensuring that it continues to play a role in providing a rural separation between Deal and Kingsdown as well as a rural setting for the Kent Downs AONB.-Seek to reduce lighting and noise impacts on this landscape and in longer views through sensitive highway design/management. Conserve the distinctive narrow winding lanes and grassy verges.</i> <p>SAP 34 would not <i>'conserve the rural character of the landscape'</i></p> <p>SAP 34 would be right next to the AONB so would clearly not <i>'provide a rural setting for the Kent Downs AONB'</i>.</p> <p>SAP 34 would, in direct contravention of the guidelines, increase <i>'lighting and noise impacts on this landscape'</i>.</p> <p>SAP 34 would, in direct contravention of the guidelines, due to the raised setting of the site, negatively affect the rural setting of the AONB on <i>'longer views'</i> of this landscape, both looking into and out from the AONB.</p>

SAP 34 would also, according to the HELLA Highways assessment, require the alteration of and therefore not *conserve the narrow winding lane and grassy verges* which form the main entrance to and help to define the character of, the quiet village of Kingsdown.

The Development Management guidelines also include:

- *Conserve the open skyline, avoiding the introduction of vertical elements such as pylons, telecommunications masts etc. - Protect and enhance views from more elevated areas and from the coast out to sea and towards landmark features such as Walmer Castle.*

SAP 34 is in an elevated position so it would not *Conserve the open skyline* of this landscape area of open chalk fields with woodland.

SAP 34 is in an elevated position so it would not *Protect and enhance views from more elevated areas* of this special landscape area of Ripple F3.

SAP 34 is clearly visible from many viewpoints within both the AONB and the Ripple F3 special landscape area, from along the A258 and the network of footpaths, and from the locally renowned 'Nelsons seat viewpoint'. I contend that it would therefore not *protect and enhance the views of this landscape*.

SAP 34 can, as I have mentioned be seen from within the Ripple F3 landscape area, and from certain directions it would be in the foreground of views out to sea, it would therefore not *Protect and enhance views out to sea*

SAP 34 has views out to the picturesque Ripple windmill, which I contend is a *'landmark feature'*, therefore this development would contravene the development guidelines, by not protecting nor enhancing views towards *'landmark features'*, which would be lost.

The development of SAP34 would result in the loss of an important buffer between the built environment of Kingsdown and the AONB. Ringwould Rd would lose part of its character and the main entrance to the village would be deprived of its character. Part of the AONB would be lost as would part of the character of the AONB. From within The Ripple F3, views across to Kingsdown and the sea would be negatively impacted and the open character of the landscape would be lost and pollution from light and traffic would increase. The HELAA sustainability appraisal states; *The site has been judged by Council officers to have the potential to moderately affect the District's landscapes, townscapes or seascapes.* I argue that this is not supported by the facts, and is not a fair appraisal of the probable impact of this development, especially when considered in the light of the site forming part of the LCA F3, the proximity to the nationally important AONB and the suggested necessary alterations to the *'distinctive narrow winding lane and verges'* which lead into what is at present a quiet rural village.

NE2 11.19 states *'The setting of the AONB comprises land adjacent to or within close proximity of its boundary, including but not limited to land which is visible from the AONB and from which the AONB can be seen.....Within the setting of the AONBs, priority will be given over other planning considerations to the conservation or enhancement of natural beauty, including landscape, wildlife habitats, tranquillity, dark skies, and geological features'*.

NE2 11.19 clearly and accurately describes the proposed site for SAP34. It is adjacent to and within close proximity of the AONB, it is visible from the AONB and the AONB can be seen from it. By allowing this development to go ahead, *'conservation of natural beauty, including landscape, wildlife habitats, tranquillity and dark skies'* would not have been given *'priority over other planning considerations'* I therefore contend that the development is not sound.

SP13 states that *the NPPF 2021 requires local plan policies to conserve and enhance the natural environment, to recognise the intrinsic character and beauty of the countryside and the wider benefits from natural capital and ecosystems.* Including SAP34 in the LDP is therefore in direct contravention of the NPPF, which means it is unsound as it would detract from the beauty of the countryside particularly the adjacent AONB. The Kent Downs AONB management plan 2021-26 says *the Kent Downs AONB, perhaps more than any other of Britain's protected landscapes – AONBs, Heritage Coasts or National Parks, has experienced and is experiencing severe development pressure.* DEFRA evidence shows *'The Kent Downs AONB stands out as an area which has experienced major change, showing a rate of urban growth of almost 10%.pa, with the urban area spreading by 14 ha over the decade'*. The AONB in Dover District has suffered development at a disproportionate rate which indicates that planning pressures on our district are unsustainable as they are overflowing into this nationally important landscape area. National Planning Practice Guidance (NPPG) confirms that the Duty of Regard is *'relevant in considering development proposals that are situated outside National Park or Area of Outstanding Natural Beauty boundaries, but which might have an impact on the setting of, and implementation of, the statutory purposes of these protected areas'*. I would argue that because the entrance onto Ringwould Rd requires widening and changing of the road which will encroach into the AONB, to mitigate for it being unsafe, this will be detrimental to the setting and directly upon the AONB.

NPPF 2021 11 – making effective use of land - Planning policies and decisions should: 120 b *recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production.* As food security is such a national issue, including SAP34 for development is unsound and unsustainable as good agricultural land would be better served in producing food. I would add that the local plan talks about sustainability for future generations, but as the UK only produces around half of the

food we need domestically, and the world population is growing and with global warming crops around the world are beginning to fail, it is highly likely that in the future we will need all the agricultural land we have to feed ourselves. Developing agricultural land is not sustainable.

Allocated money from the developers would not improve things as there is no space to provide parking in the village or for widening roads or for improving infrastructure. The narrow single track roads through the village which are an inherent part of the character and charm of the village are also a limiting factor for the village in terms of further development. The roads in the village are already adorned with parked cars wherever possible, and there are very limited pavements in the village, this means pedestrians are often forced to walk in the middle of the roads and duck in-between cars when traffic approaches. Any increase in cars trying to park to use services or passing through the village would be very dangerous. Residents of KIN002 would therefore have to use their cars for everything, creating pollution and congestion

Local Centres:

I would argue that the designation of Kingsdown as a local centre is unsound. Due to the nature of its location, with the undeveloped AONB, heritage coast and cliffs to the south, with no roads for access from this direction, the Sea to the east, with no villages, inhabitants nor roads, only Walmer to the north, which is closer to the town of Deal than to Kingsdown, but in any case, itself has better facilities than Kingsdown. To the west there are several small villages, such as East and West Langdon, but they are closer to and have better links to Dover, to the north west are Studdle, Ripple and Mongeham, but they are closer to and have better links to Deal. This leaves the small settlement of Ringwould, which is close to Kingsdown, but is cut off by the Arterial A258. Ringwould Road, which joins the two settlements, is steep and narrow in parts and not suitable for occasional cyclists or walkers, so most people would tend to drive between the two villages, however, there is very limited parking and limited facilities in Kingsdown, so even people from Ringwould are much more likely to frequent Dover, Walmer or Deal for everyday needs or services. All of this probably goes a long way to explain why Kingsdown has never developed wide roads and modern infrastructure.

The high proportion of second homes and Air b and bs in the village demonstrates that dwellings outnumber homes required, so there is not an '*objectively assessed need for housing within the Parish*'. If largescale development were to take place in Kingsdown, it is highly likely that, many of them would become second homes or Air b and bs. Unless houses used for these purposes are owned by local people who already live in the village, which is unlikely, such houses would bring very little to the village. To include SAP34 /KIN002 is therefore unsound and not consistent with NPPF 21.

NPPF 2021, Paragraph 73. b) states that suitable land for development should; '*ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;*' However SAP34 is unsound because there are extremely limited opportunities for employment within Kingsdown and there is not '*good access*' to larger towns. There is no rail link, the bus service is very limited and reduced since Reg 18, and the roads are narrow and already at certain times, dangerously busy.

NPPF 2021 Paragraph 79, states; '*To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby*'. Because as I have outlined, Kingsdown is not at the heart of other rural settlement, the development of SAP34 will not '*enhance or maintain the vitality of rural communities*'.

The HELLA highways assessment commented that the scale of KIN002 was too small to create enough new footfall to improve the bus service, I suggest it would also be insufficient to warrant any other new services either.

I have mentioned that Kingsdown is isolated by distance and due to poor public transport, due to the position of the A258 and due to the narrow roads leading to and from the village. For these reasons, it cannot be said to be part of a '*group of smaller settlements*', where '*development in one village may support services in a village nearby*'. New residents at KIN002 would mostly have to use their cars to visit Dover, Deal or Walmer for services, contributing to Carbon emissions and making the roads more congested and dangerous. For these reasons I believe the KIN002 is unsound and unsustainable.

For all of the above reasons I contend that classifying Kingsdown as a 'village centre' is not justified by the facts. It should be reclassified as a 'larger village', which would mean the only development permitted would be windfall development within the village boundary.

If Kingsdown were to be classified as a larger village, which I have shown is demonstrably appropriate, then there would be strict criteria limiting developments such as KIN002, which would not be allowed to proceed as it is outside the village boundary.

When using the criteria of the draft local plan SAP34 is not sustainable and unsound for the following reasons:

TI1 Development should, in so far as its size, characteristic and location -Give priority to the needs of pedestrians, cyclists, users of public transport, car sharers and users of low and ultra-low emission vehicles.

The location and size of SAP34 means it will give priority to car drivers only so it will not be in line with T11. The HELLA appraisal said it will not be large enough to warrant improvement of public transport. It is not on a train route. There are poor footpath routes to the village and only narrow and winding lanes to the village and to local towns. There is a cycle route to Deal along the seafront, but this joins Kingsdown at the other side of the village and the route would probably be too far for most casual cyclists. It is probably too far for people to walk to Deal or Dover in order to use the facilities at these towns. Any attempt to improve the cycling and walking routes to the village would result in loss of the distinctive character of the winding lanes which the 2020 LCA F3 Ripple seeks to preserve.

T12 New accesses and intensified use of existing accesses onto the road network will not be permitted if it would result in a clear risk of crashes or traffic delays unless the proposals can incorporate measures that provide sufficient mitigation. I consider this site to be unsound as there would be an increase in crashes and traffic delays. Widening the junction at the exit would not do anything to improve the narrow dangerous access through Kingsdown village. It would also not improve the access from Ringwould Road onto the very busy A258 at Ringwould. Widening the road at the access point on Ringwould Road, would mean losing part of the Kent Downs AONB and would also effect the character of the winding lane entering the village, which as I have mentioned the 2020 LCA F3 Ripple seeks to preserve. Land either side of Ringwould Road is not owned by the same party as KIN002 and so cannot make up part of this development. Furthermore, any attempt to alter Ringwould Road at any point would also result in the loss of the charming character of the road. The access is also complicated. It is used by visitors to the play area and the landowner to the left as you enter the field from the road. No mention is made in the HELAA highways assessment of the landowner needing access. ER5 also crosses the entrance which would therefore be dangerous to pedestrians crossing from the field back to the village. ER5 is a very busy path used by dog walkers on a daily basis. The sight lines onto Ringwould Road in both directions are poor. Ringwould Rd is very narrow in places and in places, 2 vehicles cannot pass each other. Turning left out of the site would be onto a narrow road going into a 20mph zone. Turning right is in a 50mph zone with a bridleway and footpath crossing with poor visibility and slow tractors turning out onto the road. There has already been an RTC resulting in a fatality and serious injury on Ringwould Rd. I would argue that issues with access alone mean that this site is not suitable and unsound for development. A medium pressure gas main crosses KIN002 diagonally and crosses the road at this access point which would require careful consideration when changing the access. This would cause a lot of disruption to the villagers as this is the only classified road in and out of the village and as poor as it is, is the main route to the A258. If traffic had to divert via Deal this would create extra pollution and congestion for a protracted period of time which would be contrary to SP1 and the climate emergency declaration by DDC.

T13 Applicants must demonstrate that traffic movements to and from the development can be accommodated, resolved, or mitigated to avoid severe cumulative residual impacts.

As I have already pointed out, traffic movements to and from the site would be on to Ringwould Road. This road is narrow, in places steep, in places it has high banks and hedgerows which preclude views along it, it sometimes floods in the dip before the hill towards Ringwould and I have known many winters when it has been impassable because of snow. If cars from the proposed development SAP34 were to turn left onto Ringwould Road they would soon enter the narrow streets of Kingsdown where there are many parked cars and very little pavement for pedestrians. If they were to turn right they would find themselves on the narrow, twisting, steep, liable to flooding and with poor sight lines, high banks and hedges, Ringwould Road. After this they would have to try to get onto the busy, at times extremely busy A258 at Ringwould. Ringwould Road is crossed by an official footpaths, and an official footpath/bridleway, both are on bends where it is difficult for pedestrians and horse riders to see what traffic is coming or to be seen by drivers. Pedestrians also use Ringwould Road to access the special needs school and Ringwould Village Hall which are both situated on the road close to the junction with the A258.

Any increase in traffic on this Road would be impossible to mitigate for without damaging the character of the 'distinctive winding narrow lane' which the 2020 LCA F3 Ripple seeks to preserve.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

SAP34 should not be included in the LDP.

DDC should now reconsider the housing allocation targets in light of the government announcement of 5/12/22, particularly with respect to rural settlements.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Settlement Hierarchy
Rep ID	SDLP1558
Rep Status	Processed
Consultee ID	1333333
Consultee Full Name	Mr Colin Tearle
Consultee Company / Organisation	Shepherdswell-with-Coldred Parish Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Appendix E Settlement Hierarchy
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Yes
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Far from being "sound" the Dover Local Plan is flawed. It contains many inaccuracies including:</p> <ul style="list-style-type: none"> • Shepherdswell now only has one public house. • Shepherdswell is stated as being to the west of the A2 when in fact it is to the east . • Traffic measurement flows were taken just post pandemic and clearly show a flow much lower than the parish's normal traffic volume. • The plan states there is a bus service along Eythorne Road but this service was withdrawn many years ago and most other services have been withdrawn this year. <p>One must question the validity of much of the data and evidence attached to the plan, and how (and when) it was collected. Have DDC representatives visited the Parish in recent years to carry out surveys?</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance	

with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Settlement Hierarchy
Rep ID	SDLP1759
Rep Status	Processed
Consultee ID	1267645
Consultee Full Name	Alan & Sarah Gleave
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	App E
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	DDC Note: The text below was extracted from the attached representation It is unsound and ineffective to a damaging extent, to list Kingsdown as being a ' <i>Local Centre ; a village providing services for a local rural area and a secondary focus for development in the rural area</i> ' Any development at SAP 34 would do the opposite of 'reinforcing the role of the village'; it would in fact choke off the existing parish economy, reducing its attractiveness to tourists, a key location on the Deal Welcomes Walkers initiative.

7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Settlement Hierarchy
Rep ID	SDLP2001
Rep Status	Processed
Consultee ID	1266351
Consultee Full Name	Dr Sharon Danby
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Local centres - 4.209 - 4.213
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable

6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	I would argue that the designation of Kingsdown as a local centre is unsound, unjustified, ineffective and inaccurate. Due to the unique nature of its location with AONB to the South as a border, the Sea to the East, heritage coast and cliffs to the South. The 3 narrow access roads serving Kingsdown do not link up easily to other hamlets and smaller villages to provide services. The main settlement of Ringwould is the other side of the A258 arterial road from Kingsdown and better served by Deal or Dover. There is no doctors, a recently reduced bus service, poor transport links for pedestrians and cyclists, no train station. A small village shop with post office and butchers. It is necessary to run a car to get to Deal or Dover for a food shop. It is not best served by large scale development and can only cope with a windfall developments due to its very poor but characterful roads.
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Kingsdown should be designated as a larger village not a local centre.
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Settlement Hierarchy
Rep ID	SDLP1931
Rep Status	Processed
Consultee ID	1271717
Consultee Full Name	Quinn Estates
Consultee Company / Organisation	Quinn Estates Ltd
Agent Full Name	Sarah Willson
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Settlement Hierarchy
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective

4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Iceni Projects Limited ('Iceni') is writing on behalf of Quinn Estates Ltd ('Quinn Estates') to submit representations to the Dover District Local Plan Regulation 19 Consultation in respect of land to the east of Great Cauldham Farm, Capel-le-Ferne ('the Site').</p> <p>These representations should be considered alongside the following supporting documents appended to this letter:</p> <ul style="list-style-type: none"> • Appendix 1 - Indicative Site Layout Plan; • Appendix 2 - Landscape Briefing Note; • Appendix 3 – Transport Note; and • Appendix 4 – Cultural Heritage and Archaeology Note. <p>Quinn Estates supports the allocation of the Site within the new Local Plan for 70 dwellings in order to support the Council's target of 11,924 homes over the Local Plan period to 2040. Nevertheless, as set out in further detail below, the Site can sustainably accommodate additional housing to deliver further dwellings in the Plan period, as demonstrated by the documents appended to this letter.</p> <p>The vision for the Draft Local Plan reflects the growing importance of new challenges facing local communities in regard to climate and ecological emergency, and greater emphasis on the protection and enhancement of retail, leisure, cultural and commercial development across the district area, and promoting the health and social wellbeing of communities. The corresponding objectives strive for a more prosperous economy, as well as vibrant new communities. Nevertheless, Quinn Estates considers that the approach to assessing settlements, and the resultant amount of housing allocated to settlements, is based on an ineffective method of understanding the sustainability of villages. Quinn Estates considers that the Plan would be strengthened by increasing the amount of housing allocated to settlements which can suitably accommodate such growth.</p> <p><u>a. Relevant Background</u></p> <p>Quinn Estates Quinn Estates is the south east's foremost mixed-use developer with numerous development interests within Dover District, Kent and the wider South East area. The company has delivered both successful community extension schemes and stand-alone development sites both within rural and urban</p> <p>Our services include: archaeology design engagement heritage & townscape landscape planning sustainable development transport locations within the District. Quinn Estates' track record of housing delivery should be a material consideration that should inform key planning decisions, including which sites to allocate for development. Furthermore, Quinn has demonstrated through its' actions that it can formulate and deliver development solutions of high community value, always working hard to identify through community engagement how the company's developments can support and strengthen communities by delivering community infrastructure needed. They have a track record of delivery in Dover, with over 200 new homes and 45,000 sq.ft of commercial space delivered.</p> <p>Site and Surroundings The Site adjoins the existing settlement of Capel le Ferne, though it is centrally located within the settlement given the proposed Site lies between Capel Street and Cauldham Lane. The Site is approximately 4ha and currently comprises farmland. It is located outside the settlement boundary as defined by the Core Strategy 2010.</p> <p>The Site is well connected to the local footway network with a footway running alongside Capel Street. The path is approximately 2.0m in width and provides links to the north and to the south as well as excellent connectivity to the centre of the village, including a network of interconnected public rights of way and bridleways.</p> <p>The Kent Downs Area of Outstanding Natural Beauty (AONB) borders the Site to the west and the Capel le Ferne settlement boundary bounds the site to the east. Notably, the landholding comprises the only land adjoining the settlement that lies outside of the AONB, which makes the land the best suited and the most sequentially preferable development option for the settlement. The Site is not located within a Conservation Area and there are no heritage assets or Scheduled Ancient Monuments within the site boundary. The whole of the Site is located within Flood Zone 1.</p> <p>To the north-west, the Site is bound by agricultural fields whilst the north-east corner is bound by residential properties. To the south and east of the site are further existing residential dwellings fronting onto Cauldham Lane and Capel Street. Existing dwellings also border the western boundary of the Site on the southern section and farmland on the northern section. The existing settlement is characterised by one and two</p>

storey dwellings. The rear gardens of the existing dwellings directly adjoin the Site. The gardens are generally substantial in size and therefore setback from Site.

The Site is well located in proximity to services, facilities, amenities and public transport making it a sustainable location for residential development. Capel le Ferne Primary School and Village Hall are located approximately 200m north-east of the Site (less than 5-minute walk), a convenience store is located less than 200m from the Site to south-east and so the most important components of a sustainable settlement are already in situ. In addition, the Site is served via nearby bus stops located on New Dover Road, approximately 200m to the south of the Site. The bus service runs every 15 minutes between Dover, Folkestone, New Romney, Rye and Littlestone-on-Sea and as such, there is a frequent and reliable public transport option to access a variety of high order settlements. This connectivity is an important and sometimes overlooked factor in determining the sustainability credentials of settlements such as Capel.

Capel le Ferne is defined in the adopted Dover District 2010 Core Strategy as a Local Centre providing a range of shops and services for the local communities and surroundings. There are also a variety of nearby employment areas including Folkestone and Dover that provide work opportunities for residents of Capel le Ferne and surrounding areas. Dover is the principal town in the District and therefore hosts a range of employment opportunities including those relating to the international port and retail related employment, whilst Folkestone is a sub-regional town in the Folkestone & Hythe Local Plan which provides “(inter-) national transport links, and a good choice of employment, retail, cultural/leisure and public services for the whole of the district, adjoining districts and visitors.”.

b. Response to Draft Dover District Local Plan

The draft Dover District Local Plan Regulation 19 Consultation seeks comments on the legal compliance, soundness, and compliance with the duty to cooperate of the Submission Version of the plan. This section responds to the draft Local Plan and assesses its soundness in relation to the housing growth strategy (Policy SP3) and proposed allocation at Great Cauldham Farm (Policy SAP44).

Quinn Estates welcomes the inclusion of the Site within the Draft Local Plan for residential development. However, Quinn Estates consider that the Settlement Hierarchy, particularly for Capel- le-Ferne, is based on an assessment methodology which fails to appropriately assess the sustainability of the village. Accordingly, the village could accommodate additional growth and the Table 4.12 should be amended to propose a minimum of 70 dwellings on the site. The current approach to the development strategy raises several issues which can be addressed through the allocation of additional housing growth to Capel le Ferne, including the Site subject to this representation.

Housing Need and Supply

Table 3.1 of the draft Local Plan outlines an overall supply of 11,924 dwellings across the plan period. This equates to an 8% buffer over the minimum housing requirement derived from the standard method. This is proposed to be met through a combination of committed schemes, site allocations and windfall sites. This is not considered to be sufficient due to the over reliance on one strategic site - the Whitfield Urban Expansion.

Quinn Estates has no objection to large-scale housing development at strategic sites playing an important role in meeting housing need. However, what looks good on paper needs to deliver in practice. However, in a District like Dover where there is a need for the benefits of growth to translate across the District, the spatial strategy should be seeking to unlock growth and inward investment at other settlements, such as Capel le Ferne, and this is a significant weakness of the Plan in its current form. Paragraph 35 of the NPPF outlines how plans are effective where they are found to be deliverable over the plan period. The disproportionately high dependence on Whitfield Strategic Allocation (SAP1) results in a plan which raises considerably uncertainty as to this key soundness test.

Strategic scale sites typically have long lead-in times and often require infrastructure to be delivered up-front. As a result, they may not begin to deliver housing until the later in the Plan period. Smaller scale sites, such as the subject Site at Great Cauldham Lane, which is rightly allocated to ensure the plan is positively prepared in line with the requirements of the NPPF is supported. In this regard, Paragraph 60 of the NPPF highlights that “to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed”. The allocation of the site at Great Cauldham Lane is supported by Quinn Estates, it can come forward early in the period, it is capable of delivering a mix of housing types and tenures and therefore makes an important contribution to local housing needs in the near future.

Quinn therefore encourages Dover District Council (DDC) to make every effort to meet, and if possible, exceed this target to ensure the Government’s objective to significantly boost the supply of housing can be met. As part of this a wide range of sites of different sizes and locations should be allocated to ensure choice and flexibility in the supply, in accordance with paragraph 67 of the NPPF. Sites such as Great Cauldham Farm should therefore be utilised to their full extent to reduce this over reliance on the Whitfield Urban Expansion to deliver housing across the plan period.

Settlement Hierarchy

Quinn Estates considers that the approach taken to the delivery of housing in Dover as set out within Table 3.3 of the Regulation 19 Submission Version of the Draft Local Plan is not a result of sound plan-making. It is considered that the Settlement Hierarchy inappropriately assesses settlements using a bizarre matrix system which does not reflect how residents use services, and the resultant ability for a settlement to support additional residential development and deliver benefits to existing residents.

The Council's evidence base for the Local Plan comprises a range of technical reports and topic papers including a Rural Settlement Hierarchy Study (2022). Quinn Estates are disappointed to note that the previous comments made at Regulation 18 stage have not been taken into account, and that Capel le

Ferne remains downgraded to a 'Larger Village' rather than as a 'Local Centre' as the 2010 Dover Core Strategy currently acknowledges. Within the 2010 Dover Core Strategy Capel le Ferne was identified as a Local Centre and therefore a secondary focus for development in the rural area; suitable for a scale of development that would reinforce its role as a provider of services to its home and adjacent communities.

The Rural Settlement Hierarchy Study is an important document, as it has clearly directly led to the spatial approach presented in the Plan. However, the methodology to assess the sustainability of settlements is flawed and consequently this undermines the soundness of the whole spatial strategy. A simple matrix exercise has been used to count the number of facilities within the settlement, yet limited consideration is given to the level or value of service these facilities provide or any objective and balanced measure of sustainability of settlement based on critical elements such as their characteristics or spatial relationship in relation to other settlements and connections to them. It is disappointing to note that this matrix exercise has been used again for the Regulation 19 draft of the Local Plan.

A quantified points system has been used in which each service is awarded a certain number of points based on the amount and range of facilities provided within the settlement. It is clear there are some significant shortcomings in using this inventory method to assess the sustainability of a settlement and thus determining its position within the settlement hierarchy. For example, each shop unit is worth one point whilst a primary school or train station is only worth three points in total. The result of this is a settlement could score points if it contains shops that do not provide an everyday service to the settlement, for example a car dealership or a furniture store. It is clear that these uses will make a limited contribution to sustainability, they have a limited day to day function, they make a negligible contribution to day-to-day sustainable travel patterns and indeed, if anything, they could serve to weaken the potential to achieve more sustainable travel patterns if such uses are sited at remote settlements. As such, the methodology inflates the sustainability credentials of some settlements, whilst failing to identify the high sustainability credentials of others. When considering the sustainability of the site, the Council should consider a settlement's respective connectivity to other settlements and the way that settlements inter-relate to support and foster sustainable development. This more nuanced qualitative approach was taken through the previous Local Plan Review, but appears to have been discarded in the current Plan review for no discernible reason. As such, the method used to review settlements calls into question the soundness of the Local Plan as it would not be considered appropriately justified under Paragraph 35B of the NPPF.

In the case of Capel le Ferne, the settlement is supported by its own services, as detailed the Housing and Economic Land Availability Assessment submission for the subject site in 2022, and the Sustainability Appraisal Appendix F 2022.

These services include regular bus services to Dover and Folkestone, general public store, public house, café, village hall, two churches, weekly farmers market and a primary school. This range of services meets the everyday needs of existing and future residents of Capel le Ferne and a new residential population would ensure that the vitality and viability and the range of local service provision is enhanced. Focusing growth at the settlement offers the potential to achieve highly sustainable development through a combination of the existing facilities at the settlement to meet a day-to-day convenience function, and the settlement's superb connectivity and proximity to the main town of Dover and the Sub-Regional town of Folkestone to provide sustainable access to a host of major employment opportunities. No other rural settlement boasts such connectivity to the two primary towns in this part of the County, yet this factor has been entirely overlooked.

Quinn Estates currently have land under option adjacent to the existing primary school for expansion. A larger allocation could provide the opportunity to include additional services, such as GP surgery, which is identified as lacking in the village. Nevertheless, this can only be delivered in tandem with additional housing allocation to support it.

The downgrading of Capel le Ferne from a Local Centre to a Larger Village is unsound and appears to have resulted in the development allocation at Great Cauldham Lane being reduced in size, to the detriment of the settlement and the District. Within the existing Dover Local Plan Capel le Ferne was identified as a Local Centre to 'reinforce its role as provider of services to its home and adjacent communities'. Therefore, the settlement was presumed to support the retention of existing services and attract new services within the area. The proposed downgrading of the settlement implies this objective has been met, although there is no evidence to support this. Capel Le Ferne should therefore continue to be identified as a Local Centre to continue to support this objective, with allocations such as that at Land east of Great Cauldham Lane being able to come forward to support this.

Given the range and suitability of the services available to residents in Capel le Ferne, along with its strong connections to employment centres via public transport, the settlement should be re-designated as a Local Centre. Moreover, the allocation of Land east of Great Cauldham Farm amended to a minimum of 70 dwellings to make full use of the site, strengthen the sustainability of the village and enable Quinn Estates to explore the delivery of additional services which would further enhance the settlement for existing and future residents.

Site Allocation Policy SAP44 – Land to the east of Great Cauldham Farm (CAP006)

Quinn Estates supports the allocation of the land to the east of Great Cauldham Farm within the draft Policy SAP44 for residential development. The site is available, suitable and achievable, as confirmed by the Housing and Economic Land Availability Assessment 2022. There are no obvious barriers to delivery, including that there are no constraints on the site such as ecology, trees, flooding and heritage, and the site is not dependent on the delivery of infrastructure before coming forward.

Quinn Estates consider that the land to the east of Great Cauldham Lane can comfortably accommodate additional housing. The appended Indicative Site Layout Plan details the ability of the site to accommodate up to 100 homes whilst retaining existing trees and hedgerows and providing sufficient screening along the western boundary of the Site, in accordance with the above assessment under the HELAA.

The Landscape Briefing Note submitted confirms that the site is more closely associated with the settlement edge than the open countryside to the north-west. It is considered that views are highly localised, and the visual envelope of the site is limited to a small area to the north. The site is not considered to be reflective of the special qualities or characteristics of the AONB, nor would the proposal bear any significant or detrimental impact on its setting. Furthermore, its redevelopment provides an opportunity to reinstate hedgerow planting that was lost due to intensive agricultural use and therefore a more sensitive transition to the AONB can be achieved.

Finally, it is considered to be a logical approach to extend the allocation further to the north, due to a localised dip in the land here meaning this part of the site is far less prominent and can ensure that a robust landscape buffer can be provided. Additional dwellings in this location are therefore suitable in landscape and visual terms, and the amendment of the allocation to 'minimum 70' can be supported. It is also significant to note that the site is the only site at the settlement outside of the AONB which can deliver housing, therefore, it is imperative that the Council makes best use of the site by expanding the allocation, or at the least revising the policy wording to a minimum of 70 dwellings.

A Cultural Heritage and Archaeological Scoping Report has been prepared in relation to the site and is appended to these representations. This Report confirms that there are no heritage assets on or near the site that would be directly affected by development. It is however considered that there may be archaeological remains, however it is not clear due to the limited archaeology works undertaken in the area. As such it is proposed that as part of any planning permission, a programme of archaeological evaluation would be agreed to confirm whether any remains exist, and any mitigation required.

This provision would enable greater benefits for the wider local community to be delivered, including:

- Contributing further to the local housing need;
- More affordable housing provision;
- Provision for community facilities;
- Increased amount of open space;
- Financially enables the delivery of the additional school land and potential GP surgery; and
- Opportunities to meet local self/custom build need

c. Conclusion

Quinn Estates wishes to support Dover in bringing forward a successful, effective and sound Local Plan that can serve the District across the Plan period. The allocation of the Site within the draft local plan is welcomed by Quinn and they are committed to delivering a successful housing scheme. However, Quinn seeks a minor amendment to the wording of the policy to support additional housing numbers on site, of which it has been demonstrated that the Site is suitable to do so.

It is considered that Capel le Ferne should be reconsidered as a Local Centre due to a number of factors including the facilities and services it currently provides, its proximity to Dover and Folkestone and its sustainable transport links to these settlements and the potential for future development to support existing and new facilities in the village. The matrix exercise used to determine the settlement hierarchy has taken a very narrow view on settlement sustainability and its position in the hierarchy must be reviewed. In this regard, it is recommended that the Council exercise planning judgement to ensure that the settlement hierarchy for the District reflects the potential to achieve and deliver a sustainable growth strategy.

The benefits of increasing the size of the allocation have been detailed as providing a more significant contribution to the housing needs for the local area, provision for a community facility and enhanced provision of open space. Given the range of benefits a larger allocation would be

	<p>able to provide, Quinn Estates request the wording of the allocation in Table 4.12 to be amended to a minimum of 70 dwellings to enable these significant benefits to be utilised by new and existing residents.</p> <p>We trust that the above amendment is acceptable to the Council and that these representations will be taken into account in consideration of the current consultation. We also confirm that Quinn Estates would welcome the opportunity to be involved in the forthcoming Examination-in-Public and contribute to the debate to ensure that the best strategy for the District is found.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The site is promoted for 100 dwellings and requests the policy wording is amended to minimum 70 dwellings on the present site boundary, or expanding the site to the north to include 100 dwellings</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	<p>SDLP1928 Willson Att4 Cultural Heritage and Archaeological Scoping report.pdf SDLP1928 Willson Att5 Site Layout Plan.pdf SDLP1928 Willson Att3 Transport Assessment.pdf SDLP1928 Willson Att2 Landscape briefing note.pdf SDLP1928 Willson Att1 Original rep.pdf</p>

Local Plan Policies - Supporting Document Requirements for Planning Applications

Local Plan Consultation Point	Local Plan Policies - Supporting Document Requirements for Planning Applications
Rep ID	SDLP778
Rep Status	Processed
Consultee ID	1331872
Consultee Full Name	The Melanie Lindsley
Consultee Company / Organisation	The Coal Authority
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	Appendix F part F.4
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>The Coal Authority records indicate that within the Dover area there are coal mining features present at surface and shallow depth including; mine entries and reported surface hazards. These features pose a potential risk to surface stability and public safety. The NPPF, at paragraph 183, requires planning policies to ensure that a site is suitable for its proposed use, taking account of the ground conditions and land instability, which includes risks from former activities such as mining.</p> <p>Although coal mining features are present in the Dover area, which may pose a risk to surface stability, requirements to submit a Coal Mining Risk Assessment for those sites which fall within the defined Development High Risk Area have been omitted from the Local Validation List.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>Suggested changes to part F4 are set out below in bold and italics.</p> <p>F.4 Others types of supporting documents may also be required to support applications in certain locations or certain types of application:</p> <ul style="list-style-type: none"> • Land contamination reports • <i>Coal Mining Risk Assessment</i> • Wintering Bird Surveys • Environment Assessment Study – SPA • Environment Statement – EIA Development • Minerals Assessment • Odour Mitigation Assessment • Noise and Vibration Assessment / Survey • Arboricultural Impact Assessment / Tree Surveys • Ecological Surveys / Habitats surveys • Structural Surveys • Parking, cycle storage and refuse storage plans

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Local Plan Policies - Supporting Document Requirements for Planning Applications
Rep ID	SDLP1717
Rep Status	Processed
Consultee ID	1333265
Consultee Full Name	Cllr John Lonsdale
Consultee Company / Organisation	Walmer Town Council
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	App F
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Positively prepared Justified Effective Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>DDC Note (1) The text below is an extract from the original representation which is attached to SDLP1438.</p> <p>• Response to Appendix C Local Plan monitoring indicators & Appendix F Local Plan Policies; Supporting Documentary requirements for planning applications</p> <p>Experience has caused trust in the planning process to expire in the minds of many of the public. Without independent, robust auditing, and honesty, extracting promises from developers all too often results merely in employment for public relations practitioners. So, additions to SP13, SP14 and DM policies NE is needed for it to become sound. 'Where permission is given subject to conditions regarding tree retention, tree planting and / or biodiversity enhancement, applicants will need to agree to abide by 'robust auditing' (as Wildlife Trusts insisted that the Environmental Bill legislate for). This means that honest, objective-because-independent, before-and-after evaluations / baseline measurements must be used. DDC councillors on the planning cttee have recently pointed out how very inadequate and misleading the sketchy, google-map-based ecology reports paid for by developer applicants are. Developers are ill-placed to self-certify their own work in this area, and DDC need a DM</p>

	policy requiring Environmental Impact Assessments on all planning applications for developments of over 15 dwellings on greenfield or rewilded brownfield sites.'
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Yes
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	

Local Plan Site Allocations

Local Plan Consultation Point	Local Plan Site Allocations
Rep ID	SDLP462
Rep Status	Processed
Consultee ID	1267660
Consultee Full Name	Mrs J Mallion
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP34
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	Not Applicable
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>Planning policies and decisions should contribute to and enhance the natural and local environment.</p> <p>The proposed site is next to an Area of Outstanding Natural Beauty and any development would have a detrimental effect on the surrounding area. Mature hedgerows would be torn down destroying habitats for wildlife which makes the area such a special place. In the case of the policy SAP35 Skylarks currently nest at the site of the proposed development and in a species who's habitat is already at risk any further loss would be a disaster.</p> <p>The development of 50 new homes is unlikely to improve local environmental conditions. It is likely to bring an extra 100 plus cars into the village. Ringwould Road is completely unsuitable to cope with this extra traffic. It is extremely narrow and has no footpaths for pedestrians or cyclists nor is there any space for these to be added. Added to the existing village, school, campsite and holiday park traffic, the already struggling village roads would cease to cope. The situation would be made even worse if the proposed development of 75 houses SAP15 were to go ahead.</p> <p>Kingsdown is a small village and does not have the infrastructure to support such developments.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	Not Applicable
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	
Local Plan Consultation Point	Local Plan Site Allocations
Rep ID	SDLP482
Rep Status	Processed
Consultee ID	1329498
Consultee Full Name	Dr Claire Owen
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP40 (STM010)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Justified Consistent with National Policy
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	Not Applicable
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>STM010 sits outside the settlement confines of St Margaret's and is within an area designated as AONB, adjacent to National Trust land which has special scientific interest. The inclusion of STM010 in the Local Plan for housing development would contravene national policy with regards to AONB's (NPPF 117) since there are no "exceptional circumstances" which would justify its inclusion. This therefore brings into question the legal compliance of the local plan.</p> <p>Its inclusion is also completely unjustified. The following extracts from the SHLAA assessment of this site in the preparation of the 2012 version of the local plan explain why this site was not deemed suitable for inclusion in 2012. Since that time there has been no lessening or mitigation of the reasons given; indeed the reasons for not including this site for housing development have been further heightened.</p> <p>"Landscape Impact: The site lies within the AONB and close to the Heritage Coast. It abuts National Trust land to the NE. The site is on a crest of a hill and, despite the screening, would be visible from a long distance. Any development on this site would, therefore, have a highly detrimental impact on the designated landscape."</p> <p>"Biodiversity: The site is identified as chalk grassland to the NE which is a priority habitat under the Natural Environment and Rural Communities Act 2006 and is a material consideration..... The arable land is chalk based and maybe amenable to reversion to chalk grassland with appropriate management. The site could provide foraging and flight lines for bats."</p>

	<p>“Green Infrastructure: The site provides a wide range of recreational walking opportunities, together with the biodiversity associated with chalk grassland and its associated hedges and scrub. The ambience of the area is demonstrated by the numbers of visitors to the coastal area and the levels of usage of paths, both public and permissive. The site is within the “Restore and Conserve” area of the GI network, reflecting the real opportunities for GI. Development would harm the existing GI and the opportunities for enhancement.”</p> <p>“Proximity to Road Networks: The two roads that lead to this site appear to be unadopted and not well maintained. There is no access onto the site. The site is located in the area between Salisbury Road and The Droveaway. Salisbury Road is a single track unadopted road and there are no footways along its length. The Droveaway is also a single track road but is adopted. However, the road already serves a large number of dwellings and there are no footways beyond the junction with Salisbury Road. Pedestrian access to services, including the local bus stop, is therefore poor and reliance on the car is likely to be high as a consequence.”</p> <p>“Access to Services: This site is located on the edge of the Bay area, and as a consequence the majority of the services and facilities would be over a ten minute walk.”</p> <p>“Analysis: The site is located in the AONB in a highly visible location at the top of a hill on a plateau. Any development would have a detrimental impact on this designation. Access to the site is unsuitable on unadopted roads.”</p> <p>There has been a noticeable increase in local traffic in the area of The Droveaway since 2012 and an increase in the amount of on-street parking. In recent years there have been a number of minor accidents resulting from this. Indeed, the September 2022 HELAA report for this site recognises the issues with access:</p> <p>“The Droveaway is geometrically constrained and is subject to a large amount of on street parking which reduces effective width, whilst in theory waiting restrictions could be imposed, this would have a significant impact on local parking amenity. The junction of The Droveaway/Sea Street is subject to constrained visibility (southbound), as such an increase in turning movements at this junction will increase the likelihood of vehicle conflict and there is limited scope to provide meaningful improvements.”</p> <p>The issues regarding access are therefore greater than when the 2012 study was undertaken. Similarly, the potential impact of any development of STM010 on the surrounding area has been heightened since 2012 due to the increased loss of chalkland nationally (a loss of 80% in the past 60 years) and hence the increased scarcity value of this land in terms of rare habitat.</p> <p>STM010 was considered unsuitable for inclusion in the local plan in 2012. To now propose that STM010 is suitable for inclusion in the 2022 plan is contradictory and unjustified.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Remove site STM010 from the Local Plan</p>
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes</p>
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	<p>I believe that it would be beneficial to have someone present to highlight the points that I have made to ensure that they are not overlooked.</p>
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	<p>Local Plan Site Allocations</p>
<p>Rep ID</p>	<p>SDLP436</p>

Rep Status	Processed
Consultee ID	1331638
Consultee Full Name	Mr Phillip Welburn
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP49
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Not Applicable
4 - Do you consider the Local Plan is Legally Compliant?*	No
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>SITE "WOR006" Jubilee Road:</p> <p>This site is unsuitable for inclusion in the Dover Local Plan because:</p> <p>1) This plan to initially build 10 houses on this site is not in accordance with the Worth Neighbourhood Plan (currently in force until 2026) relative to future housing development. The Worth Village Neighbourhood Plan is likely to be renewed and reinforced prior to 2026.</p> <p>INFRASTRUCTURE INADEQUACY:</p> <p>2) The foul sewage system of Worth has been a source of problems for years and the Bisley Nursery Fields (Planning number DOV15/00749) more than exhausted its capacity to take more house building without Southern Water undertaking major sewage infrastructure investment, which Southern Water has repeatedly refused to undertake.</p> <p>3) The surface water drainage of Jubilee Road where it feeds into Worth Village Pond will put Worth Primary School at greater risk of surface water flooding when the pond cannot cope with the increased volume of surface water and overflows. The school has already been evacuated in the past due to flooding problems arising from the pond.</p> <p>4) Jubilee Road is too narrow for two cars to pass in numerous long sections already, and the bus already struggles to get through, so much so that the initial review of this site by DDC in the Local Plan suggested banning parking in Jubilee Road, but this does not appear in the final draft. Banning parking would leave some households with no option but to concrete over their front gardens, adding to the surface water going into the village pond. Even if all parking were banned, two cars will struggle to pass one another without mounting the pavement, putting pedestrians at risk. 10 new houses would generate a significant increase in vehicle movements, arising from this site and potentially from 20 more houses at Site WOR009, and the bus service may not be prepared to continue along such a restricted width road with increased traffic volumes.</p> <p>AMENITY VALUE:</p> <p>5) The RSPB has developed the Lydden Valley wildlife park with new lakes and ponds. To develop houses on this site will deny residents and visitors their only real chance to look over the resulting visually improved countryside. It will also create an urban ribbon development street scene, out of character with a country village.</p> <p>SITE "WOR009" Nursery Fields/Bisley site off The Street. (Allied to planning number DOV15/00749)</p> <p>This site is unsuitable for inclusion in the Dover Local Plan because:</p>

	<p>1) This plan to build a further 20 houses on this site is not in accordance with the Worth Neighbourhood Plan (currently in force until 2026) relative to future housing development. The Worth Village Neighbourhood Plan is likely to be renewed and reinforced prior to 2026. The Worth Neighbourhood Plan originally supported the construction of 32 houses on the Bisley nursery site which was to include integral on-site green space in the form of two "paddocks". In the end 35 houses have been built and finished. The Dover Local Plan should not now allow building on the reserved green space of the "paddocks". In addition the housing proposal for this site WOR009 envisages a significantly higher density of building than the original Bisley development, by proposing to build a further 20 houses on just 0.86 of a hectare, being the overall surface area of the designated green space paddocks. This site has already been artificially raised by several feet using the soil spoil from digging out the foundations of the recently constructed houses on the Bisley site. The land is therefore unstable for construction.</p> <p>INFRASTRUCTURE INADEQUACY:</p> <p>2) The foul sewage system of Worth has been a source of problems for years and the Bisley Nursery Fields (Planning number DOV15/00749) more than exhausted its capacity to take more house building in Worth, without Southern Water undertaking major sewer infrastructure investment, which Southern Water has repeatedly refused to undertake.</p> <p>3) The surface water drainage from this site, which feeds directly into The Street's surface water drains, and from there, straight into Worth Village Pond, will exacerbate and put Worth Primary School at far greater risk of surface water flooding when the pond cannot cope and overflows. The Primary School has been evacuated in the past due to flooding, and another 20 houses will make flooding even more likely, especially when violent downpours become more frequent due to climate change.</p> <p>4) Exiting The Street and Jubilee Road onto the main Sandwich-Deal road has become very difficult and dangerous since the Nursery Fields site added traffic from its 35 new houses. Any more houses will require KCC or DDC to install a roundabout on the main road at the end of The Street to both avoid accidents and enable the buses to re-join the main road quickly and safely, so as to keep to its timetable. Extra vehicles leaving this site and heading towards Deal via Jubilee Road will further add to the difficulties of two cars trying to pass one another on Jubilee Road.</p> <p>5) Access: How is this site to be accessed for construction? The only current access is over PRIVATE ROADS owned and maintained by residents of the Bisley site, and access permission is unlikely to be forthcoming.</p>
<p>7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?</p>	Not Applicable
<p>9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.</p>	
<p>Include files</p>	
<p>Local Plan Consultation Point</p>	Local Plan Site Allocations
<p>Rep ID</p>	SDLP406
<p>Rep Status</p>	Processed
<p>Consultee ID</p>	1331561
<p>Consultee Full Name</p>	Mrs

	Barbara Ridout
Consultee Company / Organisation	
Agent Full Name	
Agent Company / Organisation	
1 - Which Part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.	SAP 35 Land adjacent to Courtlands (TC4S074)
2 - Do you consider this part of the Plan sound?	No
3 - If you consider the Plan is 'unsound', on which grounds do you consider this to be? (select all that apply)	Effective
4 - Do you consider the Local Plan is Legally Compliant?*	Yes
5 - Do you consider the Local Plan complies with the Duty to Co-operate?	No
6 - Please give details in the box below of why you consider the Dover Local Plan is not legally compliant, or is unsound, or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the plan, please also use this box to set out your comments.	<p>(DDC Note - Comment is a duplicate of SDLP1305)</p> <p>I consider it to be unsound because there are many controversial issues arising from it eg-lack of Infrastructure Development Planning, (open spaces, for example) Also this site has just been added on to the Regulation 18 plan ;therefore the local community and neighbouring residents did not have the opportunity to comment on it .</p> <p>It is also unsound because it involves loss of food-producing farmland.A;so it would be destructive of the Landscape Character. The site is within a Biodiversity Opportunity Area. (SAP 35)-Landscape Assessment. There is also a Protected Right of Way across the field to the north , up a long slope , which is used continually by hikers and dog walkers , for the benefits of fresh air and open landscapes across the Channel (so vital for mental health), The development of this site would have an uncalled for impact on the landscape and further assessment is required to demonstrate whether this can be mitigated.HELLA Appendix 2c Landscape assessments.</p> <p>SP 13 is non - compliant with the Environmental Act .Well established hedges and trees on the east boundary are important stops for migrating birds.(they are protecting and enhancing)valued landscapes.</p> <p>SAP35 Highways assessment (TC4SO74) The bus stops do not promise a reasonably frequent service any longer. There are no footpaths on the Courtlands site (which is not a wide road ,like most roads in the village) There are 12 properties in Courtlands and a further 5 along the 'lane ' which leads along the east side of the site .There are also 2 dwellings at the top of the PROW which runs along the west side of the site. These already generate a surprising amount of vehicle movements not just from the residents but also from commercial traffic.</p>
7 - What changes do you suggest to make the Dover Local Plan legally compliant or sound? Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	In my opinion , to make it sound, there needs to be a reduction to the number of dwellings proposed and even more important, an in depth look at the present situation with regard to traffic movement in the narrow village roads.

8 - If your representation is seeking a modification to the plan, do you consider it necessary to participate at the oral part of the examination?	No
9 - If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine who is to be invited to the hearings from those who have selected "yes" to the question above.	
Include files	